## **Attachment 1**



# MEDWAY LOCAL DEVELOPMENT FRAMEWORK PUBLICATION DRAFT CORE STRATEGY [CABINET VERSION] AUGUST 2011





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## 1. Introduction

- 1.1 This is the second draft of a new Core Strategy that will form the major part of what is called the Local Development Framework (LDF) for Medway.
- 1.2 It sets out how the Council sees Medway developing over the period up to 2028 and it will, when adopted, guide all major development decisions and investment plans.
- 1.3 It covers many issues but at its heart it is about fully realising Medway's enormous potential and completing the immense regeneration programme that started over 10 years ago. It sets out how Chatham will develop into a centre of regional significance, how deprivation will be tackled, and how healthier and more sustainable neighbourhoods created and much else.
- 1.4 This is what is known as the "Publication Draft" Core Strategy. Where appropriate, it responds to representations received at the previous 'prepublication draft' stage and it reflects the most up to date 'evidence' collected to inform the plan. We welcome views on its contents from all with an interest in Medway's future before a final "Submission" draft is prepared.

#### The Development Plans System

- 1.5 The Planning and Compulsory Purchase Act, 2004 requires each local planning authority (or council) to prepare a Local Development Framework or LDF. This consists of a portfolio of documents rather than a single plan. This is intended to allow it to be kept up to date, as those parts of the plan requiring review or replacement can be changed without the necessity of reviewing the entire plan. The LDF consists of what are called development plan documents, which are subject to public examination by an independent inspector, and supplementary planning documents which are not subject to a formal examination.
- 1.6 The Core Strategy is the main document in this portfolio, setting out an overall vision and strategy for the area and addressing the strategic issues facing it. However it must also be in 'conformity' with national policies and extensive guidance issued by the Government and government agencies such as Natural England, the Environment Agency and the Highways Agency. This is illustrated in the following diagram.





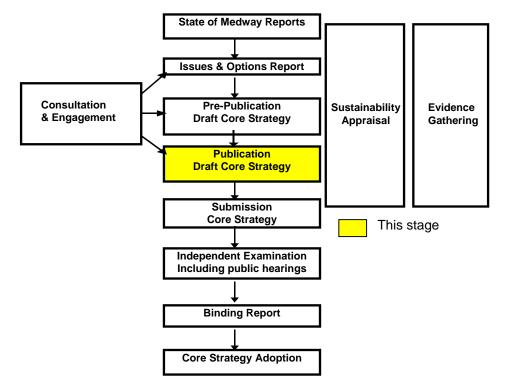


#### The Stage We Have Reached and How We Got There

- 1.7 In getting to this stage a great deal of work has been completed. This has included carrying out a number of surveys, gathering information, preparing what is called the 'evidence base' and engaging with stakeholders and the wider public. A series of State of Medway reports were produced in 2008 to provide a baseline for subsequent work and, in 2009, an Issues and Options report was published.
- 1.8 The Council consulted on the Issues and Options Report during the late summer of 2009. Consideration of all the responses received and continuing evidence gathering led to the 'Pre-Publication' draft Core Strategy being issued in November 2010. Again all responses received were carefully considered and the 'evidence base' continued to be updated. This has led to this draft, on which views are now sought.
- 1.9 We will again very carefully consider all the responses we receive and then issue what is called the Submission Draft Core Strategy. This will be submitted for an Independent Examination. An Inspector appointed by the Secretary of State for Communities and Local Government will conduct this.
- 1.10 The various stages that we must go through and where we currently are in the process are illustrated in the following diagram.



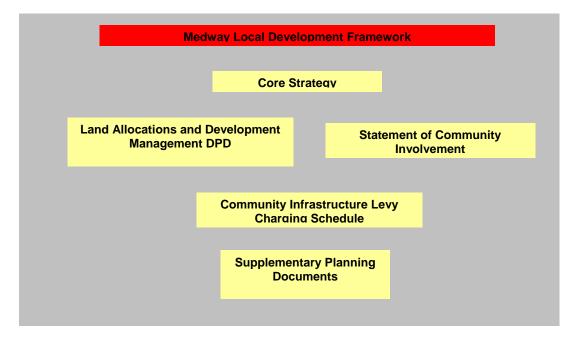
Figure 1-2 Core Strategy Stages



#### How the Core Strategy Fits Into the LDF

1.11 Indicated above the Core Strategy is one of a number of documents that will make up the complete Local Development Framework for Medway. This is illustrated in the diagram below.

Figure 1-3 Medway Local Development Framework





- 1.12 Preparing this new plan for Medway is a considerable undertaking and we are grateful for the help we have received from many organisations and individuals. This is the final opportunity to comment on it before it is submitted for independent examination.
- 1.13 The Core Strategy has been prepared at a particularly important time for Medway. It is a time of unprecedented opportunity that, if taken, will unlock Medway's potential. The challenge is to grasp and make the most of these opportunities, while making sure that Medway's renowned natural and historic qualities are nurtured and to help underpin social and economic progress. The current economic climate will undoubtedly make the job more difficult but the opportunities the area presents are becoming ever more widely recognised and there is a collective determination to achieve our full potential.

#### Structure of the Core Strategy

- 1.14 The document falls into four distinct parts:
  - A short analysis of the main issues we need to address and a specific vision and objectives to tackle these together with a 'Key Diagram'
  - Policies covering a range of topics relevant across the area, including housing and the economy
  - A chapter that sets out how these are to be applied at a more local level;
     and
  - How the policies and proposals are to be implemented, monitored and reviewed.

#### **Sustainability Appraisal**

- 1.15 In parallel with the Core Strategy a Sustainability Appraisal (SA), has assessed the likely social, environmental and economic impacts of the strategy. The appraisal tests different approaches to see which might be best when considered against a whole range of sustainability objectives and it helps to choose the best way forward. The Council's approach to SA incorporates the requirements of the Strategic Environmental Assessment (SEA) Directive, which requires strategic environmental appraisal to be undertaken on all plans and programmes with significant impacts.
- 1.16 The latest iteration of the Sustainability Appraisal is being published alongside this draft of the Core Strategy and can be accessed via the website: www.medway.gov.uk/ldf A final version will assess the Submission Draft.

#### **Habitats Regulation Assessment / Appropriate Assessment**

1.17 The Core Strategy is also subject to a Habitats Regulation Assessment (HRA), which considers the potential effects on European and Ramsar wildlife sites. A screening and scoping report is available on the website and a full assessment will be available for the Submission Draft.



#### Timetable for the Core Strategy

1.18 The expected timetable leading up to the adoption of the Core Strategy is set out in Table 1-1.

**Table 1-1 Core Strategy Timetable** 

	Stage of Production	Dates
1	Pre-Publication Draft Core Strategy Consultation	November 2010
2	Publication Draft Core Strategy Consultation	August 2011
3	Core Strategy Submission Preparation	February 2012
4	Core Strategy Submission	March 2012
5	Independent Examination	July 2012
6	Adoption	October 2012

#### **Statement of Community Involvement**

1.19 The Statement of Community Involvement is part of the Medway Local Development Framework. It sets out how the Council will involve the community in the preparation of local development documents. A first version was prepared in 2006 and this has now been updated. As with all documents relating to the LDF it can be found on the website. This draft of the Core Strategy has been prepared in accordance with that Statement.

#### **Diversity Impact Assessment**

- 1.20 In order that everyone should benefit from the regeneration of Medway and to maintain community cohesion it is essential to ensure that all the proposals in this Core Strategy take account of the needs of all communities in Medway particularly the most disadvantaged including the disabled, vulnerable people, ethnic minority communities and carers. A Diversity Impact Assessment will be carried out to ensure that the final document complies with this principle. This will determine the impact on residents due to their racial group, gender, disability, sexual orientation, age and religion. The Diversity Impact Assessment will build on the work undertaken for the SEA/SA process and relate to a number of objectives already identified through the SA work.
- 1.21 To guide work in the meantime an initial assessment has been carried out and is available on the website.

#### **Consultation Responses**

1.22 A statement will be produced setting out those bodies and persons invited to make representations at the various consultation stages, how they were engaged and a summary of the main issues raised and how these have been addressed in the preparation of the Core Strategy. This will be published alongside the Submission Core Strategy. A detailed schedule of all representations received to the Issues and Options report, the Pre-Publication Draft Core Strategy and the Council's response to them is also available.



#### **Plan Period**

- 1.23 The period covered by a Core Strategy must be at least 15 years from the date it is adopted. This is likely to be in autumn 2012.
- 1.24 Much of the evidence underpinning the Core Strategy is collected annually, beginning on 1 April each year and ending on 31 March. Much national and regional information also relates to 5 year periods: 2001, 2006, 2011, 2016 etc.
- 1.25 Detailed monitoring frequently uses a base date of 2006 and so the plan period chosen for the Core Strategy is 1 April 2006 to 31 March 2028. Going back to 2006 allows recent trends to be fully reflected and 2028 ensures that there will be the required 15 years left to run after adoption. 2028 also broadly corresponds to the anticipated end date for the Thames Gateway project, which is the single most important driver for change in Medway.

#### **Changing Circumstances and Requirements**

- 1.26 The Core Strategy is being prepared at a time when changes are being made to the planning system. The Coalition Government intends to abolish Regional Spatial Strategies, the South East Plan in Medway's case, and further changes are expected when the Localism Bill, currently before Parliament, is enacted.
- 1.27 Core strategies have to be in 'conformity' with national policies and the relevant Regional Spatial Strategy. Inevitably this causes some uncertainty but the Council is determined to proceed as quickly as is sensible in taking forward this Core Strategy.
- 1.28 The announcement by the government of its stated intention to abolish Regional Strategies has been ruled by the Courts as a material planning consideration, which could affect the weight attached to the Regional Strategy in underpinning the Core Strategy. Having considered its position, the Council takes the view that a local evidence base has informed the preparation of the Core Strategy, local consultation and sustainability appraisal and that the local context supports the strategy and policies contained in this document. The policies and proposals contained in the Core Strategy are therefore considered to be robust and evidence-based irrespective of the weight to be attached to the South East Plan.
- 1.29 This document contains some references to the South East Plan. Whilst it is likely to be abolished soon references to it are nonetheless retained, since it has been relevant in the preparation of the Plan.

#### Flexibility and Viability

1.30 An important requirement for core strategies is that they are flexible enough to deal with changing circumstances while still providing a clear strategy to guide development. This is a particular challenge in the current economic climate. In some parts of the country housebuilding has reduced sharply and retail vacancies are increasing, along with unemployment. Medway is faring



better than many areas but there is still much uncertainty over what can be delivered over the next few years.

1.31 Fortunately we have a healthy supply of identified development opportunities – housing, retail and employment – which should allow Medway to respond in these challenging times and this is a key feature of the proposals in this Core Strategy.

#### **Saved Policies**

- 1.32 Policies from old style development plans were 'saved' under transitional arrangements when the Planning & Compulsory Purchase Act 2004 came into force. That is, they remain in place until replaced by appropriate policies in local development frameworks.
- 1.33 This Core Strategy supersedes a number of 'saved' Medway policies and these are listed in Appendix A. These will fall away when the Core Strategy is adopted. All remaining 'saved' policies will be replaced when a subsequent development plan document is prepared as described below.

#### **Other Development Plan Documents**

- 1.34 Is explained above a local development framework comprises a portfolio of different documents. Following the adoption of this core strategy the Council intends to produce two further documents. These will be:
  - A Community Infrastructure Levy Charging Schedule this will introduce a
    development levy to fund essential infrastructure and facilities, the need for
    which is generated by new built development. It is intended that this will be
    progressed as quickly as possible after the independent examination of the
    Core Strategy
  - A Land Allocations and Development Management Policies development plan document – this will address all other LDF matters, replacing all outstanding 'saved' policies and providing a new Proposals Map for Medway. Work on this document will begin as soon as possible after adoption of the Core Strategy.

#### **Public Consultation**

- 1.35 Representations are invited during a six-week period from 30 August to 10 October 2011. Representations must be received by 5:00 PM on 10 October in order to be considered.
- 1.36 There are a number of ways in which you can give us your views, check progress on the preparation of the Core Strategy and view the various background documents.
  - Telephone: 01634 331629 (Office hours are 9 a.m. 5 p.m. Monday to Thursday and 9 a.m. 4.30 p.m. Friday)
  - Email: ldf@medway.gov.uk



- Post: Development Plans and Research Team, Regeneration, Community and Culture, Medway Council, Gun Wharf, Dock Road, Chatham, Kent ME4 4TR
- Website: <a href="http://www.medway.gov.uk/ldf">http://www.medway.gov.uk/ldf</a>. This is our front page and you will find numerous links to published documents, Limehouse etc.
- Limehouse: This is an online consultation system and we would strongly encourage you to "register" as a user. If you do you will receive email alerts when new consultations are underway, you can submit your views in a structured way and see our responses to all representations we receive. To register please go to: <a href="http://medwayconsult.limehouse.co.uk/">http://medwayconsult.limehouse.co.uk/</a>

#### **What Happens Next**

1.37 On completion of the consultation period, the Council will consider all representations made and determine whether any are so significant as to warrant further changes to the Core Strategy. A 'Submission Draft' will then be issued. Any representations received at that stage will be automatically passed to the Inspector appointed to carry out the Public Examination.



## 2. Context and Issues

#### Introduction

2.1 This chapter briefly describes some of the key facts and statistics that have informed the Core Strategy, it summarises the findings from the Sustainable Community Strategy and lists the issues which the area faces. The remaining chapters consider how these issues should be addressed. This analysis includes what is sometimes referred to as a 'spatial portrait' of the area.

#### **Population Base**

2.2 Based on Office of National Statistics (ONS) official projections and the level of house building proposed being achieved in this Core Strategy, it is anticipated that Medway's population will grow from 256,700 (in 2010) to 278,200 by 2028. However a number of factors, including a move from an historic net out migration trend to more recently net in migration, could result in an increase in this figure. This is likely to be the case if the graduate retention, economic and regeneration policies proposed are successful. A rounded figure of 280,000 has therefore been used to assess requirements arising from the scale of development proposed in the Core Strategy.

#### **State of Medway Reports (SOMs)**

- 2.3 In order to inform the Core Strategy, the Council published a series of State of Medway reports in 2008. These set out the baseline from which the Core Strategy was developed. This information provided stakeholders with a common understanding of the context in which the Local Development Framework is being prepared.
- 2.4 The State of Medway reports cover the following topics:
  - Built Environment
  - Chattenden (Lodge Hill)
  - Climate Change, Renewables and Flooding
  - Demography and Social Trends
  - Economy and Employment (including Employment Land)
  - Education and Skills
  - Housing
  - Infrastructure
  - Minerals
  - Natural Assets and Open Space
  - Retail, Leisure and Culture
  - Policy Framework
  - Waste
  - Water Supply
- 2.5 The reports can be viewed on the Council's website at <a href="http://www.medway.gov.uk/ldf">http://www.medway.gov.uk/ldf</a>



#### **Evidence Base Studies**

2.6 A wide range of key evidence studies has also been produced in order to inform the Core Strategy. The following list identifies some of the main ones. They can be accessed via:

http://medway.gov.uk/environmentandplanning/developmentplan/localdevelopmentframework/ldfevidencebase.aspx

- Strategic Land Availability Assessment (SLAA) November 2010
- Strategic Housing Market Assessment (SHMA) 2010
- Infrastructure Plan
- Medway Economic Development Strategy for 2009 2012
- Employment Land Review Consolidation Study 2010
- SATURN Transport Model
- Strategic Flood Risk Assessment (SFRA) 2006 & Addendum 2011
- Strategic Urban Flood Defence Strategy 2010
- Regional Waste Management Capacity Study 2007
- The Gravel Resources of North Kent 1987
- Medway Retail Needs Study 2009
- Draft Medway Green Grid Action Plan 2007
- Medway Landscape Character Assessment 2010
- Medway Renewables Energy Capacity Study 2010
- Medway Rural Housing Needs Assessment 2009
- Lodge Hill Evidence Base Reports
   (<a href="http://www.medway.gov.uk/environmentandplanning/developmentplan/localdevelopmentframework/ldfevidencebase/lodgehill.aspx">http://www.medway.gov.uk/environmentandplanning/developmentplan/localdevelopmentframework/ldfevidencebase/lodgehill.aspx</a>)
- 2.7 The Local Strategic Partnership (LSP) has produced the Medway Sustainable Community Strategy (SCS)¹ alongside the Core Strategy. It is based upon a vast volume of information and input from key community stakeholders. The Medway Sustainable Community Strategy was prepared in the context of the South East Plan, the Regional Economic Strategy, the Thames Gateway Plan and the North Kent Multi-Area Agreement.
- 2.8 The Regional Economic Strategy recognises Medway as a priority area for investment. The North Kent Multi-Area Agreement 2009 was an agreement between Central Government and the 5 local authorities with responsibilities in North Kent (Kent County Council, Medway Council, Dartford Borough Council, Gravesham Borough Council and Swale Borough Council) covering economic development, enterprise, employment, skills, transport, housing and the environment.
- 2.9 The Sustainable Community Strategy document highlights a variety of evidence and issues of particular importance to Medway as summarised below.

<sup>&</sup>lt;sup>1</sup> http://medway.gov.uk/pdf/Medway%20Sustainable%20Community%20Strategy%202010-26.pdf



#### **Economic Profile**

- 2.10 Medway has benefited and continues to benefit from considerable investment arising from its strategic location within the Thames Gateway. A major transformation has taken place around the former Pembroke naval buildings in Chatham creating the Medway Campus, home to three universities and Mid Kent College. A new sustainable community has been created in the rest of Chatham Maritime where £400 million of public and private investment has created a showpiece living and working environment attracting large corporate names. Recent infrastructure investment includes the Medway Tunnel and the High Speed Rail Link from the Channel Tunnel to London. This is resulting in a welcome diversification of the economic base towards creative industries, financial and business services, education and environmental and energy technologies. This has added to Medway's long-standing manufacturing strengths. Nationally important energy and port facilities are located on the Hoo Peninsula.
- 2.11 Farming generates significant income as Medway has a larger than average proportion of Grade 1 agricultural land. This sustains numerous permanent and temporary jobs (as recognised in the Medway Agricultural Research 2010 report).
- 2.12 Good progress has been made in raising skill levels, which are growing significantly faster than the regional and national averages. The unique cluster of universities at Chatham Maritime, Mid Kent College and the University for the Creative Arts at Rochester contribute greatly to this.
- 2.13 However, Medway remains a relatively low wage area with high numbers of people commuting out to work and skill shortages particularly at NVQ 3 and 4 levels. The business start up rate remains well below the regional and national rates though evidence for this predates the establishment of the Medway Enterprise Hub and Innovation Centre. External transport links are excellent and improving and the new dynamic bus facility together with investment in a quality public transport network will improve bus services within Medway. However there are issues around fares, off peak services and service penetration, integration with rail services. There are particular issues on the Hoo Peninsula, due to its relative remoteness. Traffic congestion on key routes during peak periods is a further issue.
- 2.14 Any deficiency in employment space of the right type and in the right place may constrain economic growth. Similarly the potential for further developing Medway as a tourism destination is limited by a lack of hotels, the need for a quality environment, connectivity, image and the town centre offer, particularly in Chatham. These issues are however being tackled through actions in the Medway Regeneration Framework 2006 2016 and by developing Medway as a city break destination.

#### **Social Profile**

2.15 The population of Medway is younger than the national average but it is ageing faster. The area has higher levels of deprivation than neighbouring local authorities in Kent and the South East. It is ranked as the 132<sup>nd</sup> most deprived local authority out of 325 in England, though at neighbourhood level,



it has some of the most affluent as well as some of the most deprived areas in the country.

- 2.16 The overall attainment of children and young people at school in Medway is better than similar local authorities in England and has improved consistently in recent years. However this conceals significant differences within Medway and underachievement at Key Stage 2. These issues are being tackled through various measures including the Primary Strategy for Change, the development of academies and a focus on vulnerable groups of children.
- 2.17 The recent arrival of people from the EU Accession countries, although generally successfully integrated into the community, has brought challenges of integration in particular areas of Medway and these are likely to continue as new developments attract more incomers to the area.
- 2.18 There is a thriving voluntary and community sector with over 580 organisations across Medway providing a range of services for local people, including engaging with the most hard to reach communities.

#### **Environmental, Cultural and Housing Profile**

- 2.19 Medway has a diverse natural environment ranging from the marshlands and wetlands of the Hoo Peninsula to downland in the south and west of the area. There are eight nationally and internationally important designated nature conservation areas and three parks with Green Flag status. In addition to the river that gives the Borough its name, there is also Metropolitan Green Belt land, as well as part of the Kent Downs AONB. Medway also has a significant historic built environment with 26 Conservation Areas, over 600 Listed Buildings and 79 Scheduled Ancient Monuments. Much of this is little known outside the immediate area. Local environments are generally clean and well looked after though satisfaction levels do not always reflect this.
- 2.20 Medway has a strong cultural and heritage offer including, new state of the art sports facilities at Medway Park, a potential World Heritage Site and recognition of the local arts and music scene through the Culture and Design Awards. Potential exists to strengthen this further and increase visitor numbers as well as local engagement, as recognised in the Cultural Strategy.
- 2.21 Medway has a below average carbon footprint due to the relatively low jobs to workforce ratio in the area though there are still challenging targets to meet.
- 2.22 Medway has declared a number of Air Quality Management Areas related to road traffic emissions in the urban area.
- 2.23 DEFRA has recently published details of areas where noise action plans may be required in Medway and this area of work is expected to develop over the LDF period. First priority locations identified by Noise Maps are areas on the highway network where the noise level (LA10,18h) is at least 76 dB.
- 2.24 Progress against targets for new and affordable houses is good but affordability remains an issue. The quality of some private housing and the environment of some private and public housing areas is poor, particularly in some of the more deprived areas. As a result the Housing Partnership is



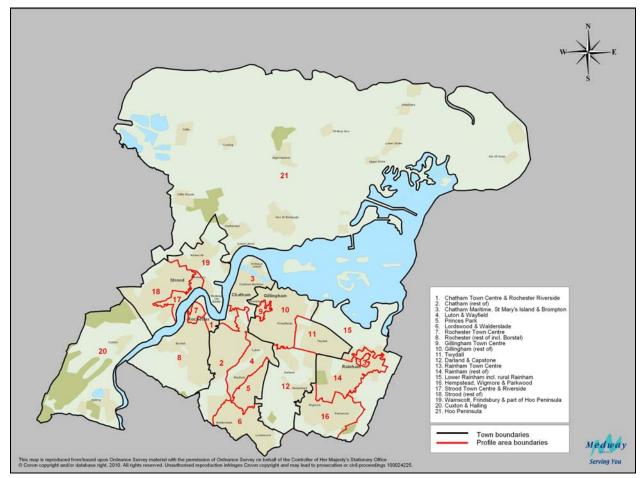
embarking on a targeted partnership approach to improving housing in All Saints and Luton.

#### **Medway Now**

- 2.25 In addition to this analysis individual neighbourhood area profiles<sup>2</sup> have been produced in order to drill down below the Medway level. They assess the individual needs of each local area and highlight the key issues that they face. The profiles cover the following 21 local areas within Medway, and the relevant areas are shown in Figure 2-1:
  - Chatham town centre and Rochester Riverside
  - Chatham (rest of)
  - Rochester town centre
  - Rochester Riverside (rest of, including Borstal)
  - Chatham Maritime, St Mary's Island and Brompton
  - Gillingham town centre
  - Gillingham (rest of)
  - Twydall
  - · Rainham town centre
  - Rainham (rest of)
  - Lower Rainham (including rural Rainham)
  - · Hempstead, Wigmore and Parkwood
  - Darland and Capstone
  - Princes Park
  - Luton and Wayfield
  - Lordswood and Walderslade
  - Cuxton and Halling
  - Strood town centre and Riverside
  - Strood (rest of)
  - · Wainscott, Frindsbury and part of Peninsula
  - Hoo Peninsula



Figure 2-1 Local Areas



#### 2.26 The headline findings from this work are:

- Chatham is the least populated town centre and Gillingham is the most densely populated town centre area in Medway
- The main areas of population growth are in those parts that have seen the most significant residential development – St Mary's Island, Chatham town centre and Rochester Riverside and Wainscott and Frindsbury
- Areas with the youngest average resident age are concentrated in a fairly central grouping in Medway, around central parts of Chatham and Gillingham. 'Older populations' are nearer the periphery of Medway, with a particular concentration around Rainham and adjoining parts of Gillingham
- The 'least dependent' populations in Medway are concentrated in a 'central arc' running from Rochester town centre, through central Chatham, across to include most of Gillingham. These areas have the highest proportional working-age population
- The areas, which have seen the largest decrease in population dependency, are on the whole within the central urban areas. Areas towards the periphery of Medway show the greatest increase in population dependency as a result of the ageing population.



2.27 The findings for more local areas are summarised below.

#### Chatham

- 'Chatham Maritime, St Mary's Island and Brompton' and 'Chatham Town Centre' have seen significant population growth since 2001
- 'Chatham Maritime, St Mary's Island and Brompton' has the youngest average resident age
- 'Chatham Town Centre and Rochester Riverside' has the highest proportional working-age population and the highest ratio of jobs to working-age residents
- 'Chatham Maritime, St Mary's Island and Brompton' has the second highest proportional working-age population and has the lowest elderly population dependency ratios
- 'Chatham town centre and Rochester' and 'Luton and Wayfield' have high 'out-of-work' benefit claimant rates
- 'Chatham (rest of)' and 'Luton & Wayfield' suffer significant deprivation

#### Rochester

- 'Rochester Riverside' has seen significant population growth since 2001
- 'Rochester town centre' has the oldest average resident age but it is one
  of only two areas that have seen a falling average resident age
- 'Worklessness' as measured by claims for Incapacity Benefit is high in 'Rochester town centre'

#### Gillingham

- 'Twydall' is amongst those areas with the largest decreases in population since 2001
- 'Gillingham town centre' has seen the largest decrease in average resident age - it is one of only two areas that have seen a falling average resident age
- 'Gillingham town centre' saw the largest decrease in population dependency with a declining elderly population and an expanding working-age population
- 'Twydall' has the most 'dependent' population, having the lowest proportional working-age population of all areas in Medway
- 'Gillingham (rest of)' has the highest proportion of employment in service related jobs
- 'Gillingham town centre' has the highest 'out-of-work' benefit claimant rates
- A relatively high number of benefit claims made by disabled residents in Medway are made in 'Gillingham (rest of)'
- Lone-parents account for a high proportion of all benefit claims in 'Gillingham town centre'
- Much of Gillingham suffers significant deprivation, one-in-four workingage residents in 'Gillingham town centre' claim an out-of-work benefit



#### Rainham

- 'Hempstead, Wigmore and Parkwood' and 'Rainham rest of' are amongst those areas showing the largest decreases in population since 2001
- 'Rainham rest of' has the second oldest average resident age having the highest proportion of residents aged over retirement age
- 'Hempstead, Wigmore and Parkwood' has seen the largest resident age increase since 2001
- 'Lower Rainham' has the fewest jobs per working-age resident
- 'Hempstead, Wigmore and Parkwood' has seen the largest increase in population dependency of all areas in Medway
- A high proportion of benefit claims in 'Lower Rainham' are by disabled claimants
- 'Lower Rainham' has a relatively high proportion of benefit claims by carers

#### Strood

- 'Strood town centre and Riverside', is amongst those areas showing the largest decreases in population since 2001
- 'Wainscott, Frindsbury and part of Peninsula' has the smallest proportional working-age population
- A high proportion of benefit claims in Wainscott & Frindsbury are by disabled claimants and carers
- Worklessness as measured by claims for Incapacity Benefit is high in 'Strood town centre and riverside' and Wainscott & Frindsbury
- Many parts of Strood suffer significant deprivation.

#### **Key Issues**

2.28 Taking account of the above, there many important issues affecting Medway that need to be addressed. Many but not all of these are shared with the Sustainable Community Strategy. For convenience they are grouped under a series of sub headings.

#### **Economy and Learning**

- 2.29 There is a need to create a Medway city centre and central business district in Chatham that maximises retail, employment, cultural and housing opportunities. Chatham is the natural heart of the Medway conurbation and it strongly influences the overall image of the area. However it is significantly underperforming economically and large parts suffer from a poor quality townscape.
- 2.30 There should be a focus on sector development by strengthening inward investment, developing the creative industries sector and exploring the potential for centres of excellence in environmental technology and construction. The current low wage economy needs to further diversify and exploit key sectors if Medway's relative economic performance is to improve.
- 2.31 Boosting cutting edge low-carbon environmental technologies and the development of growth sectors such as creative industries and spin offs,



construction, advanced manufacturing, and sub-contractors and services. These are assessed as having the greatest potential to boost local economic performance.

- 2.32 Ensure the availability of employment space by reviewing mixed use allocations, investing in infrastructure and assessing the development potential of existing employment and key derelict sites. There have been significant reductions in employment floorspace in recent years. This has been necessary as redundant waterside locations needed to be cleared for redevelopment and consolidation in the manufacturing sector has taken place. However the time has come to re-build the employment floorspace stock with modern, adaptable premises suited to modern needs.
- 2.33 Develop the Medway image around the growing Higher and Further Education and creative sectors, by promoting Medway as a venue for top sporting and cultural events, supporting the World Heritage bid, raising the profile of the River Medway and improving key gateways and town centres. These are amongst Medway's most important assets and utilised correctly provide the basis for transforming Medway's image and community confidence.
- 2.34 Develop an Enterprise Strategy covering all forms of enterprise including social enterprise. Business start-up rates are not as high as they should be and creating and nurturing an entrepreneurial culture is critical to future economic prospects.
- 2.35 Explore the transformational power of communications infrastructure (WiFi, fibre optics etc) in order to make Medway a "Smart" location for business. High quality 'connectivity' is vital to modern businesses and amply demonstrated by the success of the Medway Innovation Centre, which has this.
- 2.36 Deliver the Primary Strategy for Change bringing in new investment in school buildings and creating 21<sup>st</sup> century learning environments. In an ever more competitive world educational attainment is vital. Local standards are improving (from a low base) but more needs to be done.
- 2.37 Promote hotel development. Medway attracts large numbers of day visitors to its exceptional attractions but comparatively few short and longer stay visitors. There have been recent, very welcome, increases in the stock of hotel bedrooms but much of these have been at the budget end of the market. There is also potential to expand so called 'business tourism' that demands a broader range of facilities than those provided by budget operators.
- 2.38 Protect the large areas of the Hoo Peninsula and other land to the north and east of the urban area, which are classified as Grade 1 Agricultural Land. As well as being a nationally important asset, this land is also of considerable importance to the Medway economy. With food security a growing global issue the importance of recognising this valuable natural resource has never been greater.
- 2.39 Address the disparities that exist within Medway, with pockets of considerable affluence and deprivation (often close by one another). Equality of opportunity reduces dependence, improves social cohesion and community confidence. It



- also leads to higher economic performance and an improved quality of life. However significant sections of the population are classified as 'deprived'.
- 2.40 Promote an environmental technologies cluster. Research has identified the potential of the Hoo Peninsula in particular. There are, in any event, exceptional opportunities to link Medway's strong manufacturing pedigree with its growing higher and further education sector.
- 2.41 Maximize the benefits from the Universities at Medway by broadening the range of opportunities available for local people, raising skill levels and bringing associated benefits to the economy (including knowledge clusters). From no universities in the early 1990's to four now and an undergraduate student population of around 10,000, Medway has a unique opportunity to extract additional value from this investment.
- 2.42 Retain and grow existing businesses and attract new ones to increase economic activity. In particular, the number and quality of jobs in Medway needs to be increased. There are significantly fewer jobs than resident workers in Medway and wage rates are very low. London will always be a strong draw but there is a clear need to reduce the current reliance on outcommuting and to foster higher value employment locally.
- 2.43 Maximise business opportunities arising from the presence of around 10,000 students and staff at the universities. Retaining new graduates and harnessing their entrepreneurial drive will provide an additional opportunity to grow the Medway economy.
- 2.44 Increase the amount of student and visitor accommodation available in Medway. High number of students can distort the private rented housing market and displace vulnerable households. Specialist accommodation will limit this risk and improve Medway's perception as a location of choice for new students.
- 2.45 Work to retain the University for the Creative Arts with a growing presence in Medway. This new and thriving university is looking to consolidate its accommodation and develop a flagship campus. Every effort needs to be made to ensure that this is in Medway, where it has long established roots.
- 2.46 Promote workforce skills development, graduate retention and increases in Gross Value Added levels. Skills attainment levels amongst the existing Medway workforce are lower than the regional norm. Improving these is a critical component of a wider educational attainment and skills programme.

#### Transport

- 2.47 Invest in public transport infrastructure including a new dynamic bus facility at Chatham, upgraded railway stations at Chatham, Gillingham, Rochester and Strood, strategic bus corridors and park and ride. Good progress has been made over the last three years but further work is needed, particularly in relation to a park & ride network and station upgrades.
- 2.48 Ensure good public transport links to, and within, new developments and improved links to existing neighbourhoods. Much of Medway's network of bus routes can be traced back many years. It needs to adapt to travel patterns



that are changing as new development and destinations are developed. Many suburban areas also suffer from poor accessibility to services, particularly in the evenings.

- 2.49 Improve public transport links to the universities and college campuses. These are new destinations well related to the urban core and should be readily accessible by bus in particular.
- 2.50 Make highway improvements including the A228 to Grain and highway capacity improvements including Strood centre. The A228 carries a very high proportion of HGVs accessing the port and energy installations on the Hoo Peninsula and it has a poor safety record. Strood is a particular bottleneck and congestion detracts from the attractiveness of the town centre and results in air pollution.
- 2.51 Provide more opportunities for cycling and walking. Much has been done over the last few years but existing and new improvements should join up to create obvious networks that provide travel alternatives for local people.
- 2.52 Investigate the potential of the River Medway for work and leisure travel and for further river crossings. New opportunities should arise as the regeneration of the urban waterfront progresses and new visitor destinations develop along it.
- 2.53 Provide better transport links and wider transport choices in Medway to support regeneration, increase accessibility and connectivity, and reduce reliance on the car.
  - Climate Change
- 2.54 Consider extreme weather events (flash flooding, storm surges) that have the potential to significantly affect the Medway area when coupled with sea level rise, as there are significant low-lying areas in the Medway River valley, which are potentially at risk from flood events. A range of studies and plans has been completed to inform the response needed.
- 2.55 Reduce carbon emissions and improve air quality within the Medway area including domestic, business and transport emissions.
- 2.56 Reduce carbon emissions and improve energy efficiency of both new and existing housing by working with the community. Apart from the environmental benefits increasing fuel poverty heightens the importance of this issue.
- 2.57 Increase use of sustainable energy and investigate use of decentralised heating schemes.
- 2.58 Raise awareness of and assist in reducing water wastage, encourage reduction in water consumption and encourage water recycling. This is vital given Medway's low rainfall and tidal river that is not suitable for abstraction.
- 2.59 Realise opportunities to restore and recreate wildlife habitats in association with sustainable flood-risk management. Again a number of plans and strategies have been completed to assist in this.



- 2.60 Address the impacts of coastal squeeze and loss of inter-tidal habitats. The Shoreline Management Plans and Thames Estuary 2100 Plan should guide the response to this.
- 2.61 Recognise that water supply in Medway is largely dependent on ground water abstraction as there are no large reservoirs or any significant abstraction from the River Medway within the Borough. Water resources face increasing demand arising from existing and new development, exacerbated by changes to the climate and rainfall patterns.
- 2.62 Be aware that flood risk is a key environmental issue and therefore flood management issues need to be integrated into planning decisions. Whilst Medway has a significant proportion of previously developed land suitable for redevelopment within areas of higher flood risk. It is not appropriate to prevent all new developments in these areas, as it is needed to avoid social and economic stagnation and blight.

#### Green Infrastructure

- 2.63 Develop the Green Grid through the implementation of identified priority strategic routes. The Green Grid identifies opportunities to connect urban and rural Medway in ways that are sensitive to the natural environment.
- 2.64 Safeguard and enhance the character and appearance of Medway's diverse landscapes via proactive land management. Medway has some exceptional landscapes but these are sensitive to development and visitor pressures.
- 2.65 Strengthen the protection and conservation of open spaces. These are vital to everyone's quality of life and are an intrinsic feature of the area.
- 2.66 Conserve and enhance the diversity and abundance of habitats and species. Biodiversity is a cornerstone of environmental quality but is under pressure, not only from development but also climate change.
- 2.67 Encourage community engagement in conserving and developing open space through, for example, the development of "friends" groups. A number of such groups have been established and been vital to the development of, for example, the Hillyfields open space and the Great Lines Heritage Park.
- 2.68 Apply Green Infrastructure planning in connecting people and places. The foundations for this are in place through the Green Grid Forum and the North Kent Environmental Planning Group.
- 2.69 Continue to develop and ensure the sustainability of the Great Lines Heritage Park as the metropolitan park for Medway.
- 2.70 Ensure the adequate provision of green space in association with development. This is vital to quality of life, adapting to climate change, biodiversity and more.
- 2.71 Ensure that the nature conservation impacts of riverside development are taken into account. The river and estuary are sensitive eco systems and this must be considered alongside their commercial and leisure potential.



- 2.72 Reduce pollution affecting the Medway Estuary and local wildlife habitats.
- 2.73 Recognise that the majority of sand and gravel reserves in Medway are found on the Hoo Peninsula but there are both economic and environmental constraints regarding their extraction.
- 2.74 Provide additional capacity in recycling, recovery and final disposal to meet the national waste strategy targets for municipal and commercial and industrial wastes and enable all waste streams to be 'pushed' up the waste hierarchy away from landfill.
  - Built Environment and Neighbourhoods
- 2.75 Promote high quality design. Too much of the town centres and surrounding areas is characterised by insensitive architecture and poor urban design. This detracts from the setting of many fine buildings and the image of the area.
- 2.76 Implement the Public Realm Strategy. Our major streets and limited squares need improving and better connections established between them.
- 2.77 Improve the overall image of Medway. This is vital to economic success and community confidence and pride.
- 2.78 Deliver good quality housing in mixed use developments to contribute to sustainable regeneration.
- 2.79 Be aware that although Medway has a younger age profile than Kent and the national average, over time the structure will get older, placing an added pressure on meeting housing needs.
- 2.80 Ensure that more executive housing is provided. Too few business owners and managers reside in Medway and opportunities need to be identified to encourage them to do so.
- 2.81 Develop a multicultural community centre at the historic dockyard. This is a longstanding ambition and an opportunity to celebrate Medway's cultural diversity.
- 2.82 Develop place based initiatives to improve health in neighbourhoods identified as having the worst health and lowest life expectancy. Parts of Medway have significant health issues compared to other areas.
- 2.83 Develop a waterfront arts complex in Chatham as part of a wider cultural area including the Brook and Central theatres. A clear focus for cultural activity is needed and should form part of the regeneration programme for Chatham.
- 2.84 Implement the Chatham Centre and Waterfront Development Framework.
- 2.85 Implement the Gillingham Town Centre Development Framework.
- 2.86 Implement road improvement and retail improvements in Strood.



- 2.87 Implement and ensure integration of Rochester Riverside with Rochester Centre. This is one of Medway's most important regeneration projects and has the critical mass and visual prominence to enhance the image of Medway as a whole.
- 2.88 Create and deliver a brand new settlement at Lodge Hill, Chattenden that has strong links to the wider Hoo Peninsula. This will be the only freestanding new community in the Thames Gateway and will be a major contributor to the future development needs of the area as a whole.
- 2.89 Areas beyond town centres, large urban regeneration sites and the new settlement at Lodge Hill are not envisaged as being subject to major physical change. This is due to the fact that these areas can provide more than sufficient development capacity to meet all of Medway's needs over the plan period.
- 2.90 The main evidence used to identify these issues can be found in the following documents:
  - Medway Economic Development Strategy 2009-12
  - Medway Regeneration Framework 2006-16
  - Thames Gateway Core Vision 2009 and Delivery Plan
  - Universities at Medway Annual report 2009
  - Local Transport Plan 3 2011
  - North Kent Economic Development Plan 2009
  - North Kent Multi Area Agreement 2009
  - Medway Social Regeneration Strategy 2008 2016
  - Medway Learning and Skills Plan 2006
  - Growing Healthier NHS Medway's Strategic Commissioning Plan 2008/9 to 2012/13
  - Strategic Plan for Older People in Medway 2010 -13
  - Medway Children and Young People's Plan 2009-11
  - Medway Health and Wellbeing Strategy 2010-15
  - Medway Landscape Character Assessment 2011
  - Medway Wildlife, Countryside and Open Space Strategy 2008-16
  - Medway's Community Safety Partnership Strategy 2008-11
  - Medway Green Grid Action Plan 2007
  - Greening the Gateway Kent and Medway Green Clusters Studies for Hoo Peninsula 2008 and Bredhurst - Capstone 2008
  - Medway Housing Strategy 2008-11
  - Medway Cultural Strategy 2009-14
  - Kent Downs AONB Management Plan 2009



# 3. Vision and Strategic Objectives

#### Introduction

- 3.1 This chapter sets out the 'spatial' vision for Medway, in the context of Medway's Sustainable Community Strategy prepared by the Local Strategic Partnership and the issues identified in Chapter 2. It also explains the overall level of housing and employment growth proposed over the period to 2028.
- 3.2 The critical elements needed to guide development are then set out as a series of 'strategic objectives'. These, along with the spatial vision will form an overall guide for development decisions over the period covered by this Core Strategy and the policies in later chapters flow from them.

#### **Sustainable Community Strategy**

- 3.3 The Local Strategic Partnership, or LSP, prepared the overarching Medway Sustainable Community Strategy during 2009 and 2010.
- 3.4 The Partnership has an extensive membership drawn from across the Medway community and over 350 organisations. These include all the major providers of local services and a range of statutory agencies active in the area. Significant stakeholder engagement was an integral feature of the process and the final strategy has a very high level of support.
- 3.5 The Strategy supersedes the More to Medway Community Plan 2007 2010 and it takes a longer-term perspective that is deliberately aligned to that of this Core Strategy.
- 3.6 It also reflects many other plans and strategies for the Medway area, including the third Local Transport Plan, a Joint Needs Assessment and many more.

#### **Vision for Medway**

- 3.7 In the strategy the vision for Medway to 2026 is summarised in the strap line: *'City of Medway: Rich heritage, great future'*.
- 3.8 It consists of four key principles and six ambitions.
- 3.9 The four key principles are:
  - Sustainability: will our actions work for tomorrow as well as today?
  - Narrowing the gap: will our actions contribute to improving the lives of everyone so reducing the gap between deprived and more affluent areas?
  - Fairness: do our actions take account of all sections of society thus ensuring that everybody benefits from the regeneration of Medway?
  - Self-help: will our actions encourage people to take responsibility themselves to make things better?



#### 3.10 The six ambitions are:

- Medway to have a thriving, diverse and sustainable economy matched by an appropriately skilled workforce and supported by a Higher Education Centre of Excellence
- Every child to have a good start in life
- Medway residents to enjoy good health, well being and care
- Medway to have a safe and high quality environment
- Medway to be a place where people value one another, play an active part and have pride in their community and Medway as a whole
- Medway to be recognised as a Destination for Culture, Heritage, Sport and Tourism
- 3.11 A wide range of actions is then identified to realise these ambitions and specific plans are in place to take forward delivery.

#### **Overall Levels of Growth**

- 3.12 PPS3 requires local planning authorities to determine the local level of housing provision, taking into account current and future levels of need and demand for housing and affordability levels. These should take into account Strategic Housing Market Assessments and the Government's latest published household projections. PPS3 does not require local authorities to identify a range of options for the level of housing provision.
- 3.13 When the South East Plan was being prepared Medway Council supported the proposed housing requirement for the area of an average of 815 dwellings per year for the 2006 to 2026 period. This was considered to represent a realistic balance between meeting local needs and contributing to growth in the Thames Gateway, a national priority area for both growth and regeneration.
- 3.14 This remains the case and it is intended that the 815 per year average be rolled on to the end date for the Core Strategy of 2028.
- 3.15 To put this in context, the previous Kent and Medway Structure Plan 2006, requirement of 766 for Medway was higher than the annual average number of 681 actually delivered over the previous 10 years. A higher figure is unlikely to be deliverable and a lower figure would not meet the future levels of need in Medway and not be compatible with the objectives for the Thames Gateway. The target of 815 new homes per year will be challenging, particularly given the difficult economic climate, but it will also help to deliver essential regeneration and the ambitions for the Thames Gateway.
- 3.16 It is important that adequate provision is made for new employment opportunities, both to match the growing population and to improve Medway's economic performance compared to other areas.
- 3.17 Given current economic uncertainties a job target range was assessed, based on different demographic, economic activity and level of out commuting assumptions. The effect of these different assumptions on forecast job numbers is shown below.



**Table 3-1 Employment Growth to 2028** 

Factor	Assumption	Effect on Job Requirement
Natural	Change in numbers of people of	4,300
demographic	working age and increase in	
change	post retirement age workers	
Improvement in	Either an improved employment rate to	8,700
Employment rate	SE level (high)	
	Or an improved employment rate to	900
	National level (low)	
Reduced out-	Either a 25% reduction in net out	7,300
commuting	commuting (high)	
	Or 10% reduction in net out commuting	2,900
	(low)	

3.18 This was then assessed using different combinations of these factors – in effect alternative scenarios. The results of four of these are set out below.

Table 3-2 Job Requirements to 2028

Scenario	Job Requirement
Low employment, low commuting reduction	8,200
(4,300+ 900+ 2,900)	
Low employment, high commuting reduction	12,500
(4,300+ 900+ 7,300)	
High employment, low commuting reduction	15,900
(4,300+ 8,700 +2,900)	
High employment, high commuting reduction	20,300
(4,300+ 8,700+ 7,300)	

- 3.19 In setting a specific jobs target for the Core Strategy these and a range of other factors were considered including the findings of the Medway Employment Land Review Consolidation Study, 2010. This Study recognised that in Medway a key objective is to increase employment, reduce outcommuting and improve economic activity rates to levels closer to the South East average. The Study concluded that planning for lower economic growth would not deliver these strategic objectives, could undermine sustainability objectives and ultimately would be self fulfilling by limiting supply and undermining potential economic growth.
- 3.20 Taking these considerations into account the Council has decided to set an ambitious target of 21,500 additional jobs to be created by 2028 and ensure that there is sufficient capacity in terms of floorspace for this to occur. This is a proposed increase from a 2008 base line figure of 94,500. This will ensure that economic activity is not artificially restricted and that sufficient capacity is available to match housing growth.



#### The Core Strategy 'Spatial' Vision

3.21 Taking full account of the overall vision for Medway, the various issues discussed in Chapter 2 and the growth targets explained above, the spatial vision for the Core Strategy is as follows:

#### By 2028 Medway will have experienced major change.

Chatham will be transformed into a city centre for Medway that is also of regional significance. It will be a focus for shopping, leisure and cultural activity and a growing employment location, founded on its first class accessibility, city scale services and associated Higher and Further Education Centre of Excellence.

The urban waterfront (north bank: Temple Waterfront to Strood Waterfront; south bank: Rochester Riverside to Gillingham Waterfront) will have been similarly transformed, with mixed-use developments of the highest quality linking the town centres and capitalising on the exceptional setting provided by the river Medway.

The established district centres will be the focus for local community life and services, noted for their friendly and high quality environments. Rochester will continue to be recognised as a tourist destination, linked to the many attractions along the urban waterfront.

More widely Medway will be recognised as a year round tourist destination with a wide range of quality accommodation, facilities and attractions that celebrate its many historic and natural assets.

Easy movement within the urban area will have been achieved through intelligent management of the highway network and parking provision, a network of quality bus corridors linked to park and ride services and high quality interchange facilities. Movement into and out of the area will have benefited from radically improved rail stations at Strood, Rochester, Chatham and Gillingham.

Medway's economy will have grown substantially through the provision of higher value activities and jobs. This will have been achieved by:

- a. Closely aligning skills with the needs of employers and improved levels of educational attainment
- b. Capitalising on the centre of excellence created by our four universities and further education college
- c. Being noted as a location for its communications infrastructure (high speed broadband etc.)
- d. The implementation of reinvestment strategies for each of the established employment areas
- e. Grain, Kingsnorth and Lodge Hill as locations for environmental technologies and building products/construction, amongst other activities and



Rochester Airfield as a technology and knowledge hub f. Chatham, Gillingham and Strood, along with the major waterfront regeneration sites, as a focus for cultural industries and new office based employment opportunities.

Around 17,930 new homes will have been provided over the period since 2006 through the successful development of the identified waterfront and other urban area development opportunities, plus the new freestanding community at Lodge Hill.

Medway will be noted for its high standards of design, fully reflecting sustainability principles and the challenge of climate change through active mitigation and adaptation strategies. This will include being recognised for the way in which its rich historic legacy, including the proposed World Heritage Site, founded on the former Dockyard and its defences, is valued and promoted.

Our rural areas will be celebrated for their rich natural assets, contribution to food security and enhanced village environments. The new settlement at Lodge Hill will have been substantially completed and recognised as a beacon of best practice in terms of its design and sustainability. It will provide a new focus for services on the Hoo Peninsula, while retaining the essentially rural and locally distinctive character of the area and relating sensitively to nearby villages.

The extensive and numerous inner urban and suburban communities will be noted for their greenspaces and thriving neighbourhood centres providing local access to services through community hubs.

Deprivation will have been greatly reduced through effective intervention strategies for target neighbourhoods and the development of local opportunities in line with the development of sustainable neighbourhoods.

The area will be recognised for the way in which everyone has benefited from the large-scale physical regeneration and the way in which change has reflected the social, economic and environmental needs of the area.

Healthy lifestyles will have been actively promoted through intelligent design, enhanced opportunities for sport and recreation and the promotion of walking and cycling.

The River will be celebrated as the dominant and unifying geographical feature of the area through enhanced riverside walks and sensitive balancing of its commercial, leisure and environmental potential.

The area will be widely recognised for its contributions to the nation's energy infrastructure, its port capacity and its gateway function for the importation of minerals and other materials.



#### **Strategic Objectives**

- 3.22 In taking this vision forward the following strategic objectives will guide development and other planning decisions
  - To effectively realise Medway's role within the Thames Gateway and associated growth requirements primarily through effective physical regeneration, the reuse of previously developed land and the protection and enhancement of the area's many natural and heritage assets.
  - 2. To develop Chatham as a city centre of regional significance with its role complemented by thriving and attractive traditional town centres in Strood, Rochester, Gillingham and Rainham together with a network of strong neighbourhood centres serving local communities.
  - 3. To substantially improve the performance of the local economy, in particular by nurturing higher value activities and reducing the current reliance on out commuting.
  - 4. To focus economic and employment growth in Chatham Centre, within the major mixed use regeneration sites, through reinvestment within the established employment areas and at Rochester Airfield, Lodge Hill, Kingsnorth and Grain.
  - 5. To maximise the development opportunities associated with the four Universities and Further Education College to create a centre of excellence of national significance.
  - 6. To radically improve the quality of the townscape and public realm within the central urban area and along the urban waterfront.
  - 7. To boost the range and quality of tourist accommodation and positively promote visitor destinations.
  - 8. To significantly reduce deprivation in Medway, including through the implementation of tailored strategies for target neighbourhoods and the development of a network of strong neighbourhood centres, providing a range of local services and acting as community hubs.
  - To ensure that there is sufficient housing to meet people's needs by providing for a range, mix, type and affordability of housing in locations that contribute to the regeneration and sustainability of the area.
  - 10. To provide for the transport needs of the population through the provision of enhanced public transport facilities, proactive management of the highway network and improved facilities for walking and cycling.



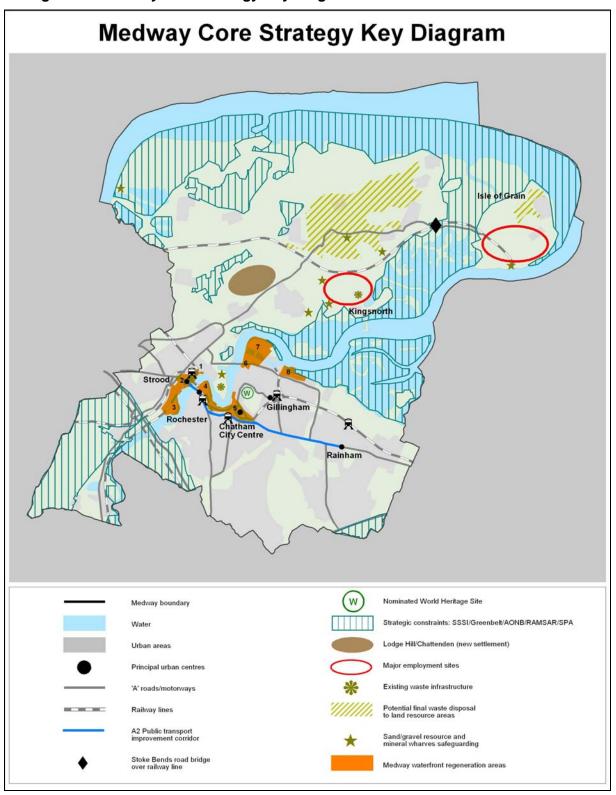
- 11. To enhance the quality of life of local people through the promotion of healthier lifestyles and the provision of improved cultural, sporting, leisure and tourism facilities, including along the river Medway.
- 12. To nurture Medway's rural areas and economy, including through village improvement projects, enhanced land management and local access strategies.
- 13. To make the new settlement at Lodge Hill a model for modern living, exhibiting the highest standards of design and sustainability and complementing existing villages on the Hoo Peninsula.
- 14. To work proactively to minimise the effects of climate change through efficient resource use, high quality buildings, improved biodiversity, the effective management of open land and other mechanisms.
- 15. To ensure that there is sufficient minerals and waste management/disposal capacity to meet local requirements and contribute to regional and national needs.
- 16. To ensure the provision of necessary infrastructure to match the needs of development at the right time and in the right place.



### **Key Diagram**

3.23 The main elements of the strategy are illustrated on the Key Diagram below.

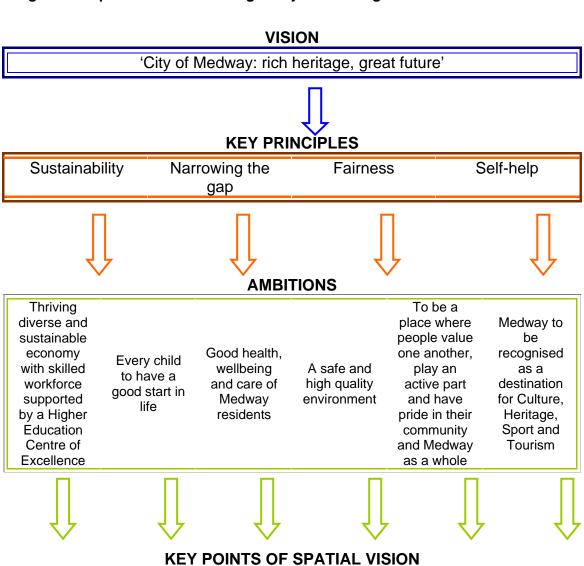
Figure 3-1 Medway Core Strategy Key Diagram





3.24 Figure 3-2 below shows the relationship between the spatial vision, the strategic objectives and each policy as set out in the following chapters.

Figure 3-2 Spatial Vision & Strategic Objectives Diagram

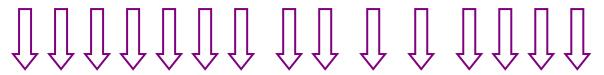


Major change by 2028	Chatham as city centre of regional importance	Transformation of urban waterfront with high quality mixed use developments
District centres to be focus of community life	Easy movement within urban centres	An expanded economy with high value activities and jobs
Approx 17,930 new homes from 2006 to 2028	Medway to be known for its high quality standards of design	Rural areas celebrated for their rich natural assets with Lodge Hill substantially completed
Deprivation will be greatly reduced	Everyone benefited from large scale regeneration	Healthy lifestyles will have been actively promoted
The River Medway will be	Inner urban and sub-urban	Area recognised for



celebrated as dominant and unifying geographical feature of area

communities noted for their thriving local or neighbourhood centres contribution to nation's energy infrastructure, its port capacity and gateway function for import of minerals



#### STRATEGIC OBJECTIVES

(Related policy)

### Realise Medway's role within Thames Gateway

(CS1 Regenerating Medway)

# Develop Chatham as a city centre of regional significance

(CS1 Regenerating Medway & CS28 Chatham)

#### Substantially improve the performance of local economy

(CS17 Economic Strategy)

# Focus employment growth in Chatham Centre

(CS28 Chatham)

# Maximise development opportunities of four universities and Further Education College

(CS20 Education & personal development)

#### Improve the quality of the townscape and public realm within central urban area and urban waterfront (CS2 Quality &

### Significantly reduce deprivation

(CS9 Health & social infrastructure)

### Sufficient housing to meet people's needs

(CS13 Housing provision & distribution & CS14 Affordable Housing)

## Provide for transport needs of the population via enhanced public

sustainable design)

transport facilities (CS24 Transport & movement)

### Enhance the quality of life of local people

(CS10 Sport & Recreation)

#### Nurture Medway's rural areas & economy via village improvements and enhanced land management

(CS6 Preservation & enhancement of Natural Assets?)

To make the new settlement at Lodge Hill a model for modern living with high design and sustainability standards
(CS33 Lodge Hill)

### Minimise effects of climate change (CS3 Mitigation & adaptation to climate

(CS3 Mitigation & adaptation to climate change)

#### Ensure sufficient supply of minerals and adequate waste management/disposal

(CS22 Provision for Minerals & CS23 Waste Management)



#### 4. Cross Cutting Themes

#### Introduction

- 4.1 This chapter covers a range of over-arching topics or themes that need to be taken into account if the Core Strategy vision is to be realised and national policy reflected in relation to matters such as climate change and the protection of environmental and heritage assets. The topics covered are:
  - Regenerating Medway
  - Quality and Sustainable Design
  - Mitigation and Adaptation to Climate Change
  - Energy Efficiency and Renewable Energy
  - Development and Flood Risk
  - Natural Environment and Biodiversity
  - Sustainable Communities.

#### **Regenerating Medway**

- 4.2 Completing the effective regeneration of Medway's town centres and urban waterfront, including making Chatham a centre of regional significance, is the single biggest challenge facing the area and is therefore the priority for this Core Strategy. Medway has embraced the Thames Gateway project and made enormous strides in attracting resources and managing change on the ground but much still remains to be done.
- 4.3 Chatham, as Medway's main centre, needs a much more positive image and to assert itself as a focus for economic, social and cultural activity. Enormous efforts, including major financial investment, have been put into the land assembly of key waterfront sites and a programme of major infrastructure improvements.
- 4.4 A stage has now been reached where market perceptions have improved and community confidence is growing. However there is much still to do if the enormous potential is to be fully realised and Medway is to be recognised as one of the most significant conurbations in the greater South East and a strategic centre within the Thames Gateway area.
- 4.5 A changed focus now could also result in the returns expected from the financial investments already made being reduced or lost altogether.

  Accordingly, Policy CS1 re-emphasises the importance of this regeneration programme and the key measures that will be applied to take it forward.
- 4.6 A range of development briefs and masterplans are in place to assist in this process and these will be reviewed and updated as necessary over the plan period. A schedule of these is set out at Appendix B. The Council will work proactively with potential development partners, both public and private, to realise opportunities and coordinate activity.



#### Policy CS1: Regenerating Medway

The development strategy for Medway is to prioritise re-investment in the urban fabric, particularly by the redevelopment and recycling of underused, derelict and previously developed land with a focus on the Medway Riverside and town centres.

To achieve this, priority will continue to be given to the established regeneration programme, namely:

- Major physical change in Chatham centre, including significant new retail floorspace between Best Street and the Brook and the expansion of the Pentagon Centre, mixed use developments at the Brook, the Station Gateway and Waterfront, major improvements to the Waterfront open space and, over the longer term, the development of a new cultural offer in this location
- On the west bank of the River Medway the creation of a dynamic new mixed use waterfront environment stretching from Medway Valley Park through Temple Waterfront, the former Civic Centre site and Strood Riverside. This will include the implementation of the Masterplan for Central Strood and associated access improvements and the creation of a river walk
- On the east bank of the river, the creation of a new community at Rochester Riverside, the sensitive regeneration of the historic area between Star Hill and Sun Pier, the further development of the Chatham Historic Dockyard as a heritage destination and commercial quarter, development of the Interface Land and the completion of the residential communities at St. Mary's Island and Gillingham Waterfront
- Sensitive change within Gillingham town centre to reinforce its role as an important 'District' centre and capitalise on the opportunities provided by the growing student population and new facilities at Medway Park and the Great Lines Heritage Park
- By working with Network Rail and the train operating companies the creation of enhanced station environments and interchange facilities at Strood, Rochester, Chatham and Gillingham
- The creation of a high quality public realm, including new public squares and spaces, new pedestrian routes connecting up the waterfront and town centres and major urban open spaces.

The Council will continue to work in partnership with all relevant bodies and commercial interests in taking forward the programme and all developments will be expected to make a positive contribution to it.



#### **Quality and Sustainable Design**

- 4.7 Medway has a unique architectural and historic character, which is enhanced by an outstanding landscape of estuarine flood plain backed by the steep escarpments and hanging valleys of the North Downs. There is a legacy of landscape and townscape views of the escarpments, the river, and key landmarks of national and international importance such as Rochester Cathedral and Castle and Chatham Historic Dockyard.
- 4.8 However, the demise of the Naval Dockyard and the disappearance of traditional industries have also left Medway with large riverside sites in need of regeneration. 1970's traffic and redevelopment schemes have also damaged the once coherent character of the towns. The scale of regeneration presents a significant challenge, but also an incredible opportunity to transform Medway into a city for the 21<sup>st</sup> Century.
- 4.9 If the regeneration, described above, is to reach its full potential good design will be critical in:
  - Making the most of Medway's character and setting
  - Making Medway a good place to live and work
  - Forging a new and exciting image for Medway as a whole.
- 4.10 It is important that this is achieved both on a building-by-building basis and on the scale of new and existing areas with streets and spaces that have their own distinct character whilst being integrated with the rest of the built environment.
- 4.11 The scale of regeneration is such that it will impact on Medway for generations to come. It is therefore important that new development is designed to ensure long-term viability and to reduce future obsolescence in the face of changing economic, demographic and social trends. Good urban design, by ensuring easy connection to open space, recreational facilities and local services, has an important role to play in enabling sustainable life styles that are less car dependent.
- 4.12 Meeting these challenges can be achieved through an understanding of the principles of urban design that underpin most successful places. These are laid down in the Government publication 'By Design- Urban Design in the Planning System' www.cabe.org.uk/publications/by-design . The Government's latest 'Building for Life' standards www.buildingforlife.org also provide a range of criteria for better housing design. To ensure that developments meet the criteria laid down in these, the Council will carry out Building for Life Assessments for all schemes of 25 dwellings or more.
- 4.13 In applying these general criteria and principles, designers should take into account the unique features of each site (including its context). For significant regeneration sites (100 dwellings or more, over 10,000 m² of commercial development, or sensitive sites that will be visible or prominent within the surrounding area or in close proximity to important heritage assets), good design will best be ensured by agreeing basic design principles with the Council. These should normally be set out in a design statement or brief that, in appropriate cases, is subject to community consultation prior to a planning application being submitted.



4.14 Tall and bulky buildings present a particular challenge. The Council's adopted Building Heights Policy (2006) defines riverside areas where tall buildings will, or will not be acceptable. It also lays down a methodology for determining the detailed acceptability of tall buildings and their effect on strategic views and landmarks. The Council will continue to use this in assessing proposals for buildings that are 18m or more in height or which impact on strategic views.

#### Policy CS2: Quality and Sustainable Design

New buildings in Medway will be expected to meet the highest architectural standards that reflect or generate local distinctiveness through:

- The expression of function and structure
- The use of materials
- Appropriate proportions, visual order and detailing
- The application of environmental criteria.

New development should result in buildings, streets, spaces and neighbourhoods, which are high quality, durable and well integrated with their surroundings by:

- Respecting strategic and local views and settings
- Respecting local context, townscape and landscape including the character, scale, street and settlement patterns of the surrounding area
- Contributing to the enhancement or creation of local identity
- Creating a pattern of streets and spaces which are well connected to their surroundings and which are attractive and easy to walk through
- Being flexible and adaptable to meet a variety of needs, uses and lifestyles into the future.
- Contributing to a pattern of development, which provides easy access to open space, recreational facilities and local services, and which encourages walking and the use of public transport.

In meeting the above the Council will expect designers to have regard to the objectives for urban design as laid down in the Government's publication 'By Design'. It will also measure the quality of new housing development against the Design Council CABE 'Building for Life' Criteria.

The acceptability of tall buildings (18m or higher) and the protection of strategic views will be determined in accordance with the Council's Building Heights Policy 2006.

Applications for major sites (25 houses or more) should be accompanied by:

 An 'Accessibility Assessment' which demonstrates adequate access for residents to necessary services, integration with



existing development and that unnecessary travel demands do not arise

- A design statement outlining how the development accords with:
  - The objectives of 'By Design'
  - Building for Life Standard for housing development; and
  - How the local physical, social, environmental and policy context has been taken into account at the design stage.

Applications for significant regeneration sites, large, or sensitive sites should be accompanied or preceded by a design brief that is subject to a public consultation process.

#### Mitigation and Adaptation to Climate Change

- 4.15 Climate change and its potential effects is one of the greatest issues affecting humanity. Extreme heat and flooding can threaten human life and flooding can cause major property damage. Higher average temperatures affect both flora and fauna and sea level rise threatens coastal areas. The Government has introduced a number of measures to address the issue, including measures that should to be considered in local development frameworks. Through PPS1 and its climate change update, sustainable development, adaptation to climate change and mitigation are now key cornerstones of planning.
- 4.16 A well-known and recognised contributor to climate change is carbon dioxide emissions, sometimes referred to as the carbon footprint of an area.

  Therefore a critical part of any strategy for tackling climate change needs to deal with this issue.
- 4.17 A detailed explanation of Medway's ecological footprint is contained within the Climate Change, Renewables and Flooding State of Medway Report.
- 4.18 A Local Area Agreement target sought a reduction of emissions by 13.9% by 2011, equating to 4.3 tonnes of CO2 per capita. Further and more stringent targets are likely to be applied to Medway over the plan period.
- 4.19 In order to improve the sustainability of new homes, the Government has introduced The Code for Sustainable Homes. This rates new homes against nine measures of sustainability: CO2, pollution, water, health and well being, materials, management, surface water run-off, ecology and waste. The code uses a 6 level rating system, according to the degree to which the homes measure up to the 9 measures. The previous Government set a target for all new homes to achieve a Level 3 rating by 2010, progressing to a Level 6 (or zero carbon) rating by 2016. The current Government has confirmed a commitment to zero carbon homes by 2016. However the definition of zero carbon is being amended to remove the requirement for Level 6 of the Sustainable Homes Code and replace it with amendments to Part L of the Building Regulations, coupled with off-site 'allowable solutions', for example contributions to carbon reduction projects in the community. Details of the scheme are not yet finalised.
- 4.20 The Building Research Establishment operates a similar system for nonresidential development called the BREEAM standard. This rates buildings as



either pass, good, very good, excellent or outstanding. The Government has set a timescale for non-domestic buildings to be carbon zero by 2019, with the exception of schools and public sector buildings where the timescale is 2018. No intermediate targets have been set for non-domestic buildings.

- 4.21 It is widely recognised that some climate change is now unavoidable, with a resulting need to start adapting now to the predicted impacts that are likely in the future. For the South East of England predicted impacts include sea level rise, increased flooding, impacts on water supply, agriculture and biodiversity. One result of increased development and levels of greenhouse gas emissions is what is termed the Urban Heat Island Effect (UHIE). This is the difference between rural and urban temperatures, which has been shown to be up to 7°C. This happens where increased levels of solar absorption and radiation occur and transport, heating and cooling systems as well as industry all add to city heat. In heatwave conditions this can have serious health implications, particularly for the elderly and the infirm. It has been recognised that there are a number of actions that can help mitigate the impact of UHIEs. These include the use of 'green' roofs, urban tree planting, shading through design, passive heating and ventilation systems and preserving urban open spaces and gardens.
- 4.22 Water supply in Medway is largely dependent on ground water abstraction from local sources or imported water from the Medway Water Resource Zone, which extends into mid Kent. There are no large reservoirs or any abstraction from the river within the Medway administrative area. The demand for water is rising from both existing and new development and with increasingly erratic rainfall patterns there is widespread concern over the stability and sustainability of future supplies.
- 4.23 In simple terms Medway is one of the driest parts of the most water 'stressed' region in the country. Some of Medway's highest value ecological areas are along marshland and shorelines and reduced water supply also has implications for the functioning of these areas.
- 4.24 The Southern Water Final Water Resources Management Plan for 2010 to 2035, proposes a number of measures to ensure an adequate water supply to the area. These include universal metering to manage demand, improvement schemes for groundwater sources, optimisation of inter-zonal transfers, renewal of inter-company bulk water transfer schemes, licence variations, leakage reductions, wastewater recycling and raising Bewl Water. The Council supports all of these measures, although many of the required improvements will occur outside the administrative area.
- 4.25 The Water Framework Directive applies to all types of groundwater, including rivers, lakes, estuaries, wetlands, ground and coastal waters. The Directive aims to push the proportion of water bodies in good ecological status (GES) from 26% in 2011 to 32% by 2015 and then to get as many as possible of the UK's water bodies to this status by 2027. The Council will support these objectives by ensuring the timely delivery and capacity of infrastructure to serve new development and the proper integration of Sustainable Urban Drainage systems and/or water neutral developments.



#### Policy CS3: Mitigation and Adaptation to Climate Change

All development will be expected to take full account of its potential impact in terms of climate change and demonstrate that appropriate mitigation and adaptation strategies have been put in place to limit these impacts.

All residential development will be required to contribute to the progression to sustainable and zero carbon homes by 2016 through meeting the following requirements:

- Code Level 4 until the end of 2013
- Code Level 5 between 2014 and 2016
- From the beginning of 2016 Code Level 5 plus any additional requirements needed to meet the Government's definition of Zero Carbon (potentially Part L of the Building regulations) plus 'allowable solutions'.

In addition all residential developments should achieve water efficiency of no more than 80 litres per person per day.

Commercial buildings over 1,000 sq m will be required to meet the BREEAM "very good" standard until 2016 and thereafter BREEAM 'excellent', progressing to the Government's definition of Zero Carbon by 2019.

Developments will also need to demonstrate that the following measures have been adopted, where appropriate:

- Limiting the embodied energy of materials used in construction
- Maximising thermal efficiency and limiting the need for mechanical heating and cooling systems
- Countering urban heat island effects, including through the provision of greenspaces and roofs, planting and intelligent design
- The application of National Sustainable Urban Drainage Systems Standards

The Council will support the proposals in the Final Water Resources Management Plan, 2010-2035 or other measures that have been agreed to improve the efficiency of water use and maintain supplies at the level required to meet local needs. It will also support the objectives of the Water Framework Directive for water bodies to reach a Good Ecological Status by 2027.

#### **Energy Efficiency and Renewable Energy**

4.26 Medway has a strategic role in supplying power and heat to the region and the country as a whole (e.g. around 15% of the nation's electricity) but this is



currently almost wholly from conventional sources. In order to assess Medway's potential in terms of renewable energy the Renewable Energy Capacity Study 2010 was commissioned<sup>3</sup>.

- 4.27 This shows that there is potential for the Medway area to generate around 641MW of power or heat equivalent using renewable sources. It indicates that this could be provided through a number of technologies, covering wind (both small and large scale), biomass, solar and district heating. The largest proportion could come from wind developments of varying scales but this would involve the use of locations across the middle of the Hoo Peninsula, which are sensitive both environmentally and visually. Other technologies, especially photovoltaics or solar thermal could be spread across a number of concentrated areas through the main centres.
- 4.28 A number of the available technologies only tend to become viable on larger scale developments. Combined heat and power systems usually need a demand at a community scale to be cost effective. Others such as ground source heat pumps are often constrained due to the land surface that is usually demanded to accommodate them, although this has lessened with vertical systems being introduced as alternatives.
- 4.29 To consider the impact on scheme viability of applying higher sustainable code levels and the impacts of including renewable technologies, the study specifically considers the strategic sites of Rochester Riverside, Chatham Centre and Waterfront and Lodge Hill. It discusses potential mixes of technologies that could be used over the plan period, on the basis that these schemes will all come through during and after the national timetable for zero carbon homes.
- 4.30 If the Government grants permission for the proposed new coal power station at Kingsnorth, it is expected to include Carbon Capture and Storage. In addition the Council has recommended that, if approved, a condition be applied requiring pipes to be laid to the edge of the site, which could be connected for waste heat to be used as part of a district heating system. This could potentially be of a significant scale due to the volume of waste heat available.
- 4.31 The greatest constraints to a speedy development of a district heating system would be the commitment of the utility companies and current legislation and processes, which are not geared towards large scale district heating schemes. However the study suggests that this is a key element that should be further investigated.
- 4.32 Due to the large size of the existing housing stock and the nature of commercial and industrial activity across the area, simply controlling new development will not, in itself, be enough to result in a significant reduction in CO<sup>2</sup> emissions. As a large proportion of the building stock is older and of variable quality, there are issues in terms of bringing it up to new thermal standards. Retrofitting will be neither cheap nor easy in many cases and a

<sup>&</sup>lt;sup>3</sup> http://medway.gov.uk/pdf/renewable\_energy\_capacity\_study\_may\_2010.pdf



very high proportion is privately owned, making it difficult to implement area wide improvement programmes.

- 4.33 The ability to implement significant improvements will be heavily influenced by the national picture and the application of consistent standards. Nevertheless the Council will continue to actively seek out opportunities and apply standards that have net benefits but do not endanger the regeneration programme.
- 4.34 It will also positively respond to any opportunities to work with Government to prove the potential for large-scale district heating, including as a national demonstration project area.
- 4.35 Renewable energy provision is a welcome and necessary part of the programme to increase the sustainability of the UK economy and housing market. However the maximum benefits to sustainability come from reducing the demand for energy in the first place, before considering how the remaining requirements are generated and distributed. The energy hierarchy gives the following order of priority:
  - Energy conservation through design
  - Energy efficiency through building fabric
  - · Efficient supply of energy
  - Renewable and low carbon energy generation

#### Policy CS4: Energy Efficiency and Renewable Energy

All new development will be expected to maximise energy efficiency savings through passive design and building fabric improvements. Developments of 10 dwellings or more, or over 1,000 sq m of non-residential floorspace should also meet 20% of the residual on-site energy requirements from decentralised, renewable energy sources. Direction for which technologies would be most appropriate should be taken from the Medway Renewable Energy Capacity Study, although emerging and innovative technologies will also be supported. If it is demonstrated that this target cannot be met economically through onsite measures, equivalent CO<sup>2</sup> savings will be sought through compensatory off-site measures including renewable energy schemes and retrofit schemes for existing buildings in the local area.

Should it prove feasible to do so, the Council will promote large-scale district heating schemes that use waste heat from conventional power generation. Subject to there being no significant adverse effects in terms of the natural environment and residential amenity, the Council will support and promote the installation of all forms of renewable energy systems including small scale generation.

#### **Development and Flood Risk**

4.36 As sea levels rise and extreme weather events become more common it is vital that all developments are appropriately designed to withstand these factors and sufficient space is made for floodwater. Where development is



unavoidable next to rivers and the coast, as is the case in much of urban Medway, a range of sustainable flood risk management measures should be incorporated. Depending on the location these could include a mixture of formal flood defences, land raising, flood resilience and flood resistance measures. Outside the main urban area the location and style of coastal defences will need to take account of 'coastal squeeze' so that internationally important habitats are not eroded or lost altogether.

- 4.37 Managing our undeveloped areas appropriately is also essential by maintaining watercourses and flood storage areas and providing sufficient space and protection for flora and fauna to adapt and migrate in the face of rising temperatures.
- 4.38 The Environment Agency produces flood maps, which identify three zones of risk: zone 1, low probability, zone 2, medium probability and zone 3, high probability. These are shown in Figure 4.1. Medway is located at the confluence of the Thames and Medway estuaries and large tracts of marshland to the north of the urban area are at high risk of flooding (Zone 3). These include the low lying land to the north, east and west of Cliffe and most of the land to the east of Allhallows and Stoke. Most of the industrial land at the Isle of Grain and Kingsnorth also lie within flood zone 3 but will need to be actively defended due to the nationally important infrastructure there.
- 4.39 On the south side of the Medway, most of St. Mary's Island, Chatham Dock and the Gillingham waterfront and the lower lying parts of the historic dockyard are in Zone 3. The floodplain continues, to include the Star Hill to Sun Pier area and Rochester riverside. The latter contains a smaller area of low to medium risk (Zone 2). On the north bank, most of the Medway City Estate falls within Zone 3 with small areas in Zone 2. A similar pattern occurs in Strood town centre. The Hogmarsh valley also lies within Zone 3. However as currently defined these flood zones do not take account of existing defence structures, for example as at Rochester Riverside, which now has full flood protection.
- 4.40 To the south of the urban area, the largest area within Zone 3 is on the east bank of the river, on Wouldham Marshes, whilst smaller areas occur on the west bank to the north of Cuxton station and to the north of Halling.
- 4.41 The Medway Estuary and Swale Shoreline Management Plan and the Thames Estuary 2100 Plan set out the constraints to development that need to be accounted for in terms of flooding and coastal erosion. They consider the situation over the next 100 years. The policy is to 'hold the line' along most of the coastline on both sides of the Medway. This applies to all areas where there are either residential properties, industrial or infrastructure installations.
- 4.42 In addition, there are limited lengths of coast where a policy of 'managed realignment' is to be applied. In these areas local strategies will be developed to set back the existing defences to allow more space for flood storage and inter-tidal habitats. However these may not be implemented for 50 years or more. Areas affected include the edge of Allhallows, some of Allhallows Marshes and some of the northern area of Grain Marsh.



- 4.43 There are also very limited sections where it is proposed there should be 'no active intervention', meaning that there will be no investment in coastal defences and natural processes will be allowed to take over.
- 4.44 The Thames Estuary 2100 Plan (TE2100) outlines the recommendations for flood risk management for London and the Thames estuary through to the end of the century. As part of this, models have been developed that outline the expected impact of certain rises in sea level, to ensure the resilience of the Plan to climate change along the estuary. Therefore it puts climate change adaptation at its core. It is expected that this will be given the same weighting as a Shoreline Management Plan (SMP). There are two SMPs that cover the coast around Medway. These are the Medway Estuary and Swale SMP and the Isle of Grain to South Foreland SMP.
- 4.45 It has been calculated that over the next century up to 1200 hectares of designated intertidal habitat in the TE2100 plan area could be lost through the effects of coastal squeeze and which will have to be replaced. The three areas (out of seven in total) identified as potential locations for suitable replacement habitat on the Kent side of the estuary all fall within the Medway area. These are Cliffe Marshes, Cooling Marshes and High Halstow Marshes but the Environment Agency has yet to determine which areas might be selected and may not do so until later in the century.
- 4.46 This is already causing considerable uncertainty and could affect a range of countryside access and improvement projects. Accordingly the Council has and will continue to press the Environment Agency to address this issue as soon as possible. It will also work positively with the Agency to both identify and implement appropriate solutions.
- 4.47 Sustainable drainage solutions for new developments can cover a number of potential design solutions from the positioning of elements within a development and the choice of materials used, through to more engineered solutions such as the inclusion of swales. However, due to the differing geology across the area, it will not always be practicable to take such approaches. They do not solve all flooding issues but they are seen as having a number of advantages over more established solutions, particularly by reducing the potential for flash flooding. They can also have additional benefits such as the reduced need for water treatment, as they allow a replication of routes for water across the river basin and the overall water system.
- 4.48 The Flood and Water Management Act 2010 creates SUDs (sustainable urban drainage systems) approval bodies, which will be unitary and county authorities. SUDs approval bodies will be required to approve SUDs in line with new national standards, which are currently being drawn up. Where SUDs drainage systems drain more than one property, the SUDs approval body will be required to adopt and maintain them.
- 4.49 A number of the key regeneration sites are located on the riverside and a strategic approach to their defence is appropriate. Accordingly the Council commissioned a study of the existing defences and the potential works and



strategies that should be applied to ensure flood risk is managed sustainably<sup>4</sup>. This will ensure that all flood defences along the waterfront meet a universal standard. It is accepted that, although a large part of the urban waterfront is located within the flood plain, it needs to be defended due to the long established development form and the value of the commercial assets that would otherwise be at risk. Beyond the current urban boundaries however it is important to avoid inappropriate development that would increase flood risk and reduce the capacity to store water.

4.50 This approach will allow optimum solutions to be identified that balance the protection of sites with management of the natural environment.

#### Policy CS5: Development and Flood Risk

Proposals for development within flood zones 2 and 3 and on sites of over 1 hectare in zone 1 must be accompanied by a flood risk assessment. Permission will not be granted unless, following a flood risk assessment, it can be demonstrated that:

- It would not be at an unacceptable risk of flooding itself; and
- The development would not result in any increased risk of flooding elsewhere.

Exceptionally, sites within the Medway urban area, which contribute to the regeneration of the area, need to be redeveloped. In such cases and where the tests above cannot be met, development will only be permitted if:

- The development is designed to be compatible with potential flood conditions, and
- There are no alternative sites in a lower flood risk zone; and
- The development would make a significant contribution to the overall sustainable development objectives of the LDF, such that the wider sustainability benefits of the development outweigh the flood risk; and
- It can be demonstrated to the satisfaction of the Council and the Environment Agency that any residual flood risks are adequately mitigated to avoid an increased risk of flooding either on the site or elsewhere; and
- It is only for uses that are not defined as highly vulnerable by PPS25.

Development that would harm the effectiveness of existing flood defences or prejudice their maintenance or management will not be permitted.

Proposals in areas at risk from flooding must demonstrate that

4



account has been taken of the resilience of buildings, infrastructure and other important local features.

Options to manage flood risk identified in the High Level Appraisal of the Potential Solutions to Manage Flood Risk in the Urban Medway<sup>5</sup> should be incorporated where possible.

All developments, which have the potential to affect the ability of land to absorb rainwater, will be required to incorporate and obtain approval for sustainable urban drainage systems (SUDS) in line with national standards, prior to construction.

All development within flood zones 2 and 3 will require surface water run-off to be controlled as near to its source as possible.

Development will not be permitted which encroaches onto the natural floodplain beyond the current urban boundaries or which harms the stability or continuity of flood defences. Opportunities will be taken, in consultation with partner agencies such as Natural England and the Environment Agency, to create replacement intertidal habitat and reduce flood risk.

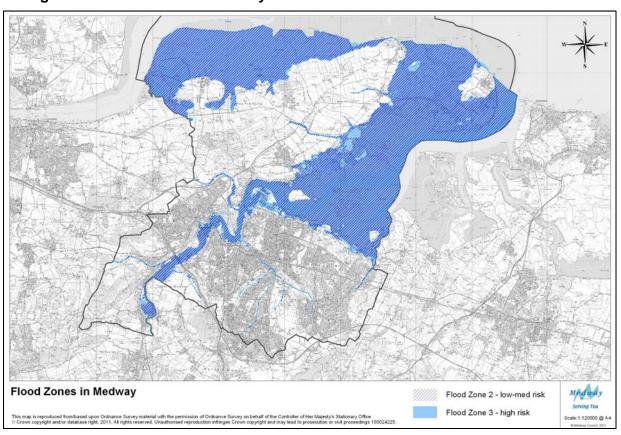


Figure 4-1 Flood Zones in Medway

5

http://www.medway.gov.uk/PDF/Medway%20Flood%20Defence%20Strategy%20High%20Level%20Appraisal%20-%20FINAL%20-3%20Feb%202011.pdf



#### **Natural Environment and Biodiversity**

#### **Preservation and Enhancement of Natural Assets**

- 4.51 Medway is fortunate in having an extraordinarily high proportion of internationally and nationally significant landscapes, including the Thames estuary and River Medway estuary marshes, the chalk grasslands of the Kent Downs and also its ancient woodlands. Highly valued local areas of nature conservation value, many of which are designated nature reserves, complement these. Medway has a relatively large number of parks within the densely built up areas, as well as a series of rural valleys, including Capstone Valley, Horsted Valley and Darland Banks. These extend far into the urban area and as well as providing physical links to the countryside beyond, act as wildlife corridors and informal recreational areas for adjoining neighbourhoods. It follows that Medway's open spaces and countryside have a critical role to play in helping to deliver sustainable development.
- 4.52 The proximity of these valuable sites to the urban area and their visitor potential poses particular challenges. Built development can lead to the fragmentation of habitats and high visitor numbers can damage the quality of designated areas. There is a specific concern that access to the most sensitive sites, including Special Protection Areas and Sites of Special Scientific Interest needs to be actively managed to avoid disturbance to wildlife from visitor numbers. To address this problem the Council is contributing to ongoing research into the effects of disturbance on bird populations being led by the North Kent Environmental Planning Group. This will inform measures to manage access and the development of mitigation strategies that could include the provision of Strategic Alternative Green Spaces and site level visitor management.
- 4.53 Planning Policy Statement PPS9 'Biodiversity and Geological Conservation', recognises that sites of international importance for nature conservation are separately protected by European Habitat Regulations and therefore do not require specific policies in local development frameworks. However, a high degree of protection should be given to Sites of Special Scientific Interest (SSSIs) whilst regionally important geological sites, local nature reserves, local sites, ancient woodlands and single "veteran" trees should be safeguarded from development.
- 4.54 In addition to individual sites, the importance of networks of natural habitats is recognised as they can provide routes or stepping stones for the migration, dispersal and genetic exchange of species. Local authorities are required to protect, strengthen and extend them. This is particularly important as climate change puts pressure on established habitat areas. Many of Medway's habitats also form part of a wider ecological network across North Kent and the greater Thames estuary. Given this there is added value in working at a landscape scale with partners in adjoining areas to manage habitats strategically. The Biodiversity Opportunity Areas developed by the Kent BAP Partnership identify sites for habitat creation schemes based on their potential to extend and connect key landscapes, such as chalk grassland and salt marshes.



- 4.55 A consultation paper on Planning for a Natural and Healthy Environment, published in March, 2010, requires local development frameworks to set out policies for the conservation, restoration, enhancement and enjoyment of the natural environment and include criteria-based policies against which to judge proposals for development on or affecting nature conservation sites. The policies below aim to meet those requirements.
- 4.56 The Medway Estuary and Marshes and the Thames Estuary and Marshes are both Special Protection Areas and Ramsar sites. Both areas form part of the Greater Thames Estuary Natural Area defined by Natural England. They are wetlands of international importance comprising intertidal habitats, saltmarsh, coastal grazing marshes, and saline lagoons and lagoon type habitats.
- 4.57 Special Protection Areas and Special Areas for Conservation (SACs) provide increased protection to a variety of wild animals, plants and habitats and all such sites are also SSSIs. There is only one SAC in Medway in the Medway Valley near Upper Halling. This forms a small part of the North Downs Woodlands SAC, the majority of which lies within Gravesham.
- 4.58 There are eight Sites of Special Scientific Interest (SSSIs) in Medway. These are:
  - South Thames Estuary and Marshes;
  - Medway Estuary and Marshes;
  - Cobham Woods;
  - Northward Hill;
  - Dalham Farm;
  - Chattenden Woods;
  - Tower Hill to Cockham Wood:
  - Halling to Trottiscliffe Escarpment.
- 4.59 Regionally Important Geological and Geomorphological Sites (RIGS) were established in 1990 by the Nature Conservancy Council and are selected by local, voluntary RIGS groups.
- 4.60 RIGS do not have the formal, statutory, protection afforded to SSSIs but their importance is recognised in national planning policy PPS9 and criteria based policies are required to be included in local development documents to enable the impact of development upon them to be judged.
- 4.61 The Kent RIGS Group notified Medway Council of four sites in its area at Halling, Cliffe and Fort Amherst in 2006.
- 4.62 Local Authorities designate Local Nature Reserves. They must be in the ownership or otherwise under the control of local authorities. They should be of high natural interest in the local context (SSSI or near equivalent) or of some reasonable natural interest and be of high value for environmental education or research or for the informal enjoyment of nature by the public and capable of being managed with the conservation of nature and/or the maintenance of special opportunities for study or research as a priority.
- 4.63 There are currently eight Local Nature Reserves in Medway at Baty's Marsh, South Wood, Berengrave Chalk Pit, Rainham Dock (east), Darland/Ambley



Wood, Darland Banks, Foxburrow Wood and Levan Strice. Medway Council has identified a further 15 sites which it intends to designate as Local Nature Reserves.

- Chestnut Woods
- Coney and Daisy Banks
- Dargets Woods
- Darland Banks
- East Hoath Wood
- Hook Wood
- Horsted Farm/Ridgeway
- Mill Hill Wood
- Rede Common
- Sindal Shaw
- Watts Meadow
- Princes Park
- Riverside Country Park
- Capstone Country Park
- Ranscombe Farm Reserve
- 4.64 In addition to National and Local Nature Reserves, other nature reserves may also be established independently from Natural England and the local authorities. In Medway, the Royal Society for the Protection of Birds purchased Cliffe Pools on the Hoo Peninsula in 2001 and is developing visitor and education facilities. This is a winter roosting site for thousands of birds. The RSPB also manages the national nature reserve at Northward Hill and its management is linked to that for Cliffe Pools.
- 4.65 It is recognised that the protection and conservation of sites of significant nature conservation interest outside the network of statutorily protected sites is essential to the maintenance of the UK's natural heritage. Such sites are identified as local wildlife sites and in Kent they have been known as Sites of Nature Conservation Interest (SNCI).
- 4.66 The Kent Biodiversity Partnership designates local wildlife sites and although the sites are not statutorily protected, they are generally recognised by local authorities, included in development plans and offered protection through policies in those plans.
- 4.67 In Medway there are seventeen local wildlife sites, which are identified as SNCIs in the Medway Local Plan, 2003. These are:
  - Ambley and East Hoath Woods
  - Berengrave Pit
  - Bridge Woods, Burham
  - Cuxton Pit
  - Cuxton Wood (Mill Wood)
  - Darland Banks
  - Grain Pit
  - Great Lines
  - Grove Wood
  - Hook Wood, Walderslade



- Luton Banks
- Princes Avenue
- River Medway and Marshes, Wouldham
- River Medway between Cuxton and Temple Marsh
- South Hill and Houlder Quarry
- South Wood
- Yaugher Woods
- 4.68 Ancient woodlands are those where there is believed to have been continuous woodland cover since at least 1600 AD. Ancient semi-natural woodland is composed of native trees that have not obviously been planted, although it may have been managed by coppicing or felling and allowed to regenerate naturally. Planted ancient woodland sites are ancient woods in which the former tree cover has been replaced, often with non-native trees. Important features of ancient woodland often survive in many of these woods, including characteristic flora and fauna, and archaeology.
- 4.69 PPS9 requires local planning authorities to identify any areas of ancient woodland that do not have statutory protection and they should not grant planning permission for development which would result in its loss or deterioration unless the need for and benefits of the development outweigh the loss of woodland habitat.
- 4.70 All these areas of nature conservation importance are described in more detail in the Natural Assets and Open Space State of Medway Report and in the Medway Landscape Character Assessment. Wildlife is not restricted to designated and protected sites but it occurs throughout the countryside, coast and built-up areas of England. No parts of the country are without some wildlife interest. Consequently the following policies apply to the whole of the Medway area.

#### Policy CS6: Preservation and Enhancement of Natural Assets

Wildlife habitats and sites, populations of wild species and other biodiversity features will be protected, maintained and enhanced, especially through long term management and habitat creation schemes that increase connectivity and strengthen ecological resilience. This will be particularly the case where they have been identified as being of international, national and local importance and as priorities in the UK and Kent Biodiversity Action Plans, or where they are protected or designated under relevant legislation.

The Council will implement the findings of the bird population and visitor studies commissioned by the North Kent Environmental Planning Group and will ensure that any proposed strategic avoidance and/or mitigation measures are considered in all planning documents and in the assessment of planning applications.

Development that causes unacceptable harm to important habitats and species through increased atmospheric, noise or light pollution will not be permitted unless it can be demonstrated that measures can be taken to overcome any significant risk.



The management of farming, agricultural land, forestry and woodland so as to conserve and enhance biodiversity will be encouraged.

When development is permitted, opportunities will be pursued and secured for the incorporation, enhancement, re-creation or restoration of wildlife habitat, either on-site, off-site or through contributions to the strategic provision of natural open space. Such strategies should be in place and functioning prior to commencement of the development.

Any negative impact on recognised wildlife habitats or other biodiversity features should be avoided or minimised through the appropriate siting and/or design of development. Where the negative impact cannot be avoided, but the importance of the development is considered to outweigh the impact, then environmental compensation will be provided by the creation by the developer of new habitats or features on other suitable sites and their long term management will need to be secured. Compensation will normally be provided on more than a like-for-like basis, in order to secure both the maintenance and enhancement of biodiversity.

#### **Countryside and Landscape**

- 4.71 Medway's distinctive sense of place is closely linked to its landscape setting. Its chalk hills and valleys, the Hoo Peninsula with its wooded spine and extensive marshes and the river and its estuary all play their part. Special Landscape Areas and Areas of Local Landscape Importance were designated in the Medway Local Plan, 2003. These reflected countywide and locally recognised areas of importance. PPS7 does not support local designations that may unduly restrict development and economic activity. When drawn up it considered that these designations should be replaced by criteria based policies. However the Coalition Government has indicated that it will reintroduce a form of local designation. The Core Strategy consequently includes a policy that could replace the designations and applies it to the whole of the rural area rather than specific parts. However this approach may be adapted in light of the Government's proposals when details are available.
- 4.72 Medway adopted a Landscape Character Assessment in March 2011<sup>6</sup>, which is a spatially mapped strategy that supports this approach and provides an evidence base to inform decisions on planning applications in the countryside and urban fringe. It sets out a framework for protecting and enhancing the character and function of the area's distinct landscapes. It recognises that the landscape has been degraded in some places and sets out recommendations to restore and strengthen sites.

http://www.medway.gov.uk/pdf/Medway%20LCA%20Mar11 Main%20report.pdf; http://www.medway.gov.uk/pdf/Medway%20LCA%20Mar11\_Appendices.pdf; http://www.medway.gov.uk/pdf/Medway%20LCA%20Mar11\_Map.pdf



- 4.73 There were two special landscape areas. These were first designated in the Kent Structure Plan in the 1990's and incorporated into the Medway Local Plan 2003. The North Downs area coincided with the Kent Downs Area of Outstanding Natural Beauty, which continues in force and provides a high degree of protection. Parts of the North Kent Marshes special landscape area coincided with designated Ramsar sites and special protection areas, which are afforded international protection for their biodiversity.
- 4.74 There were 16 areas of local landscape importance which were not only designated for their landscape interest but also for the following reasons:
  - As green lungs and buffers, helping to maintain the individual identity of urban neighbourhoods and rural communities
  - As green corridors (or links) for the community to reach the wider countryside
  - As edge or "fringe" land, needing protection from the pressures of urban sprawl: and
  - As habitats for wildlife and corridors, along which wildlife from the wider countryside can reach the urban environment.
- 4.75 All these functions are recognised in Medway's Landscape Character Assessment document, which in turn is the subject of the countryside and landscape policy. The Council's plans for strengthening green infrastructure networks and specifically the green grid corridors will also contribute to the realisation of the policy.
- 4.76 It is important that the distinctive character of the countryside is retained and enhanced while, at the same time, recognising that it is a living, working rural area. Both PPS4 and PPS7 allow for development in the countryside. PPS4 seeks to raise the quality of life and the environment in rural areas by promoting thriving, inclusive and locally distinctive rural communities, whilst continuing to protect the open countryside.
- 4.77 PPS7 recognises the role of planning in supporting and facilitating development and land uses which enable those who earn a living from the countryside to continue to do so, whilst continuing to ensure that the quality and character of the wider countryside is protected and, where possible, enhanced. The focus for housing development is at existing settlements and housebuilding in the open countryside should be strictly controlled. The local exception to this is Lodge Hill for the reasons explained in Chapter 10.
- 4.78 PPG 2:'Green Belts', states that the general policies controlling development in the countryside apply with equal force in Green Belts, but there is, in addition, a general presumption against inappropriate development within them. The guidance then goes on to define inappropriate development. Consequently, the Council will rely upon Policy CS7 and PPG2 to manage development in the Green Belt.
- 4.79 Paragraph 29 of PPS7, Sustainable Development in Rural Areas, allows local planning authorities to include policies in their local development documents to protect specific areas of best and most versatile agricultural land from speculative development. Medway has substantial tracts of this increasingly important resource on the Hoo Peninsula and to the north and east of Rainham in particular. Food security is a growing global issue and these



areas are of particular importance for food production. Given that sufficient sites have been identified in Medway to meet development requirements without the need to use the best and most versatile agricultural land, the Council will seek to protect the main tracts from development and fragmentation.

4.80 The AONB Management Plan 2009-2014, prepared under the Countryside and Rights of Way Act 2000, contains policies adopted by all the local authorities in the Kent Downs, including Medway. The Council will take these into account when implementing Policy CS7.

#### Policy CS7: Countryside and Landscape

Sustainable development in the countryside will be permitted in accordance with the objectives and principles of PPG2, PPS4 and PPS7 provided that:

- The openness and intrinsic character of the countryside is retained.
- There is no significant erosion of the separation of individual settlements
- Urban sprawl is contained
- The highest degree of protection is given to the nationally designated Kent Downs Area of Outstanding Natural Beauty and its setting
- The individual landscape characteristics identified in Medway's Landscape Character Assessment are protected and, where appropriate, repaired, enhanced, extended and connected in accordance with the recommendations of those assessments
- Access to the countryside and coast is maintained and enhanced and managed appropriately
- Important habitats are protected and the highest degree of protection is afforded to sites of national and international importance
- The objectives and proposals of the green grid strategy, including the maintenance of a network of habitats is not compromised and, where appropriate, enhanced
- The best and most versatile agricultural land, grades 1, 2 and 3a on the Agricultural Land Classification Map, on the Hoo Peninsula outside of the Lodge Hill strategic allocation, in the Capstone and Medway Valleys and to the North and East of Rainham, will be protected.

Planning permission will be granted for development provided that its design is appropriate to the character of the landscape. Appropriate designs of development shall accord with the characteristics of the type of landscape within which it is located, including having regard to and conserving:

- The landform and natural patterns of drainage
- The pattern and composition of trees and woodland



- The type and distribution of wildlife habitats
- The pattern and composition of field boundaries
- The pattern and distribution of settlements and roads
- The presence and pattern of historic landscape features
- The scale, layout, design and detailing of vernacular buildings and other traditional man-made features.

Existing features, which are important to the local landscape character, shall be retained, incorporated into the development and protected during construction work.

The Council will take forward the proposals in the Medway Landscape Character Assessment and the Green Cluster Studies when working with partners and developers to identify and implement landscape and habitat enhancement schemes.

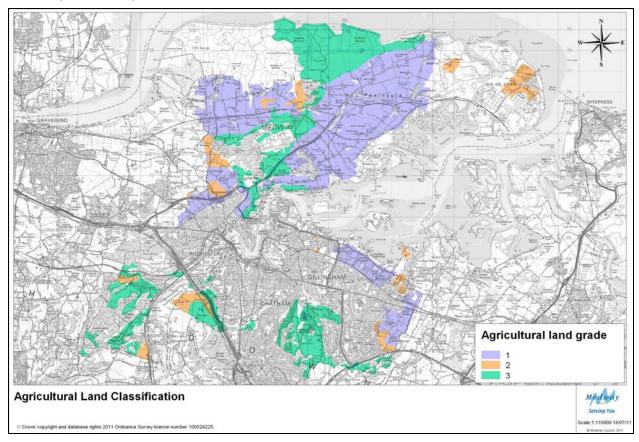


Figure 4-2 Agricultural Land Classification

#### **Green Infrastructure**

4.81 The Government recognises the importance of greenspace to the quality of the environment, the conservation of biodiversity, the image of the Thames Gateway and to quality of life, including opportunities for healthy exercise, sport and recreation. It encourages a holistic approach to the greenspace network in order to provide a cohesive, multi-functional green infrastructure, which will enhance new built development and provide migration routes for wildlife, enabling greater resilience in adapting to climate change.



- 4.82 The term Green infrastructure is used to refer to the totality of urban and rural open space. It recognises the value that individual sites offer to wildlife and people, together with the opportunity for greater gains that derive from coherent, integrated networks of green spaces. Biodiversity and landscape are key features of green infrastructure. This section focuses on the strategic planning and delivery of open spaces. The public realm, such as civic squares and cycle routes in urban areas is a key part of the network in Medway. Green infrastructure planning promotes multi-functional open spaces, but it also recognises areas where there is a need to carefully manage access to avoid damage to the most sensitive environments.
- 4.83 There is a strong basis to the planning and delivery of green infrastructure in Medway. The area has played a major role in progressing key sites, such as the Great Lines Heritage Park and contributing to plans for 'Greening the Gateway' in north Kent. A number of projects have developed guidance and funded schemes to deliver specific elements of green infrastructure. These include the Cluster Study plans carried out by Greening the Gateway Kent and Medway, the Valley of Visions Landscape Partnership, and Kent Wildlife Trust's green infrastructure plans for the Hoo Peninsula and chalk grassland to the south of Medway.
- 4.84 The policy context for green infrastructure encompasses national planning guidance, promotion of best practice through statutory agencies, such as Natural England, and plans for the Thames Gateway that give the environment a prominent role in achieving successful regeneration.
- 4.85 Creating Sustainable Communities; Greening the Gateway, 2004 sets out a vision for the landscape of the Thames Gateway. It is a statement of intent within which more detailed strategies and action plans will fit. It is not a spatial strategy or a prescription for land use development on specific sites but it presents an exciting vision for the future.
- 4.86 The strategy aims to provide a framework for integrating the whole range of urban and rural open spaces into the regeneration process. It applies to formal parks, the grounds of schools and hospitals, the landscape around housing, canal and rail corridors, woodlands, wetlands, inter-tidal areas, wilder landscapes and the wider countryside. Farmland, business parks, development sites and domestic gardens also make a vital contribution to the greenspace network.
- 4.87 In Medway the Wildlife, Countryside and Open Spaces Strategy 2007 sets the framework for green infrastructure planning and promotes the Medway Green Grid. The Green Grid focuses on connectivity on strategic routes aiming to improve links between people, wildlife and green spaces, countryside and towns.
- 4.88 Medway's Green Grid seeks to develop strategic connections linking the key assets of its natural and historic environment with local communities, to promote a distinctive sense of place and underpin healthy, sustainable and vibrant living. Green Grid planning in Medway fits within wider strategic green infrastructure work across north Kent, coordinated through Greening the Gateway Kent & Medway. Strategic routes and projects flow across local



authority boundaries into Swale, Gravesham and Tonbridge and Malling, to deliver effective and multi-functional use of natural resources.

- 4.89 Medway's Green Grid is defined under five broad geographical areas that reflect the distinctive characteristics of Medway:
  - Medway Waterfront there is a strong focus on public realm in the centre
    of Medway, intrinsic to regeneration ambitions for the area, realising the
    connections to a riverside city with an enhanced environment and
    accessibility for pedestrians.
  - Hoo Peninsula the key aim is to open up access to the high quality environment, characterised by the marshes bordering the Thames and Medway and the wooded ridge and open farmland across the wider peninsula. Green infrastructure planning is linked to plans for developments, such as Lodge Hill, RSPB's reserves at Cliffe Pools and Northward Hill and work emerging from the Four Parishes Plan on the eastern side of the peninsula. The strategy seeks to protect the important natural environment, whilst enhancing sensitive access to the area, linking local villages and nearby towns with the peninsula, raising recognition of its value.
  - Medway Valley this area focuses on the area to the south of the M2 and follows the river and the landscape of the Kent Downs. Work here reflects the need to manage the protected landscape of the Downs and to improve opportunities for access, particularly along the banks of the river, linking Medway with Maidstone. The Valley of Visions Landscape Partnership is leading in delivering this work.
  - Estuary and Orchards this area in north Gillingham and Rainham reflects the landscape dominated by the estuarine location and traditional fruit growing areas. The strategy here is to restore and promote the landscape character and improve access for neighbouring communities to the natural environment.
  - Great Lines to the Downs this route connects Medway's landmark heritage park based around the Great Lines to the towns' backdrop of the Kent Downs. The aim is to develop and enhance the connections between local communities and the surrounding countryside, valleys and parks.
- 4.90 Green Grid is supported by a broad based partnership of statutory, voluntary and community organisations and has corporate involvement across the Council to coordinate planning work, funding and the delivery of projects. Delivery is also informed by and progressed through a number of other initiatives such as the Green Cluster studies and the Valley of Visions programme.
- 4.91 Greening the Gateway Kent and Medway produced a number of 'Green Cluster' studies to promote an ambitious vision for landscape enhancement across north Kent. Those in Medway cover:



- The Hoo Peninsula<sup>7</sup>
- Capstone to Bredhurst<sup>8</sup>
- 4.92 Two other Cluster studies are concentrated in adjoining authorities but by crossing into Medway, demonstrate the wider connectivity of the schemes. These are the Shorne to Shore Study and the Thames and Medway Canal Study. Both promote improvements to access from Medway to adjoining areas as part of a wider vision for enhanced opportunities to get into the countryside.
- 4.93 The Valley of Visions project is based in the Medway Valley south of the urban area in the Medway Gap between Medway and Maidstone. It is a partnership scheme supported by the Heritage Lottery Fund. Its focus is on enhancing landscape and habitats, improving public access, promoting the area's historic heritage, and establishing strong links with local communities.
- 4.94 Kent Wildlife Trust is managing the Medway Smile Living Landscape Scheme to the south of Medway, together with local landowners and the local community, this aims to extend areas for nature and create a network of good wildlife habitats. The Four Parishes Plan on the eastern side of the Hoo Peninsula also promotes the Living Landscape initiative.
- 4.95 Parks and other open spaces are also a vital element of the green infrastructure resource. The open space network in Medway has been assessed in line with PPG17 guidance for its ability to meet the needs of local communities. The Council has used the findings of this work to develop standards for the provision and quality of a range of green spaces. These will be applied in the planning of new developments, and in progressing green infrastructure ambitions.
- 4.96 A high quality of public realm is essential in reinforcing Medway's assets such as the river and in making it an attractive, liveable and inclusive place. Redevelopment of Medway's large riverside and other brownfield sites offers opportunities to open up hitherto inaccessible areas, create new and attractive destinations for visitors and citizens and to extend access to the rural riverside by foot and cycle routes.

#### Policy CS8: Open Space, Green Grid and Public Realm

The Council will seek to provide equal opportunities for all people to enjoy accessible, high quality, well maintained and affordable open space. It will ensure that:

 A multifunctional network of open space will, as far as possible, connect to enhance landscapes and create a system of footpaths, cycle routes, equestrian facilities and wildlife stepping stones and corridors in a green grid which links the urban areas with five broad strategic corridors at Medway

<sup>&</sup>lt;sup>7</sup> http://www.gtgkm.org.uk/documents/hoo-brochure-1265037396.pdf

<sup>8</sup> http://www.gtgkm.org.uk/documents/capstone-brochure-1265039144.pdf



Waterfront, across the Hoo Peninsula, Medway Valley, the Estuary and Orchards and Great Lines to the Downs. These will be informed by the proposals in the Green Cluster Studies, Valley of Visions landscape programme and Living Landscapes project

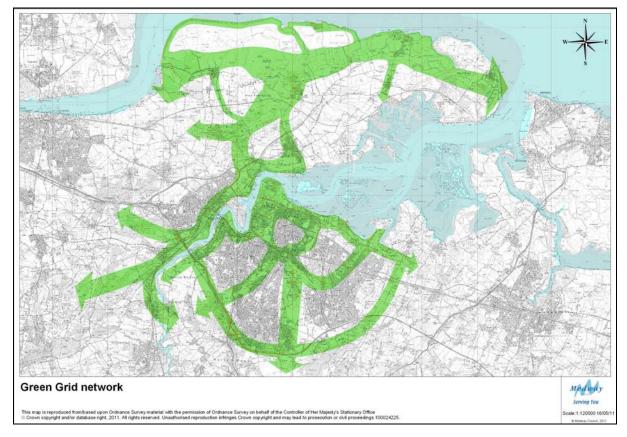
- Opportunities will be taken to provide for open space, including habitats, either directly or in conjunction with development that contributes to the formation of the Green Grid and strengthens the wider green infrastructure network
- Existing open space will be preserved and poor quality open space enhanced unless an improved provision can be made by new development to the benefit of the local population
- A set of consistent open space standards will be established which will apply to new development throughout the council area
- Where open space cannot be provided on-site, alternative equivalent provision of new open space or the enhancement of existing open space will be required off-site.

New or enhanced urban spaces should be provided as a part of major regeneration proposals. These should:

- Ensure that all people can easily and comfortably move through and into developments
- Provide necessary recreational, amenity, and, where appropriate, civic space
- Be fully integrated with the rest of the development as part of an overall design approach
- Safeguard and enhance access to the riverside
- Create or maintain attractive and safe streets and public spaces.



Figure 4-3 Green Grid Corridors



#### **Sustainable Communities**

Health and Social Infrastructure

- 4.97 One element of the vision of this Core Strategy is to seek better access to community infrastructure, for all residents of Medway. By community infrastructure we mean facilities such as affordable housing and community facilities, including public open space, sport and leisure facilities. The distribution of existing facilities is shown in the Infrastructure State of Medway Report (2009).
- 4.98 The Medway Sustainable Communities Strategy and Medway's Council Plan (2009 2012) place emphasis on the need to improve access to housing, jobs, services, transport and facilities for rural residents and disadvantaged groups throughout the area, and consider the needs of young people.
- 4.99 Consequently, the Core Strategy is about providing equal opportunities and access to good quality community infrastructure, sport and recreational facilities, cultural facilities and heritage assets, regardless of geography or personal circumstances, ensuring that actions benefit all sections of the community.



#### Deprivation

- 4.100 The Medway area has some disadvantaged neighbourhoods where communities are experiencing marginalisation and isolation as well as various social, personal, financial or other barriers, preventing individuals from accessing training, employment or local services. The Index of Multiple Deprivation indicates that 25 neighbourhoods in Medway count amongst the poorest 25% nationally, whilst Medway also has some of the wealthiest areas in the country. Pockets of deprivation are also present in rural communities.
- 4.101 Priority therefore needs to be given to social regeneration if all are to benefit from the scale of physical change envisaged. Accordingly the Social Regeneration Strategy aims to:
  - Create a cohesive and inclusive community
  - Improve access to employment opportunities for all
  - Ensure physical improvements are accessible to all
  - Strengthen access to local community services by the most hard to reach communities
  - Improve access by local communities to local employment opportunities; and
  - Undertake a renovation programme of the poorest quality housing stock.
- 4.102 In taking the Strategy forward five priority areas have been targeted for Neighbourhood Action Plans. These areas are: All Saints, Brook Lines, Strood South, Twydall and White Road Estate. The Council proposes to add a further two areas, Luton and Gillingham North. A range of projects are being implemented in these areas, including: Strood Community Project, New Chalk Pit Community Park, refurbishment of the Beechings Way playing fields and many others.

#### Health

- 4.103 The Sustainable Community Strategy's vision for Medway is that its residents shall enjoy good health, well being and care. To enable this to happen, the strategy seeks to improve lifestyle, reduce health inequalities, improve mental health, and promote independence and quality of life for vulnerable and older people. The NHS Medway Board's 10 year vision is that, through partnership and participation, it will:
  - Work to ensure that Medway will be a healthy, safe and exciting place with a good environment and major cultural attractions
  - Support the development of Medway into a city where people want to achieve in all aspects of their life, through work, leisure and learning
  - Deliver a vision of Medway based on sustainability principles with a better quality of life for everyone now and for future generations. This requires the integration of health, social, economic and environmental targets.
- 4.104 In 2007 the NHS Medway Board approved a number of principles around its property estate with the intention of incorporating them into a comprehensive estate strategy. The first is the development of community hubs providing access to health and other services leading to greater integration. The second



is to improve utilisation of accommodation. The final one is to improve training opportunities to impact positively on recruitment and retention. Other NHS Medway strategies have been instrumental in shaping this strategy. They include:

- A Healthier Medway (the 10 year strategy for the PCT)
- Strategic Commissioning Plan 2008 2013
- Primary Care Strategy 2009.
- 4.105 The main issues from the Estate Strategy 2010 2020 are:
  - Ensuring good coverage for access to services by locating facilities appropriately
  - A commitment to sustainable development i.e. maximise estate usage and occupancy and refurbishing unless a new build is the most appropriate option
  - Working with local partners to embody the principles of "Total Place" in Medway in terms of asset use
  - Ensuring GP practices are fit for purpose
  - Working with NHS Medway and its delivery partner Medway Community Estates to enable them to develop and adapt their business.
- 4.106 At this time, there is considerable uncertainty with regard to developing additional health sites given the difficulties of ensuring sufficient funding is available. Inevitably, the disposal of surplus or redundant sites will be required in order to fund these. Facilities in the following locations may be affected by either enhancement or relocation schemes over the planning period: Canterbury Street, Gillingham, Chatham Town Centre, St Bartholomew's Hospital, Chattenden/Hoo, Hempstead, Luton, Twydall, Wainscott and the Wayfield/Walderslade area. Other areas for consideration include: Rochester Riverside, Hoo Peninsula, Darland House, Elm House Clinic, New Road, Kings Road Clinic, Luton, Nelson Road, and Balmoral Road.
- 4.107 Premises are generally located appropriately across Medway but there is need for some development and some rationalisation within them. There is some under utilisation of buildings. There are areas of planned housing regeneration, which are currently under provided. Primary care services are provided from a range of facilities and the standard of GP premises requires significant investment to improve them.
- 4.108 Over the longer term there may be benefits from relocating services away from St Bartholomew's Hospital to other local centres, but as yet there is no programme in place for this to happen.
- 4.109 Medway is served by one major hospital. Medway Maritime Hospital in Gillingham is the largest and busiest hospital in Kent. Some recent developments at the hospital include:
  - The start of a major building development programme, which will see some of the hospital's old blocks replaced with new, modern facilities
  - The completion of some 250 new spaces to the car park; and



- The start of £1.5m investment in the emergency department over the next three years, which plans to move the emergency department to a new building on the hospital site as part of the Trust's major redevelopment plan.
- 4.110 NHS Medway is responsible for 68 GP practices. There are 125 GPs (and 60 part-time / locum GPs) serving the nearly 280,000 people in the NHS area.
- 4.111 There are also 10 healthy living centres and health centres in Medway. These are the base for a number of integrated health services and some community facilities. Some are also co-located with GP practices. The Medway NHS Foundation Trust provides Medway secondary care. It employs over 3,500 staff in a wide variety of clinical and non-clinical roles.

**Adult Social Care** 

4.112 The adult social care services in Medway are currently undergoing transformation and modernisation. Adults fall into a number of service categories. These services are based on an individual's need; anything that enables that individual to be safe and be well. A revised older people's plan is being produced and has already identified programmes in a number of key areas that will help address the needs of Medway's growing older population.

Places of Worship

4.113 There are places of worship for Buddhists, Christian denominations, Hindus, Jews, Muslims and Sikhs as well as some for smaller independent faiths, but current provision is not thought to be adequate and more will be required. Faith groups are usually self funded but need support to find space for their congregations.

Voluntary Sector

4.114 Medway has in excess of 530 voluntary and community organisations, some of which are faith based. The Medway Council for Voluntary Service is an umbrella organisation, which offers a range of support services to the voluntary and community sector. In 2006 it developed a Local Infrastructure Development Plan for Medway's voluntary and community sector. It identified areas in which the sector needs to develop but recognised that the sector was strong.

**Custodial Services** 

4.115 Amongst other things Medway has two prisons located within the local authority boundary, which are part of the HM Prison Service and a young persons unit managed by Rebound Youth Justice Services. Whilst there has been some refurbishment and minor extension to these facilities there is no identified requirement for major new developments within the Medway area.

Youth Services

4.116 There are approximately 65,500 children and young people aged 0-19-years in Medway, and while this number is expected to reduce marginally during the life of this plan the number of children aged 0-4 will grow by around 5 per



cent. Medway's population has a greater proportion of children and young people than the national and regional average. Medway's Youth Service organises activities and courses and provides information, guidance and support for 11 to 25-year-olds. Helping young people to enjoy life and get ahead, the service offers access to sports, leisure and creative art activities.

4.117 Medway has a number of youth centres that provide a wide range of services:

Hempstead Youth Centre; Lordswood Youth Centre; Parkwood Youth Centre, Rainham; Strood Youth Centre; Woodies Youth Centre, Rochester; Woodlands Youth Centre, Gillingham.

4.118 A network of Sure Start centres also provides support and facilities to younger families.

#### Policy CS9: Health and Social Infrastructure

The development of sustainable places in Medway with healthy communities and social infrastructure where residents enjoy a high quality of life will be assisted by:

- Relevant organisations and communities being supported to promote, protect and improve the health of Medway's population and reduce health inequalities between different population groups and areas
- Protecting and enhancing existing facilities, services and amenities that contribute to the quality of life of residents and visitors
- The reduction of air pollution and ground and water contamination and the control of noise
- Working closely with the Medway Maritime Hospital Trust to bring about the continued redevelopment of the hospital in Windmill Road and to make the hospital a centre of excellence
- Preserving and improving access to facilities and services wherever possible. Support will be given to the redevelopment and improvement of primary care facilities through active participation in the Local Improvement Finance Trust (LIFT) Co process
- Ensuring effective regeneration and the timely provision of additional, health and social facilities. The identified strategies for the provision of relevant health and social infrastructure, in locations that are appropriate and accessible, will be used to ensure that new development integrates satisfactorily with, and meets the needs of, all communities.



The Council will continue to implement its Neighbourhood Action Plans at All Saints, Brook Lines, Strood South, Twydall and White Road Estate, and develop two more at Luton and Gillingham North.

#### **Sport and Recreation**

- 4.119 Details of the typology, quantity and quality of Medway's outdoor sports facilities can be found in the Medway Wildlife Countryside and Open Space strategy 2008-2016. This is supplemented by a 'PPG17' audit completed in 2011. Sport and leisure is an important means of tackling local issues of poor health, community development and deprivation.
- 4.120 Between 2009 and 2016 the Sports Development Strategy has a Vision for sports development in Medway; which is for it to be a place:
  - Where all young people get a good start in sport and recreation
  - Where people of all ages have high quality, enjoyable opportunities to stay involved in sport and recreation throughout their lives
  - In which all sports participants have opportunities to improve and achieve their own personal sports goals
  - Where people are encouraged to adopt a healthy lifestyle through active living and enable the socially disadvantaged to feel socially included
  - In which the Medway Sporting Academy gives every primary school child in Medway the opportunity to fulfil his or her full sporting potential.
- 4.121 Medway Park is the area's new flagship multi-sport facility and has been approved as an Olympic pre-games training camp. The creation of Medway's regional centre of sporting excellence is an £11million project, developed in partnership with the Thames Gateway, Sport England and University of Kent at Medway. If sports provision is considered as a pyramid, Medway Park is at the pinnacle. Below this are what might be termed 'district' sport and leisure centres. Currently these comprise Strood, Lordswood and Stirling leisure centres, supplemented by the Splashes leisure pool. Schools, private and voluntary clubs make up the next tier of provision.
- 4.122 Gillingham Football Club is Kent's only football league club. It has ambitions to relocate to a new purpose built stadium. However, no site or funding has currently been identified in order for this to take place.
- 4.123 In terms of outdoor sports pitches, Sport England advice and National Playing Fields Association standards indicate a substantial shortfall in provision. However detailed analysis of existing supply and demand indicates that provision is broadly in balance for cricket, rugby, bowls and hockey, with a limited problem with senior football and a greater need for junior football and tennis. The latter is being addressed by Tennis Together the creation of a 6 court indoor purpose built tennis centre at Beechings Cross. This difference is attributed to lower participation rates in Medway than the national average.
- 4.124 As part of its leisure, culture, sport and tourism strategy, the Council intends to actively realise the opportunities presented by the award of the Olympic Games to London in 2012 and the easy access to Stratford afforded by Channel Tunnel Rail Link Domestic Services. In the period leading up to the



Games themselves a range of strategies have been put in place to increase participation rates in sport and to improve the standard and distribution of facilities. This in turn should provide the basis for a long term and positive local legacy from the Games.

#### Policy CS10: Sport and Recreation

In order to improve the quality of life of existing and future residents of Medway and promote healthier lifestyles the Council will:

- Safeguard existing facilities for sport and leisure and seek to extend and supplement these with new facilities where appropriate to meet a broad range of needs
- Continue to implement strategies to maximise the local benefits
  of the London Olympics in 2012. These include the
  development of enhanced training facilities, increased
  participation in sport, provision of a major pre-Games training
  camp and meeting hotel and other accommodation needs for
  visitors to the games. All strategies will aim to secure a strong,
  positive and long lasting legacy from the Games.

#### **Culture and Leisure**

- 4.125 Medway has a strong cultural and heritage offer including the state of the art sports facilities developed at Medway Park, a potential World Heritage site and recognition of the local arts and music scene through the Culture and Design Awards. Potential exists to strengthen this further and increase visitor numbers as well as local engagement as recognised in the Cultural Strategy.
- 4.126 The Council's Cultural Strategy 2009-2014 will help the Council to promote, encourage and provide opportunities for culture and leisure for all, quality of life and community wellbeing, meeting the needs of young people, community cohesion, contributing to the local economy and providing a clean and green environment. Halls, libraries and clubs fulfil a key role in meeting the needs of local communities.
- 4.127 Within Medway there is a large built and natural heritage offer, encompassing castles, parks and open spaces, museums and archives. These places and spaces provide the setting for a wide range of cultural activity. It is important to care for and develop these assets for current and future generations. Key proposals for this include:
  - Developing sustainable cultural uses for Eastgate House and Temple Manor
  - Conservation of and improved visitor facilities for Rochester Castle and Upnor Castle
  - Improvements to Gillingham Park
  - Refurbishment of play areas under the Playbuilder Programme
  - Making open spaces more welcoming, safer, cleaner and greener
  - Delivering the Great Lines Heritage Park



- Supporting the bid for World Heritage Site Status
- Ongoing development of the Medway museum offer at the Historic Dockyard and the Guildhall and Royal Engineers Museums.
- 4.128 Medway's Economic Development Strategy emphasises the importance of cultural and creative industries, in contributing to the growth of Medway's tourism and economic prosperity. Arts and Culture are important contributors to Medway's wider economic growth and its growth as a tourist destination. In particular, Chatham's two theatres, free festivals, historic buildings, the Guildhall museum, the increased visitor numbers to Chatham's Historic Dockyard and Dickens World all represent a significant contribution to Medway's economy.
- 4.129 Medway's cultural strategy outlines a number of further aspirations to work with partners to promote and develop the cultural offer.

#### Policy CS11: Culture and Leisure

In order to realise the significant cultural and leisure potential of the area, to improve the quality of life of existing and future residents, promote healthier lifestyles and a participative and inclusive community the Council will support the implementation of Medway's Cultural Strategy which encompasses a range of cultural provision, including the development of new cultural venues centred on Chatham and extending along the Medway waterfront.

#### **Heritage Assets**

- 4.130 Medway's historic environment is an irreplaceable asset. It is an expression of our history, heritage and culture and lies at the heart of local and regional character and sense of place. It helps to maintain varied and attractive places in which to live and work, provides historic places to visit and enjoy and encourages investment in, and re-use of, old buildings. It has the potential to act as a significant draw for inward investment and heritage led regeneration.
- 4.131 The importance of the historic environment in contributing to sustainable development in terms of its potential to support regeneration, tourism and social inclusion as well as conservation can be seen by the revitalisation of The Historic Dockyard, Chatham.
- 4.132 Medway is particularly fortunate in that it has a number of the region's most significant historic environment assets including:
  - The historic City of Rochester
  - The potential World Heritage Site of Chatham Dockyard and its Defences
  - Significant defence heritage including

     Upnor and Rochester Castles,
    Fort Amherst and the Chatham Lines, and the Great, Lower and Inner
    Lines.
- 4.133 Most of these heritage assets are protected to some degree by statute for instance designation as conservation areas, scheduled ancient monuments or listed buildings. However, the historic environment is much more extensive



than this. It includes reference archaeology, historic landscapes and historic development patterns. Important heritage assets include:

- Historic street patterns and forms of development in many parts of Medway, particularly within the major town centres (and not just in conservation areas). An example of this is the long and winding Chatham and Rochester High Streets, which stretch from Rochester Bridge to Luton arches.
- A unique river and hillside topography. Historically the escarpments and the tops of hills were often left undeveloped for Military purposes. This, together with key landmark buildings of national and international importance such as Rochester and Upnor castles, Fort Amherst, the Dockyard and the Cathedral, has left a legacy of unique views. There are also a number of local landmark buildings within each view. Development over a wide area (and not just within conservation areas) could impact upon this historic environment. Strategic views, together with a management strategy for controlling development that impinges upon these views is laid out in the Building Height Policy for Medway. In addition, the setting of the proposed World Heritage Site is defined by its 'buffer zone' (as laid out in the World Heritage Site Management Plan)
- Unlisted buildings, which contribute to the character of their localities.
- Areas of rich archaeological importance dating from the Palaeolithic, Mesolithic and Neolithic periods to the 20<sup>th</sup> Century.
- 4.134 It is recognised that the historic environment will be subject to change and that it is not possible, or at times desirable, to maintain all aspects. Through the use of conservation area appraisals and management plans (where appropriate), development briefs, The Chatham Dockyard and its Defences World Heritage Site Management Plan, and the Kent Historic Environment Record, the Council will adopt a managed approach to this change based on an understanding of the character and significance of the historic environment.
- 4.135 In applying policy CS12 it is recognised that sensitive modern design which takes into account historic street patterns, scale, plot width, townscape and so on can enhance the historic environment. Conversely 'Historic Style' facadism applied without a thorough understanding of the historic environment may be inappropriate.

#### Policy CS12: Heritage Assets

Medway's heritage assets will be preserved and enhanced by:

- Supporting the conservation and, where appropriate, the enhancement of the historic environment and the contribution it makes to local and regional distinctiveness and sense of place
- Assessing new development within historic areas, within the setting of historic areas and landscapes (including the 'buffer zone' of the identified World Heritage Site) or prominent in key views, in terms of its contribution to the preservation and enhancement of the special qualities of these areas, views and



landscapes and, in the case of the World Heritage Site, against its impact on the Site's Outstanding Universal Value

- Encouraging proposals that make sensitive use of historic assets through regeneration, particularly where these bring redundant or under-used buildings and areas into appropriate and viable use
- Requiring design statements which accompany new development proposals to demonstrate an understanding of how the historic environment within which the development will sit, has informed the development of the design
- Where appropriate, removing permitted development rights from 'local list' buildings in order to control change
- Supporting World Heritage Site status for the Chatham
   Dockyard and its Defences; supporting the development of the
   Great Lines Heritage Park and seeking to establish new
   integrated management arrangements covering enhancement,
   maintenance and access for Fort Amherst and the Chatham
   Lines (subject to military security, safety and other issues
   being resolved).



**Figure 4-4 Great Lines Heritage Park** 

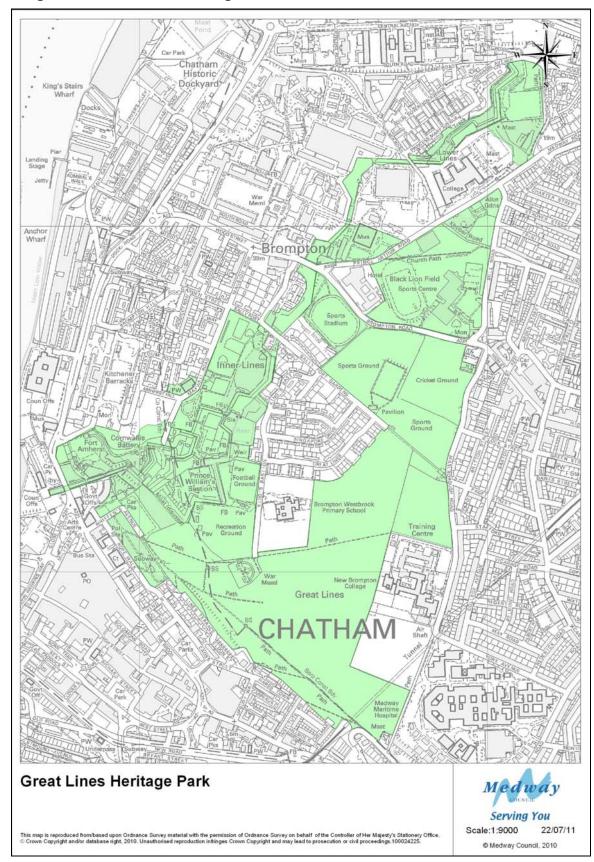
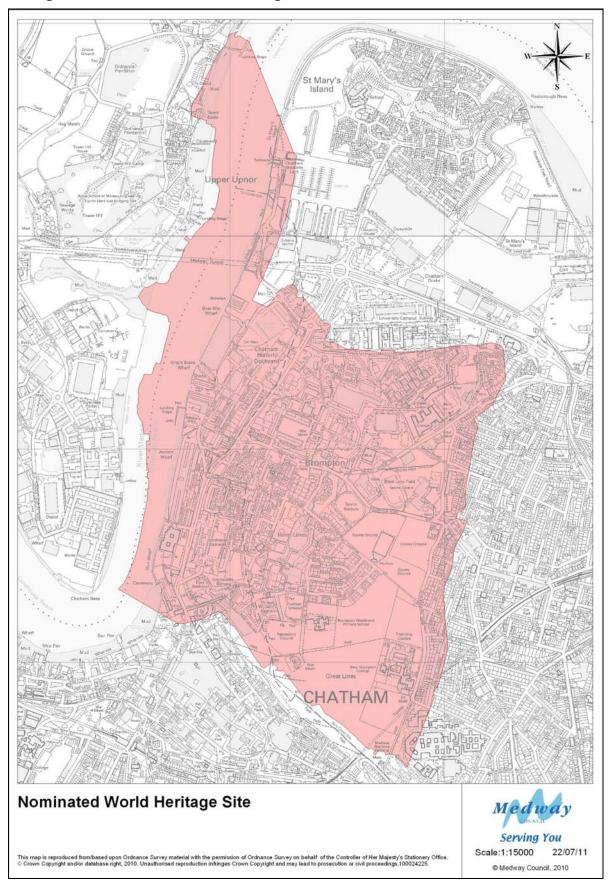




Figure 4-5 Nominated World Heritage Site





# 5. Housing

#### Introduction

- 5.1 The majority of Medway is located within the Thames Gateway, which covers the area of the borough north of the M2. The remainder, located to the south of the M2, is deemed to be part of the 'rest of Kent' for planning purposes. There has been longstanding recognition of the need to regenerate Medway and exploit its abundant brownfield land supply, particularly with regard to its numerous waterfront sites, as well as on the Ministry of Defence land at Lodge Hill where a new settlement is proposed. Therefore priority is given in the Strategy to new development taking place on previously developed land. Housing provision is also an important tool to help rejuvenate town centres and their evening economies, especially when it forms part of comprehensive mixed-use developments. This is a particular issue in respect of Chatham, which has so far failed to develop a town centre and evening economy worthy of a sub-regionally important centre and which has a small residential population.
- 5.2 Delivery of sufficient housing of the right types and in the right locations in order to ensure the creation of sufficiently mixed and balanced communities is crucial to the sustainable development of Medway. On the other hand, there is also a need to balance the pressure to redevelop employment land for housing with the need to ensure sustainable economic growth and nurture local businesses.

## **Housing Provision and Distribution**

- As explained in Chapter 3 the Council intends to proceed with an overall housing target of an average of 815 dwellings per year over the period to 2028. This equates to a total for the whole plan period of 17,930. This applies to Medway as a whole and represents a balance between the needs of the current population and the aspirations for the Thames Gateway as a growth area.
- 5.4 The great majority of this will occur in the main part of the Borough that is located in the Thames Gateway. Only around 624 units in total are expected to be built in the 'rest of' area, which essentially corresponds to the parishes of Cuxton and Halling (Medway Valley). Here the former Cemex cement plant at Halling is to be redeveloped and this will account for most of this number.
- 5.5 The Core Strategy therefore proposes the delivery of at least 815 dwellings per annum (785 within the Thames Gateway) on average over the plan period up to 2028. Despite adverse economic conditions nationally, recent dwelling completion rates in Medway have been historically high. 761 dwellings were delivered in 2007-2008, 914 in 2008-2009 and 972 in 2009-2010. The delivery rate fell to 657 dwellings for 2010-11 but this still exceeded the forecast. It is therefore considered to be a healthy delivery rate, given the challenges facing the housebuilding sector nationally.
- 5.6 The key components of housing supply will be the large waterfront regeneration sites within the main urban area and the new settlement at



Lodge Hill. It is expected to deliver approximately 5,000 dwellings in total (4,275 within the plan period).

## **Housing Delivery**

- 5.7 Medway's established housing delivery strategy will continue with its heavy emphasis upon the regeneration of previously developed land in accordance with the Thames Gateway agenda. Consequently, unnecessary greenfield developments will not be allowed that would jeopardise this overall strategy. The Council has little control over the private market in terms of the timing of actual delivery, particularly given the current uncertainty with regard to the economic recovery. However, it will continue to encourage pre-application discussions and actively engage with Registered Providers and other key stakeholders in order to maintain delivery.
- 5.8 The housing trajectory for Medway anticipates that the peak of housing delivery will come forward between 2015 and 2021. It also suggests that delivery is expected to tail off over the last few years of the plan period. This is based on the availability of sites and the market may, in practice, even-out this trajectory.
- 5.9 A plan, monitor and manage approach to residential land supply will be taken in order to ensure that the positive regeneration agenda is not undermined by potentially harmful environmental effects. The Council has prepared a Housing Trajectory, which identifies the rolling five-year land supply and how the required housing growth will be accommodated over the life of the plan. This shows a more than adequate 15-year housing supply and continuing capacity for development beyond this. A summary of the supply position is shown in the table below.

**Table 5-1 Medway Housing Supply Components** 

Supply Component	Number of dwellings (Thames Gateway)	Number of dwellings (Rest of Kent)	Total
Units completed 2006-2011	3,854	41	3,895
Small Sites with planning permission at April 1, 2011	271	14	285
Large Sites with planning permission at April 1, 2011	6,357	569	6,926
Allocations	396	0	396
Projected Strategic Land Availability Sites (not including large sites and allocations detailed above)	9,441	0	9,441
Total Supply	20,319	624	20,943

Source: 2010/11 Annual Monitoring results and Strategic Land Availability Assessment 2010/11

5.10 This shows a housing supply from identified sites for Medway of 20,943 dwellings (19,439 up to 2028). This includes housing completions already achieved of 3,895 dwellings. Importantly it makes no allowance for future 'windfall' developments. That is, sites not currently identified but which may also come forward in future years. Medway has had a significant contribution



from such sites in the past but no allowance is being made for the future as this cannot be quantified. A very healthy supply position is therefore indicated for the period up to 2028. This will contribute to the resilience of the strategy and increase market choice.

5.11 The following table and map shows where the majority of new housing is planned to come forward (see also Chapter 10 for further details).

Table 5-2 Distribution of New Housing by Sub Areas from 2011/12 to 2028+

Sub-areas	Number of Units
1. Chatham	4,437
2. Rochester	2,940
3. Gillingham	1,363
4. Strood	2,106
5. Rainham	112
6. Medway Valley	569
7. Hoo Peninsula	5,236
Total	16,763

- 5.12 In relation to the proposed allocation at Lodge Hill, the Core Strategy differs from the Strategic Land Availability Assessment in that it only assumes that 4,275 of the total provision of 5,000 dwellings will be delivered within the plan period. However, the SLAA still demonstrates a healthy surplus with regard to the overall housing supply requirement.
- 5.13 A number of Adopted Local Plan Allocations are being carried over as listed below. All are suitable development sites and the Council has had positive and recent discussions about a number of them.

**Table 5-3 Local Plan Allocations** 

SLAA Ref	Local Plan Ref	Site Name
0013	GL181	Medway House, 277 Gillingham Road
0090	ME254 & ME375	Strood Riverside, Canal Road
0100	ME386	320 - 344 High Street inc. 42 New Road, Rochester
0102	ME407	1-35 High Street, Chatham (Grays Garage)
0516	ME342	Mercury Close, and adj to 62-72 Shorts Way Borstal
0525	ME409	Former Laundry Hilda Road Chatham
0598	ME410	R/O 329 - 337 (Featherstones) High St Rochester
0757	ME383	Between Cross Street & The Brook, Chatham
0844	GL150	Amherst Hill, Brompton



# Policy CS13: Housing Provision and Distribution

In accordance with Table 5-1 and the schedule set out in Appendix C, provision will be made to ensure at least 17,930 new homes can be delivered between 2006 and 2028, (an average of 815 per year), of which at least 17,500 will be within the Thames Gateway Area.

#### This will include:

- All sites which are the subject of adopted development briefs or masterplans, including Strood, Chatham and Gillingham town centres
- Sites allocated in the Medway Local Plan 2003 not already having the benefit of a planning permission
- A contribution of 5,000 dwellings (of which approximately 4,275 dwellings will be delivered during the plan period) arising from the Strategic Allocation of land at Lodge Hill (see Policy CS33)
- Sites with planning permission; and
- Other sites identified in the Medway Strategic Land Availability Assessment.

Further sites will be allocated in the forthcoming Land Allocations and Development Management Development Plan Document, depending on the outstanding requirement at the time it is prepared.

#### Affordable Housing

- 5.14 A significant proportion of the population is unable to afford the cost of purchasing, outright, a house or other type of residential accommodation. As such it is critically important to maintain an adequate supply of what is termed 'affordable housing' to ensure that the whole population has a satisfactory place to live. Affordable housing can take a number of forms, including 'social rented', 'affordable rented' and various types of 'intermediate' accommodation and is usually provided through a Registered Provider (RP) or Housing Association approved by Medway Council. Government funding is allocated by the Homes and Communities Agency to RP's but not all sites receive a subsidy and larger private housing developments are asked to make a contribution. In recent years this has been at a rate of 25% on sites of over 25 units in urban Medway and 15 units in rural Medway. PPS3 'Housing' requires Local Planning Authorities to set a target for the number of affordable homes, which they will seek to provide during the plan period.
- 5.15 In order to quantify the need for affordable housing over the period of this plan the Council jointly commissioned a North Kent Strategic Housing Market Assessment (SHMA) in association with Gravesham Borough Council. The North Kent SHMA (2010) found that:



- 70% of future requirements for social rented housing\* is for smaller homes (1 and 2 bedrooms); and
- 65% of future requirements for other tenures is for larger (3+bedroom) homes.
- 5.16 An analysis of house prices in Medway, in a parallel Viability Study, indicates that the area can be divided into seven market value areas: High Value Medway, Medway Rural, Southern Settlements, Chatham West and Rochester, Strood, Gillingham North and West and Chatham South and East.
- 5.17 Assuming a development scenario of schemes being developed at 40 dwellings per hectare, residual values at a 25% affordable housing rate vary from £3.35 million per hectare in High Value Medway, to £0.56 million per hectare in Chatham South and East. The calculations were based upon the assumption of nil grant from the Homes and Communities Agency and assume that the intermediate affordable element of the affordable housing was New Build Home Buy.
- 5.18 The Viability Study suggests three main options for setting affordable housing proportions for planning policy purposes. These are:
  - Maintain the current policy target of 25% as set out in the Council's current planning framework. This would provide continuity.
  - Introduce a split target, which seeks a higher level of affordable housing in the high value locations of the local authority area. A broad indicative split would work between the urban areas including Chatham, Gillingham, Strood and Rochester where 25% affordable housing, supported by grant in the weaker locations would be appropriate; and, on the other hand, the more rural areas of Medway Rural and Southerly Settlements, where a 30% affordable housing target would be viable.
  - A 35% target for High Value Medway.
- 5.19 The Study concluded that whilst a 25% target would be a continuation of existing policy, it would rely on grant funding being available in the weaker sub markets. Therefore, a split target, recognising the inherent variation across the area, might be a more appropriate solution.
- 5.20 Having regard to the study's findings it is intended that the current affordable housing policy target of 25% will be maintained within the existing urban area boundaries and at Hoo St. Werburgh, but elsewhere a 30% policy target will apply. These targets will apply to all sites of over 15 units or 0.5 hectares. In all cases the viability of developing a site will be taken into account, including the cost of any other development contributions being sought.
- 5.21 Developers will need to demonstrate and justify, via appropriate evidence, why they are seeking to deviate from specific developer contribution

<sup>\*</sup> The same assumption should be made for affordable rented need as this is essentially the same client group



requirements. The Council will require an 'open book' approach. The developer/landowner will be expected to provide all relevant financial and other information behind the appraisal to enable the Council and/or independent valuer on the Council's behalf to assess the nature, extent and impact of the constraints upon the viability of the scheme. It is recommended that this information is submitted as part of any pre-application discussions.

- 5.22 If the Council seeks independent advice regarding such a submission, the developer will be required to pay the Council's costs for this advice. This is standard practice and in line with the advice contained within the Home & Communities Agency's Good Practice Note: Investment and Planning Obligations Responding to the Downturn (August 2009).
- 5.23 If, following such an appraisal and based upon all available evidence, the Council concludes that the scheme is economically viable, and if the affordable housing requirement is not met, this could result in the application being refused planning permission.
- 5.24 Individual site viability may be affected by the availability (or not) of grant funding. Where viability issues arise, consideration will be given to alternative means of ensuring affordable housing delivery in line with the Council's 'cascade' mechanism. Further guidance in relation to affordable housing provision is set out in the Medway Guide to Developer Contributions. This document will be regularly updated.
- 5.25 The term 'affordable housing' is defined as in PPS3 'Housing' 2011 and this definition applies to Policy CS14 below.
- 5.26 The definition does not exclude homes provided by private sector bodies or provided without grant funding. Steps need to be taken to ensure that, through the drafting of any agreement, homes meet the definition and can be considered, for planning purposes, as affordable housing. Those homes that do not meet the definition, for example, 'low cost market' housing, may not be considered as affordable housing.
- 5.27 Affordable housing should be provided on-site and secured through a S106 agreement (or equivalent device introduced by Government) as part of the proposed development unless the Council and the applicant both consider that it is preferable for provision to be made on an alternative site or for a financial contribution to be made. The Council's preference is for affordable housing to be provided and managed by a Registered Provider (RP). In order to achieve inclusive and sustainable communities, the provision of on-site affordable housing should be integrated seamlessly into the layout of the whole development.
- 5.28 In negotiating the proportion and tenure of affordable housing, account will be taken of site characteristics and the economic viability of provision. Where viability is an issue, financial support will be sought via public subsidy, such as through the Homes and Communities Agency (HCA). At appropriate rural settlements, sites that would not normally be released for housing will be considered for schemes that specifically meet an identified local need for affordable homes. This is known as an 'Exceptions Policy' and is advocated in PPS3. Such schemes must ensure that the properties are made available in perpetuity for this purpose.



# Policy CS14: Affordable Housing

In order to address affordable housing need over the plan period:

- 25% affordable housing provision will be sought on all sites within the existing defined boundary of the main urban area and Hoo St. Werburgh
- 30% affordable housing provision will be sought on all sites elsewhere within Medway
- Provision should be made on all new housing developments capable of accommodating 15 or more dwellings, or on sites of 0.5 ha or more in size, irrespective of the number of dwellings.

The provision of affordable housing to meet local needs on a qualifying site will be subject to:

- Its suitability for on-site provision
- Site viability
- The extent to which the provision of affordable housing would prejudice other planning objectives to be met from the development of the site; and
- The mix of units necessary to meet local needs and achieve a successful, sustainable and socially inclusive development.

On sites of 15 or more (gross) dwellings, on-site provision should be made, which seeks to incorporate a range of different dwelling types and sizes which reflect the site's characteristics, the development as a whole and the types of need identified in the most up-to-date Strategic Housing Market Assessment and Housing Needs Study. Any overconcentration of any one type of dwelling will be resisted if it would adversely affect community cohesion.

Small- scale affordable housing schemes may be acceptable on an exceptional basis on sites outside of, but adjoining the settlement boundaries of the rural villages.

## **Housing Design and Other Housing Requirements**

- 5.29 The planning system has traditionally been most concerned with the provision of new housing for occupation by self-contained households. However:
  - Despite Medway being located in the Thames Gateway the amount of new housing proposed will still be dwarfed by the existing housing stock
  - Significant elements of the population do not live in self-contained accommodation including those in various types of institutions, students and those occupying hostel style accommodation and houses in multiple occupation
  - Although higher sustainability standards are being applied to new housing, a consequence is that the existing stock will account for an increasing proportion of our carbon footprint if no action is taken.



5.30 Accordingly the sections below consider these and related issues.

## **Existing Housing Stock**

- 5.31 A significant proportion of Medway's housing stock dates from before 1919 and is not readily adaptable to modern standards in terms of thermal insulation and fuel efficiency. This presents difficulties in bringing the older stock up to modern standards and adds significantly to the incidence of fuel poverty. Improving the existing stock, most of which is privately owned, is therefore a challenge but also important.
- 5.32 The Council will seek to develop and promote retrofitting programmes at a neighbourhood level to address this issue but the programming and scale of this will be heavily dependent on the resources available. Programmes are already in place to upgrade the publicly owned stock.

# **Housing Type and Tenure**

- 5.33 Three specific characteristics mark Medway out from other major settlements in the South East: a very small proportion of what might be called 'executive style' accommodation; a smaller than average private rented sector; and a much smaller proportion of flats and apartments in favour of terraced properties than the norm elsewhere.
- 5.34 Accordingly very high quality housing schemes will be encouraged in appropriate locations. An expanded and higher quality private rented market will also be encouraged. In other areas there has been a very strong move away from providing flats and apartments, where this was seen as contributing to the collapse in the housing market in 2008-09. However in Medway there is much less justification for this and the various waterfront regeneration sites provide exceptional opportunities to develop schemes of the highest quality.
- 5.35 It is also important that new development:
  - Provides adequate standards of accommodation to enable occupants to undertake their day-to-day living activities safely, comfortably and efficiently
  - Meets future needs by being flexible and generous enough to meet changing demands and lifestyles; and
  - Combines efficiency in land use with the environmental benefits of welldesigned, well-managed housing, particularly when built to higher densities.
- 5.36 For these reasons the Council has produced Housing Design Standards alongside this Core Strategy.

## **Special Care Accommodation**

5.37 For many vulnerable older people, having the chance to avoid residential care and live in specially designed housing as tenants or owner-occupiers is the single most important element in retaining independence and dignity in old age. Increasingly, the Extra Care housing model is gaining support as a



realistic and viable alternative to 'institutional' care models. Extra Care housing is a flexible concept, but fundamentally refers to "purpose built accommodation in which varying amounts of care and support can be offered and where some services are shared"9.

5.38 The Core Strategy addresses this need through the retention of existing viable care homes; by seeking to bring forward new extra care facilities and increasing the stock of suitable new housing that complies with the Lifetime Homes standard and therefore helps a range of residents including older people to live active and independent lives for longer.

## **Institutional and Student Housing**

- 5.39 Given the rapid expansion of the Universities at Medway and the associated rise in student numbers to 10,000 and further increases envisaged over the next few years, it is important to avoid situations where established residential neighbourhoods are adversely affected by an over concentration of students and existing privately rented accommodation is not 'lost' to tenants with otherwise limited housing options.
- 5.40 These issues have recently been recognised in a revision to the Use Classes Order, which makes private units in multiple occupation a class in its own right and so requiring express planning consent.
- 5.41 Equally the Council is committed to positively supporting the expansion of further and higher education and so it will work with the universities and Mid Kent College to help deliver bespoke student accommodation where necessary. To this end, a student accommodation registration scheme will be set up. A recent study<sup>10</sup> analyses student housing requirements in Medway. It looks at the relationship between students and the wider housing market. The report recognises that current economic circumstances make it difficult to predict future student housing requirements with much certainty. Consequently, the council will need to regularly liaise with the universities in order to ensure that student accommodation needs can be properly met.
- 5.42 However, should further planning controls ever be needed in the future, due to the growth of student houses in the area eventually resulting in the creation of imbalanced communities, the Council will make an 'Article 4 Direction' that restricts home owners 'Permitted Development' rights to use their property as houses in multiple occupation (HMOs) within Class C4 of the Use Classes Order.

## **Health and Education Implications for Housing**

5.43 Housing developments that encourage and deliver healthy living should be the norm. This can be done by a variety of means including linking new housing to improved sports provision, playing pitches, allotments and children's play spaces, as well as making places more accessible, attractive and safe to use for walking and cycling. One way of achieving this is through

<sup>10</sup> Understanding the housing needs of students in Medway, ORS – June 2010

<sup>&</sup>lt;sup>9</sup> Housing Learning and Improvement Partnership 2006, Extra Care Housing Toolkit)



the use of Health Impact Assessments (HIA's) and these will be sought in relation to housing proposals of 50 or more dwellings.

5.44 Developers will also need to take into account the impact new housing development will have on the need for early years, primary and secondary education provision including provision for special educational needs.

## Policy CS15: Housing Design and Other Housing Requirements

Sustainable residential communities will be created by requiring the provision of a mix and balance of good quality housing of different types and tenures and having regard to the North Kent Strategic Housing Market Assessment. This will be achieved by ensuring that:

- Housing developments help to balance the size, type and tenure and affordability of the local housing stock
- All housing developments are well designed and are capable of adaptation to accommodate lifestyle changes, including the needs of the elderly and people with disabilities, and to achieve the Lifetime Homes standard
- Housing complies with space and other standards laid down in the Medway Housing Design Standards
- Proposals for developments of 50 or more dwellings are accompanied by a Health Impact Assessment
- Support is given to the provision of housing for vulnerable people and specialist housing, including fully wheelchair adapted homes, units for clients with learning disabilities, extra care accommodation and sheltered housing facilities, in appropriate locations and where there is an identified need
- 'Executive' style housing will be supported as part of housing schemes offering a range of housing types and in other suitable locations
- Land is utilised effectively and higher densities are achieved in locations well served by public transport or which can be made accessible to public transport
- Student accommodation proposals demonstrate how they will meet a proven need for the development and are compatible with wider social and economic regeneration objectives and are conveniently located for access to the universities and local facilities. Where necessary, Article 4 Directions will be imposed, in order to restrict home owners' 'Permitted Development' rights to use their property as houses in multiple occupation (HMOs) within Class C4 of the Use Classes Order
- Subject to available resources, programmes to improve and renovate the existing housing stock will be advanced to maintain its fitness for purpose and improve sustainability standards.



## **Gypsies, Travellers and Travelling Showpeople**

- 5.45 Government policy requires local development frameworks to make specific provision for the housing needs of gypsies, travellers and travelling showpeople. In Medway there is a long established Council run gypsy and traveller site at Cuxton and a winter quarters site owned by the Showmen's Guild of Great Britain at Station Road in Strood. Elsewhere in Medway some gypsy and traveller families have settled on small private sites or integrated into the general housing market.
- 5.46 A North Kent Gypsy and Traveller Accommodation Assessment (GTAA) undertaken in 2006 identified a requirement for 10 new 'pitches' in Medway over the following 5 years. A 'pitch' in this context is taken to be a plot of land capable of accommodating two caravans. The GTAA found that in Medway 80% of new pitches should be provided on private sites in line with demand.
- 5.47 Given current uncertainties over the direction of national policy in this area the following policy provides an objective basis for the determination of planning applications. This will be revised as necessary if, as expected, further changes in national policy are introduced, subsequent to the 'Planning for Traveller Sites Consultation (April 2011)'.

## Policy CS16: Gypsies, Travellers and Travelling Showpeople

To meet the identified need for Gypsy, Traveller and Travelling Showpeople pitches within Medway, sufficient sites will be allocated within the Land Allocations and Development Management Development Plan Document. In allocating sites and for the purpose of considering planning applications, the following criteria will need to be satisfied:

- The site is located outside of Flood Zones 2 and 3, or if not, adequate flood defences are, or will be, put in place
- Safe and convenient vehicular and pedestrian access to the site can be provided
- There is easy and safe access to the strategic road network and the site does not generate traffic of an amount or type inappropriate for the roads in the area
- The site is able to accommodate on site facilities for the parking and manoeuvring of vehicles (including exiting in forward gear) and storage, play and residential amenity space
- The site is located within a reasonable distance by foot and/or public transport of local facilities and services, including schools and health facilities; and
- The site is environmentally acceptable, compatible with neighbouring land uses and of limited impact on the local landscape as assessed in the context of the Medway Landscape Character Assessment.

Existing authorised Gypsy, Traveller sites in Medway and the Travelling Showpeople site in Strood will be safeguarded, unless they are no longer required to meet an identified need, or improved replacement facilities are being provided.



# 6. Economic Development

#### Introduction

- Nurturing and developing the Medway economy goes hand in hand with the physical regeneration of the area and is essential to improve the prospects of local people in an ever more competitive world and keep pace with housing growth.
- 6.2 Traditionally the Medway economy was dominated by the naval dockyard and associated industries but in recent years it has diversified. However it is still characterised by very low local pay rates and significant levels of out commuting to London and the greater Maidstone area.
- 6.3 The challenges for the future are therefore to increase the value of local jobs, to reduce, to a degree, the current reliance on net out commuting and to grow local enterprises currently the area has a very high proportion of small and micro businesses.

## **Economic Development**

6.4 The current economic downturn has made future prospects uncertain, not just in Medway but across the country. The immediate strategy must therefore be about creating the right conditions for future growth and taking advantage of the specific local opportunities on offer.

### 6.5 The latter include:

- BAe Systems at Rochester Airfield. This is by some way the area's
  largest private sector employer and the company is a global leader in its
  field. The company itself has identified opportunities for spin-off activities
  and land is available to develop complementary operations. This could
  create an economic 'cluster' of considerable significance. Future
  commercial development should be concentrated on advanced
  manufacturing and software engineering to foster growth in these sectors
- The Universities at Medway Campus, Chatham Maritime, as it develops, has obvious opportunities for spin-off activities and value added research. The range of institutions on the site provides an unparalleled opportunity to develop a cluster of at least Thames Gateway, if not national, significance
- The proposed site for the new settlement at Lodge Hill is highly attractive and the opportunity is available to take advantage of the proposals for a sustainable settlement form. The location is also suitable to accommodate smaller scale, higher and further education functions, for example, satellite operations from the Universities at Medway, Chatham Maritime and higher value activities associated with the developments at Kingsnorth and Grain
- Isle of Grain: A very large site with a potential focus on low carbon and associated technologies, plus value added port activities



- The large employment area at Kingsnorth is now well connected to the main road network and offers a range of opportunities including logistics and distribution, off-site manufacture for the construction sector, environmental technologies and waste management and processing
- Central Chatham associated with its development as a centre of regional significance and with a specific focus on fostering development within the creative industries and office sectors.
- In 2009, the Council adopted the latest Medway Economic Development Strategy. This contained five strategic priorities, which form the basis for the economic strategy set out here. Those priorities are:
  - Sector development
  - Skills development
  - Higher education
  - Employment space; and
  - Image building.
- 6.7 It considered that the most significant opportunities are with the creative industries and tourism but the specific development opportunities described above also point to a range of other opportunities, particularly around construction, environmental technologies, power and energy generation and advanced manufacturing.
- 6.8 Skills development and Medway's expanded further and higher education capacity go hand in hand and the Council and its partners will continue to work very closely with the four universities and Mid Kent College to both improve skills capacity and match it more closely to the needs of employers.
- 6.9 Modern start-up businesses help to create jobs and contribute to Gross Value Added (GVA). The development of more effective and innovative firms, complementing more traditional industries, is an important contributor to productivity growth and a competitive economy. In order to assist these businesses, a range of support measures is essential to ensure sustainable growth.
- 6.10 An effective start-up strategy will be one that seeks to address imbalances by providing services tailored to meet specific needs. Medway is at the forefront of best practice in this field and has been recognised nationally by its Beacon Council award for business support. The Council's "Medway Means Business" programme enables interaction with the business community, aspirant entrepreneurs and new and growing businesses.
- 6.11 Tangible business support initiatives further strengthen the support on offer. Medway offers managed workspace facilities, graduate and apprenticeship work support programmes, financial support services such as start up grants and interest free loans, employment support services and European funded business support projects to facilitate cross-channel trade and business environmental sustainability. Medway is also developing its own entrepreneurial culture, building enterprise into the school curriculum and developing links between schools and the Universities at Medway.



- 6.12 Medway is also well placed to provide the full range of support services and facilities required by established businesses due to the city scale infrastructure and services available. The range of projects highlighted below is intended to unlock this potential and make Medway a destination of choice for businesses.
- 6.13 The Council and its partners will promote:
  - Active business support networks
  - Sector specific working groups
  - Apprenticeship and graduate placement schemes
  - Employ Medway (the Council's employment support service)
  - The development of incubator and grow-on spaces for new and expanding businesses
  - The continuing development of innovation sector facilities in conjunction with the Rochester Airfield technology cluster
  - A new creative industries cluster in Chatham in conjunction with the University for the Creative Arts and other partners.
- 6.14 In 2008 there were 94,500 people employed in Medway. As explained in Chapter 3 the Council has developed a range of four alternative job targets or scenarios based on a population projection of 280,000 by 2028. These are:
  - Low employment rate and low reduction in out commuting = 8,200
  - Low employment rate and high reduction in out commuting = 12,500
  - High employment rate and low reduction in out commuting = 15,900
  - High employment rate and high reduction in out commuting = 20,300
- 6.15 A number of factors point towards the lower end of the range unless a step change occurs in employment and out commuting patterns. To put this in context, between 1991 and 2001, the number of Medway residents out commuting increased whilst the economic activity rate remained steady and even dropped between 2006 and 2008. However, given the Council's aim of reducing out commuting and growing the local economy, the Core Strategy is making provision to meet a high growth target.
- 6.16 In 2010, the Council commissioned consultants, Baker Associates, to prepare an Employment Land Review Consolidation Study, which identified the amount of land and floorspace required to provide for 21,500 jobs up to 2026. This study was commissioned before the Core Strategy plan period was extended to 2028 and the jobs target is now lower. Given that the Study has yet to be reviewed, the floorspace provision is therefore slightly higher than is required for this lower jobs figure, but sufficient land is already committed to meet this requirement.
- 6.17 The study divided Medway into a number of sub-areas, which reflected the distribution of existing employment areas and the areas where market demand surveys indicated the market would want to locate in the future.



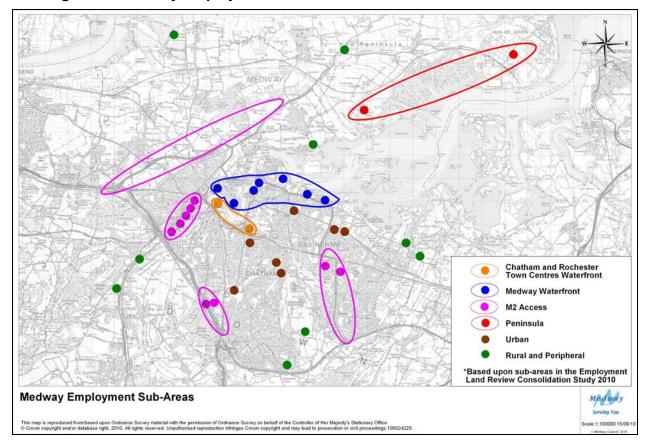


Figure 6-1 Medway Employment Sub Areas

6.18 The overall requirement amounted to 392,610 sq m. on 54.44 hectares of land in the following locations.

**Table 6-1 Floorspace Requirements by Sub Areas** 

Location	Floorspace	Land	
	Sq m	Ha	
Town Centre/Waterfront	150,352	11.37	
M2 Access	183,747	32.25	
Peninsula	31,121	4.29	
Other Urban Areas	27, 389	6.53	
Total Requirement	392,610	54.44	

6.19 The study drew upon the Medway Employment Land Supply Study of 2006, a number of adopted development briefs and, in the case of two sites, the Medway Strategic Land Availability Assessment (SLAA) 2010, to identify a potential supply of employment land to meet the requirements. Using SLAA floorspace figures for sites where only a hectarage figure is given in the employment land study the current overall supply position in each sub area is indicated.



Table 6-2 l	<b>Employment</b>	Floorspace (	Supply	by Sub	Areas
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Location	Floorspace Required	Floorspace Supply	Surplus/Deficit
	Sq m	Sq m	Sq m
Town	150,352	76,376	-73,876
Centre/Waterfront			
M2 Access	183,747	49,505	-134,242
Peninsula	31,121	666,290	+635,169
Other Urban Areas	27, 389	4,827	-22,562
Total	392,610	796,998	+404,388

- 6.20 Details of the anticipated rate of development of B1, B2 and B8 uses are set out in the Employment Land Trajectory in Appendix D.
- 6.21 The study did not identify a requirement for floorspace/sites in the rural area but a further 9,453 sq m of potential floorspace has been identified in the SLAA on sites in the rural area.
- 6.22 These results show that, overall, there is a very healthy supply situation but that there are some mismatches in the sub areas. This is not surprising as the area has not been split down in this way before and the analysis at this level takes no specific account of constraints to land releases.
- 6.23 Taking account of the Economic Strategy, the Employment Land Study and the SLAA, it is intended that priority will be given to the development of sites in the town centres and the redevelopment of existing urban employment areas at higher densities. This will include sites within Strood and adjacent to Rochester Airport, which enjoy good access to the M2 and have the ability to attract growth businesses offering significantly higher-skilled and higher value local employment opportunities The Employment Land Study emphasises that development on new sites with access to the M2 would undermine reinvestment in more central locations.
- 6.24 Although both Kingsnorth and the Isle of Grain have been allocated for employment development for many years, the latter has not previously been counted towards meeting development plan requirements. However both sites have now been granted planning permission for B1, B2 and B8 uses and new markets are emerging for the development of environmental technologies and other activities. Although these industries may result in development at lower densities than traditional B2 and B8 uses, the scale of the sites is such that a substantial contribution can be made to employment growth and consequently they are included in the employment land supply contributing to the Core Strategy. It is anticipated that the employment generated there will more than offset notional supply deficits elsewhere in Medway.
- 6.25 Retail development is a significant employment generator but the consolidation study does not identify either retail floorspace demand or supply. Instead it defers to the Medway Retail Needs Study carried out by Nathaniel Lichfield and Partners in 2009. The details of this study are set out



in policy CS19. This study identified spare capacity for 111,635 sq m of retail floorspace in Medway up to 2026 based on a high growth option. The Annual Monitoring results and the Strategic Land Availability Assessment (SLAA) 2010/11 Update has identified a potential supply of 124,510 sq m up to 2028.

- 6.26 Not only is there sufficient floorspace overall to meet the employment requirements but there are also a range of locations and types of site to cater for all likely growth sectors over the plan period. A substantial surplus of floorspace in B1, B2 and B8 uses and A1 to A5 uses will provide flexibility to meet all anticipated requirements over the plan period and respond to changing economic conditions.
- 6.27 The final strategic objective from the Economic Strategy is concerned with image building. That is, boosting the overall image of Medway, not only as a business location but also a thriving place in which to live and play. Specific actions to achieve this are set out in Policy CS17.

## Policy CS17: Economic Development

The development of the Medway economy will be dynamic and widely based, to provide employment for the community as a whole, to provide greater choice for the workforce, offer an alternative to outcommuting and achieve a balance with housing growth.

Provision will be made for the expansion of the existing economic functions of the area, including the growth of Chatham as a sub-regional employment, retail and service hub and the development of the large Isle of Grain employment site and the Kingsnorth Commercial Park, and associated energy and port related areas.

The development of the following specific sectors, will also be encouraged:

- Energy and environmental technologies
- Engineering and manufacturing
- Building products and construction (including off-site manufacture)
- Health and social care
- Creative industries; and
- Tourism.

There will be new office, manufacturing and service development on a variety of scales, with an emphasis on higher value activity to develop increased GVA and higher skilled employment opportunities. This will include the development of incubator and grow-on space for new and expanding businesses.

The Council and its partners will assist in the development of the work readiness and skills required by existing and potential employers through improved standards of education and skills in the workforce. This will include support for initiatives to expand higher and further education and improve its links with local employers.



## Major efforts will be made to improve Medway's image by:

- Developing Chatham as a centre of regional significance
- Development of a diverse and vibrant evening economy
- Encouraging the development of comprehensive leisure facilities
- Promoting Medway as a venue for top sporting and cultural activities
- Continuing to support the bid for World Heritage status
- Stimulating a more creative use of the River Medway in conjunction with the development of riverside sites
- Improvement to Medway's 'gateways' such as its railway stations
- Continuing to promote and develop Medway as a City
- Developing Medway as a genuine and connected "city break" tourism destination.

A supply of around 935,998 sq m of employment floorspace and premises has been identified to provide a range and choice of sites in terms of quality, accessibility, type and size, to meet Medway's requirements up to 2028.

The Council particularly recognises the potential that the new settlement at Lodge Hill presents for creating a high quality environment for the development of employment and the continuing opportunities at, and in close proximity to, Rochester Airfield to develop a technology and knowledge based cluster.

The Council will protect established employment areas from other development and support higher density development where appropriate, and promote reinvestment strategies for each.

The Council will also support the agricultural, horticultural and forestry industries, and rural economic diversification and non-land based business proposals in towns and villages or on farm sites where applications show positive benefits.

#### **Tourism**

- 6.28 In 2009, tourism employed over 6,100 people and was worth about £286 million annually to the local economy. Continued growth is projected in the national and international tourism economy and Medway has the potential for further growth.
- 6.29 Tourism helps to raise levels of civic pride, improves the perception of an area, delivers local and sustainable jobs and provides economic incentive for new cultural and leisure facilities. It provides a boost to other sectors of the local economy such as retail, arts and culture, leisure, heritage and transport.
- 6.30 Medway Council is a major stakeholder in the tourism economy. It operates one of the largest and most prestigious Visitor Information Centres in the



South East, Kent's second most visited local authority museum, two castles, five major annual festivals, an award winning coach park, three country parks and several historic green spaces.

- 6.31 The Historic Dockyard now ranks as one of Kent's premier league visitor attractions. The new No.1 Smithery gallery and museum, displaying national collections, should make the Dockyard one of the top attractions in the South East.
- 6.32 Dickens World, which opened in 2007, has secured Chatham Maritime's status as Medway's second major visitor attraction cluster and has complemented the existing Dickensian aspect of Rochester's tourist appeal.
- 6.33 The prospect of World Heritage Site status for Chatham Dockyard and its defences by 2014 will greatly enhance Medway's reputation as a visitor destination of international status.
- 6.34 The 2012 Olympics present Medway with various opportunities and will be a further catalyst to develop Medway as a genuine city break destination.
- 6.35 Rochester Castle and Cathedral are iconic landmarks and significant tourist destinations. Plans to conserve the two monuments will help Rochester to continue to develop as one of the UK's most significant historic destinations.

## Policy CS18: Tourism

Medway Council will positively promote sustainable tourism development. A diverse and high quality tourism offer will be encouraged that seeks to lengthen the tourism season, increase the number and length of visits, provide job opportunities and sustain the tourism economy, whilst maintaining and where possible, enhancing Medway's natural and built environment qualities.

In order to successfully develop Medway's tourism 'product', the Council will seek to secure:

- The provision of more internationally branded hotels to allow a shift from the lower spend day trip market towards new markets such as business tourism and city breaks
- Public realm investment in the historic core of Rochester
- The development of the evening economy and cultural offer which are required for all successful city break destinations
- A waterfront theatre and cultural hub which would help to link the tourist offer in Rochester with the Dockyard and Chatham Maritime and assist with the overall destination profile of Medway
- An improvement of the image and 'brand' of Medway to enhance its awareness as a visitor destination beyond the South East
- Development of the leisure use of the river Medway; and
- An increase in skills and quality of the local tourism industry.

## Local tourism will be supported by:



- Encouraging tourism and provision for visitors which is appropriate to the character of the area
- Retaining and enhancing existing serviced accommodation and supporting the provision of new serviced accommodation in towns and villages
- Encouraging proposals for new hotel accommodation and conference/exhibition facilities in locations which complement regeneration opportunities, particularly along the urban waterfront
- Maintaining and enhancing existing tourist and visitor facilities
- Supporting new tourist initiatives:
  - o In towns and villages and
  - O In the countryside through the re-use of existing buildings or as part of farm diversification schemes.

#### **Retail and Town Centres**

- 6.36 The Government's key objective for town centres, as set out in PPS4; Planning for Sustainable Economic Growth, is to promote their vitality and viability. It seeks to do this by focusing new economic growth and development in them, and enhancing consumer choice through the provision of innovative and efficient shopping, leisure, tourism and local services in town centres whilst conserving and enhancing their historic, archaeological and architectural heritage.
- 6.37 The current hierarchy of town centres in Medway is being retained. It consists of
  - Regional Hub and primary centre: Chatham
  - District Centres: Strood, Gillingham, Rainham, Hempstead Valley Shopping Centre, Rochester
  - Villages and Neighbourhood Centres (as identified in Chapter 10)
- 6.38 In addition there are retail Parks at Gillingham Business Park, Horsted Retail Park and Strood Retail Park, free standing food superstores at Courtney Road, Gillingham, Maidstone Road, Chatham and Princes Avenue, Chatham and a factory outlet centre at Chatham Maritime. A further food superstore is being developed at Whitewall Creek.
- 6.39 In 2009, Nathaniel Lichfield and Partners prepared a town centre, retail and leisure study, which included an assessment of all the main centres. The study assessed the future need for additional retail, commercial leisure facilities and other town centre uses, taking full account of the current economic climate.



- 6.40 Shopping or retail potential is considered in two categories:
  - 'Convenience' goods bought on a day-to-day basis, mainly food
  - 'Comparison' or 'durable' goods. These include clothing, footwear, electricals etc.
- 6.41 The Study found some potential for new convenience floorspace, as detailed in the following tables.

Table 6-3 Convenience Floorspace Capacities 2008 - 2026

Sales floorspace (sq m net)	2008	2011	2016	2021	2026
Large food stores	2,960	3,760	5,607	6,642	7,298
Small food stores/shops	1,776	2,256	3,364	3,385	4,379
Total	4,736	6,016	8,971	10,027	11,677

**Table 6-4 Convenience Floorspace Options 2008 - 2026** 

Time Period	Large foodstore floorspace	Small store/shop floorspace
2008 – 2011	3,280 – 3,760 sq m	1,968 – 2,256 sq m
2011 – 2016	969 – 1,847 sq m	581 – 1,108 sq m
2008 - 2026	6,439 – 7,298 sq m	3,863 – 4,379 sq m

- 6.42 To put this in context a large food superstore is usually around 6,000 sq m.
- 6.43 It concluded that there was no obvious area of deficiency in Medway, that some capacity could be accommodated within existing vacant premises or small redevelopments within the main centres but outside of the main centres the priority should be to serve major new residential developments.
- 6.44 On the other hand, in relation to comparison spending, the Study identifies scope for a large increase in floorspace as detailed below.

**Table 6-5 Comparison Floorspace Options 2008 - 2026** 

Medway Catchment Sales floorspace (Sq m Net)	2008	2011	2016	2021	2026
Scenario 1: Increased market share – baseline population	N/A	-4,560	34,940	63,103	94,854
Scenario 2: Constant market share – High population growth	N/A	-3,238	23,750	49,702	76,775
Scenario 3: Increased market share – high population growth	N/A	-3,238	41,363	69,981	99,958

6.45 Apart from forecast changes in population this is largely due to the fact that a high proportion of spending on comparison goods currently 'leaks' out of Medway to other shopping centres – indicating that the local town centres, particularly Chatham, are performing well below their potential.



- 6.46 It is therefore intended that the strategy for Medway will be to enhance Chatham's current position in the shopping hierarchy and improve the area's market share of available expenditure.
- 6.47 The retail study points out that the shopping centres within Medway are all located close to each other, particularly Strood, Rochester and Chatham and that their primary catchment areas therefore overlap. The main centres collectively provide what is described as a reasonably good range of comparison shops (393 units with sales floorspace of 86,396 sq m net), including a range of national multiples and independent specialists. However, the choice of shopping could be improved. Existing provision largely caters for the middle and lower end of the market, and has a poor offer for the upper end.
- 6.48 It concludes that Medway is well provided for in terms of retail warehouse facilities. Retail parks provide about 42,000 sq m (net) of comparison floorspace. This accounts for about 28% of all comparison sales floorspace.
- 6.49 The Study provides a sound basis for the future retail strategy and how this should be applied in each centre.
- 6.50 Chatham is, and will, remain the main comparison shopping destination and the main focus for employment, leisure, entertainment and cultural activities. As the main centre, it needs to compete with other large regional/sub-regional centres such as Maidstone, Bromley and Canterbury. To achieve this it needs to be the focus for major retail developments, large-scale leisure and other uses that attract large numbers of people, including major cultural, tourism and community facilities. At least 30,000 sq m of additional floorspace should be brought forward to radically change the perception of the centre and its range of shops and attract larger retailers.
- 6.51 The District Centres will complement Chatham by providing convenience food shopping and a range of comparison shopping facilities and other services catering for their immediate catchments. Opportunities to develop additional small scale shop premises will be encouraged, and the priority will be for additional convenience shopping facilities and lower order comparison shopping. Higher order comparison shopping will be focused in Chatham.
- 6.52 Neighbourhood and Village Centres will be maintained to ensure they provide basic food and grocery shopping facilities, supported by a limited choice and range of comparison shops selling lower order comparison goods (bought on a regular basis) and a range of non-retail services and community uses.

  Together with local parades they will continue to serve smaller catchment areas focused on their respective local communities.
- 6.53 The Medway Local Plan 2003 sought to protect and enhance a very large number of sometimes very small local and neighbourhood centres. However since it was adopted many have struggled commercially or even disappeared completely. The intention therefore is to now afford protection to those centres that are of sufficient scale and are in locations that readily serve significant residential communities. These are identified in Chapter 10.
- 6.54 The floorspace figures shown in policy CS19 reflect the findings of the Medway Retail Needs Study, 2009 and the Medway Land Availability



Assessment First Review, May 2011. The figures are indicative only and should not be treated as the maximum floorspace, which will be permitted.

## Policy CS19: Retail and Town Centres

Medway Council will maintain and enhance the vitality and viability of its network of urban and rural centres and support the delivery of appropriate comparison and convenience retail, office, leisure, community, entertainment and cultural facilities. Town centres and edge of centre sites will be the preferred location for such development and a sequential test will be applied for development elsewhere in accordance with PPS4.

Chatham, the sub-regional hub, will be the preferred location for major retail development and other uses attracting a large number of people.

Provision will be made for the following retail development:

- 50,000 sq m gross comparison retail floorspace in Chatham, primarily in the Best Street/High Street area, the Pentagon, the Brook and the Waterfront redevelopment area
- Smaller scale comparison goods shopping units at the district centres with a cumulative total floorspace of:
  - Strood, (9,400sq m)
  - o Rochester (Riverside) 7,800sq m
  - o Gillingham (6,200 sq m)
  - Lodge Hill (5,200 sq m)
  - Hempstead Valley (2,800 sq m)
- Two convenience stores of about 3,500 sq m at Corporation Street, Rochester and 5,000 sq m at Lodge Hill, Chattenden.

The Council will promote its centres and will seek improvements in the range and choice of shops and services, the intensification of retail floorspace use and the reoccupation of vacant retail floorspace.

### **Education and Personal Development**

- 6.55 The Council's overall aim is to enable everyone to realise his or her full potential, regardless of race, gender, disability, sexual orientation, age and religion, and make the best possible contribution to society. The Council is seeking to do this by focusing on the needs of the learner, raising aspirations, promoting the highest standards of teaching and learning and sharing good practice.
- 6.56 Schools have the primary responsibility for raising achievement. The Council recognises the need to strengthen their autonomy and their capacity for self-evaluation. The Local Education Authority's role (LEA) is to provide



leadership and to give schools appropriate challenge and support in order to meet Medway's overall targets.

- 6.57 Medway Council's School Organisation Plan (SOP) for 2007/08 2011/12 sets out the policies and principles on which school organisation will be based and how Medway plans to meet its statutory responsibility to provide enough places to promote higher standards of attainment. For example, in response to changing pupil numbers, it proposes amalgamating some infant and junior schools to create all-through primary schools for children aged 4 -11. It also recognises the role of the community in the concept of extended schools which can include childcare and health provision as well as out of school hours and community education opportunities.
- 6.58 According to the 2001 Census, only 12% of residents' aged 16-74 had qualifications at degree level or higher, and this ranked Medway 66th out of 67 authorities in the South East. Therefore increasing the educational achievement of Medway residents and encouraging local people to go to university in Medway rather than elsewhere have been key priorities for the Council and the Local Strategic Partnership. This is now yielding excellent results with attainment levels rising at a greater rate than other areas. Indeed by 2009 just over 20% of working-age residents in Medway had qualifications at degree level or higher.
- 6.59 The University for the Creative Arts has an ambition to develop a new campus to replace that at Fort Pitt and the Council will positively support this. It will also work with the other three universities to further develop the capacity and range of provision on the Chatham Maritime campus and, if necessary in satellite locations.
- 6.60 Mid Kent College has a longstanding association with construction and allied trades and, as part of the Holdfast Consortium, now provides training to the Royal School of Military Engineering at Brompton and Wainscott. With a new campus at Prince Arthur Road the college is exceptionally well placed to promote itself as a regional construction skills hub.
- 6.61 The Council is also determined that the broad education offer available in Medway is aligned as closely as possible to the needs of existing and future employers and a number of actions are ongoing to achieve this.

# Policy CS20: Education and Personal Development

The Council will work with all relevant partners to develop a fully integrated educational offer including:

- All-through primary provision with integrated or associated early years provision
- Re-investment in secondary education, including the development of Academies
- Management arrangements for schools which fully exploit their potential as community hubs
- A distributed adult learning service with a new focus on reskilling and meeting the identified needs of local employers
- The further development of the University for the Creative Arts,



- offering a wide range of foundation and graduate opportunities whilst fully exploiting opportunities for direct spin-off and other creative industry opportunities
- Re-investment in and the further development of Mid Kent College, both as a broad focus for post 16 education and as a regional scale hub for construction and allied skills
- The further development of the Universities at Medway campus at Chatham Maritime as a distinct focus for degree and post degree higher education provision within Thames Gateway
- The establishment of a cross sector high level education forum intended to steer future development and strengthen links with the business sector.



# 7. Energy, Waste and Minerals

#### Introduction

- 7.1 As an all purpose unitary council Medway is also a minerals and waste planning authority and, in discharging this role, needs to ensure that effective policies are in place to meet both local and regional requirements. These are set out in this chapter.
- 7.2 Medway is also nationally significant in terms of power generation, electricity distribution and liquefied natural gas storage.

# **Conventional Energy Generation**

- 7.3 Medway generates around 15% of the country's electricity. This was originally founded on coal and oil, with large plants at Kingsnorth and Grain respectively. More recently two gas powered plants were added at Damhead Creek and adjacent to Thamesport. A large combined cycle gas turbine technology station has come on stream at Grain and this will eventually replace the oil fired plant there. Plans for the tripling of output from the Damhead Creek gas powered plant have been approved but a plan to replace the Kingsnorth coal plant with a modern alternative is awaiting a decision by Government. If this proceeds it is likely to be coupled with full Carbon Capture and Storage (CCS) technology.
- 7.4 North Sea natural gas supplies have been depleting whilst UK demand has been increasing. Gas powered energy generation currently stands at 38% of national energy production. To meet the gap Grain has been at the forefront in providing new importation and storage capacity and it now provides one of the largest storage installations in the world.
- 7.5 A two-way electrical inter-connector (BritNed) now links Grain and the Netherlands and aviation fuel is also imported, stored and distributed from Grain.
- 7.6 Although renewable technologies will play a much greater part in energy production in the future, all the indications are that fossil fuel sources will continue to be needed, if a serious energy gap is to be avoided. Medway's strategic contribution to national requirements will therefore continue for the foreseeable future.
- 7.7 Despite this enormous investment in strategically vital infrastructure however, the benefits to the local area and economy have been limited. The operational workforce for each facility is quite small and the construction workforce is drawn from around the world rather than from within Medway.
- 7.8 Despite this there are certain opportunities for the future, which will be vigorously pursued:
  - The creation of a maintenance and support services cluster to the local energy sector, building on Medway's traditional manufacturing and support industries strengths



- Long term research and development opportunities if new plants are required to install full scale CCS
- The potential for large-scale district heating utilising waste heat from new power plants. Initial feasibility studies in relation to Kingsnorth indicated a scale of opportunity so far unique in the UK (100,000 homes equivalent)
- Local matching of skills development to the needs of the sector.

## **Policy CS21: Conventional Energy Generation**

Proposals for additional power generation and energy storage capacity on the Hoo Peninsula and the Isle of Grain will be supported, subject to:

- Their impact on the natural environment and local settlements being acceptable
- Specific efforts being applied to the recruitment and use of local labour, including collaboration with local universities and colleges
- The feasibility and viability of proposals being assessed for their potential to re-use waste heat.

The Council will positively promote the development of local supply chains and a support and maintenance cluster. It will also seek to develop further value added and Research and Development activities in conjunction with the plant operators.

#### **Provision for Minerals**

- 7.9 Medway Council is the Mineral Planning Authority (MPA) for the area. It is charged with the responsibility of ensuring a steady supply of minerals to both meet local needs and contribute proportionally to regional requirements.
- 7.10 Details of the available local reserves, past production rates and other information are set out in the Minerals State of Medway Report.
- 7.11 The materials covered by this section are:
  - Secondary aggregates effectively the reuse of materials such as demolition waste in place of virgin aggregates
  - Land won sands and gravels (aggregates)
  - Chalk
  - Clay
  - The importation of aggregates both marine dredged and land won from outside the region.
- 7.12 Where relevant the Medway apportionments in terms of supply, capacity and safeguarding from the appropriate regional working parties are applied.
- 7.13 The government's overall objectives for minerals supply and safeguarding are:



- A reduction in overall need through increased efficiency of use
- Use of recycled and secondary aggregates to supplant primary sources as far as technically practical; and
- Securing the remainder of the supply need from new primary extraction (terrestrial and marine).
- 7.14 It also applies the following hierarchy in terms of meeting need:
  - 1. Increased use of alternatives to primary aggregates are to be encouraged where technically practicable
  - 2. Use of imported marine resources, where environmentally sustainable sources are present; and
  - Source land won resources, maintaining at least a seven year landbank of permissions based on the sub-regional apportionments from the evidence base of the South East Plan
  - 4. Make provision at existing cement manufacturing facilities for at least 15 years of production, and 25 years at new sites.
- 7.15 There is no specific guidance for high purity chalk for whiting purposes or for clay, although both occur in Medway. However it is prudent that resources of high quality engineering clay and chalk should be maintained. Medway has no brick or clay tile industry but has abundant London Clay resources that can be used for certain purposes such as coastal flood defences.
- 7.16 The likely revocation of the South East Plan will mean that Medway no longer has to make provision to meet a sub-regional apportionment for secondary aggregates of 0.2 million tonnes per annum (mtpa). However it is national policy to seek to substitute primary aggregates with secondary sources and significant amounts of this material are derived from the construction and demolition waste stream. Accordingly it is considered that Medway should make provision for the 0.2 million tonnes per annum previously envisaged.
- 7.17 Both land won minerals (crushed rock and sand and gravel) and marine dredged materials (sand and gravel) are imported into the South East. Wharves and railheads are essential to this source of supply and it is of growing importance to overall aggregate supply. Some 13.1 million tonnes of sands and gravels and crushed rock were supplied to the region in 2007, while only 8.5 million tonnes came from land won reserves. Medway's regional contribution is in the order of 2 million tonnes so the safeguarding of facilities will be important to maintain this increasingly important source of supply.
- 7.18 Medway has the following facilities:

Marine Wharves:

• Euro Wharf, Frindsbury, Medway City Estate - Aggregates

Combined Rail Depot and Marine Wharves:

- Ex BP Terminal, Isle of Grain Aggregates
- North Sea Terminal, Cliffe Aggregates/Cement Products
- Halling Coal Rail Depot and Wharf, Halling Coal/Cement Products



Planned but Non Operational Marine Wharves:

- Halling (adjacent to Halling Coal Rail Depot and Wharf) Aggregates/ Waste Treatment to form Secondary Aggregates.
- 7.19 In terms of native land won aggregates the Government has indicated its support for regional apportionments envisaged in the South East Plan. In Medway's case that is 0.18 mtpa. This equates to 2.7 million tonnes for the period 2010-25 and a land bank of planning permissions at any one time of 1.26 million tonnes (equal to 7 years of production) throughout the life of the plan.
- 7.20 Medway has a long history of cement manufacture but this has now ceased. The Cemex UK owned Halling works has been demolished and significant permitted reserves of chalk in the Dean Valley at Cuxton have been abandoned. There is a significant new cement manufacturing site at Holborough in Tonbridge and Malling, owned by Lafarge UK that borders Medway. Preliminary site works have been implemented here but it is not known if or when the plant itself might be constructed. The associated chalk reserves (in Tonbridge and Malling) are in excess of 35 years.
- 7.21 Given this situation there is no need to identify any additional chalk resources for the cement industry at this stage.
- 7.22 High purity chalk for industrial whiting purposes is not specifically covered by national mineral planning policy but there is an important plant and associated reserves at Cliffe Quarry, owned and operated by Omya UK. The reserves are in excess of 6 million tonnes. Extraction rates are in the order of 20-30,000 tonnes per annum and there is an approved low-level restoration scheme. There is therefore no need to identify additional reserves of high purity chalk.
- 7.23 Medway does not have a clay brick or tile industry but does have abundant deposits of London Clay on the Hoo Peninsula. This material is suitable for engineering clay uses. Again there is no specific national mineral planning policy for engineering clay and it is an abundant material in the region but there is intermittent local demand, primarily for use on flood defences. The sole permitted reserves, at Rose Court Farm near Grain, are time limited to the end of 2011.
- 7.24 Clay is also an important material for lining and capping waste landfill/landraise sites and can also be used for contaminated land remediation. Accordingly it is appropriate to consider this in terms of possible requirements.
- 7.25 In terms of land won aggregates the permitted reserves in Medway are currently 1.2 million tonnes, representing a land bank of 6.6 years. These are at a site close to the east of Hoo St. Werburgh. Although it has planning permission, extraction has not commenced. The remaining reserves at Perry's Farm, Grain have been abandoned as uneconomic and the site is being restored back to agriculture.
- 7.26 Given this situation the overall requirement for the period 2010-2025 is:



- 2.7 million tonnes, minus current permitted reserves of 1.2 million tonnes, giving a residual requirement of 1.5 million tonnes; and
- A rolling land bank of 1.26 million tonnes throughout the life of the plan.
- 7.27 Resources available have varying degrees of reliability in terms of both quantity and economic viability. The potential reserves at Grain are now considered to be uneconomic. Against this, total proven reserves are 1,640,000 tonnes and total potential (proven and unproven) river terrace sand and gravel reserves in the unconstrained areas of the Hoo Peninsula are assessed as being in a range from 3,345,326 tonnes to 4,547,940 tonnes.
- 7.28 The available reserves are therefore more than sufficient to provide the 1.5 million tonnes proposed between 2010-2025.
- 7.29 The current land bank figure is equivalent to 6.6 years. With each successive year this is reduced by the assumed production of 0.18 mtpa. Assuming further reserves are permitted from the unconstrained identified potentially workable sand and gravel reserves on the peninsula these would ensure a 7 year land bank is maintained up to and beyond the end of the plan period. The lower reserve figure of 3.45 million tonnes would provide for a land bank until 2028 and the potentially higher figure of 4.54 million tonnes until 2035.
- 7.30 The identified reserves are shown on Figure 7.1

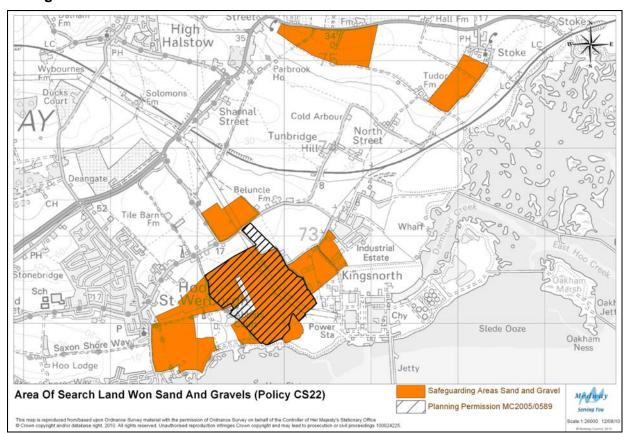


Figure 7-1 Land Won Sand and Gravels



7.31 Given the lack of cement production and the large reserve of high quality chalk at Cliffe there is no need to identify additional reserves of chalk over the plan period. It is possible that chalk supply could be sought for agricultural liming purposes or for engineering activity and so provision is proposed to meet this eventuality.

## **Policy CS22: Provision for Minerals**

Provision of a continuous supply of 0.2 million tonnes per annum of Secondary Aggregates will be sought by:

- Imposing conditions requiring the reclamation and reuse of construction and demolition wastes on redevelopment sites
- Allocating sites for the processing, sorting and distribution of secondary aggregate materials in the Land Allocations and Development Management Development Plan Document.

The Council will make provision for the extraction of at least 0.18 million tonnes per annum of land won aggregates within the area identified to the east of Hoo St. Werburgh, together with at least a 7 year land bank of permitted sand and gravel reserves in the areas of search identified on the Hoo Peninsula over the plan period.

The Land Allocations and Development Management DPD will define the geographical extent of the Areas of Search in more detail.

The basis for assessing proposals to meet an identified national, regional or local need for engineering grade clay or chalk will be set out in the Land Allocations and Development Management DPD.

All existing mineral wharves will be safeguarded against proposals that would prejudice their use for the continued importation of marine dredged sand and gravel, crushed rock and associated materials.

#### **Waste Management**

- 7.32 More background information on this complex topic can be found in the Waste State of Medway Report.
- 7.33 As a unitary authority Medway is responsible for the contractual arrangements for the collection, treatment and disposal of the municipal solid waste stream and for the sustainable spatial planning of the necessary capacity for this and all the other waste streams represented in the area. These are:
  - · Commercial and industrial waste
  - · Construction, demolition and excavation wastes; and
  - Hazardous waste.
- 7.34 The emphasis is very much on sustainable waste management. That is reduction, reuse and recycling at source to meet national and regional



guidance and targets, including an amended EU Waste Directive, now transposed into UK law, which strives for zero waste. This is reflected in a recently amended waste hierarchy issued by the Government.

Figure 7-2 The Waste Hierarchy



- 7.35 Wastes that cannot be recovered and residues from treated waste have to be safely disposed of to land (landfill) but this is increasingly a last resort solution and volumes being dealt with in this way are reducing rapidly.
- 7.36 Councils in the South East have been required to make provision for the disposal of a certain amount of London's waste to landfill. However there has been no recent demand for this in Medway and given the rapid trend towards zero waste it is not expected to apply in the future.
- 7.37 One of the guiding principles of national policy is that waste should be treated in reasonable proximity to where it arises. This is to encourage local responsibility and limit the environmental impact of transporting waste materials over long distances. Any final disposal should also be as close as possible to the place of origin of the waste.
- 7.38 An important consequence of the move towards zero waste is the need for a greater range of facilities to recover reusable materials and treat those capable of subsequent reuse, as opposed to landfill capacity. A wide range of methods and technologies are emerging, making it difficult to determine future requirements. However such facilities can include those for soil treatment, secondary aggregates, waste oil recovery and organic material processing such as composting.
- 7.39 The Council has just let a 25 year waste disposal contract for its municipal waste. After a competitive tender process, it will be taken out of the area for treatment and disposal. As a result there is no need to make provision for this form of waste over this plan period. However provision must still be made for the other waste streams.



## **Commercial and Industrial Wastes**

7.40 The quantities of commercial and industrial wastes arising in Medway were calculated in 2009 as follows:

Table 7-1 Average tonnage per Sector per Annum

•	Mining and Quarrying	Negligible
•	Manufacturing	72,456
•	Electricity, Gas and Water	8,765
•	Distribution, Hotels and Catering	56,085
•	Transport and Communications	3,841
•	Financial and Business Services	12,422
•	Government and Other Services	19,350
	Total all sectors approx.	173,000

7.41 Environment Agency data in 2008 showed how this type of waste was dealt with, although this did not necessarily all occur in Medway or comprise exclusively Medway waste. This is shown in Table 7-2.

Table 7-2 Disposal of Commercial and Industrial Waste 2008

•	64,261 tonnes recycled	35.7%		
•	2,290 tonnes incinerated	1.3%		
•	349 tonnes reprocessed	0.2%		
•	24 tonnes otherwise treated	0.01%		
•	320 tonnes transferred	0.18%		
•	92,090 tonnes unknown	51.2%		
•	20,533 tonnes landfilled	11.4%		
Total 179,867 Tonnes				

- 7.42 Currently Medway has the following facilities/capacity to deal with these commercial and industrial wastes:
  - 0.67mtpa potential recycling capacity over a wide range of wastes but with significant application to the Commercial and Industrial Wastes stream, at Medway City Estate
  - In vessel waste composting at Kingsnorth: 125,000 tpa
  - Abattoir waste in vessel composting at Matts Hill: 40,000 tpa
- 7.43 Although the treatment or disposal of over half the waste identified by the Environment Agency is unknown, it is known that recycling and recovery rates are increasing. Landfill may continue to be the only option for certain types of waste but quantities associated with this can also be expected to decline rapidly as costs increase and new methods of reuse, recycling and recovery are introduced.



# **Construction, Demolition and Excavation Waste**

7.44 This is also a difficult waste stream to quantify. The great majority of material is dealt with on site (crushing and reuse of demolition waste for example) and so is not officially classified as waste. Those materials taken off-site may be treated elsewhere or simply sold on, for example, as hardcore. However Table 7-3 shows how quantities recorded by the Environment Agency in 2008 were dealt with.

Table 7-3 Disposal of Construction, Demolition and Excavation Waste, 2008

•	461.86 tonnes recycled	0.97%
•	42,759.55 tonnes reprocessed	89.9%
•	370.46 tonnes transferred	0.78%
•	3,414.5 tonnes unknown	7.1%
•	524.86 tonnes landfilled	1.1%
Total 47,531.23 tonnes		

In addition to this some 6,010.8 tonnes of inert wastes were reprocessed.

- 7.45 It can be assumed that all reprocessed material was reused in one way or another. The proportion needing final disposal was very small.
- 7.46 Most treatment crushing, washing etc. is carried out on the site where the waste arises, using mobile plant. Material that cannot be dealt with in this way is normally taken to local depots for sorting, grading and so on and then sold on as construction or recycling material.
- 7.47 Facilities available for this are currently limited in Medway. There is some capacity at Knight Road in Strood but this will need to be relocated as the Temple Waterfront regeneration area comes forward for redevelopment.

#### **Hazardous Wastes**

- 7.48 Hazardous waste can arise from all waste sectors. The Environment Agency's Hazardous Waste Interrogator 2008 showed that some 22,245 tonnes of Medway's wastes were recorded as hazardous, of which 12,799 tonnes were managed in Medway. The data shows that hazardous materials were transferred nationally, illustrating the complex nature of this waste stream with relatively small quantities often being taken to a few specialist treatment and disposal facilities nationwide. Medway has a recorded negligible amount of Low Level Radioactive wastes that are part of this stream.
- 7.49 The Medway site operator waste return interrogator 2008 detailed company activity as set out in Table 7-4.

Table 7-4 Disposal of Hazardous Waste, 2008

•	Recycled 266.43 tonnes	1.8%
•	Reprocessed 5,745.31 tonnes	39.6%
•	Treatment (unspecified) 2,509.69 tonnes	17.32%
•	Incinerated 813.79 tonnes	5.6%
•	Landfilled 248.47 tonnes	1.7%



•	Unknown 4,901.45 tonnes	33.8%
	Total 14,484.14 tonnes	

- 7.50 Facilities within Medway catering for hazardous wastes include tyre shredding and waste oils recycling plants at Kingsnorth and metal recovery at Medway City Estate with the following capacities:
  - 167,500 tonnes per annum oil/water waste treatment
  - 147,125 tonnes per annum metals ferrous/non-ferrous recovery
  - 74,740 tonnes per annum photographic and printing waste disposal and recycling, including silver recovery and refining
  - 3,650 tonnes per annum asbestos wastes treatment and transfer.
- 7.51 There are no arisings of low-level nuclear wastes in Medway and so local provision is not necessary for such material.
- 7.52 Regional analysis identified priority needs for hazardous waste capacity in the form of:
  - Additional hazardous waste landfill capacity in the south and south-east of the region (prior to the new waste hierarchy being introduced)
  - Treatment facilities for air pollution control residues (primarily flue residues from controlled processes)
  - Treatment facilities for waste electronic and electrical equipment (WEEE);
     and
  - Sub-regional networks of contaminated Construction Demolition and Excavation waste treatment facilities.
- 7.53 It was suggested that authorities should:
  - Identify and safeguard sites for the storage, treatment and remediation of contaminated and demolition waste
  - Identify criteria for the determination of large-scale specialist hazardous waste facilities, and a network of landfill cells for stabilised non-reactive hazardous wastes.

#### **London's Waste Exports**

- 7.54 Medway is still technically required to have regard for London's waste exports. However it is increasingly likely to be the case that any materials will be residues from higher order waste management processes. The quantities are unclear and the London authorities and commercial operators have expressed no interest in new landfill capacity.
- 7.55 It is expected that the Government will clarify its position on this in due course but given the absence of any current demand in Medway it is not intended to make specific provision for London's waste.

#### The Strive for Overall Self Sufficiency

7.56 Medway has an array of facilities and associated capacity for the management of waste but whether these deal with materials generated in



Medway or they are brought into the area is largely a matter for the operators and their commercial contract arrangements.

- 7.57 For the future, the priorities are therefore to:
  - Ensure there is sufficient capacity for waste handling, recycling and treatment for each of the waste streams, including transfer capacity for municipal waste
  - That there is adequate collection infrastructure, given increasing separation of different wastes at source
  - Consider whether specific provision should be made for new landfill capacity and, if so, whether this should be for non-inert or hazardous wastes, or a combination of these.
- 7.58 Medway City Estate and Kingsnorth are already established as centres for waste handling and treatment and, subject to market demand, further expansion would be appropriate provided relevant environmental standards are met.
- 7.59 With rapid developments in the waste management field it is difficult to forecast what specific collection and transfer facilities will be required over the plan period but these can usually be readily dealt with in conjunction with the planning of new developments and in the established employment areas.
- 7.60 Landfill capacity across the South East is declining rapidly but that is also the case with the quantity of material that needs to be disposed of in this way. Providing new capacity is almost wholly dependent on having suitable void space and the right geological conditions.
- 7.61 Much of Medway sits on chalk, a highly permeable rock, unsuitable for non-inert and hazardous waste disposal. However chalk quarries can and have been restored using inert materials. The Hoo Peninsula, on the other hand, is overlain with London Clay and this impermeable material is well suited for the landfilling of non-inert and hazardous materials that cannot be disposed of in any other way. However there are no existing voids so any provision would either involve the creation of new void space by extraction of cover material or re-profiling land by raising its natural contours or a combination of the two approaches.
- 7.62 It would appear that Medway's arisings from all sectors, including hazardous wastes, are not sufficiently large to justify the investment required to create new void space, though cross boundary flows of wastes historically occur and this may well distort what would otherwise be 'perfect' self-sufficiency in an area's range of waste management capacities including final disposal to land. The Hoo Peninsula is also remote from major markets adding to transport costs and the environmental impact of transporting materials.
- 7.63 Given these considerations no specific allocations for new landfill/landraise facilities are proposed but Policy CS23 includes appropriate criteria for determining any proposals that might come forward. The potential final waste disposal to land resource areas that are relatively free of strategic constraints are shown in Figure 7-2 below.



7.64 A particular characteristic of the Thames Gateway is the number of redevelopment sites where the ground has been contaminated by previous uses. These soils and other materials need to be treated before the sites are reused. Frequently this is done on site using a variety of techniques but some practitioners have called for 'cluster' facilities where material can be brought for treatment where this is not practical on site. The Council has carefully assessed the need for such a facility but has found no evidence of market demand for it. Nevertheless it will carefully consider any proposals that might come forward against the criteria in Policy CS23.



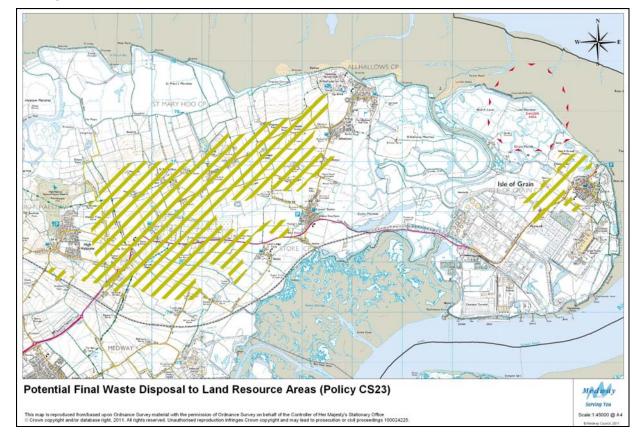


Figure 7-3 Potential Final Waste Disposal to Land Resource Area

# **Policy CS23: Waste Management**

Provision will be made for the collection, reuse, recycling, treatment and disposal of Medway's waste by:

- Ensuring all new built developments make appropriate provision for the separation, storage and collection of waste materials
- 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 employment areas are the preferred locations for such activities
- Assessing the potential for a soil treatment facility, subject to acceptable local environmental impacts, adequate access arrangements and any impact on residential amenity.

Any proposals for the creation of void space or landraising to facilitate a disposal facility for non-inert or hazardous materials within the areas referred to as the Potential Disposal to Land Resource Areas on the Hoo Peninsula and the Isle of Grain will be assessed against the following criteria:

 Impact of development on rural landscape character and local distinctiveness. To be judged against characteristics and



- guidelines as set out in the Medway Landscape Character Assessment
- 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
- It being clearly demonstrated that the materials 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
- There being a clear programme and time limit for the operation proposed and satisfactory provision for the restoration and afteruse of the site.



# 8. Transport and Movement

#### Introduction

- 8.1 As an all-purpose unitary authority Medway Council is also a transport authority, responsible for the local highway network, public rights of way and other transport related infrastructure. This includes 840 km of adopted highway and 293 km of public rights of way, plus the Medway Tunnel.
- 8.2 However the Council has no specific responsibility for the rail network or commercial bus services, although it works closely with all operators and with the Highways Agency, which is responsible for the motorway and trunk road network. There are no trunk roads in Medway but the M2 runs through the area.
- 8.3 In this role the Council is required to prepare a Local Transport Plan, setting out an overall transport strategy for the area. Medway's third Local Transport Plan or LTP3 has recently been adopted and it is purposely aligned to both the Local Development Framework and the Sustainable Community Strategy. It runs to 2026. Its main provisions are summarised below.
- 8.4 It follows that the transport and movement strategy underpinning this Core Strategy closely mirrors and is informed by the third Local Transport Plan but with an emphasis on those aspects that affect the programming of development or have implications for land or property.

# **Thames Gateway Funding and LTP2**

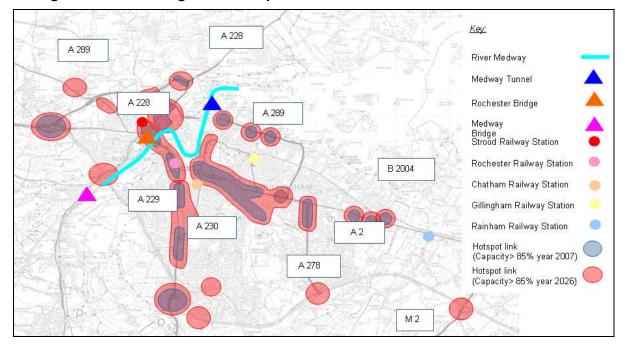
- 8.5 Due to its strategic location within the Thames Gateway, Medway received substantial capital funding from the Department of Communities and Local Government, the Department for Transport and the Homes and Communities Agency for a range of transport initiatives running through to 2011. These included funding to remove the flyover in Chatham, returning the town to a two way traffic system, widening the Brook etc., improvements to Gillingham rail station, construction of a new 'dynamic' bus station in Chatham and over £13 million for bus infrastructure and bus priority measures to begin to create a quality bus network. In 2011 a comprehensive Urban Traffic Management Control (UTMC) system went live. Further improvements to the A228 to Grain were also underway.
- 8.6 This funding addressed longstanding problems and introduced new capacity to the highway network. Significantly it also created capacity to accommodate development on the major regeneration sites in the short term.
- 8.7 Over the longer term however further interventions will be required to offset background traffic growth and these are the focus for LTP3.

#### **Context and Priorities**

8.8 As indicated, the major challenge is to address the increased demand for travel that will arise over the longer term. At the same time it is recognised that transport influences and adds value to many key priorities including



- economic growth, the natural environment, connectivity, equality of opportunity and health.
- 8.9 With a development strategy that specifically seeks to accommodate future development within the existing main urban area and at Lodge Hill, new primary transport links are not required to realise development. Local improvements are required in a number of cases but these do not, by themselves, have a strategic impact. Instead the emphasis needs to be on the more effective management of existing networks and selective investment to tackle congestion hotspots and improve public transport options and capacity to offset general traffic growth.
- 8.10 This has been confirmed by intensive analysis, including the development of several transport models, one of which is an area wide SATURN model (Simulation and Assignment of Traffic to Urban Road Networks), which has been developed in partnership with the Highways Agency. The forecast effects without further intervention are illustrated in the following diagram.



**Figure 8-1 Main Congestion Hotspots** 

- Further details are contained in a technical report prepared by the Council's modelling consultants, Transport Issue & Preliminary Options Report Phase 1 2<sup>nd</sup> Issue, April 2009.
- 8.12 Consequently five overarching priorities have been set out in the third Local Transport Plan to guide future policies and programmes. These, and the key actions proposed under each are set out below:

Supporting Medway's regeneration, economic competitiveness and growth by securing a reliable and efficient local transport network



#### Key actions:

- More efficient management of the highway network and car parks
- Improvements to the strategic road network focusing on congestion hotspots
- Improving the quality of bus services, including the development of Fastrack style bus links and smart ticketing
- Better management of freight, including improved access to the International Gateway at Grain
- Encouraging walking and cycling for short journeys
- Investigating river transport and additional river crossings.

Supporting a healthier natural environment by contributing to tackling climate change and improving air quality

# Key actions:

- Encouraging alternatives to the private car by:
  - Improving the quality of bus services, including the development of Fastrack style bus links
  - Encouraging walking and cycling for short journeys
- More efficient management of the highway network including air quality, traffic management schemes and tackling congestion hotspots.

Ensuring Medway has good quality transport connections to key markets and major conurbations in Kent and London

# Key actions:

- Improved sub-regional public transport services and facilities to connect Medway with key business centres and labour markets, including improvements to railway stations
- Longer distance trips into Medway captured by park and ride services to reduce town centre traffic
- More coordinated sub-regional highway network management by improved partnership working with the Highways Agency and Kent County Council
- Encouraging commuters to cycle to railway stations as part of their outward journey to work
- Development of sub-regional cycle routes.

Supporting equality of opportunity to employment, education, goods and services for all residents in Medway

#### Key actions:

- Improving accessibility to bus services for people with mobility difficulties
- Supporting students to access the learning quarter by public transport, walking and cycling
- Supporting independence by maintaining socially necessary bus services and providing transport services to day services
- Revised design guidance for new developments that supports improved accessibility by walking, cycling and public transport
- Community transport schemes.



Supporting a safer, healthier and more secure community in Medway by promoting active lifestyles and by reducing the risk of death, injury or ill health or being the victim of crime

# Key actions:

- Road safety interventions incorporating highway schemes, education, publicity, promotion and enforcement
- · Safer routes to school initiatives
- Encouraging cycling
- Improved pedestrian access to local facilities
- Development of Green Grid and the Coastal Access initiatives, and improving public rights of way
- Public safety initiatives
- Effective highway maintenance, including footways and cycleways.
- 8.13 Specific schemes to address these matters are grouped under five transport objectives and programmed as follows:
  - Short term: April 2011 to March 2016
  - Medium term: April 2016 to March 2021
  - Long term: April 2021 to March 2026.
- 8.14 A full list of schemes and actions can be found in Appendix E.
- 8.15 Although many actions and schemes are proposed over the life of this plan it is expected that the great majority will not require additional land, other than as an integral feature of new built developments. However some schemes to address congestion hotspots may do so, depending on detailed designs, and these are listed below:
  - A289 link between Four Elms roundabout and Medway Tunnel including Sans Pareil and Anthony's Way roundabouts and exit from Medway City Estate
  - A2 junctions and link between Chatham Hill and Canterbury Street junctions
  - A2/A228 links through Strood town centre
  - A2 junction with Mierscourt Road, Rainham
- 8.16 The M2 through the area was widened and upgraded only a few years ago. Generous carriageway capacity has been provided and most junctions operate satisfactorily. However Junction 3 (Chatham) is an exception. This is a very large and complex junction that caters not only for motorway traffic but also local traffic accessing the A299 (Bluebell Hill) between Medway and Maidstone. The junction is located outside of the Medway boundary but significant amounts of traffic using it originate in Medway.
- 8.17 The Highways Agency is concerned that further growth would impact on this junction, notwithstanding the fact that there are few significant proposals for new development close to it. Given this situation the Council will work with the



Agency and the adjoining transport authority (Kent County Council) to seek to identify possible measures to divert some local traffic using the junction. However given the short time since the junction was rebuilt it is expected that the Agency will also consider what further investment it should make in improving the junctions performance.

#### **Other Transport Related Issues**

- 8.18 LTP3 considers a number of aspects of river transport and the role of the major port facilities. These include identifying the need to protect and possibly supplement existing piers to support possible river bus/taxi services. It does not consider aviation issues as these have very localised impacts and no scheduled services operate from Rochester Airport.
- 8.19 However it is important that the Core Strategy takes full account of the planning implications of these matters.
- 8.20 In the case of both the River Medway and the Thames, "saved" local plan policies give protection to a number of local wharves as well as the larger docks at Chatham and Thamesport. These include a strategically important aggregates importation wharf at Cliffe, wharves on Medway City Estate and a wharf at Halling. All benefit from reasonable landward access and are well established. It is intended that they should continue to be safeguarded over the longer term in order that the area can continue to contribute to national, regional and local needs for maritime capacity.
- 8.21 Thamesport is an international gateway and is a nationally significant container port with potential for further growth together with the development of 'value added' activities on adjoining land (Grain employment area). Both safeguarding it and facilitating its further development is therefore appropriate.
- 8.22 Chatham Docks caters for smaller vessels up to 8,000 tonnes with lock gates controlling access from the Medway. The site and associated facilities need reinvestment but there is every indication that it has a long-term commercial role, complementing the larger ports catering for deep-sea traffic and handling vessels too large for local wharves and jetties. Accordingly it is intended that it should continue to be safeguarded although some consolidation within the site may be possible.
- 8.23 Over many years efforts have been made to encourage water taxi style services along the urban waterfront, particularly to cater for visitors during the summer months. Despite a number of piers and landing places being available this has not proved viable but it is considered important to safeguard these facilities for the future. The continuing development of major visitor attractions on or close to the riverbank and the increased population that will result from the redevelopment of the waterfront regeneration sites may well present new opportunities, as may the proposed park and ride site at Whitewall Creek. The relevant locations are:

#### Piers and Jetties:

Commodore Hard



- Lower Upnor Pier
- Chatham Maritime Marina
- Thunderbolt Pier
- Sun Pier
- Strood Pier
- Rochester Pier
- 8.24 In terms of aviation there are two established facilities:
  - Rochester Airport a general aviation facility with two grass runways, catering for leisure flying, flight training and some emergency service uses. It is subject to airspace safeguarding by the Council
  - Stoke Microlights this is a small, unlicensed, facility situated relatively close to the large employment area at Kingsnorth. There is currently no safeguarding regime in place, either for the limited facilities on the ground or the surrounding airspace.
- 8.25 Facilities at Rochester Airport need reinvestment and upgrading and the current operator is working closely with the Council to see how this might be achieved, while also ensuring that adjacent land can be fully utilised for employment purposes (see Economy chapter). Investigations are ongoing and it is expected that a masterplan covering both the Airport and surrounding land will be agreed in the near future.
- 8.26 The Stoke facility is limited in scale and constrained by high voltage power lines and other features. Accordingly it is not proposed to afford it long term safeguarding.

### **Transport and Development**

- 8.27 Although some continuing growth in private car traffic is probable, it is vital that alternatives are available if congestion along many urban routes is not to reach unacceptable levels.
- 8.28 The urban regeneration areas are exceptionally well located in relation to existing bus routes and the mainline rail stations and so can contribute to the enhancement of these facilities, as opposed to catering solely for the car.
- 8.29 In the case of Lodge Hill and the larger employment areas some highway improvements will be required but there are still opportunities for public transport solutions that will contribute to meeting the demand for non-commercial movements arising from these developments.
- 8.30 Accordingly it will be important, in all appropriate cases, to strike a balance between design solutions catering for the car and providing other choices, whether they are public transport, walking or cycling.
- 8.31 This will also be critically important in the town centres and Chatham in particular. Here adequate and high quality public parking, geared towards the short stay visitor, is important for their commercial viability. However employees and shoppers must also have access to high quality bus (including park and ride) and rail options if congestion is to be managed and high quality environments created and maintained.



8.32 Taking account of the varying factors set out above, and proposals in the Local Transport Plan, Policy CS24 sets out the key planning principles that will be applied over the plan period.

### **Policy CS24: Transport and Movement**

### Over the plan period:

- The highway system will be proactively managed to minimise congestion, through the operation of urban traffic management and control systems, the development of a quality bus network and selective junction improvements in congestion/air quality hotspots
- Car growth will be balanced by increasing the capacity, reliability and quality of public transport through:
  - The introduction of Fastrack style services on major urban and inter urban routes, including to and from Lodge Hill
  - Four potential park and ride facilities at Horsted, Whitewall Creek, Strood and between Gillingham and Rainham, plus park and coach facilities
  - o Improved interchange facilities associated with the railway stations and in the town centres
  - Improved main line railway stations at Strood, Rochester, Chatham and Gillingham
  - High quality real-time information and cross mode ticketing systems.
- Car parking in the town centres, especially in Chatham, will be rationalised (though not reduced in scale) where appropriate into multi storey facilities available for public use. Contributions will be sought towards new town centre car parking in lieu of reduced provision on individual sites
- Lower car parking standards will be considered in areas with already or potentially good public transport availability to provide a realistic option to private car use
- All significant development proposals will be subject to an agreed transport assessment, which includes an assessment of the potential to encourage modal shift away from private car use
- Walking and cycling networks will be extended, catering particularly for local journeys but also sub-regionally, including in conjunction with new developments
- Existing wharf and port capacity will be safeguarded in order to meet national and regional capacity requirements and to encourage the local transportation of goods by water
- A network of piers and landing places will be safeguarded to facilitate the introduction of water bus/taxi services along the urban waterfront, linking visitor and other attractions and providing capacity for visiting vessels
- The Council will continue to work with the operator of Rochester Airport to objectively consider the future of the general aviation facility, bearing in mind its co-location with a strategic employment opportunity.



# 9. The River Medway

#### Introduction

- 9.1 The Medway is one of the largest rivers in the South East and it is a defining feature of the area. It was made navigable as far as Maidstone in the 17<sup>th</sup> century and then extended to Tonbridge by 1746. The outer reaches have a naval history dating back to Henry VIII's time. Although the navy has now gone, the Medway is still an important commercial river and is increasingly recognised for its nature conservation value.
- 9.2 The River forms one of the most dramatic and consistent features of the Medway administrative area; providing a strong link as it broadens out from the urban areas towards the marshes and the Thames estuary; weaving together a tapestry that connects a variety of landscapes, settlements and communities. It provides Medway with much of its strong sense of place and it contributes significantly to the identity of the area. The river is also highly visible from many places, providing dramatic views, particularly from strategic points along the waterfront and from areas of higher ground. However it is less accessible in other areas a legacy from the time when the Navy and industry monopolised the waterfront. The Medway is also home to a significant number of industrial archaeological assets.
- 9.3 The tidal River comprises three reaches outer (Sheerness to Chetney Marshes), middle (Chetney Marshes to Gillingham) and inner (Gillingham to Allington Lock). The 'Conservator' is the Medway Ports Authority, part of Peel Ports and operator of both Chatham and Sheerness Docks. The conservator has responsibility (below the high water mark) for navigation arrangements, 'trots' or floating berths, associated byelaws and other matters.
- 9.4 The local character of the river and its edges varies along its length.

  Distinctive natural features within the undeveloped sections of waterfront between Gillingham and Sheerness include extensive areas of inter-tidal habitat, comprising saltmarsh and mudflat. The wooded slopes around Upnor provide particularly dramatic views from the river and from the south bank. Historic military uses are distinctive features along the river, particularly at Chatham Historic Dockyard and at Rochester and Upnor Castles. Developed sections along the north bank include major infrastructure facilities at Grain and Kingsnorth, including power stations and a container port. Within the urban area there is a working port at Gillingham (Chatham Docks). Industrial facilities predominate along the North Bank at Medway City Estate.
- 9.5 The estuary also supports nationally and internationally important populations of breeding and passage birds. It is likely that it will be designated as a Marine Coastal Zone.
- 9.6 Major new housing schemes are replacing former uses at Rochester Riverside and St Mary's Island. There are marinas at various locations, including sites at Upnor, St Mary's Island, Gillingham Waterfront, Strood, Rochester and Cuxton. The rich variety of industrial, historic and leisure uses along the river provides a diverse and varied character with strong local distinctiveness.



9.7 Important economic activities along the Medway include the gas terminal and Thamesport container site on the Isle of Grain, coal importation to Kingsnorth Power Station, Chatham Docks and aggregate and other river wharfs. However most of these activities are not major employment generators.

Figure 9-1 River Medway

#### **Management of the Natural Eco-system**

- 9.8 Navigation and dredging is an issue. Siltation has increased in the river as dredging activities have reduced following the departure of the Navy and commercial activities have moved downriver to the outer reaches. Over the longer term this has implications for navigation, particularly in the upper stretches.
- 9.9 The extensive inter-tidal habitats bordering the estuary are of international importance for wildlife and designated as both Special Protection Areas and Ramsar sites. However these are under pressure from industrial activity and 'coastal squeeze' whereby the inter-tidal margins are prevented from retreating and re-establishing in the face of sea level rise due to flood defence structures.
- 9.10 New habitat creation opportunities therefore need to be sought in order to mitigate for the loss of inter-tidal habitats (marshes), in accordance with the Environment Agency's Regional Habitat Creation Programme as required by the Marine and Coastal Access Act 2009.



- Consultants have completing an update of the Strategic Flood Risk 9.11 Assessment for the Medway and an associated appraisal of the potential options to manage flood risk in the Urban Medway (providing the basis for a Strategic Urban Flood Defence Strategy). This puts forward options for managing flood risk for new development which are largely based on flood defence asset replacement and do not consider protection that could be afforded by a combination of flood risk management measures. The Study indicates which approach will be best in different flood cells. Currently, there are different standards and levels due to different land ownerships and engineering works of different ages. It is accepted that, although a large part of the urban waterfront is located within the flood plain, it needs to be defended due to the long established settlement form and the value of the commercial assets that would otherwise be at risk. Beyond the current urban boundaries however it is important to avoid inappropriate development that would increase flood risk and reduce the capacity to store flood water.
- 9.12 In addition to the Green Grid, the Core Strategy also supports the creation of a 'Blue Grid'. This encompasses a network of rivers, ditches, wetlands, ponds and lakes. As well as providing valuable habitat, this network is essential to hydrological functioning. The Blue Grid will assist in reducing flood risk, reducing the impact of pollution, and allowing the free passage of species.

#### Regeneration

- 9.13 The urban waterfront is the focus for Medway's regeneration activity, with over 900 hectares of brownfield land spanning 11 spectacular kilometres of the River Medway. At its heart is Chatham Centre and waterfront. The Medway Waterfront Strategy (2004) proposed the creation of a new linear waterfront city, composed of a series of urban quarters. Each quarter will contribute its own particular sense of place to the overall character of the waterfront. It identified its unique characteristics as including:
  - A series of spectacular meanders of the River, framed by steep escarpments, that create the opportunity for stunning views and visual connections between the urban quarters
  - Substantial areas of green spaces, largely a result of the military fortifications associated with the Chatham Historic Dockyard, forming a distinctive backdrop to the urban areas
  - The River Medway is both a busy working river and an important ecosystem. The intertidal sand and mudflats are particularly important as a food source for migrating birds and as spawning grounds for fish such as sea bass
  - The undeveloped coast and internationally significant wetland further downstream is designated as a Special Protection Area for migrating birds. The North Kent Marshes on both sides of the river provide dramatic landscapes and wildlife habitat as well as being used as grazing land; and
  - The waterfront includes some of the most intact and finest historic features. Rochester Castle and Cathedral are among the oldest in the country and Rochester's historic High Street contributes significantly to the environmental quality of Medway's Waterfront. During the mid-17th



century the Historic Dockyard at Chatham became the Royal Navy's preeminent shipbuilding and repair yard. Chatham's naval and military heritage is amongst the most important in the world and the Government has included it on a list of locations to be nominated to the United Nations for World Heritage Site status.

#### **Marine Leisure**

- 9.14 Marine leisure activities primarily consist of yachting and motor boating along the middle and upper reaches of the river, largely away from conflict with the bulk of commercial activities elsewhere. Existing marinas operate at or close to full capacity. It is recognised that better co-ordination between marina operators is desirable, in order to improve Medway's leisure boating offer. Residential houseboat moorings occupy areas that could be utilised for additional marina berthing. Many of the houseboats have limited facilities and are often somewhat unsightly. Therefore, proposals for upgraded or new high quality marina facilities and amenities will be supported where there will be no adverse environmental impacts. In particular, impacts upon the SPA.
- 9.15 River access to shore facilities, attractions, shopping areas, restaurants and public houses require improving.
- 9.16 There are also a significant number of marine engineering and boat repair businesses that have an important role within the local economy.

#### **Chatham Docks**

9.17 Chatham Docks occupies one of three basins of the former naval dockyard. It has a range of commercial and industrial tenants within the 56 hectare dock estate. It can cater for vessels up to 8,000 tonnes and so complements both deep water facilities further down the river and smaller commercial wharves and jetties upstream.

### Wharves, Piers and Jetties

- 9.18 A coherent network of piers and landing places exists along the urban stretches of the river but some are in disrepair. There is considered to be real potential to develop tourism based water taxi or other services between these facilities, despite this not being commercially viable in the past. In some measure, this is due to the significant tidal range in the river but, as redevelopment along the waterfront gathers pace, new opportunities should arise. However, there are a very limited number of public launching places on the river. Accordingly the retention and protection of existing and disused wharves, and public piers, and access land to them will be promoted.
- 9.19 The river is also strategically important for the importation of construction aggregates and it is important that adequate capacity is retained.
- 9.20 Facilities for visiting vessels are currently limited but there is significant potential for this, not only small craft but also certain types of cruise ship.
- 9.21 Given not only the great significance and potential of the river but also its vulnerability to flooding and coastal squeeze, it is vital that it is managed effectively and that an appropriate balance is maintained between its



commercial, leisure and environmental roles. For this reason the Council has supported the Medway Swale Estuary Partnership since its formation in the 1990's. The Partnership brokers contact between the many interests along the river and encourages an active management regime that balances different interests.

- 9.22 As with other bodies of this type there is some uncertainty over its future but the Council will always seek to work with relevant organisations to ensure that the river is sensitively managed and that an appropriate balance is achieved between different interests.
- 9.23 Proposals that maximise the potential of the River Medway, as a valuable natural resource, will also be supported. The Council will work with the appropriate bodies in order to implement measures that will result in improvements to water quality and pollution levels in order to ensure that the Core Strategy helps achieve the requirements of the EU Water Framework Directive. Financial contributions will be sought from developers to assist this process in appropriate cases.

# **Policy CS25: The River Medway**

The River Medway is strategically significant in terms of its employment, environmental, transport and leisure importance. Accordingly:

- Along the urban waterfront mixed use redevelopment will be promoted in order to create safe, high quality environments, provide new homes and jobs, leisure and social infrastructure facilities with public spaces as focal points, a riverside walk and cycle way and increased public access to the river
- Greater use will be made of the river. Wharves and port capacity at Chatham Docks and Thamesport will continue to be safeguarded for the transhipment of freight, including waste and aggregates and other materials
- Existing infrastructure that provides access to the river and the foreshore, such as piers, jetties, slipways, steps and stairs will be protected unless redevelopment would result in an improvement. New facilities, including piers for river taxis, will be encouraged where appropriate.
- Leisure activities on and along the river will be supported as long as they will not harm the environment or natural ecosystems
- The river will be protected in its own right, as a key landscape feature of natural beauty.
- Proposed development will be expected to either maintain or improve water quality and minimise air, land and water pollution.
- The Council will seek contributions from developers for the maintenance and improvement of the river, where appropriate.

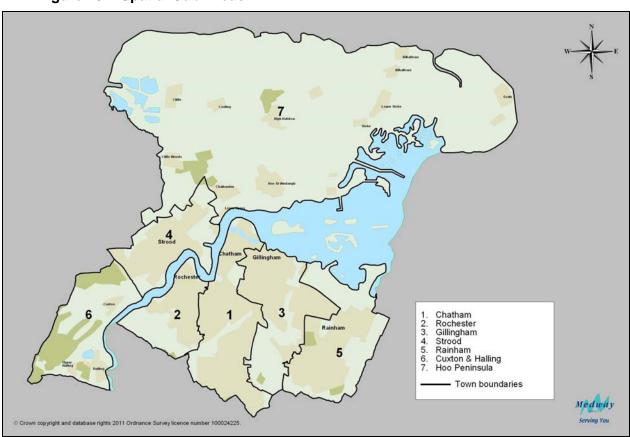


# 10. Area Policies

#### Introduction

- 10.1 This section of the Core Strategy sets out how the overall strategy will be applied to specific areas within Medway.
- 10.2 To do this the administrative area has been divided up as follows:
  - The five towns Strood, Rochester, Chatham, Gillingham and Rainham including their suburban areas and urban/rural fringes
  - The Hoo Peninsula and the Isle of Grain excluding Lodge Hill
  - Medway Valley this area needs to be separately considered from the
    rest of rural Medway as it is located south of the M2 and is therefore
    outside the Thames Gateway and so falls into what has been termed the
    "rest of Kent" sub region.
  - Lodge Hill this is considered separately given the scale of change envisaged for this location.
- 10.3 Figure 10-1 shows the general extent of these areas and context diagrams accompany the sections relating to each area below.

Figure 10-1 Spatial Sub Areas





10.4 In these sections the more significant issues facing each area are described and overall policies set out how these will be addressed. Each area has considerable contrasts, such as prosperous and deprived neighbourhoods within it and these are taken into account. The broad scale and location of development that each area is expected to accommodate is also highlighted in table form. The figures in the tables are taken from the Strategic Land Availability Assessment (SLAA) and so indicate what might be termed a baseline capacity for each area. In practice the capacity of some sites and areas may be greater. This is due to the strict rules followed in preparing the SLAA.

#### Strood

- 10.5 Strood has extensive residential areas bordering the town centre and adjacent rural areas. These vary from pre-1919 terraced streets close to the town centre, to post war estates to the west and modern development, still being completed, at Wainscott and Frindsbury.
- 10.6 The extensive river frontage is of poor visual quality and susceptible to flooding. This reflects its industrial past. The townscape in the central area is also of variable quality and although the town centre is performing well economically it lacks character and suffers from heavy traffic congestion.
- 10.7 Strood is a key employment location with extensive estates at Knight Road/Priory Road and on the Frindsbury Peninsula (Medway City Estate). Despite this much of the town centre and adjoining areas are classified as suffering from deprivation.
- 10.8 Strood station is strategically important, providing mainline services (including High Speed 1) to a number of London termini and acting as the northern terminus for the Medway Valley Line. However it is not welcoming and needs upgrading in terms of longer platforms and access. Links to the town centre are also poor.
- 10.9 The central area has seen a substantial decrease in its resident population since 2001 and it also has a rapidly ageing population. Deprivation factors include 'income' and 'education and skills'. Out of work benefit claims are also high.
- 10.10 The outlying residential areas also have pockets of deprivation related to education, crime and the local living environment.
- 10.11 Wainscott and Frindsbury have the smallest proportion of working age residents in Medway, with more older people and children than the norm. There are relatively high levels of claims for incapacity benefit and carers allowance, indicating underlying health issues associated with older age groups. Deprivation is not significant but the area fares poorly on 'barriers to housing and services'.
- 10.12 Significant steps have been taken to begin the fundamental regeneration of the Town Centre and Riverside with adopted development briefs for Temple Waterfront and Strood Riverside and a masterplan for central Strood that was prepared specifically to inform the Core Strategy. The demolition of the Civic Centre has also started to prepare this prominent site for redevelopment. It is



intended that these sites are taken forward in accordance with the already agreed development briefs and masterplan.

10.13 The Strood Town Centre Masterplan has 8 key objectives to guide the future development in the centre of Strood. These are reproduced below as they encapsulate the actions needed to revitalise the central area and improve its image.

# 1. Capitalise on major developments

To ensure that the planned housing-led development of major sites at Strood Riverside and Temple Waterfront, and future redevelopment of the Civic Centre are all well connected to the heart of the town centre to enable them to support the role and function of the centre.

#### 2. Strengthen the role of Strood's town centre

To improve the retail 'circuit' in the town centre through better connections between the key anchor stores and the High Street, encouraging more linked trips by pedestrians from a single point of access/parking and utilising the redevelopment of the Tesco store to secure an improved retail frontage to the High Street/Commercial Road area. Secure better leisure offer in the heart that will contribute to the vitality of the centre.

#### 3. Improve the appearance of the town centre

To ensure that redevelopment of sites within the Town Centre area contributes to improving the street scene and public realm improvements to key streets and spaces. A number of sites on prominent corners currently make a poor contribution to the street environment, together with key streets that are lined with surface parking. New development should provide buildings that address the street, with parking and servicing located to the rear.

#### 4. Secure Strood as a working town

To protect, enhance and promote employment uses and opportunities in Strood to strengthen and grow the local economy, reduce the need to travel, and promote a sustainable community.

#### 5. Managing the Medway – improving access and flood defences

To ensure that waterfront developments, and other areas affected by flooding contribute to providing broad improvements to the flood defences for the town. New development should also seek to recover and provide physical links to, and along the waterfront, contributing to an accessible and attractive river walk, to improve movement and well-being.

#### 6. Rediscovering heritage assets – promoting distinctiveness

To recover the lost and hidden heritage of Strood and ensure that heritage assets contribute to a high quality townscape and strong sense of place.

#### 7. Enabling improved access and movement



To ensure that all new development and streetscape improvements contribute to improving safer and more attractive routes for pedestrians and cyclists, facilitate better public transport and minimise the impact of private vehicles on the functioning of the town. Improvements to access for pedestrians to the rail station, and between key shopping facilities, should be prioritised.

# 8. Promoting open space and urban green space

To ensure that the redevelopment of the waterfront also respects the ecological and recreational benefits of the area and to encourage the waterfront landscape to inform landscape design and new and improved open spaces within the town centre.

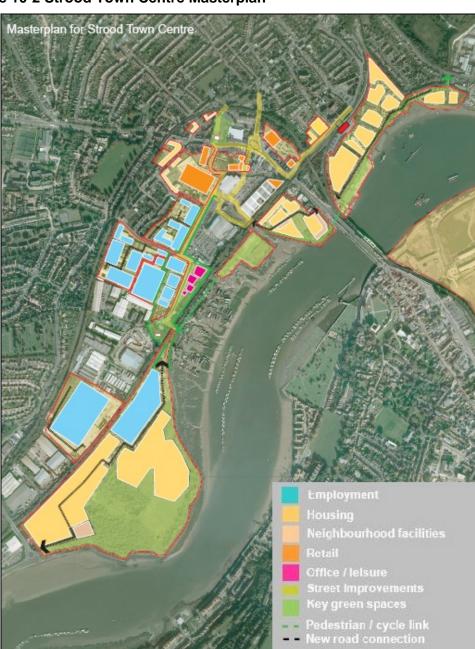


Figure 10-2 Strood Town Centre Masterplan



- 10.14 By comparison to some other parts of the conurbation, the outlying residential estates are fairly well served by local centres providing a variable range of services and shopping. The most important of these are:
  - Bligh Way, Wells Road and Darnley Road serving Strood South. These
    will be supplemented by a new neighbourhood centre at Temple
    Waterfront, in conjunction with the redevelopment of this key waterfront
    regeneration site.
  - Bryant Road and Frindsbury Road serving Strood North. Additional facilities will also be provided in conjunction with the Strood Riverside regeneration scheme and associated improvements to Strood Station.
  - Wainscott Road, Wainscott serving Wainscott and Hollywood Lane. This
    will be further improved in conjunction with significant residential
    development already underway at Hoo Road, Wainscott.
- 10.15 It is intended that these locations will be promoted as designated 'neighbourhood centres' offering suitable locations for the concentration of local services and acting as natural focal points for their surrounding communities.
- 10.16 The quality of housing in the suburban areas is of variable quality, varying from tight streets of small terraced properties to large new neighbourhoods, developed since the 1980's.
- 10.17 Open space areas are very limited in the central area but beyond the town centre Temple Marsh has the potential to be a striking waterfront leisure area. Broom Hill enjoys extensive views over much of urban Medway and the river. The Hogmarsh Valley, Manor Farm and Islingham Farm together perform a vital role in separating Frindsbury and Wainscott from Upper Upnor and Lodge Hill/Chattenden and are very prominent from the A289. Although subject to classic urban/rural fringe pressures they also form a prominent gateway to the urban area and it will be important to progress landscape improvements wherever possible.
- 10.18 Over the plan period the broad scale and location of new housing, employment and retail related development is expected to be as indicated in the following tables.

**Table 10-1 Potential Housing Development in Strood** 

Strood Housing Sites		
SLAA Ref	Site Name	Capacity
0090	Strood Riverside	576
0685	Temple Waterfront	620
0137	Civic Centre	398
0522	East of Higham Road, Wainscott	140
0523	East of Wainscott Road, Wainscott	135
	Main Sites	1869
	Other sites	237
	Housing total	2,106



Table 10-2 Potential Employment Development in Strood

	Strood Employment Sites	
SLAA Ref	Site Name	Capacity
0137	Civic Centre	18,060
0653	Land fronting Sir Thomas Longley Road Frindsbury	3,160
0654	Land adjoining Southern House, Anthonys Way	2,062
0685	Temple Waterfront Between Knight Road and Roman Way	7,100
0686	Three Acre site, Roman Way	4,440
0727	Brompton Farm, adj. 66 Brompton Farm Road	1,190
MC102881	Land at Norman Close and Knight Road Strood	16,825
0839	Former Alloy Wheels Site Temple Park Priory Road Strood	16,882
0752	Land at Whitewall Road Medway City Estate	
	Commissioners Road	5,623
	Main developments	75,342
	Other sites	-96
	Employment floorspace total (sq. m)	75,246

Table 10-3 Potential Retail Development in Strood

Strood Retail Sites		
SLAA Ref	Site Name	Capacity
	Plot 1 Anthonys Way Medway City Estate	
0648	Frindsbury	9,354
	Land adjacent to and Tesco Store	
0843	Charles Street	5,774
	Temple Waterfront Between Knight Road	
0685	and Roman Way	1,800
0641	Land at Friary Place High Street	1,510
	Main developments	18,438
	Other sites	1,538
	Retail floorspace total (sq. m)	19,976

Housing: showing sites over 100 units

Employment & retail: showing sites over 1000 sq. m

10.19 The town centre will continue to be developed as a 'district' scale centre, complementing Chatham and in accordance with the masterplan as outlined above.

Policy CS26: Strood

The role of Strood as a district centre will be strengthened by;

- Promoting housing and mixed use developments on sites that will enhance the townscape and cohesion of the centre
- Improving the quality of retail provision and links between the retail areas and accessibility to the railway station and waterfront



- Safeguarding open spaces and enhancing the public realm, particularly along the waterfront
- Promoting employment opportunities through reinvestment in the existing employment sites and in conjunction with mixed use developments in and adjoining the centre
- Reducing the impact of traffic through improved traffic management and localised junction and other improvements.

Beyond the town centre the following local centres will be safeguarded and promoted as neighbourhood centres:

- Wainscott Road, Wainscott
- Frindsbury Road, Frindsbury
- Bryant Road/Weston Road
- Darnley Road
- Bligh Way
- Wells Road
- Temple Waterfront (new)

Open space areas at Temple Marsh and Broom Hill will be afforded long term protection and, where feasible, landscape improvements will be progressed in the Hogmarsh Valley/Manor Farm/Islingham Farm area to enhance its role as a strategic gateway and in separating settlements.



Wainscott Frindsbury Strood Medway City Estate District Centre Neighbourhood Centres Waterfront Regeneration Areas Strategic Open Spaces Countryside Links Landscape buffer/gateway **Strood Context Diagram** Serving You Scale:1:35000 21/07/11 © Crown copyright and database rights 2011 Ordnance Survey licence number 100024225. © Medway Council, 2011

**Figure 10-3 Strood Context Diagram** 



#### Rochester

- 10.20 Rochester Town Centre is a nationally renowned historic settlement distinguished by its Norman Castle and Cathedral, which are located on high ground and dominate views from the surrounding area. Its built environment dates from Roman times and the High Street is of the highest architectural importance, containing architectural styles dating back to the medieval period. The Cathedral, Kings School and the Castle are all located in attractive areas of open space and The Vines and the Esplanade complement the open setting of the town centre.
- 10.21 The town centre functions as a district shopping centre for the residential areas to the south, and as a cultural and tourist centre. It contains many specialist shops, restaurants, and other services related to this function. It has a significant evening economy, which can cause tensions with adjoining residential properties. Despite its extensive hinterland it has few convenience shops but it has retained its historic character and avoided damaging, unsympathetic development.
- 10.22 A conservation area appraisal of Rochester together with an area management plan is in place. These documents provide a sound basis for preserving the unique heritage of the centre and managing sensitive change.
- 10.23 During the 1990s, it was recognised that Rochester Riverside exhibited many of the typical hallmarks of dereliction: an out-dated road network; a proliferation of low grade and bad neighbour uses; large tracts of vacant and derelict land and buildings; ground condition problems; a poor local environment; lack of confidence by investors; and fragmented land ownership. The area was in need of comprehensive regeneration.
- 10.24 As a result the site was compulsory purchased and the Rochester Riverside Development Brief adopted. This seeks to achieve a mixed use quarter providing a high quality environment for residential living.
- 10.25 Outline planning permission was granted in 2006, for 2000 dwellings and other uses, including a hotel, and the site was subsequently cleared. The land has been raised, a new river wall constructed, a riverside walk has been laid out and a development partner has been appointed to undertake the first phase of the development, which commenced in 2011.
- 10.26 The historic centre of Rochester and Rochester Riverside are separated by a busy road, Corporation Street and a railway embankment which both have a substantial severance effect. Corporation Street presents an uninspiring, poor quality environment dominated by traffic.
- 10.27 In 2008, the Council adopted the Corporation Street Development Framework, which covers the area from Rochester Bridge to Rochester Station. This proposes a mix of uses including residential, offices, retail, a multi-storey car park and a hotel combined with environmental enhancements, landscaping and improved pedestrian facilities. The intention is to reduce the severance effects of the road, improve the area as a "gateway" to Rochester and to facilitate high quality development that will



- complement the historic character of Rochester town centre and the new community at Rochester Riverside.
- 10.28 Beyond the centre lie extensive residential neighbourhoods, extending southwards to Rochester Airport and Borstal. These vary in character and housing quality and a major issue is that those further away from the centre, have few local facilities or obvious community hubs. Limited bus routes and a virtual absence of evening services, results in social isolation for many, particularly the elderly.
- 10.29 The long river frontage from the Esplanade past Shorts Way to Borstal is not exploited to its full potential. In particular there is an absence of local facilities to draw visitors or meet the needs of the extensive adjoining residential areas.
- 10.30 Borstal also lacks a natural centre and further services and facilities are justified given its distance from Rochester centre.
- 10.31 Key opens spaces include Watts Meadow, Baty's Marsh and the open slopes around Fort Borstal plus playing field areas at the Alps, Priestfields and Shorts Way. There are few significant employment areas beyond the town centre, with the exception of the BAe Systems site adjoining Rochester Airfield.
- 10.32 Over the plan period the broad scale and location of new housing, employment and retail related development is expected to be as indicated in the following tables.

**Table 10-4 Potential Housing Development in Rochester** 

Rochester Housing Sites		
SLAA Ref	Site Name	Capacity
0598	R/O 329-337 (Featherstones) High	120
	Street, Rochester	
0515	Rochester Riverside	2000
0144	St Bartholomews Hospital, New Road,	108
	Rochester	
	Main development	2,228
	Other sites	712
	Housing total units	2,940

**Table 10-5 Potential Employment Development in Rochester** 

Rochester Employment Sites		
SLAA Ref	Site Name	Capacity
0515*	Rochester Riverside, Corporation	
	Street	12,000
0598	R/O 329 - 377 (Featherstones) High	3,600
	Street	
	Main development	15,600
	Other sites	-1734
	Employment floorspace total (sq m)	13,866

130



**Table 10-6 Potential Retail Development in Rochester** 

Rochester Retail Sites			
SLAA Ref	Site Name	Capacity	
	Rochester Riverside, Corporation		
0515*	Street,	7,800	
	Land at Robins and Day (Peugeot),		
022	High St,	2,275	
	Main development	10,075	
	Other Sites	-632	
	Retail floorspace total (sq m)	9,443	

<sup>\*</sup>All Rochester Riverside permissions added together as one entry. Housing: showing sites over 100 units Employment & retail: showing sites over 1000 sq. m

# Policy CS27: Rochester

The highest priority will be given to the conservation and enhancement of the historic and architectural character of Rochester Town Centre whilst maintaining its vitality and viability as a district centre and its function and character as a specialist retail, service and tourism centre.

New development will be concentrated in Corporation Street in accordance with the Corporation Street Development Brief and at Rochester Riverside in accordance with the Rochester Riverside Development Brief.

Beyond the town centre the following local centres will be safeguarded and promoted as neighbourhood centres:

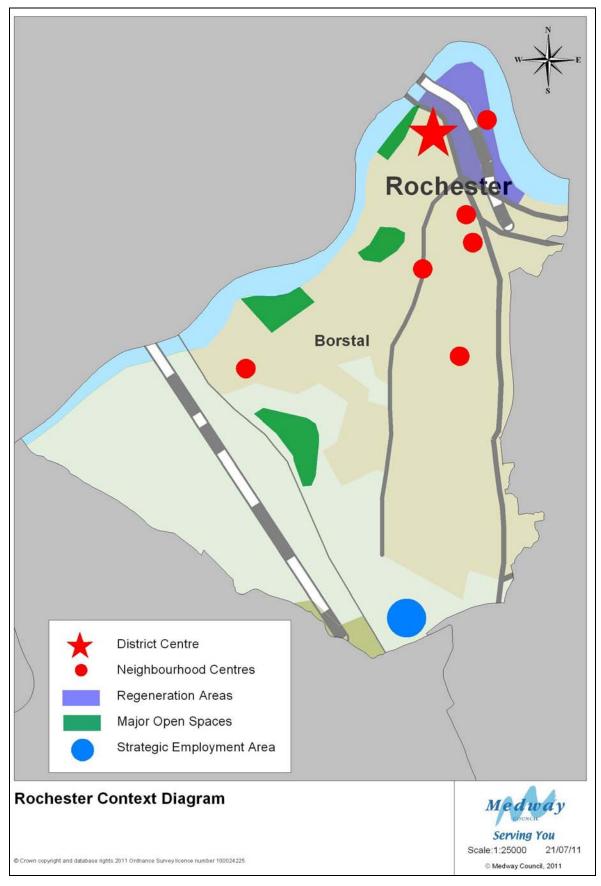
- Delce Road
- Maidstone Road
- Marley Way subject to options and viability testing
- Borstal (new)
- Rochester Riverside (new)

Small-scale opportunities will be sought to provide local employment, particularly in and around the neighbourhood centres.

The Council will work with bus operators to extend access to services in the south of the area.



Figure 10-4 Rochester Context Diagram





# Chatham

- 10.33 The Chatham sub area extends from St. Mary's Island and Chatham Maritime in the north to the borders with the Maidstone and Tonbridge and Malling Borough areas north of the M2. It embraces some of Medway's most affluent communities but also its most deprived. The latter include areas to the northeast and south of the town centre and significant parts of Luton and Wayfield, including All Saints. It includes much of the prospective World Heritage Site but also extensive post war suburban neighbourhoods and tight terraced streets of pre-1919 housing.
- 10.34 Chatham town centre is located at the natural heart of the urban area, bisected by major north-south and east-west road links and occupying a potentially exceptional waterfront setting. Other than the river, key landscape features include the scarp slope to the Great Lines and the green dry valley running from Horsted to Luton and incorporating the Coney and Daisy Banks.
- 10.35 The Chatham Centre and Waterfront Development Framework, which was adopted in 2004, addressed a number of long standing problems affecting the centre of Chatham:
  - Chatham's role as a sub-regional shopping centre had been undermined by out-of-town developments and competition from other towns
  - The ring road created a hostile environment for pedestrians and severed the centre from its surroundings
  - There were no squares or attractive open spaces within the heart of the town
  - The architecture was barren and unattractive
  - Some of the car parks were unattractive and threatening
  - The railway station was isolated from the centre and dominated by traffic; and
  - The bus station had poor facilities with passengers enduring noise, fumes and cold (in the winter).
- 10.36 The Framework set out the measures necessary to transform the centre of Chatham as summarised below.
- 10.37 Greatly improved shopping and leisure facilities, including:
  - Expansion and refurbishment of the Pentagon Centre to increase floorspace by approx. 15,000 sq m
  - A new food store of approx. 8,000 sq m; and
  - Over 8,000 sq m of small-scale employment space and ground floor retail and leisure uses.
- 10.38 A world class cultural waterfront with:
  - A major new contemporary performing arts facility on the Waterfront
  - A major new visual arts facility centred on the conversion and re-use of historic buildings at Old Gun Wharf
  - A dramatic new Waterfront Park, transforming the quality of the existing green spaces at the waterfront



- Improved visibility and access to historic features, including the Barrier Ditch, and connections to the Great Lines; and
- Hotel development on the waterfront.
- 10.39 A new central library and learning resource and Civic Office comprising;
  - A new central library and learning resource centre (This has now been accommodated in a former military building on the waterfront near Gun Wharf)
  - A new Civic Office to meet the changing needs of the Council and to reflect future approaches to integrated service delivery to the community, particularly "First Point of Contact" facilities (This has now been accomplished by the Council occupying the former Lloyds building at Gun Wharf)
  - A range of related and complementary facilities, which could include small scale retail and cafes and restaurants; and
  - A new public square.
- 10.40 Major environmental improvements throughout the Centre including;
  - New waterfront park and riverside promenade from Old Gun Wharf to Sun Pier
  - Greatly improved access to the waterfront by breaking down the severance effect caused by Sir John Hawkins Way and Globe Lane
  - Increased use of Sun Pier for boat moorings and related activities
  - Greatly enhanced Paddock to provide an attractive and useable civic space; and
  - Improvements along the High Street, including the creation of new high quality public spaces within the shopping area.
- 10.41 Accessibility improvements to, and within, the Centre comprising:
  - Returning The Brook and Best Street to two-way streets, with associated environmental improvements (virtually complete)
  - Closure of Sir John Hawkins Way and Globe Lane to through traffic and downgrading of Medway Street and Lower High Street (completed)
  - Removal of the Sir John Hawkins Way flyover and enhanced streetscape along the route to the flyover (completed)
  - Greatly improved public transport access, with new, modern, high technology bus facilities along the route of Sir John Hawkins Way close to the Pentagon Centre and the High Street (virtually completed)
  - Enhanced and rationalised car parking, including new, high quality, well located multi-storey car parking to serve the centre
  - Improved pedestrian and cycle connections, including links along the waterfront and the possibility of establishing a cross-river link to Medway City Estate.
- 10.42 Two further supplementary planning documents were also adopted, which provide more detail on specific areas of the town centre. These are the Chatham Pentagon Centre Development Brief, 2005 and the Chatham Centre and Waterfront Development Brief, 2008. The latter incorporates three masterplans:



- Station Gateway featuring major improvements to Chatham Station and the creation of a new commercial quarter and pedestrian routes leading down to the Waterfront and High Street
- Waterfront featuring development of a significant scale near Sun Pier and a radically improved waterfront park
- The Brook promoting radical improvements to the local townscape and the creation of new residential and commercial uses on the northern side with new connections to the Great Lines and Fort Amherst.
- 10.43 More recently two further masterplans have also been adopted:
  - High Street/Best Street containing major retail proposals for the shopping heart of the centre, along with radical townscape improvements and new pedestrian links and open spaces
  - Gun Wharf covering the area from the Historic Dockyard to the Waterfront with the objective of bringing to life the rich heritage of this area and linking it to the rest of the town centre.
- 10.44 All these documents remain relevant to the regeneration of the town centre and the stage has now been reached where private investment will increasingly drive change following the completion of extensive publicly funded infrastructure works.
- 10.45 Beyond the centre of Chatham are numerous but distinct residential neighbourhoods stretching down to near the M2. Most have well established local centres providing a strong focus for their communities, although they are of varying visual quality. Detailed schemes for their improvement and development should be taken forward in conjunction with local people where resources permit. There are a number of locally important employment areas and retaining these and encouraging reinvestment in them will be important. Initiatives are in place to tackle deprivation in the most disadvantaged neighbourhoods. The emphasis is on improving skills and access to employment. A specific challenge will to sustain and expand these programmes over the longer term.
- 10.46 Over the plan period the broad scale and location of new housing, employment and retail related development is expected to be as indicated in the following tables.

**Table 10-7 Potential Housing Development in Chatham** 

Chatham Housing Sites			
SLAA Ref	Site Name	Capacity	
0033	RSME Kitchener Barracks, Brompton	248	
0470	Mid Kent College, Horsted, Maidstone	414	
	Road, Chatham		
0472	Land at St Mary's Island, Maritime Way,	455	
	Chatham Maritime		
0757	Between Cross Street and The Brook	118	
0758	Sir John Hawkins Car Park, Chatham	120	
0761	Chatham Waterfront	494	
0820	Interface Land	525	

135



Chatham Housing Sites			
SLAA Ref	Site Name	Capacity	
0865	2-8 King Street and 1-11 Queen Street, Chatham	158	
0867	2-14 Railway Street & 142-146 High Street, Chatham	126	
0869	Wickes, New Cut, Chatham	279	
0871	Chatham Railway Station	173	
	Main Sites	3,110	
	Other sites	1,327	
	Housing total units	4,437	

**Table 10-8 Potential Employment Development in Chatham** 

Chatham Employment Sites		
SLAA Ref	Site Name	Capacity
0243	Chatham Retailing,	
	Clover/Richard/Rhode/High Sts	5,951
0470	Mid Kent College, Horsted Maidstone	
	Road Chatham	2,480
0570	Fort Horsted Primrose Close Chatham	1,139
0724	BAE Systems	11,147
0761*	Chatham Waterfront	5,456
0804	Former Officers Mess, Maidstone Road	4,300
0845	Woolmans Wood Caravan Site	6,160
0862	296-310 High Street	2,040
0869	Wickes, New Cut	30,865
	Main developments	69,538
	Other sites	-2,939
	Employment floorspace total (sq.m)	66,599

**Table 10-9 Potential Retail Development in Chatham** 

Chatham Retail Sites		
SLAA Ref	Site Name	Capacity
	Chatham Retailing,	
0243	Clover/Richard/Rhode/High Sts	28,000
0755	Former Police Station	1,898
0756	Pentagon	15,000
0758	Sir John Hawkins Car Park	3,059
0760	Tesco, The Brook	1,940
0761*	Chatham Waterfront	7,772
0818	J7, Chatham Maritime	5,220
0821	Machine Shop 8, Chatham Maritime	1,200
0834	1 Batchelor Street, off the Brook	1,600
0857	The Brook (r/o High St and Batchelor St)	1,107
0860	Land at High St, Union St and New Road,	9,852
0757	Land at Cross Street Chatham	3,430
0865	2-8 King Street and 1-11 Queen Street	2,531
	55-105a The Brook & 1, 5, 11 & 13 King	
0866	St	4,113
0867	2-14 Railway Street & 142-146 High	1,228



Chatham Retail Sites			
SLAA Ref	Site Name	Capacity	
	Street		
0868	19 New Road Avenue and 3 New Cut	1,328	
	Main developments	89,278	
	Other sites	949	
	Retail floorspace total (sq m)	90227	

\*Chatham Waterfront sites have been combined under one entry Housing: showing sites over 100 units

Employment & retail: showing sites over 1000 sq. m

Policy CS28: Chatham

The centre of Chatham will be developed as a regional hub and as the city centre for Medway in accordance with the principles of the Chatham Centre and Waterfront Development Framework and Development Brief and the regeneration, economic and retail policies of the core strategy. This will include the development of:

- Greatly improved shopping facilities
- A world class waterfront
- Major environmental improvements
- Accessibility improvements to and within the centre
- New employment floorspace and housing reflecting the five masterplans covering the centre.

Initiatives will continue to reduce deprivation in the more disadvantaged neighbourhoods and beyond the town centre the following local centres will be safeguarded and promoted as neighbourhood centres:

- Chatham Maritime
- Brompton High Street
- Luton Road
- Luton High Street
- Princes Park
- Wayfield
- Shirley Avenue
- Walderslade Village
- Kestral Road
- Admirals Walk
- Silverweed Road

Local employment opportunities will be encouraged, including through reinvestment in established employment areas.



St Marys Island **Chatham Maritime** Chatham Luton Wayfield Walderslade City Centre/Regional Hub Neighbourhood Centres Lordswood Chatham Waterfront Strategic Open Space/Green lung Countryside Links **Chatham Context Diagram** Serving You Scale:1:40000

Figure 10-5 Chatham Context Diagram

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Medway Council, 2011



# Gillingham

- 10.47 The Gillingham sub area extends from Gillingham Waterfront through the town centre to Darland and the Capstone Valley beyond. The northern part of the area is characterised by a generally very tight street pattern with pre-1919 terraced properties. These give way to post war and modern suburban developments further south. The town centre is by far the most densely populated in Medway and this and surrounding areas have significant pockets of deprivation. The area also contains the Medway Maritime hospital and Gillingham Business Park.
- 10.48 Gillingham town centre once rivalled Chatham in importance but in recent years has consolidated into a district level centre serving a compact but dense catchment area.
- 10.49 The area has seen much change over the last few years, notably the establishment of the universities at Pembroke, the development of the new Mid Kent College campus at Prince Arthur Road, the Medway Park regional sports facility and new parks at the Lower Lines, Great Lines and Hillyfields. The growing student population in particular presents opportunities for the future and for the town centre to re-position itself.
- 10.50 A Gillingham Town Centre Development Framework was adopted in 2007. It contains a number of measures to revitalise the centre, including:
  - Development of a key retail site in a central location for a new food supermarket, retail, employment and residential uses as well as significant new public car parking provision
  - Creation of a series of linked spaces along the High Street to break up its length and make it easier for pedestrians to cross busy junctions
  - Improved connections to wider initiatives such as Medway Park, the Universities and the Great Lines Heritage Park
  - Promoting Gillingham Hub as a landmark cultural/entertainment building at the western end of the High Street;
  - Encouraging regeneration of the railway station and improve public space and reduce traffic conflicts outside the station
  - Improve links to adjoining residential areas
  - Provide a new town square at the junction of High Street and Green
     Street as a focal point for events and a meeting place/destination; and
  - Introduce more flexible land uses at the western end of the High Street, with opportunities for residential uses on upper floors and a wider range of food, drink and leisure uses.
- 10.51 These should continue to be pursued over the medium and longer terms. Significant improvements to the Station are in hand but other measures will take longer to realise.
- 10.52 Beyond the centre a range of local centres provide a number of services. Some have consolidated in recent years but others are adapting well to an ever more competitive environment. These are listed in Policy CS29.



- 10.53 Elsewhere the Strand Leisure Park and Gillingham Park are highly valued facilities and have significant potential for improvement. However this will be largely dependant on resources being available. The Capstone valley and associated Darland Banks and Spekes Bottom provide a striking landscape adjoining very extensive and densely populated residential neighbourhoods. This area also forms part of the setting for the Kent Downs AONB. It will therefore be important to maintain and, where possible, enhance its open character, landscape quality and recreational potential.
- 10.54 Over the plan period the broad scale and location of new housing, employment and retail related development is expected to be as indicated in the following tables.

**Table 10-10 Potential Housing Development in Gillingham** 

Gillingham Housing Sites		
SLAA Ref	Site Name	Capacity
0511	Victory Pier, Pier Road (formerly Akzo	776
	Nobel), Gillingham	
0875	Retail Core (High St, Jeffrey St, King St)	100
	Gillingham	
	Main Sites	876
	Other Sites	487
	Housing Total	1,363

**Table 10-11 Potential Employment Development in Gillingham** 

Gillingham Employment Sites		
SLAA Ref	Site Name	Capacity
0564	Land off Bailey Drive (Adjacent to Royal	
	Mail to the east)	12,169
0875	Retail Core (High St, Jeffrey St, King St)	4,750
	Main developments	16,919
	Other sites	-1480
	Employment floorspace total (sq m)	15,439

Table 10-12 Potential Retail Development in Gillingham

Gillingham Retail Sites		
SLAA Ref	Site Name	Capacity
0875	Retail Core (High St, Jeffrey St, King St)	3,750
	Main developments	3,750
	Other sites	961
	Retail floorspace total (sq m)	4,711

Housing: showing sites over 100 units

Employment & retail: showing sites over 1000 sq. m



Policy CS29: Gillingham

In Gillingham Town Centre, priority will be given to the improvement of the built fabric and public realm through the development of a mix of town centre uses, the provision of open space and the promotion of the evening economy, in accordance with the Town Centre Development Framework, in order to strengthen its role as a district centre.

Specific efforts will be made to capitalise on the proximity of the universities at Pembroke and Mid Kent College and to continue measures to reduce deprivation.

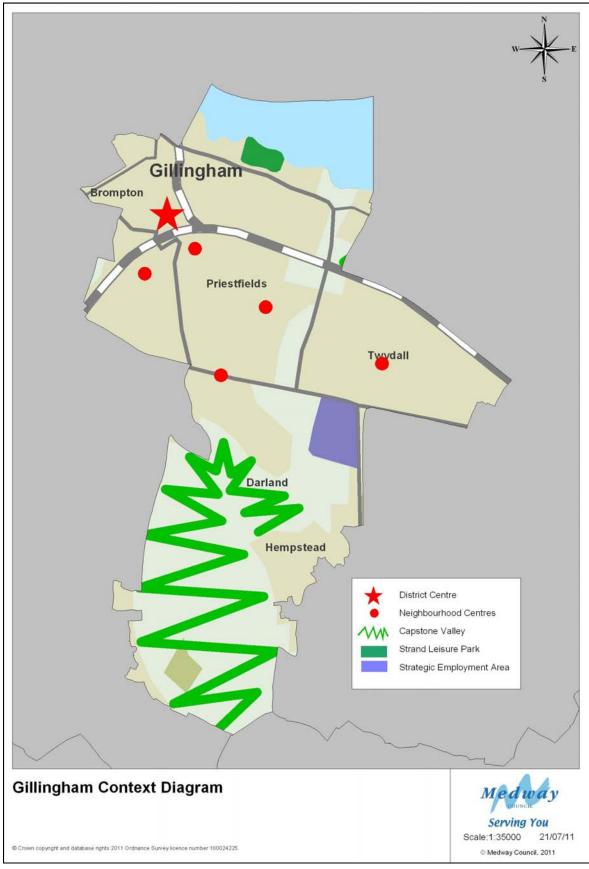
The following local centres will be safeguarded and promoted as neighbourhood centres:

- Canterbury Street
- Livingstone Circus
- Sturdee Avenue
- Watling Street
- Twydall Green

Where available, opportunities will be pursued to enhance the recreational potential of the Strand Leisure Park. The Capstone Valley will be afforded long term protection from built development, reflecting its high quality landscape and contribution to the setting of the Kent Downs AONB.



Figure 10-6 Gillingham Context Diagram





## Rainham

- 10.55 The Rainham sub area runs from the Riverside Country Park and Motney Hill Peninsula through the town centre and on to the Borough boundary south of the M2.
- 10.56 Rainham is a generally prosperous area characterised by extensive neighbourhoods developed in the post war period. These include Rainham Mark, Parkwood and Hempstead and Wigmore. The town centre was a freestanding village in living memory but has now been surrounded on all sides by development.
- 10.57 Important remnant areas of the North Kent Horticultural Fruit Belt remain to the north and east of the town and land next to the estuary is an important country park. These areas experience classic urban fringe pressures with land fragmentation and trespass putting pressure on farming activity.
- 10.58 There are pockets of deprivation close to the town centre, contrasting strongly with the very prosperous southern neighbourhoods.
- 10.59 Rainham station is one of the busiest commuter stops in the region, while large numbers of London commuters also use daily coach services to the capital from the neighbourhoods closer to the M2.
- 10.60 The town centre is dominated by the 'Precinct' a 1980's pedestrianised shopping centre that is trading reasonably well but warrants reinvestment. A key feature recently has been the growth of the evening economy, which has diversified the centre and brought vacant properties back into use.
- 10.61 The catchment area of the centre overlaps with that of the Hempstead Valley Shopping Centre. This is a very successful purpose built centre, wholly occupied by national multiple retailers and providing an attractive alternative to not only Rainham but also Gillingham and Chatham town centres.
- 10.62 Local centres are well located to serve their residential neighbourhoods but are, in some cases, struggling to compete with the nearby larger centres. This is particularly the case with Parkwood Green but it still provides a diverse range of services to its local area and it is important that it is nurtured.
- 10.63 Over the plan period the broad scale and location of new housing, employment and retail related development is expected to be as indicated in the following tables. The low housing numbers reflect the built up nature of the area and absence of previously developed land.

Table 10-13 Potential Housing Development in Rainham

Rainham Housing Sites		
SLAA Ref	Site Name	Capacity
	Main Development	0
	Other Sites	112
	Housing Total	112



**Table 10-14 Potential Employment Development in Rainham** 

Rainham Employment Sites		
SLAA Ref	Site Name	Capacity
0655	Land south of Kent Terrace Canterbury	
	Lane Rainham	2,350
0690	Crest Packaging Site Courteney Road	9,750
	Main developments	12,100
	Other sites	-99
	Employment floorspace total (sq.m)	12,001

Table 10-15 Potential Retail Development in Rainham

Rainham Retail Sites		
SLAA Ref	Site Name	Capacity
0691*	Hempstead Valley Shopping Centre	9,730
	Main developments	9,730
	Other sites	493
	Employment floorspace total (sq.m)	10,223

<sup>\*</sup> Hempstead Valley Shopping Centre sites have been combined under one entry Housing: showing sites over 100 units

Employment & retail: showing sites over 1000 sq. m

# Policy CS30: Rainham

Rainham town centre will continue to function as an important 'district' level centre and reinvestment in and extensions to the 'Precinct' centre will be encouraged.

Hempstead Valley Shopping Centre is also classified as a 'district' level centre. New retail investment should focus on maintaining the current competitive position of the centre and not be of a scale that would divert investment from other centres and Chatham in particular.

Opportunities to diversify the mainly comparison based shopping offer and provide a wider range of non-retail services typical of a district centre will be encouraged.

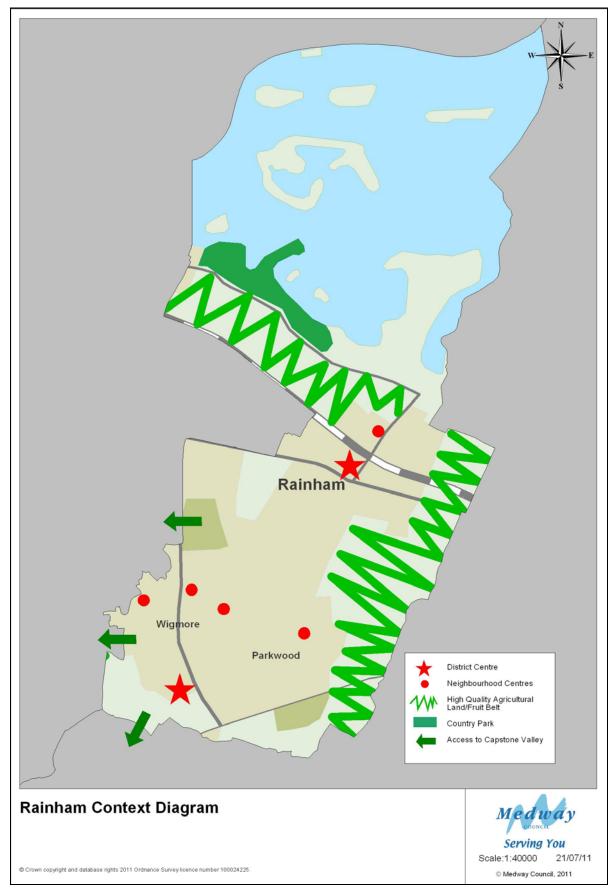
The following local centres will be safeguarded and promoted as neighbourhood centres:

- Station Road
- Hoath Lane
- Fairview Avenue
- Hempstead Road
- Parkwood Green

The Council will work with landowners and farmers, the local community and relevant agencies to actively manage urban/rural fringe areas, balancing continued agriculture production with managed public access, open space and biodiversity.



Figure 10-7 Rainham Context Diagram





# Hoo Peninsula and Isle of Grain

- 10.64 The Hoo Peninsula makes up the largest part of Medway's extensive rural area. Located between the Thames and Medway estuaries, it has a distinctive character that strongly distinguishes it from other parts of Medway.
- 10.65 The area's character is defined by a sense of remoteness, the openness of the internationally important marshes, and surrounding estuaries, and the wooded ridge running from the south west, contrasted with the dominant industrial installations at Grain and Kingsnorth, and the pattern of villages around the main transport routes. The peninsula's historic environment has been shaped by centuries of industrial activity, and its strategic position on the confluence of the Thames and Medway has given it a significant military heritage.
- 10.66 The area has strategic importance for energy infrastructure, transport and minerals, and also has large tracts of land in use by the military. These activities have strong impacts on the surrounding countryside and villages, resulting from their dominance in the landscape, traffic levels, and particularly freight movements on rural roads.
- 10.67 The area offers potential for managing adaptations to climate change, such as flood water storage and increases in woodland. The north and east of the peninsula could offer sites for new wetland habitat creation in response to the Thames Estuary 2100 plan. There are a number of barriers in accessing the countryside but there is recognition that the area could offer a great open space resource for local people and visitors through appropriate management. An access management strategy, promoting strategic connections and local routes will be developed for the area, ensuring that visitor pressure is drawn away from the most sensitive sites.
- 10.68 There is a distinct rural character to the Hoo Peninsula, with a dispersed pattern of villages. Historically remote from the main centres of population across north Kent, the area's population expanded significantly from the 1960s with the development of the energy sector on the peninsula. The largest settlement of Hoo St Werburgh acts as a service centre for the surrounding rural communities but has a relatively limited range of facilities.
- 10.69 The villages face the pressures of sustaining services and facilities needed to underpin the quality of life for their residents and surrounding countryside. These pressures present a challenge to the retention of the distinctive characteristics of rural life. The peninsula villages vary significantly in size and character, and some are particularly vulnerable to loss of services, that could undermine their sustainability. Rural transport services are critical in preventing isolation. Many villages experienced expansion during the 1960's and 70's and this has detracted from their intrinsic character. In the case of Hoo St. Werburgh and High Halstow expansion has continued to the present day but has not necessarily knitted well into the settlement structure. There are opportunities to promote local landscape enhancements to the peninsula villages. Particularly their edges and the roads connecting them, to better reflect the rural setting.
- 10.70 Agriculture is a key land use on the Hoo Peninsula and the area contains a significant proportion of the highest quality agricultural land. Horticultural



production is on a significant scale, serving markets nationally. In addition to the large industrial sites at Kingsnorth, Grain and Hoo Marina, there are a number of smaller employment sites across the area, providing local employment opportunities.

- 10.71 The area faces change through expansion of industrial activities, the proposed new settlement at Lodge Hill, increasing visitor numbers, and pressures on the sensitive natural environment, including through climate change. The peninsula has also experienced ongoing threats of damaging development, such as proposals for a Thames Estuary airport.
- 10.72 The overarching issue for the Peninsula is the challenge of realising the strategic importance of the area, in line with the protection and enhancement of a sensitive and important natural environment and safeguarding a vibrant and distinctive character of rural life. In summary the Peninsula is an area of exceptional significance for a number of diverse land uses its energy and transport infrastructure are of national importance, its natural environment is of international importance for wildlife, and its agricultural land is of the highest quality for food production. It contains the largest sites in Medway allocated for residential and employment growth.
- 10.73 These unique circumstances and opportunities demand that development on the peninsula is considered with the utmost sensitivity.
- 10.74 In line with wider national trends, there are increasing pressures on village services and facilities, such as shops, post offices, health facilities, pubs and village halls. Many services have been lost, and much community infrastructure is in need of investment. These services together with good public transport are essential to the well-being of the communities. The provision of broadband is recognised as critical infrastructure to support businesses and communities, and existing services are poor in many parts of the peninsula. The council will support rural communities in developing village plans to address the needs of their local areas.
- 10.75 Hoo St Werburgh provides a range of services and facilities, such as retail, education, community services and leisure that are not found in the smaller villages. The development of Lodge Hill creates both an opportunity to enhance the services and facilities on the peninsula and a challenge to Hoo's current role. The impact of Lodge Hill on Hoo St Werburgh and the surrounding villages will need to be carefully managed so that existing services and facilities are not undermined. Enhanced rural transport links will be critical to ensuring that people from outlying villages can take advantage of new services at Lodge Hill, including the expanded bus services operating from the new settlement.
- 10.76 The environment of the Hoo Peninsula has gained a higher profile in recent years, through initiatives such as the Thames Gateway Parklands programme. These plans seek to develop a greater role for the Peninsula as a location for visitors to enjoy, particularly through walking and cycling. This will be achieved through the development of key visitor destinations, such as the RSPB reserves at Cliffe Pools and Northward Hill, Upnor Waterfront and Grain Coastal Park, together with improvements to the footpath and cycling networks.



- 10.77 The area to the south-west of the peninsula, between Frindsbury, Upnor and Chattenden, is of significant importance as a 'gateway to the peninsula'. It is the key interface between urban Medway and the rural area of the peninsula. It is an area noted for the richness of its heritage and environment, with Manor Barn, Upnor Castle and Depot, Medway waterfront, and neighbouring woodland. This area needs to be actively managed for landscape enhancements to retain its open setting and to promote improved access for pedestrians and cyclists between urban and rural Medway.
- 10.78 Agriculture is facing a number of changes and there is recognition that businesses may need to diversify or develop more efficient methods of production but this needs to be achieved in a sensitive way.
- 10.79 Villages need local employment to support the life and vibrancy of their communities. Small employment sites are part of the fabric of villages, and these need to be encouraged.
- 10.80 There are extensive residential home parks at Allhallows and Hoo Marina that provide for an important niche within the wider housing market.
- 10.81 Allhallows also has an extensive holiday park and the operator has identified significant opportunities to upgrade the facilities and increase visitor numbers. This, in turn, could put pressure on the surrounding countryside but could also be an opportunity to improve the wider leisure experience for park visitors and others.
- 10.82 Over the plan period, the broad scale and location of new housing, employment and retail related development is expected to be as indicated in the following tables.

**Table 10-16 Potential Housing Development on Hoo Peninsula** 

Hoo Peninsula and Isle of Grain Housing Sites		
SLAA Ref	Site Name	Capacity
0050	Lodge Hill (Chattenden) Ministry of	5000
	Defence Estate	
0520	Hoo - North East Bells Lane Hoo	158
	Main Sites	5,158
	Other Sites	78
	Housing Total	5,236

**Table 10-17 Potential Employment Development on Hoo Peninsula** 

Hoo Peninsula and Isle of Grain Employment Sites		
SLAA Ref	Site Name	Capacity
0050	Lodge Hill (Chattenden) Ministry of	44,100
	Defence Estate	
0699	National Grid Property Holdings Grain	
	Road	464,750
0730	Land north east of Kingsnorth Industrial	
	Estate Eschol Road	250,992
0952	Land adjacent to Bellwood Cottages	4,655



Ratcliffe Highway	
Main Sites	764,497
Other Sites	1,422
Employment floorspace total (sq. m)	765,919

Table 10-18 Potential Retail Development on Hoo Peninsula

Hoo Peninsula and Isle of Grain Retail Sites		
SLAA Ref	Site Name	Capacity
	Lodge Hill (Chattenden) Ministry of	
0050	Defence Estate	5,315
	National Grid Property Holdings Grain	
0699	Road	180
	Main Development	5,495
	Other Sites	189
	Retail floorspace total (sq. m)	5,684

Housing: showing sites over 100 units

Employment & retail: showing sites over 1000 sq. m

# Policy CS31: Hoo Peninsula and the Isle of Grain

The Council will seek to achieve the potential of the peninsula's strategic development sites, in line with the protection and enhancement of its important natural environment.

The Council will work to secure the viability of the rural communities on the Hoo Peninsula and Isle of Grain by supporting the retention and development of local services and facilities needed to sustain village life and reduce the need to travel. It will work with local communities to prepare and implement village plans and other initiatives in order that they can become more self-supporting and can respond to local needs and changing circumstances.

# This applies to the following settlements:

- Hoo St Werburgh
- Lower Upnor
- Upper Upnor
- Cliffe
- Cliffe Woods
- Chattenden
- Cooling
- High Halstow
- St Mary Hoo
- Lower Stoke
- Stoke
- Allhallows
- Grain

The Council will seek to realise the potential of the Peninsula as a destination for walking and cycling by safeguarding and promoting key access routes, such as the national coastal path, supporting the



development of key sites for visitors and developing improved connections through the Medway Green Grid.

Improvements to the Allhallows holiday park will be supported provided they complement the adjoining settlement and contribute effectively to the sustainable management of the surrounding countryside.

The Council will support the development of a strong economy to sustain local communities and retain the distinctive character of the countryside.

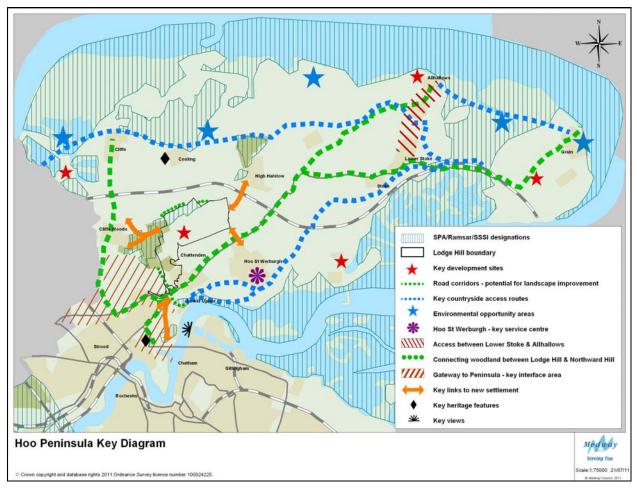


Figure 10-8 Hoo Peninsula Context Diagram

# **Medway Valley**

10.83 This rural area covers the Medway Valley and Kent Downs to the south of the M2 and to the east and west of the River Medway. It is characterised by riverside villages set against the backdrop of the woods and grasslands of the Downs and is strongly marked by the transport corridors of the M2 and A228 and the river cutting through the area.



- 10.84 Its downland landscape and the barrier created by the M2 give it a different character to other parts of Medway. Land to the east of the river is particularly isolated.
- 10.85 Much of this area is set within the Kent Downs Area of Outstanding Natural Beauty. On the western side running along the Medway Valley, a prominent transport and development corridor reflecting former industrial uses, contrasts with the upper scarp slopes and wooded ridge of the Kent Downs. To the east of the river, a more open landscape, less damaged by infrastructure, affords generous views. The valley sides, wooded ridges, marshland and river all contribute to a strong sense of visual richness and local distinctiveness.
- 10.86 The area is 'sandwiched' between the M2 and the M20. Transport infrastructure within and adjacent to the area has a significant impact on the landscape and setting of the villages and countryside. The road network will be further extended through a planned bridge over the Medway linking Halling and Wouldham, serving a new development at Peters Pit in Tonbridge and Malling.
- 10.87 There is a strong historic environment, and a legacy of settlement across the centuries from the Neolithic period. The valley villages grew up through their links to the river and saw expansion with the development of the cement industry in the 19<sup>th</sup> Century. Most of the cement industry has gone but it has defined much of the local landscape, with chalk cuttings and pits, and the 'blue lake' at Halling.
- 10.88 The villages of Cuxton and Lower Halling offer a range of local services and facilities well related to their size. These villages are also connected to the Medway Valley rail line linking Strood, Maidstone and Paddock Wood. Many residents look outside of Medway, particularly to the Malling and Maidstone areas to access services, such as education and retail. There are local employment sites at Cuxton Marina and in Halling, and farming and forestry are significant. There is scope for limited consolidation of employment land at Cuxton Marina, but only where development realises the opportunity to deliver improvements to the landscape setting of this sensitive area.
- 10.89 Much of the land is Metropolitan Green Belt. The Medway Valley also forms part of an area where it is intended to prevent coalescence between Medway and the Maidstone/Malling area and maintain the character of the various settlements in between.
- 10.90 The closure of the Cemex plant at Halling is a key site and will accommodate a significant new employment and residential development. It is more than sufficient to meet local requirements and so can also contribute to meeting needs in the surrounding area. It has a particularly important role in providing replacement employment for that lost when the cement works closed. The amount of land available is such that it will significantly extend the settlement and redefine how services are provided and located. The new development will need to demonstrate sensitive design and knit into the existing development form of the wider village.
- 10.91 Until recently the area has been somewhere to travel through rather than it being a destination in its own right. However that is now changing as the



- rugged industrial legacy softens and new countryside initiatives improve appreciation of its exceptionally high intrinsic quality.
- 10.92 Recognition of the area's environmental assets, together and promotion of the objectives of the AONB, underline the need for positive management of this sensitive landscape. This will need to focus on strengthening its distinctive character, enhancing connections to the river and wider countryside and improving access from neighbouring urban areas. Work is already well underway through the Valley of Visions programme, and work at Ranscombe Farm and Nashenden Valley. The Valley of Visions programme focuses on improving access, enhancing the quality of the environment and engaging with local communities in sharing the area's heritage.
- 10.93 The Medway Valley is of key importance to strategic green infrastructure networks across north Kent, through its strong connections to adjoining districts. The North Downs Way and the surrounding footpath network provide links to Cobham, Shorne and more widely to the south. Although the area sits within the valley of the Medway, access and views to the river are limited. There is a strong interest in giving greater emphasis to the river. A feasibility study for the creation of a path running along the riverside connecting Medway and Maidstone has been produced by Sustrans to support plans to develop this strategic route.
- 10.94 The special character of the area requires sensitive treatment. This includes road corridors, the marked impact of the M2, improved links to the river and the links to Strood. Halling Marshes should also be developed as a key site for wetland management and improved access.
- 10.95 In line with wider national trends, there are increasing pressures on village services and facilities, such as shops, pubs and village halls but new developments have helped sustain a good range of services in Cuxton and Lower Halling.
- 10.96 Despite this there is need for further investment to ensure that the rural communities are able to continue to meet local needs. Cuxton has a specific issue with the provision of community hall facilities. The council will support local communities in assessing the needs of their village and sustaining services.
- 10.97 Agriculture and woodland are significant land uses in the area but there is a need to improve woodland management in some areas.
- 10.98 Over the plan period, the broad scale and location of new housing, employment and retail related development is expected to be as indicated in the following tables.

**Table 10-19 Potential Housing Development in Medway Valley** 

Medway Valley Housing Sites		
SLAA Ref	Site Name	Capacity
0352	Former Cement works, Formby Road, Halling	525
	Other Sites	23
	Housing Total	548



**Table 10-20 Potential Employment Development in Medway Valley** 

Medway Valley Employment Sites		
SLAA Ref	Site Name	Capacity
0352	Former Cement works, Formby Road, Halling	3000
	Other Sites	660
	Employment floorspace total (sq. m)	3660

**Table 10-21 Potential Retail Development in Medway Valley** 

Medway Valley Retail Sites							
SLAA Ref	SLAA Ref Site Name Capacity						
	Main Development	0					
	Other Sites	700					
	Retail floorspace total (sq. m)	700					

Housing: showing sites over 100 units

Employment & retail: showing sites over 1000 sq. m

Policy CS32: Medway Valley

The focus on green infrastructure planning in the Cobham-Shorne-Ranscombe area will be maintained and developed to improve access to and management of the high quality environment.

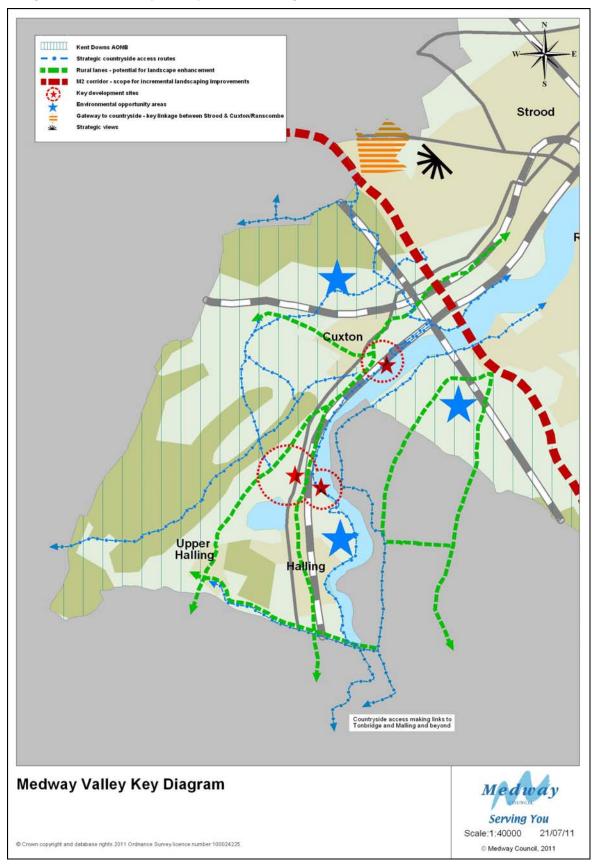
Cycling and pedestrian routes connecting to adjacent areas will be promoted, including the strategic connection between Medway and Maidstone. Opportunities for landscape enhancement in line with the objectives of the Kent Downs AONB designation will be encouraged.

The Council will support the retention and development of local services and facilities in Cuxton, Lower Halling and Upper Halling and encourage local communities to plan for the needs of their villages.

The Council will support a strong economy in the Medway Valley to sustain local communities. The site of the former cement plant at Lower Halling should be a major contributor to this. The land-based economy will be supported through more active woodland management and the sympathetic diversification of agriculture.



Figure 10-9 Medway Valley Context Diagram





A2/M2 to EBBSFLEET & LONDON

# Lodge Hill

- 10.99 Lodge Hill, Chattenden has been identified as a location for a new freestanding settlement since 1995 when the Thames Gateway Planning Framework was published. The principle of development has been consistently restated and reconfirmed in all plans since then.
- 10.100 The site is currently owned by the Ministry of Defence and comprises the Lodge Hill Training Area, Lodge Hill Camp, Chattenden Barracks and the Chattenden Training Area. The site extends to around 320 hectares in total, of which around 256 hectares is considered to be developable. A significant proportion of this can be classed as previously developed land. The site excludes further land in the Ministry's ownership, including the Wainscott Training Area and Camp, which will remain in military use.
- 10.101 Much of the site is set between the Chattenden and Deangate ridges and is largely hidden within the landscape of the Hoo Peninsula. However there are also exceptional views from these ridges and the adjoining rich woodland and countryside creates an outstanding setting for the development area.
- 10.102 Due to its location close to the A228 and its proximity to existing villages on the Peninsula, the development of Lodge Hill provides an opportunity to enhance the range of services available locally. However, it must also respect the character of nearby settlements and the wider Peninsula. Its position between the main urban area and the major employment areas on the Peninsula is a major asset in establishing Lodge Hill as a new centre for employment growth.

Allhallows-on-Sea Allhallows St Mary Hoo Cliffe Cooling Lower High Stoke Halstow GRAIN LODGE Cliffe Woods HILL KINGSNORTH St Werburgh Higham Chattender Higham Wainscott River Medway

UNIVERSITIES AT MEDWAY

Figure 10-10 Lodge Hill Connections



- 10.103 The site's physical constraints are recognised and understood. Detailed investigations have been undertaken which demonstrate that they can be appropriately addressed to allow the majority of the site to be developed over the period covered by the Core Strategy. There has been extensive engagement with local communities. This will need to continue throughout the planning phase of the new settlement, leading up to the submission of planning application(s) for the redevelopment of the site. The new community as it grows will also need to be involved as the development evolves.
- 10.104 There is no comparable opportunity in the Thames Gateway for a new settlement of this scale and nature on previously developed land and it is important that every effort is made to create a settlement that meets high standards of design and sustainability while relating sensitively to its exceptional surroundings. The following vision reflects this:

Lodge Hill will be a sustainable and integrated community, capitalising on its exceptional setting, complementing and supporting nearby settlements and the Hoo Peninsula as a whole.

It will be a distinctive place that connects to the surrounding rich countryside, with a land use pattern that minimises the need to travel. It will be an exemplar for the Thames Gateway in the way that it minimises its impact on the environment and provides for an excellent quality of life for all its residents.

It will also become an important focus for higher value economic activities, taking advantage of its location between urban Medway and the existing and emerging industries at Grain and Kingsnorth.

It will be a resilient place that is capable of adapting to environmental, social and other changes over the long term.

- 10.105 In delivering this vision the following principles will guide all planning and development decisions:
  - Strong character making the most of the natural landscape and military heritage to create a distinctive and attractive place with a strong identity and a legible hierarchy of spaces and places.
  - Active community a diverse, inclusive, vibrant and creative local culture encouraging pride in the local community and achieving a sense of mutual support and well being
  - Environmentally sensitive design, infrastructure, delivery and management that respect and enhance the natural environment, conserve natural resources and support people to lead sustainable lifestyles
  - Well connected bringing people together and to jobs, schools and services in an efficient, safe, affordable and uplifting way, both within the new settlement and between Lodge Hill and surrounding communities
  - Thriving economy achieving a high quality, prestigious employment offer, unique to Medway and complementary to Medway's economic vision. Prosperous and diverse, Lodge Hill's economy will provide a range of training, employment and business opportunities



- Well served allowing the community within Lodge Hill and beyond to benefit from public, private and voluntary services that are accessible to all and meet people's needs and aspirations
- Well run effective engagement and participation by local people, groups and businesses in the planning, design and delivery of Lodge Hill, with a sustainable management model and effective leadership, governance and participation of the community in the long-term stewardship of Lodge Hill.
- 10.106 In this Core Strategy, Lodge Hill is categorised as a 'strategic allocation', which is defined on the Proposals Map. Policy CS33 below will be expanded on by a site-specific Development Brief and a masterplan for the site, which will guide detailed planning decisions. The masterplan will be subject to regular reviews to ensure that proposals for the site remain robust in the face of changing circumstances.

# Policy CS33: Lodge Hill

Lodge Hill, as shown on the Proposals Map, will be developed as a freestanding mixed-use settlement providing:

- Approximately 5,000 new homes, of which around 4,300 will be completed within the plan period. Provision of 30% affordable housing within this total will be sought, in line with the provisions of Policy CS14
- Employment opportunities generally in balance with the resident working age population (c. 5,000), not only reflecting the needs of the settlement but creating a new focus for higher value economic activity in Medway
- Retail provision of at least 5,000 square metres GEA floorspace.

## Planning permissions will be granted subject to:

- Being consistent with a Development Brief and site-wide masterplan.
   These should fully reflect the Vision and Objectives for the site as set out above and be in accordance with the design principles and parameters illustrated on the Lodge Hill Concept Plan
- The provision of supporting infrastructure, including transport links, green infrastructure and community facilities
- Design solutions having due regard to:
  - o The military history and heritage of the site
  - The proximity of the Chattenden Woods Site of Special Scientific Interest, including the need for appropriate buffers and management arrangements
  - The provision of open space and other community facilities
  - o The benefits of retaining existing trees, hedgerows and other landscape features within the site
  - Measures to enhance biodiversity within and in close proximity to the site
  - O The potential for a comprehensive heating grid, neighbourhood power and heat generation, SUDs and other features minimising the carbon footprint of the development as a whole, including a water



# strategy

- o The need to create a well defined 'town centre' and associated neighbourhood centres serving not only the needs of the resident and working community, but also existing smaller settlements on the Hoo Peninsula, and in particular the existing settlement of Chattenden
- The need to create liveable neighbourhoods where the built form, mix of uses and layout of development enables future residents to achieve a good quality of life and encourages healthy and active lifestyles
- The requirements of a comprehensive Access Strategy and associated Transport Assessments, to be phased in accordance with the demands generated by the development, including:
  - o Accesses at the eastern and southern ends of the site
  - Contributions to offsite highway and junction improvements directly related to the scale and phasing of the development
  - Early provision of a high quality bus service including priority measures on the highway network, or other comparable public transport facilities connecting the settlement to the main Medway urban area
  - Measures to actively promote sustainable transport, including public transport use, walking and cycling
  - Measures to minimise rat-running on the surrounding rural road network while promoting connectivity for pedestrians and cyclists

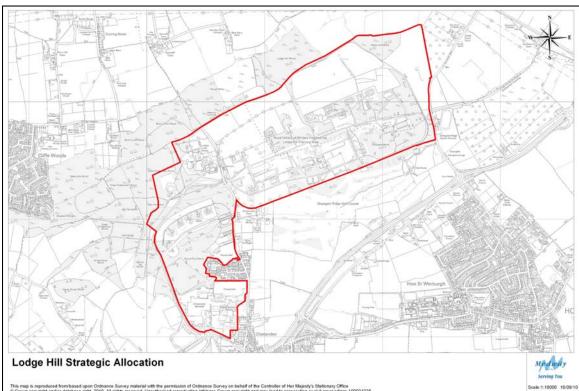


Figure 10-11 Lodge Hill Strategic Allocation



# Implementation

10.107 Given the scale of the development the precise mix and quantum of uses is likely to vary over time due to, for example, changing technology and market trends. The following broad land use mix is anticipated:

Table 10-22 Proposed Land Uses at Lodge Hill

Housing	Capacity for approximately 5,000 residential dwellings (of which approximately 4,300 to be delivered within the plan period), and with 30% affordable housing. This will include retirement accommodation.
Economic development	
- Retail	At least 5,000 square metres GEA, to include a foodstore
- Employment	At least 43,000 square metres sq m GEA for business uses
- Hotel	Two hotels
Community	Three primary schools (which may include an extension to the existing Chattenden Primary School) and a secondary school. All schools will include dual community use.  Community centre incorporating uses such as place of worship; emergency service accommodation; library  Primary Healthcare Centre  The land take for social infrastructure is expected to be approximately 6.5 hectares
Residential institutions	Assisted living and/or extra care accommodation (approximately 60 units) Nursing home accommodation (approximately 60 units)
Leisure	A range of facilities to be provided throughout the site through the provision of open space and through dual use with community and education provision
Landscape and open space	Throughout the site The land take for green infrastructure is expected to be approximately 90 hectares

- 10.108 The amount of development expected within the Core Strategy period has been calculated based on anticipated market absorption rates for residential dwellings on an annual basis, and an allowance for the provision of affordable residential dwellings. Market absorption rates are based on an analysis of the following:
  - The expected size and tenure mix of the residential accommodation anticipated



- The simultaneous marketing of multiple development opportunities to different developers
- The response of the housebuilder industry to predicted changes in industry and economic circumstances; and
- The appeal of Lodge Hill in the short, medium and long term in a local, regional and national context.
- 10.109 It is expected that the first residential dwellings would be delivered in 2014. The annual delivery rate of dwellings will step up from the start on site and will fluctuate across the period. It should reach an average of around 300 dwellings (all tenures). This is reflected within the housing trajectory. Lodge Hill is expected to contribute approximately 1,000 dwellings within the first five years after the Core Strategy's adoption.
- 10.110 In terms of the delivery of economic growth and employment opportunities, there will be a range of employment opportunities across the uses proposed, including business premises, shops and leisure, hotels and public services. As part of the objective of creating sustainable economic growth, the development of the new settlement should also explore opportunities to facilitate new working practices such as live/work and local communications and technology hubs.
- 10.111 The policy is based on the delivery of a minimum of 43,000 square metres of dedicated space for business uses, which reflects the fact that it will take a certain amount of time to establish Lodge Hill as a high quality business location. However, there is capacity to accommodate significantly more employment floorspace if its full potential is realised. The policy incorporates an ambition for a higher level of provision.
- 10.112 The development is expected to be delivered in phases. There may be strategic infrastructure that will be delivered ahead of the phased sequence. This will assist the delivery of future phases and may also help in meeting some of the objectives for the development. Land remediation may also be undertaken intensively at the beginning of the development process.



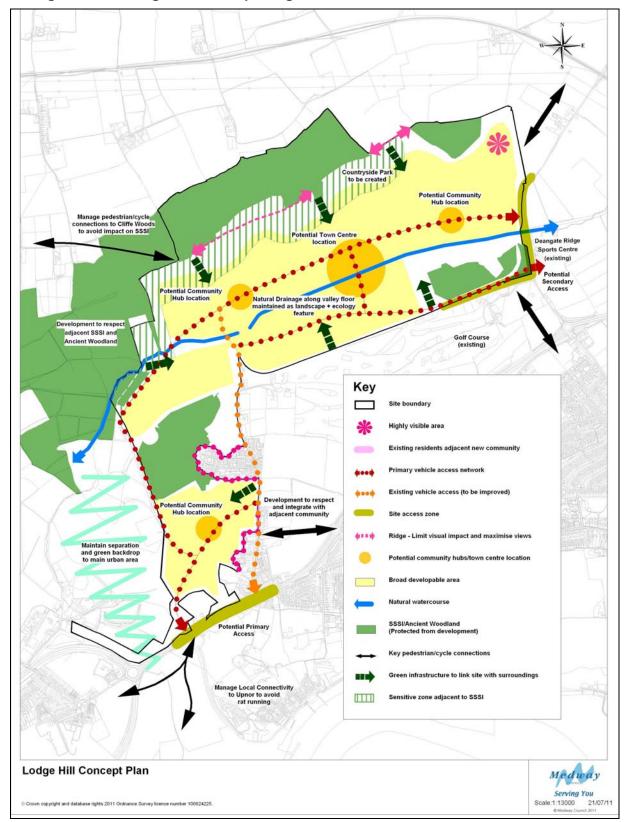


Figure 10-12 Lodge Hill Concept Diagram



- 10.113 The evidence base for the Core Strategy includes a number of Lodge Hill-specific documents that assess infrastructure requirements/provision for the development. It sets out the responsibility and funding source for delivery of each element, and the consultation bodies who have a bearing on the delivery. It demonstrates that there are good prospects of this being provided to enable the scale of development expected within the Plan period to be delivered, consistent with the requirement set out in PPS12.
- 10.114 The landowner's consultant team has been working closely with the Council and other relevant agencies. This early engagement has informed the indicative masterplan and is reflected in the site-specific evidence base. It will continue through the Development Brief process, the initial planning application and over the longer term to ensure that the strategic allocation is delivered in accordance with the policy.

# Monitoring

- 10.115 A number of formal and informal mechanisms are already in place to monitor progress of this strategically important project. An extensive development team is in place, as are arrangements for ongoing community and stakeholder engagement.
- 10.116 As the project develops progress will be reported formally through the Annual Monitoring Report but this is likely to be supplemented by at least six monthly project reviews and update reports to the Rural Liaison Committee and other relevant bodies.
- 10.117 The following indicators and targets will be used to monitor the progress of Lodge Hill.

**Table 10-23 Monitoring Targets for Lodge Hill** 

Indicator	Target
Progress through planning process, delivery of related documents	<ul> <li>Adoption of development brief by mid-2012</li> <li>Outline planning permission granted by mid/late 2012</li> </ul>
Dwelling completions at Lodge Hill	<ul> <li>First dwelling completion 2014</li> <li>Average annual completions of c. 300 dwellings (after 2014)</li> <li>Total of approximately 4,300 dwellings completed during plan period</li> </ul>
Amount of floorspace developed for employment uses at Lodge Hill	<ul> <li>Minimum of 43,000m² delivered during plan period</li> <li>Amount of floorspace delivered within use classes B1, B2 and B8, annually and cumulatively*</li> </ul>
Achievement of sustainability goals	<ul> <li>Energy infrastructure operational*</li> <li>Number of dwellings delivered at each Code level*</li> <li>Overall energy, carbon &amp; water</li> </ul>



Indicator	Target
	savings against Building Regulation compliant development*  • % energy needs met through on site generation*  • Number of households and businesses registered members of car club*  • % waste recovery and % reduction in waste sent to landfill during construction and operational waste phases*
Delivery of green infrastructure and open space at Lodge Hill	<ul> <li>Delivery of countryside park*</li> <li>Delivery of a linear park (including ecological areas) and water landscaping*</li> <li>Area of open space provided within development area*</li> <li>Length of cycle/footpath connections delivered*</li> </ul>
Provision of transport and social infrastructure at Lodge Hill	<ul> <li>Public transport service &amp; interim priority measures (or alternative measures to promote the bus service) in place by end 2013</li> <li>Final public transport priority measures in place*</li> <li>Delivery of footbridges at Four Elms Roundabout &amp; over A228 to Hoo by end 2013</li> <li>Opening of supermarket*</li> <li>Floorspace of retail &amp; town centre uses delivered*</li> <li>Delivery of primary &amp; secondary schools, health centre and community centre*</li> </ul>

<sup>\*</sup>Where appropriate, targets for these indicators will be set through the development brief and planning application process and will be monitored once in place



# 11. Implementation, Monitoring and Review

#### Introduction

- 11.1 To deliver the Core Strategy's spatial vision, objectives and targets, a robust implementation and monitoring framework is needed to ensure that outcomes are realised. This chapter identifies mechanisms for delivery, key milestones and delivery partners and provides a framework to monitor progress. It also sets out the basis for what are often termed 'developer contributions'. The Council, as a Local Planning Authority, is required to publish an Annual Monitoring Report (AMR). This assesses progress against core indicators and policies. Significantly, the AMR should also highlight what actions might be necessary to address core indicators and policies that are not being achieved.
- 11.2 Whilst the Council has produced the spatial strategy, its development has been informed by contributions from a wide range of stakeholders who will also support its delivery. The Core Strategy will be implemented by the Council working with its partners, through the planned investment of private and public resources and by proactively managing development through planning applications and related planning processes.

# **Delivery Partners**

The Private Sector

- 11.3 Implementation will be heavily dependent on investment by the private sector through new build or the redevelopment of key land uses such as housing (including affordable housing) and employment (including retail). Much infrastructure is also dependent upon private sector investment, including some transport improvements, utilities upgrades and green infrastructure.
- 11.4 As new developments are built, developers are expected to contribute towards a range of facilities through Developer Contributions.
- 11.5 This can affect the viability of individual developments, which have varying costs and constraints. The pattern of development proposed in the Core Strategy has been carefully assessed in this respect and three points need to be borne in mind:
  - Provision has been made for a greater scale of development than is actually required to deliver the strategy. This is to provide for reasonable flexibility and ensure that the strategy can be progressed in a volatile economic climate
  - Medway's location in the Thames Gateway means that it has some of the
    most complex and difficult development sites thanks to a legacy of past
    industrial use, flood risk and contamination. In these complex cases some
    element of public subsidy is likely to be required to bring them forward
    and prospects for this are uncertain. This again points to the need for
    flexibility in delivering the strategy
  - The Council has well developed systems in place to assess the viability of sites and negotiate in a transparent and consistent way with developers.



#### Other Public Sector Bodies

11.6 The Council will work with other public sector bodies, such as the Department for Communities and Local Government, Department for Transport, the Homes and Communities Agency and the Local Economic Partnership to deliver this spatial strategy. A particular focus will be placed on working with these partners to deliver key infrastructure (e.g. transport, green infrastructure and utilities) and development (residential and employment) projects.

## Local Strategic Partnership

11.7 The LSP is comprised of a number of partners and is a forum for collectively reviewing and steering public resources in Medway to meet the needs of the local communities. Together, these partners have a direct role in developing, delivering and monitoring this spatial strategy. Many 'public' facilities will be provided through Medway Council, their partners and charitable and voluntary organisations working in partnership. The Sustainable Community Strategy 2010 closely reflects this spatial strategy and has the support of these partners.

## **Implementing Development**

- 11.8 Although the Council, as local planning authority, determines planning applications for new development it has little direct control over when these are brought forward or implemented if permission is given. As such it is heavily reliant on private developers voluntarily coming forward with proposals. Even in a strong economic climate this can be unpredictable but prospects are particularly uncertain in the current economic downturn.
- 11.9 In response to the downturn in the market the Council was one of the first in the country to bring in a system of deferred payments for development contributions. It also has a structured process for pre-application discussions and it brokers introductions with affordable housing providers. Progress is monitored by, amongst others, the Medway Strategic Housing Board that reports into the Local Strategic Partnership.
- 11.10 Severe reductions in public funding have impacted on the Council's ability to directly support the regeneration programme but it nevertheless remains a top priority of the authority as set out in the Council Plan.
- 11.11 Policy CS 34 takes account of these factors and sets out the primary mechanisms the Council will use to implement the Core Strategy.

## Policy CS34: Implementation of the Core Strategy

The Council will utilise all appropriate measures to ensure the effective implementation of the Core Strategy. These include:

- Working closely with partners, particularly in delivering supporting infrastructure
- Seeking additional resources to bring forward strategic regeneration sites
- Ensuring that progress is closely monitored and, where



## necessary, remedial action taken

Intending developers are strongly advised to:

- Discuss proposals at an early stage using the pre-application process
- Ensure significant proposals are subject to consultation with the local community before planning applications are submitted
- Be prepared to follow an 'open book' approach where the extent or nature of development contributions are at issue
- Seek planning advice from the Council before acquiring land to ensure that appropriate costs are reflected in the land value.

Service partners should keep the Council informed of progress with and changes to their investment programmes to ensure they can be coordinated and adapted to changing circumstances and the Medway Local Infrastructure Plan is kept up to date.

# Implementing Infrastructure

- 11.12 New development within Medway needs to be supported by a level and type of infrastructure that is appropriate to meet the needs of existing and future residents. This may be achieved through the protection and improvement of existing infrastructure and/or requiring new infrastructure to be established alongside new development.
- 11.13 PPS 12 states that the Core Strategy is a means for orchestrating the necessary social, physical and green infrastructure to ensure sustainable communities are delivered. In order to ensure that the infrastructure needed to support development in Medway is delivered, the Council needed to establish a comprehensive understanding of the infrastructure requirements of future development and growth, and work with partners to identify how it will be provided.
- 11.14 There are many delivery partners responsible for the delivery of various parts of the Strategy. The key areas relate to housing, employment and retail development. Work undertaken to prepare an Infrastructure Plan has examined what will be needed, where it is to be located, when it will be provided, who is responsible and the means to implement and deliver the development. Further detail can be found in the Infrastructure Delivery Schedule at the end of this chapter.

# **Monitoring and Implementation Framework**

- 11.15 The following Monitoring and Implementation Framework (MIF) has been derived from work undertaken to provide a baseline position for both the Spatial Strategy and the Sustainability Appraisal.
- 11.16 The MIF set out below identifies how Core Strategy Policies are to be implemented, by when and by whom. It also sets out indicators to monitor these policies. As stated above, the Council reports annually on core indicators as well as national indicators in the AMR. The Sustainability Appraisal also includes a monitoring framework to monitor the performance of



the Council's spatial strategy against sustainability criteria in order to ensure more sustainable development is secured. The MIF therefore builds on these existing processes, rather than establishing an additional framework and will likewise be reported in the AMR.

#### **Review**

11.17 Significant issues or changes in circumstances, which might necessitate a full or partial review of the Core Strategy, will also be considered through the AMR.

## **Developer Contributions**

- 11.18 The Council has powers to enter into planning obligations with those who have an interest in the land concerned. These are set out in S106, 106A and 106B of the Town and Country Planning Act 1990 (as amended by the Planning and Compulsory Purchase Act 2004). They are a means of ensuring that the environment is safeguarded and that necessary infrastructure and facilities are provided to serve new development and offset any consequential planning loss to the area.
- 11.19 Regulation 122 of the Community Infrastructure Regulations 2010 (CIL) sets out the tests for such obligations. It is unlawful for a planning obligation to be taken into account when determining a planning application for development that is capable of being charged by CIL if the obligation does not meet the following tests:
  - Necessary to make the development acceptable in planning terms
  - Directly related to the development; and
  - Fairly and reasonably related in scale and kind to the development.
- 11.20 Medway Council's Guide to Developer Contributions, a Supplementary Planning Document<sup>11</sup>, sets out what obligations and contributions will be required for future developments in accordance with Government guidance. Developers are expected to take account of, and meet the requirements of, this document before submitting planning applications to the Council. It is designed to help them know what the Council is likely to require for new developments in Medway.

# **Community Infrastructure Levy**

- 11.21 The Community Infrastructure Levy (CIL) is a new charge that local authorities can choose to introduce to fund infrastructure in their area. The CIL regulations came into force in April 2010. CIL is intended to provide greater certainty, predictability and transparency as to the level of contribution that will be required, as it takes the form of fixed standard charges.
- 11.22 Medway Council will establish an appropriate Charging Schedule for the Community Infrastructure Levy. It will go through a process of public consultation and Independent Examination before becoming operative. Funding from the CIL will then be used to help finance any necessary

<sup>11</sup> http://www.medway.gov.uk/environmentandplanning/planning/developercontributions.aspx



improvements to infrastructure. The Council has set out, in its revised Local Development Scheme (LDS), its timetable for adopting its CIL. In the meantime, its Developer Contributions Guide SPD will continue to be applied.

- 11.23 The Infrastructure Delivery Plan is intended to provide the evidence to support a Medway Infrastructure Charging Schedule. It will need to be supplemented by an economic viability assessment of the impact of any proposed levy when the charging schedule is submitted for examination.
- 11.24 The accompanying Infrastructure Delivery Schedule identifies infrastructure of importance to the overall delivery of the LDF. Fortunately the scale and location of development proposed in the Core Strategy is not dependent upon critical infrastructure works such as major new road links. However a range of infrastructure will still be required to ensure that new and existing developments are properly integrated, the natural environment is protected and new residents have access to essential services.

# **Policy CS35: Developer Contributions**

Developers will be required to make provision for infrastructure where the need arises directly from development. The Council will seek to enter into a legal agreement with developers to provide for new physical infrastructure, social, recreational and community facilities (including education facilities) and environmental mitigation or compensation measures where mitigation on site is impossible or inadequate on its own. Provision will be sought in proportion to the size and nature of the individual development and will take into account the existing pattern of provision in the locality.

Provision will be made on the site where this can be reasonably achieved. When this is not the case, contributions will be sought for the provision of facilities and ecological features elsewhere, provided their location can adequately serve the development site or are appropriately related to it.

This policy will be adapted, as necessary, in the Guide to Developer Contributions to reflect Government guidance and regulations in force at the time.



**Table 11-1 Monitoring and Implementation Framework** 

Policy	Policy summary points		Timesca	le	Implementation	Monitoring
,		Short 1-5 yrs	Medium 5-10 yrs	Long 10-15 yrs		indicators
CS1 Regenerating	Major physical change in Chatham centre	<b>✓</b>	<b>√</b>	✓	- Chatham Historic	Multiple Deprivation
Medway	The creation of a dynamic new mixed use waterfront environment on the west bank of the River Medway		✓	✓	Dockyard Trust	Index of Deprivation
	The creation of a new community at Rochester Riverside	✓	$\checkmark$		Network Rail	
	Further development of the Chatham Historic Dockyard as a heritage destination and commercial quarter	✓	✓	✓	Train Operator Companies	Completion of retail, mixed use and commercial floor space
	Development of the Interface Land		✓	✓		
	Completion of the residential communities at St. Mary's Island	✓				
	Completion of the residential communities Gillingham Waterfront.	<b>√</b>				
	Sensitive change within Gillingham town centre to reinforce its role as an important 'District' centre	✓	✓	✓		
	The creation of enhanced station environments and interchange facilities	✓	✓	✓		
	The creation of a high quality public realm	✓	$\checkmark$	$\checkmark$		
CS2 Quality & sustainable design	New buildings in Medway will be expected to meet the highest architectural standards that reflect or generate local distinctiveness through: The expression of function and structure The use of materials Appropriate proportions, visual order and detailing The application of environmental criteria.	ate local Via planning applications Housing Qual Assessments te proportions, visual	Housing Quality - Building for Life Assessments  Number of planning applications			
	New development should result in buildings, streets, spaces and neighbourhoods, which are high quality, durable and well integrated with their surroundings	✓	<b>√</b>	<b>✓</b>		which make reference to conditions as listed in policy summary points
	The acceptability of tall buildings (18m or higher) and the protection of strategic views will be determined in accordance with the Council's Building Heights Policy 2006.*	✓	<b>√</b>	<b>✓</b>		



	Applications for major sites (25 houses or more) should be accompanied by an 'Accessibility Assessment'	<b>✓</b>	✓	✓		
	Applications for significant regeneration sites, large, or sensitive sites should be accompanied or preceded by a design brief that is subject to a public consultation process.	<b>√</b>	✓	<b>√</b>		
CS3 Mitigation & adaptation to	Residential development will be required to achieve at least level 3 of the Code for Sustainable Homes	✓			Via planning applications	Number of residential completions
climate change	Commercial buildings over 1,000 sq m will be required to meet the BREEAM "very good" standard.	<b>√</b>			Via planning applications	achieving at least level 3 of the Code for Sustainable Homes, or the national timescales mentioned.
	The Council will support the proposals in the Final Water Resources Management Plan, 2010-2035 or other measures that have been agreed to improve the efficiency of water use and maintain supplies at the level required to meet local needs.	<b>√</b>	<b>√</b>	<b>√</b>	Southern Water	Percentage of commercial completions over 1,000 sq m meeting the BREEAM "very good" standard.  Monitored by OFWAT
CS4 Energy Efficiency and	All new development will be expected to show reduced energy loads through passive design and the inclusion of energy efficiency measures.	<b>✓</b>	<b>✓</b>	<b>√</b>	Via planning applications	
Renewable Energy	In developments of 10 dwellings or more, or over 1,000 sq m of floor space, it will be expected that 20% of the remaining on-site energy loading will be delivered from renewable energy sources.	✓	✓	<b>√</b>	Energy providers	Percentage of applications conforming with energy requirement
	Should it prove feasible to do so, the Council will promote large scale district heating schemes that utilise waste heat from conventional power generation		Not kno	own		
	Subject to there being no significant adverse effects in terms of the natural environment and residential amenity the Council will positively promote the installation of all forms of renewable energy systems.	<b>✓</b>	<b>√</b>	✓		Relevant planning applications  Number of retrofitting schemes carried out
	Compensatory measures will be sought and applied to current buildings within the locality	<b>√</b>	<b>√</b>	<b>√</b>		Potentially reflected in number of properties in fuel poverty/high heat loss reducing
CS5 Development and Flood Risk	Proposals for development within flood zones 2 and 3 and on sites of over 1 hectare in zone 1 must be accompanied by a flood risk assessment.	<b>✓</b>	<b>√</b>	<b>√</b>	Via planning applications	Number of planning permissions granted contrary to Environment



	Development that would harm the effectiveness of existing flood defences or prejudice their maintenance or management will not be permitted.	✓	✓	<b>√</b>		Agency advice on flooding and water quality grounds
	Proposals in areas at risk from flooding must demonstrate that account has been taken of the resilience of buildings, infrastructure and other important local features.	✓	✓	✓		Number/percent of applications conforming to conditions listed in policy summary points
	Relevant flood defence works as identified in the Medway Strategic Urban Flood Defence Strategy should be incorporated, if applicable. All developments which have the potential to affect the ability of land to absorb rainwater will be required to incorporate and obtain approval for sustainable urban drainage systems (SUDS) in line with national standards, prior to construction.	<b>√</b>	<b>√</b>	<b>√</b>		
	All development within flood zones 2 and 3 will require surface water run-off to be controlled as near to its source as possible.	✓	<b>✓</b>	✓		
CS6 Preservation and Enhancement of Natural Assets	Wildlife habitats and sites, populations of wild species and other biodiversity features will be protected, maintained and enhanced, especially through long term management and habitat creation schemes, particularly where they have been identified as being of international, national and local importance and as priorities in the UK and Kent Biodiversity Action Plans, or where they are protected or designated under relevant legislation.	<b>√</b>	<b>√</b>	<b>√</b>	management	Hectarage of land lost  Number/area of new habitat created  Contributions received towards opens spaces
	The management of farming, agricultural land, forestry and woodland so as to conserve and enhance biodiversity will be encouraged.	✓	✓	✓		Amounts and actions done on management of sites
	When development is permitted, opportunities will be pursued and secured for the incorporation, enhancement, re-creation or restoration of wildlife habitat, either on-site, off-site or through contributions to the strategic provision of natural open space. Such strategies should be in place and functioning prior to commencement of the development.	<b>√</b>	<b>√</b>	<b>√</b>		



	Where the negative impact cannot be avoided, but the importance of the development is considered to outweigh the impact, then environmental compensation will be sought by the creation by the developer of new habitats or features on other suitable sites and their long term management will need to be secured.  Compensation will normally be sought on more than a like-for-like basis, in order to secure both the maintenance and enhancement of biodiversity.	<b>✓</b>	<b>✓</b>	<b>√</b>		
CS7 Countryside	Development in the countryside will be permitted in accordance with the objectives and principles of PPS4 and PPS7.	<b>✓</b>	✓	<b>√</b>	Via planning	Landscape Character Assessments
and Landscape	Existing features, which are important to the local landscape character, shall be retained, incorporated into the development and protected during construction work	✓	✓	<b>√</b>	applications  Medway Council	
	The Council will take into account the proposals in the Medway Landscape Character Assessment, the Green Cluster Studies, the Valley of Visions project and the Medway Smile Living Landscape Scheme when working with its partners to identify and implement landscape and habitat enhancement schemes.	<b>√</b>	<b>√</b>	<b>√</b>	Amenity Organisations	Number of schemes implemented taking account of proposals in listed studies
CS8 Open Space, Green Grid and	The Council will seek to provide equal opportunities` for all people to enjoy accessible, high quality and affordable open space.	✓	✓	✓	Via planning applications	Number of applications observing these guidelines
Public Realm	New or enhanced urban spaces should be provided as a part of major regeneration proposals.	✓	✓	✓	Medway Council	
CS9 Health and Social	The development of sustainable places in Medway with healthy communities and social infrastructure where residents enjoy a high quality of life	✓	✓	✓	Medway Council & Partner agencies	Health deprivation by - Index of Deprivation



Infrastructure	The Council will continue to implement its Neighbourhood Action Plans at All Saints, Brook Lines, Strood South, Twydall and White Road Estate, and develop two more at Luton and Gillingham North.	<b>√</b>	<b>✓</b>			Standardised mortality ratio  Average life expectancy  Early deaths – heart disease & stroke, cancer  Teenage pregnancy rate
CS10 Sport and	Improve the quality of life of existing and future residents of Medway and promote healthier lifestyles	<b>√</b>	✓	✓	Medway Council NHS (PCT, SHA)	Adults participation in sports
Recreation .	Safeguard existing facilities for sport	<b>√</b>	✓	✓		Number/type of facilities lost
	Continue to develop a strategy to maximise the potential local benefits of the London Olympics 2012	✓				
CS11 Culture and Leisure	In order to realise the significant cultural and leisure potential of the area, to improve the quality of life of existing and future residents, promote healthier lifestyles and a participative and inclusive community.	✓	<b>√</b>	<b>√</b>	Lead: Medway Council	Via monitoring of Cultural Strategy
	Support the implementation of Medway's Cultural Strategy which encompasses a range of cultural provision	✓	✓	✓		
	The development of new cultural venues centred on Chatham and extending along the Medway waterfront.		✓	✓		
CS12 Heritage Assets	Supporting the conservation/ enhancement of the historic environment and contribution made to local and regional distinctiveness and sense of place`	✓	<b>√</b>	✓	Medway Council English Heritage	Heritage Assets Register
	Encouraging proposals that make sensitive use of historic assets through regeneration	✓	✓	<b>√</b>	Planning applications	
	Supporting World Heritage Site status for the Chatham Dockyard and its Defences	<b>√</b>	✓			
CS13 Housing Provision and Distribution	Provision will be made to ensure at least 17,930 new homes can be delivered between 2006 and 2028, (an average of 815 per	✓	✓	✓	Planning applications	Net additional dwellings a) in previous years b) for reporting year c) in future years



	year), of which at least 17,500 will be within the Thames Gateway Area.					Number of new and converted dwellings on previously developed land  Housing trajectory - 2006-2028
CS14 Affordable Housing	25% affordable housing provision will be sought on all sites within the existing defined boundary of the main urban area and Hoo St. Werburgh	<b>√</b>	✓	<b>√</b>	Planning applications	Gross affordable completions (count)  Affordable completions as proportion of all completions
	30% affordable housing provision will be sought on all sites elsewhere within Medway.	✓	✓	✓		
	Provision should be made on all new housing developments capable of accommodating 15 or more dwellings, or on sites of 0.5 ha or more in size, irrespective of the number of dwellings.	<b>√</b>	✓	✓		
CS15 Housing Design and Other Housing Requirements	Sustainable residential communities will be created by requiring the provision of a mix and balance of good quality housing of different types and tenures and having regard to the North Kent Strategic Housing Market Assessment.	<b>√</b>	<b>√</b>	<b>√</b>	Planning applications	Housing Quality - Building for Life Assessments
CS16 Gypsies, Travellers and Travelling Show people	To meet the identified need for Gypsy, Traveller and Travelling Show people pitches within Medway, sufficient sites will be allocated within the Allocations and Development Management Development Plan Document.	<b>✓</b>	✓	<b>√</b>	DPD	Net additional pitches (Gypsy and Traveller)
CS17 Economic Strategy	The development of the Medway economy will be dynamic and widely based, to provide employment for the community as a whole, to provide greater choice for the workforce, offer an alternative to out-commuting and achieve a balance with housing growth.	<b>√</b>	✓	✓	Lead: Medway Council LSP	Amount and type of completed employment floor space.  Amount and type of employment land available



			,	,		
						Job Seekers Allowance claimant count & rate  Employment rate  GVA per capita
CS18 Tourism	Medway Council will positively promote sustainable tourism development.	<b>√</b>	<b>√</b>	<b>√</b>	Medway Council Planning	Number of visitor stays in Medway  Length of season
	A diverse and high quality tourism offer will be encouraged that seeks to lengthen the tourism season, increase the number and length of visits, provide job opportunities and sustain the tourism economy, whilst maintaining and where possible, enhancing Medway's natural and built environment qualities	<b>√</b>	<b>√</b>	<b>√</b>	applications	Average length of stays
CS19 Retail and Town Centres	Medway Council will maintain and enhance the vitality and viability of its network of urban and rural centres and support the delivery of appropriate comparison and convenience retail, office, leisure, community, entertainment and cultural facilities.	<b>√</b>	✓	<b>√</b>	Medway Council Planning applications	Net completions A1-A3 Gross completions in town centres
	Town centres and edge of centre sites will be the preferred location for such development and a sequential test will be applied for development elsewhere in accordance with PPS4.	<b>√</b>	<b>√</b>	<b>✓</b>		Number of planning applications not according with sequential test
CS20 Education and Personal Development	The Council will work with all relevant partners to develop a fully integrated educational offer	<b>√</b>	<b>√</b>	✓	Medway Council	GCSE attainment rate  NVQ levels



CS21 Conventional Energy Generation & Energy	Support for additional power generation and energy storage capacity on Hoo Peninsula & Isle of Grain;	<b>√</b>	<b>√</b>	<b>√</b>	DECC Power Generators Medway Council	Economic benefits to be monitored by Economic Development team	
Security	Promotion of local supply chain developments and a support & maintenance cluster.	<b>√</b>	<b>√</b>	✓			
CS22 Provision of Minerals	Imposing conditions requiring the reclamation and reuse of construction and demolition wastes on redevelopment sites. Allocating sites for the processing, sorting and distribution of secondary aggregate materials in the forthcoming Allocation and Development Management Development Plan Document. All existing mineral wharves will be safeguarded against proposals that would prejudice their use for the continued importation of marine dredged sand and gravel, crushed rock and associated materials.	<b>\</b>	<b>\</b>	<b>√</b>	Medway Council  Planning applications	Production of primary land won aggregates  Primary aggregates imports (marine dredged and land won and crushed rock from outside Medway)  Production of secondary/recycled aggregates	
CS23 Waste Strategy	Appropriate provision for the separation, storage and collection of waste materials in all new build;	✓	<b>√</b>	✓	Planning applications	Capacity of new waste management facilities	
	Permission for appropriate facilities for the reuse, recycling, treatment and transfer of waste materials	✓	✓	✓	Waste operators	Amount of waste arising, and managed by management type.	
CS24 Transport and Movement	Proactive management of highway system to avoid congestion	✓	✓	✓	Lead: Medway Council	UTMC monitoring  Bus satisfaction	
	Balancing of car growth and public transport via increased capacity, reliability and quality of public transport	✓	✓	✓		Amount/% of provision achieved	
	Rationalisation of parking in town centres – particularly Chatham via use of multi storey facilities	✓	<b>√</b>				



CS25 The River Medway	The River Medway is strategically significant in terms of its employment, environmental, transport and leisure importance.	<b>√</b>	<b>√</b>	<b>√</b>	Lead: Medway Council Planning	Permitted development completed on Waterfront
	Mixed-use development will be promoted along the urban waterfront.	<b>√</b>	✓	✓	applications  Conservator	New infrastructure installed Water Quality & SPA condition
	Greater use will be made of the River with existing infrastructure protected and new facilities encouraged.	<b>√</b>	<b>√</b>	<b>√</b>	Nature conservation bodies	
	Leisure activities on and along the river will be supported as long as they will not harm the natural ecosystems	<b>✓</b>	✓	<b>√</b>	MSEP Environment Agency Natural England	
CS26 Strood	The role of Strood as a district centre will be strengthened by: Promoting housing and mixed use developments on sites that will enhance the townscape and cohesion of the centre	<b>√</b>	<b>√</b>	<b>√</b>	Lead: Medway Council  Planning applications	Progress in implementing Town Centre Master plan
CS27 Rochester	The highest priority will be given to the conservation and enhancement of the historic and architectural character of Rochester Town Centre whilst maintaining its vitality and viability as a district centre and its function and character as a specialist retail, service and tourism centre	<b>√</b>	<b>√</b>	<b>√</b>	Lead: Medway Council Planning applications	Progress measured via: Rochester Conservation Management Plan Corporation Street Development Brief Rochester Riverside Development Brief
CS28 Chatham	The centre of Chatham will be developed as a regional hub and as the city centre for Medway in accordance with the principles of the Chatham Centre and Waterfront Development Framework and Development Brief and the regeneration, economic and retail policies of the core strategy.	<b>√</b>	<b>√</b>	<b>√</b>	Lead: Medway Council Planning applications	Chatham specific development completion monitoring figures



CS29 Gillingham	In Gillingham Town Centre, priority will be given to the improvement of the built fabric and public realm through the development of a mix of town centre uses, the provision of open space and the promotion of the evening economy, in accordance with the Town Centre Development Framework in order to strengthen its role as a district centre.	<b>✓</b>	✓	<b>√</b>	Lead: Medway Council Planning applications	Gillingham specific development completion monitoring figures	
CS30 Rainham	Rainham town centre will continue to function as an important district level centre and reinvestment in and extensions to the 'Precinct' centre will be encouraged. Hempstead Valley Shopping Centre is also classified as a 'district' level centre.	<b>✓</b>	✓	✓	Lead: Medway Council Planning	Rainham specific development completion monitoring figures	
	Opportunities to diversify the mainly comparison based shopping offer and provide a wider range of non-retails services typical of a district centre will be encouraged	<b>✓</b>	✓	✓	applications		
CS31 Hoo Peninsula and the Isle of Grain	Supporting retention & development of local services / facilities sustaining village life & reduce travel need;	<b>✓</b>	<b>✓</b>	✓	Lead: Medway Council  Planning applications	Progress in implementing approved projects	
	Promoting access for walking & cycling, developing visitor sites and improved Green Grid connections;	<b>√</b>	✓	✓			
	Supporting strong economic development sustaining local communities & retaining distinctive character.	<b>√</b>	✓	✓			
	There will be a presumption against development that would lead to the loss of the highest quality agricultural land	✓	✓	✓		% loss/gain in quality agricultural land	
CS32 Medway Valley	The focus on green infrastructure planning in the Cobham- Shorne-Ranscombe area will be maintained to make provision for access and management of the high quality environment.	<b>√</b>	<b>√</b>	<b>√</b>	Medway Council Planning applications	Medway Valley specific development completion monitoring figures	
CS33 Lodge Hill	Lodge Hill will be developed as a freestanding mixed-use settlement.	<b>√</b>	<b>√</b>	✓	Medway Council Lead developer	See Table 10.3 Medway Core Strategy for Lodge Hill monitoring measures/milestones	
CS34 Developer Contributions	Money received and facilities provided in accordance with the Council's Guidance.	<b>√</b>	✓	✓	Medway Council	Annual income & expenditure	



Table 11-2 Preliminary Infrastructure Delivery Schedule (May 2011 Draft)

	Development Site (plus site source)	Scale	Phasing	Infrastructure Requirement	Development dependent?	Funding Source	Contingency Planning Required?
Hoo/ Chattenden	Lodge Hill (Strategic Allocation)	<ul> <li>Phase 1</li> <li>Approx. 1684 residential dwellings</li> <li>Approx. 16,406 sq m of Business floor- space (offices and Knowledge Park).</li> <li>East Gate village 'hub' provided.</li> <li>50%of the central 'core' area inclusive of key service elements.</li> <li>Food Store delivered</li> </ul>	2013-2020	<ul> <li>Widening of Dux Court Road, speed reduction and traffic capacity improvements at the roundabout with the A228.</li> <li>Site access provided at the eastern edge of the site.</li> <li>Potential additional eastern access road created.</li> <li>Footway / cycleway bridge over the A228 provided.</li> <li>On-site roads installation within Phase 1 area.</li> <li>Provision of a new bus service.</li> <li>Central spine road provided as construction haulage road, plus A228 offslip at Chattenden to provide access for construction traffic.</li> <li>Installation of Public Realm and GI in proportion to development.</li> <li>Enabling works (demolition, vegetation clearance, remediation and earthworks) undertaken in Phase 1 area.</li> <li>On-site utilities provided within the Phase 1 area (Water, LV, Energy infrastructure, Gas connection).</li> <li>Surface water drainage works and attenuation undertaken within Phase 1 area.</li> <li>Provision of foul drainage infrastructure, including 2 pumping stations</li> </ul>	Yes	Developer	Range of homes, employment/retail figures and mix of uses appropriate for flexibility (resilience) over LDF.  Infrastructure reliant on phasing of housing (particularly schools and health -level TBC by Medway Council / Medway NHS).  Further schemes dependent on development TBC by Highways Agency (such as ramp metering access to A2 Trunk Road).  Phase (1) Soil Treatment Facility installed. Onsite soil treatment and reinstatement to be undertaken on a phased basis.



			•	Primary Substation requisition. Connections to existing LV supply (2MVA) established. Primary Substation installed. Initial water bodies formed for aesthetic and attenuation purposes. Creation of the East Gate and Lodge Hill Wood Neighbourhoods. Landscaping of Wyborne Wood, Deangate Wood, Lodge Hill Wood, Rough Shaw Wood, Eastern Shelterbelt, Central Shelterbelt, Market Square, Rams Bottom Wood, and creation of the Ridge Beacon Projects and Countryside Park. All associated landscaping works undertaken to facilitate 'arrival' corridor to East Gate. Creation of the East Gate Local Hub (convenience retail & village office). Provision of the Central Hub food-store, and Approx. 50% of town centre convenience retail facilities and town centre village offices. Initial works to Chattenden East area, likely to include limited residential development, local Hub (approx 20% of mixed use e.g. local convenience shop/offices/community centre/parking).			
Lodge Hill (Strategic Allocation)	Phase 2 • Approx. 1884 residential dwellings. • Approx. 22,050 sq m of Business floor- space. • 50% of Elderly Care	2019- 2026	•	Completion of remaining improvements at Four Elms roundabout.  Works to facilitate access to Chattenden. On-site roads installation within Phase 2 area.  Expansion of bus link service to serve Phase 2.	Yes	Developer	Phase (2) Soil Treatment Facility installed. Onsite soil treatment and reinstatement to be undertaken on a phased basis.



Residential Provision.  • West Gate Village  'hub' provided.  • Remaining 50% of the central 'core' (mixed use) hub. Hotel facilities provided at both Lodge Hill and Chattenden.	Traffic measures as required to address cut-through traffic, Enabling works (demolition, vegetation clearance, remediation and earthworks) undertaken in Phase 2 area. On-site utilities provided within the Phase 2 area (Water, LV, Energy infrastructure, Gas connection). Surface water drainage works and attenuation undertaken within Phase 2 area. Potential further works required to attenuation in Valley area to increase capacity. Creation of Westgate, Denegate and Chattenden West Neighbourhoods. Landscaping of the Western Shelterbelt, Central Park, SSSI buffer Zone, Chattenden Wood Nature Reserve, A228, and provision of (other) Heritage Beacon project. Provision of remaining Central Hub mixed uses and Lodge Hill Hotel. Provision of further mixed use (approx 40%) at Chattenden Hub, and provision of Chattenden Hotel / Knowledge Park. Provision of 50% of Elderly Care residential. First Stage of Secondary School provision. Provision of the Community Centre/Library. Second Primary School delivered. Potential refurbishment of existing Chattenden Primary School delivered (either in
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			Phase 2 or Phase 3, depending on need).  Second Stage of GP surgery provision.  Further provision for public realm and GI commensurate with the quantum of development.  Further water body provision to suit the requirements for the attenuation of the site.
Lodge Hill (Strategic Allocation)	<ul> <li>Approx. 754</li> <li>residential dwellings.</li> <li>Approx. 5,644 sq m of Business floorspace.</li> <li>Remaining 50% of Residential Elderly Care facilities provided.</li> <li>Remaining 40% of Chattenden Hub provided.</li> </ul>	2025-2028	<ul> <li>Expansion of bus link service to serve Phase 3.</li> <li>On-site roads installation within Phase 3 area.</li> <li>Enabling works (demolition, vegetation clearance, remediation and earthworks) undertaken in Phase 3 area.</li> <li>On-site utilities provided within the Phase 3 area (Water, LV, Energy infrastructure, Gas connection).</li> <li>Surface water drainage works and attenuation undertaken within Phase 3 area.</li> <li>Creation of Chattenden Wood, Chattenden North and Chattenden South Neighbourhoods.</li> <li>Landscaping of Roundtop Wood.</li> <li>Provision of remaining mixed use (approx 40%) at Chattenden Hub.</li> <li>Provision of remaining 50% of Elderly Care residential.</li> <li>Third Primary School delivered (either in Phase 2 or 3, depending on need).</li> <li>Second Stage of Secondary School provision.</li> <li>Final water bodies formed for aesthetic and</li> </ul>



			<ul> <li>attenuation purposes.</li> <li>Further provision for public realm and GI commensurate with the quantum of development</li> </ul>			
National Grid Property Holdings, Grain Road (Call for sites)	232465sq/m employment space	2011- 2016	Continuing upgrade of routes to Grain;	Part	Developer / Medway	Improved freight & road routes to Grain TBC.
(MC2009/1628 outline)	464,685sqm (B1, B2, B8) 245 sqm Business park management centre (B1 (a), A1, A3, A5)	2016- 2021				
Land NE of Kingsnorth Industrial Estate, Hoo (Call for sites)	Groundwork's commenced 250992sqm employment space. (20752 sqm B1, 115120 sqm B2, 115120 sqm B8)	2011- 2016	Continuing upgrade of routes to Grain;	Part	Developer / Medway	Improved freight & road routes to Grain TBC.
North East Bells Lane Hoo (plg permission)	295 homes Whole site 540 dwellings 381 completed 46 uncompleted 113 not started.	2011- 2016	<ul> <li>Open space and play area;</li> <li>Wildlife conservation area within site;</li> <li>Traffic calming on bells lane;</li> <li>Off-site pedestrian facilities;</li> </ul>	Yes	Developer	



	East of Wainscott Road, Wainscott (plg permission)  East of Higham Road, Wainscott (plg permission)	96 homes, 300sq/m retail area  98 homes	2011- 2016 2011- 2016	•	Public open space facilities; Improvement works to Four Elms Roundabout; signalisation of Sanspareil roundabout; Traffic calming on Brompton Farm Road and Hollywood Lane; Highway improvement to Hoo Road and Wainscott Road, inc pedestrian and cycle links And provision of new bus shelters on Wainscott Road; Improved site accesses; new footways and cycleways on Hoo Road; Healthcare facility (land given to Medway PCT to deliver); Expansion/improvement of Frindsbury Extra Parish Council's Hall	Yes	Developer	
Rochester	Riverside (plg permission)	300-700 homes, 2400-12000sq/m employment space, 4440-6800sq/m retail area  600-1000 homes, 9600-10000sq/m employment space, 2360sq/m retail area  300-400 homes, 9000sq/m employment	2011- 2016 2016- 2021	•	Off-site utilities (approx £1m foul sewerage reinforcement & £1.2m electricity connection); (part) Riverside Walk, Phase 1A - £260,000: 2011-2012; (part) Public Space, Phase 1A - £300,000: 2011-2012  Primary school (need to consider development phasing & impact on pupil numbers); GP practice (rented out to PCT, so cost issues); Off-site utilities (including approx £2m for gas provision); Crescent Park & Riverside Walk (part).	Yes	Developer / utilities providers	£4m utilities funding gap (uncertainty regards scale of contributions)  Potential substantial burden on developers if external providers unwilling to fund offsite utilities.



		space, 1000sq/m retail area 700 homes (2000 homes not started)	2021- 2026 2026+	•	Off-site utilities; St Clement's Park & Riverside Walk (part).  Utilities; Riverside Walk (part).			
	Former Mid Kent College City Way (plg permission)	214 homes (Reduced to 59 not started)	2011- 2016	•	Financial contributions to off-site provision (education/transport).	Yes	Developer	
	Former Rochester Police Station Cazeneuve St (plg permission)	65 homes (Not started New application reduces number of units)	2011- 2016	•	Improvements to bus facilities; Improved cycle links; Equipped play facilities at Jackson's Recreation Ground.	Yes	Developer	
	Land at Robins and Day (Peugeot), High St (Call for Sites)	84 homes, 856sq/m employment space, 2275sq/m retail area	2016- 2021	•	TBC			
	R/O 329 - 377 (Featherstones) High St (MLP 2003 allocation / Call for Sites)	102 homes, 3600sq/m employment space	2021- 2026	•	TBC			
	University for the Creative Arts, Fort Pitt (Urban Capacity Study)	77 homes	2021- 2026	•	TBC			
	320 - 344 High Street inc. 42 New Road (MLP 2003 allocation)	66 homes	2021- 2026	•	TBC			
Strood	Temple Waterfront, Roman Way (plg permission)	450 homes, 4500sq/m employment space, 1620sq/m retail area	2011- 2016	•	Public realm: Temple Manor & Knight Road; Highway improvements: Cuxton Road/Roman Way junction; Off-site Doctors Surgery provision.	Yes	Developers (Outline S106)	Exact cost of flood defence measures unknown at outline stage. S106 yet to be signed (August 2010)



	(620 units not started) 170 homes, 5800sq/m employment	2016- 2021	•	Flood Defence Strategy measures (Scott Wilson's August 2010 report).	Part		
Former Alloy Wheels, Priory Rd (plg permission)	16100sq/m employment space (Not started)	2011- 2016	•	TBC			
Cuxton Pit No. 3 Cuxton Road (plg permission)	Total 487 dwellings 420 completed 67 under construction	2011- 2016	•	Improvements to junction between site access and A228/Cuxton Road; Footway/cycleway connection; Scheme for retail shop and healthcare facilities.	Yes	Developer	
Ancaster Garage, Station Rd (plg permission)	68 homes (Not started)	2011- 2016	•	Provision/improvement of equipped play and open space at Broomhill Park.	Yes	Developer	
North side of Commissioners Rd (Call for Sites)	6000 sq/m employment space	2011- 2016	•	TBC			
Three Acre site, Roman Way (Call for Sites)	4440 sq/m employment space	2011- 2016	•	TBC			
Friary Place, r/o 46-98 High St (plg permission)	Retail area New application reduced to 1510 sqm (Not started)	2011- 2016	•	Town centre improvements	Yes	Developer	
Tesco, Strood (Call for Sites) (With planning permission)	New development of 10200sqm retail area	2011- 2016	•	TBC			
Civic Centre (Masterplan)	398 homes, 2000sq/m employment, 2000sq/m retail	2016- 2021	•	Flood Defence Strategy measures (Scott Wilson's August 2010 report).	Part	Developer	Yes, given high Flood Defence costs



	Riverside, Canal Road (Masterplan)	256 homes 320 homes, 860sq/m retail area	2016- 2021 2021- 2026	•	Flood Defence Strategy measures (Scott Wilson's August 2010 report).	Part	Developer	Yes, given high Flood Defence costs
Gillingham	Victory Pier, Pier Road (Akzo) (plg permission)	250 homes, 625sq/m employment space, 850sq/m retail area Including student accommodation hotel shops etc	2011- 2016	•	Pedestrian & cycle accessibility improvements to Gillingham railway station & wider area; Pier improvement works.	Yes	Developer	
		375 homes, 885sq/m employment space Total 776 549 Not started 227 under construction 151 homes	2016- 2021					
			2021- 2026					
	South Thames Regional Health Authority Land, Gillingham Business Park (plg permission)	12169sq/m employment space	2011- 2016	•	Improvements to bus infrastructure on A2; Improvements to cycle infrastructure on A2 and at junction of Ambley Road. Access road only constructed so fat no other works commenced.			
	Crest Packaging Site, Courteney Road (plg permission)	9750sq/m employment space	2011- 2016	•	Town centre public realm improvements; Bus stop improvements.	Yes	Developer	
	MC11069	for garden centre development (undecided)						



Howlands Nursery Christmas St (plg permission)	60 homes (38 Not started 5 under construction 17 completed.)	2011- 2016	<ul> <li>Open space/formal play provision at either Grange Road or Strand, Gillingham;</li> <li>Junction improvements, traffic calming &amp; speed signage at Christmas Street &amp; Church St</li> </ul>	Developer	
Tesco (plg permission)	2475sq/m retail area (completed)	2011- 2016	• TBC		
Astra Site, Courteney Rd (plg permission)	1250 sqm B8 completed 2301 sqm other completed	2011- 2016	Air Quality Management / Monitoring Yes improvements	Developer No –	s106 received
Rainham Mark Grammar School Pump Lane (plg permission)	35 homes 37 under construction	2011- 2016	Open space improvements / sports     facilities  Yes	Developer	
Rear of 9-25 Birling Avenue (Call for Sites) Planning permission for 46 refused.	32 homes Not started	2011- 2016	• TBC		
Retail Core(High St,Jeffrey St,King St) Gillingham (Development Framework) Outline pp MC10/1095 - 82 Jeffrey St. 12 units not started.	100 homes, 4750sq/m employment space, 3750sq/m retail area	2021- 2026	• TBC		



Horsted	Former Mid Kent College, Maidstone Road (plg permission) New application to reduce numbers.	150 homes, 2480 sq/m employment space, 200 sq/m retail area Not started 264 homes	2011- 2016 2016- 2021	•	Improved bus and pedestrian facilities;  Horsted Gyratory system (financial contributions towards).	Yes	Developer	
	BAE Systems (Call for Sites)	11147 sq/m employment space	2011- 2016	•	TBC			
	Woolmans Wood Caravan Site (Withdrawn H&MU DPD)	6160 sq/m employment space	2016- 2021	•	TBC			
Medway City Estate	Land between Vanguard Way and George Summers Close (plg permission) New application Sainsbury	Not started 9354sqm	2011- 2016	•	Park and Ride facility; Alteration of Anthony's Way / A289 roundabout; signalisation schemes within vicinity; Footway widening on Anthony's Way; River walk; Improvement / creation of estuarine habitat lost.	Yes	Developer	New application submitted for a different range of goods includes Park & Ride facility.
Chatham	Sir John Hawkins Car Park (Call for Sites)	120 homes, 3059sq/m retail area	2011- 2016	•	TBC			
	Between Cross Street & The Brook (MLP 2003 allocation)	110 homes, 3680sq/m retail area	2011- 2016	•	TBC			
	1-35 High Street (Grays Garage) (MLP 2003 allocation)	54 homes, 800sq/m employment space, 800sq/m retail area	2011- 2016	•	TBC			
	2 Ash Tree Lane (plg permission)	55 homes 8 not started 47 under construction	2011- 2016	•	Traffic calming measures.	Yes	Developer	
	Chatham Waterfront (Call for Sites)	400 homes, 5456sq/m employment space, 7772sq/m	2016- 2021	•	Waterfront Park & (part) Riverside Walk; Flood Defence Strategy measures (Scott	Yes	Developer	Potentially high Flood Defence associated cost



					Wilson's August 2010 report).		
		retail area			, ,		
	Planning permission	94 homes					
		111 Homes not started					
		Hotel 86 beds	2026				
		3381sqm commercial					
	Pentagon		2016-	•	TBC		
	(Call for Sites)	29 homes	2021				
	2-8 King Street & 1-11		2016-	•	TBC		
	Queen St	retail area	2021				
	(Development brief)						
	Tesco, The Brook	60 homes, 1940sq/m	2016-	•	TBC		
	(Call for Sites)	retail area	2021				
	Former Police Station	60 homes, 1898sq/m	2016-	•	TBC		
	(Call for Sites)	retail area	2021				
	1 Batchelor Street, off	50 homes, 1600sq/m	2016-	•	TBC		
	,	retail area	2021				
	Whiffens Avenue Car	70 homes	2016-	•	TBC		
	Park (Call for Sites)		2021				
	Eldon St, Carpeaux	50 homes	2016-	•	TBC		
	Close & Hards Town		2021				
	(Development brief)						
	Former Officers Mess,	4300sq/m employment		•	TBC		
	Maidstone Rd	space	2021				
	(Call for Sites)	0.400					
	Cross Street	3430sqm A1/A2 118					
	Planning permission	residential units	0040		TDO		
	296 - 310 High Street	2040sq/m employment		•	TBC		
con	(Development brief) 19 New Road Av & 3	space	2021 2016-		TDO		
	New Cut	1328sq/m retail area	1	•	TBC		
			2021				
	(Development brief) Chatham Retailing,	28000sq/m retail area,	2021-		TBC		
	Clover/Richard/Rhode/Hi		2021-	•	IBC		
		employment space	2020				
	Ign Old	Tombioyment space					



	(MLP 2003 allocation)							
	Chatham Railway Station (Development brief)	279 homes	2026+	•	TBC			
	West of Maidstone Road, adj Chatham Rail Station (Development brief)	173 homes	2026+	•	TBC			
	Wickes, New Cut (Development brief)	79 homes	2026+	•	TBC			
	55-105a The Brook & 1, 5, 11 & 13 King St (Development brief)	50 homes, 4113sq/m retail area	2026+	•	TBC			
	2-14 Railway Street & 142-146 High Street (Development brief)	51 homes, 1228sq/m retail area	2026+	•	TBC			
	Land at High St, Union St and New Road (Development brief)	9852sq/m retail area, 590sq/m employment space	2026+	•	TBC			
Maritime & Brompton	Land at St Mary's Island Maritime Way Chatham Maritime	Phased delivery of 1700 homes, inc: 280 homes (Part)	2011- 2016	•	Landscaping/recreational areas throughout phasing; Roads and footways throughout phasing;	Yes	Developer	Dental Surgery under construction (2010)
	(plg permission)	1263 completed 20 under construction 417 not started 117 homes (Part)	2016- 2021	•	Healthcare facility (upon completion of 100 <sup>th</sup> home – see right) Primary school (upon completion of 300 <sup>th</sup> home); Secondary access (upon completion of 300 <sup>th</sup> homes); Community building (upon completion of 500 <sup>th</sup> home).			
	Interface Land, Chatham Maritime (SLAA) Updated	(approx) 25000sq/m University development & 500	2011- 2026	•	Flood Defence Strategy measures (Scott Wilson's August 2010 report). On-site and off-site utilities (unknown at	Yes	Developer	Approx University cost of £75m+.
	(OL) (1) Opudicu	student bed-spaces		•	present, depends on mix and quantum).			Exact mix of uses yet



	alternative option:  Amherst Hill, Brompton (MLP 2003 allocation)	525 homes, 44,500 sq/m employment space + university 34 homes	2011- 2016	•	TBC			to be established by landowner/developer.
	RSME Kitchener Barracks, Brompton (Withdrawn H&MU DPD)	248 homes	2016- 2021	•	TBC			
	J7, Chatham Maritime (Call for Sites)	75 homes, 5220sq/m retail area	2016- 2021	•	TBC			
Halling/ Cuxton	Former Cement Works, Formby Road, Halling (plg permission)	175 homes, 3000sq/m employment space, 700sq/m retail area 550 Not started 250 homes 100 homes	2011- 2016 2016- 2021 2021-	•	Improvement Junction 4 (M20) overbridge; Capacity & safety improvement at A228/Bush Road/Station Road junction; Bus service improvements (new shelters on A228 etc); New community centre	Yes	Developer	
Luton	Southern Water, Capstone Rd (plg permission)	69 homes Not started	2026 2011- 2016	•	Improvements to pedestrian / cycle facilities.	Yes	Developer	
Rainham & Wigmore	Queens Court, Chichester Cl, Rainham (Call for Sites)	40 homes	2011- 2016	•	TBC			
	Hempstead Valley Shopping Centre (Call for Sites) Planning permission	2774sq/m retail area 9730sqm retail 845 D1	2011- 2016	•	TBC			



# **Appendix A: Schedule of Superseded (Replaced) Policies**

# **Superseded Policies:**

Local Plan Policy No.	Policy	Core Strategy Policy No.
S1	Development Strategy	CS1, 17, 24, 6, 7, 8, 12
S2	Strategic Principles	CS2, 32, 4, 19, 26 To 32
S4	Landscape And Urban Design Guidance	CS2, 7
S5	Medway's "City" Centre	CS1, 24,28,19, 8
S6	Planning Obligations	CS34
S7	Rochester Riverside Action Area	CS1, 2,12, 24,27
S9	Chatham Historic Dockyard	CS2, 12
S10	Strood Waterfront Action Area	CS1, 8, 9, 2, 24, 6, 26, 12, 17
S12	Kingsnorth	CS17, 21
S13	Isle Of Grain	CS17, 21
S14	Ministry Of Defence Estate, Chattenden	CS33, 13, 17,19, 24
BNE1	General Principles For Built	CS2, 8
	Development	
BNE4	Energy Efficiency	CS4
BNE12	Conservation Areas	CS12
BNE14	Development In Conservation Areas	CS12, 7, 8, 2
BNE25	Development in the Countryside	CS7
BNE26	Business Development in rural Settlements	CS7
BNE28	Farm Diversification	CS7
BNE29	Farm Shops	CS7
BNE31	Strategic Gap	CS7
BNE32	Areas of Outstanding Natural Beauty	CS7
BNE33	Special Landscape Areas	CS7
BNE34	Areas of Local Landscape Importance	CS7
BNE35	International and National Nature Conservation Sites	CS6, 7
BNE36	Strategic and Local Nature Conservation Sites	CS6, 7
BNE37	Wildlife Habitats	CS6, 7, 8
BNE38	Wildlife Corridors and Stepping Stones	CS6, 7, 8



Local Plan	Policy	Core Strategy Policy No.
Policy No. BNE39 BNE40 BNE44 BNE45 BNE48	Protected Species Cliffe Conservation Park Community Woodlands Undeveloped Coast Agricultural Land	CS6 CS6, 7 CS6, 7, 8 CS5, 6, 7, 8 CS7
ED9 ED11 ED14	Chatham Port Existing Tourist Facilities Bed & Breakfast Accommodation and Guest Houses	CS24, 25 CS18 CS18
H3 H5 H10 H11	Affordable Housing High Density Housing Housing Mix Residential Development in rural Settlements Gypsy Caravan Sites and	CS14 CS15 CS15 CS7
	Travelling Showpeople's Quarters	
R10	Local Centres, Village Shops and Neighbourhood Centres	CS19, 26 To 32
R11	Town Centre Uses and the Sequential Approach	CS19
R13	Retail uses and the Sequential Approach	CS19
L13	Water Based Leisure	CS25
T5 T6 T9 T10 T11	Bus Preference Measures Provision for Public Transport River Buses and Piers Wharves Development Funded Transport Improvements	CS24 CS24 CS24, 25 CS24, 25 CS34
CF1 CF2 CF4 CF5 CF7 CF9 CF11 CF13	Community Facilities New Community Facilities Primary Healthcare Facilities Nursing and Special Care Further, Higher and Adult Education Power Stations Renewable Energy Tidal Flood Areas	CS9, 10, 11 CS9, 10, 11 CS9 CS15 CS17, 20 CS21 CS4 CS5
01 10	11ddi 1 100d / 110d3	255



# **Appendix B: Schedule of Current Supplementary Planning Documents**

Item	Type*	Title	Date Adopted	Remarks
Adopte	d Develo	pment Briefs and Masterplans		
1	SPG	Rochester Riverside Development Brief Rochester Riverside Development Brief (pdf 2,800KB)	2004	Conforms with Policy S7 of Medway Local Plan. Supplemented by the Rochester Riverside Green Charter Green Charter (pdf 263KB)
2	SPG	Wainscott Development Brief Wainscott Development Brief 906KB)	2004	Conforms with Policy H1 of Medway Local Plan
3	SPG	Grange Farm Development Brief Grange Farm Development Brief (pdf 685KB)	2004	Conforms with Policy H1 of Medway Local Plan. Will be revoked in the near future as the development is nearing completion
4	SPG	Chatham Town Centre and Waterfront Development Framework Chatham Centre and Waterfront Development Framework (pdf 6,985KB)	2004	Conforms with Policy S5 of Medway Local Plan. Provides an overall context for development in Chatham town centre and the subsequent more detailed masterplans listed below
5	SPG	Star Hill to Sun Pier Planning and Design Strategy Star Hill to Sun Pier Planning and Design Strategy (pdf 6,918KB)	2004	Conforms with Policy BNE12 of Medway Local Plan. Covers the Townscape Heritage Initiative area (THI) and complements that scheme
6	Specia I	Gillingham Waterfront Development Brief Gillingham Waterfront Development Brief (pdf 1,923KB)	2004	Adopted as a development brief but as a departure from the Medway Local Plan given it was not known at the time the local plan was adopted that the site would become available for redevelopment. Relates to the former Akzo Nobel site
7	SPD	Pentagon Development Brief Pentagon Development Brief (pdf 1,769KB)	2006	Complementary to Chatham Centre and Waterfront Development Framework and conforms with Policy S5 of Medway Local Plan
8	SPD	Temple Waterfront Development Brief  Temple Waterfront Development Brief	2006	Conforms with Policy S10 of Medway Local Plan and



Item	Type*	Title	Date Adopted	Remarks
		(pdf 3,465KB)	•	covers the area from Roman Way to Knight Road
9	SPD	Strood Riverside Development Brief Strood Riverside Development Brief (pdf 4,079KB)	2006	Conforms with Policy H1 of Medway Local Plan and covers the waterfront between Rochester Bridge and the Medway City estate, including Canal Road
10	SPD	Gillingham Town Centre Planning Framework Gillingham Town Centre Planning Framework (pdf 9,957KB)	2007	Conforms with Policies BNE22 and R5 of the Medway Local Plan and covers the main town centre area
11	SPD	Chatham Centre and Waterfront Development Brief Chatham Centre and Waterfront Development Brief (pdf 15,907KB)	2008	Conforms with Policy S5 of the Medway Local Plan and complementary to Chatham Centre and Waterfront Development Framework. Incorporates three masterplans – for the Brook, the Station Gateway and the Waterfront
12	SPD	Corporation Street Development Framework Corporation Street Adopted Framework (pdf 6,848KB)	2008	Conforms with Policy S7 of the Medway Local Plan and complementary to the Rochester Riverside Development Brief. Covers the area from Rochester Station to Rochester Bridge
13	SPD	Gun Wharf Masterplan http://www.medway.gov.uk/pdf/Chatha m%20High%20St%20Best%20St%20m asterplan%20report.pdf	2010	Conforms with a number of local plan policies. Covers the area from the Historic Dockyard boundary to the Waterfront open space. The final document is currently being readied for publication following its adoption by Cabinet
14	SPD	Best Street/High Street Chatham Masterplan http://www.medway.gov.uk/pdf/Gun%20 Wharf%20Masterplan%20SPD.pdf	2010	Conforms with a number of local plan policies. Covers the area from Best Street to the Brook and from Union Street to Railway Street/Military Road. The final document is currently being readied for publication following its adoption by Cabinet



Item	Type*	Title	Date Adopted	Remarks
15	SPD	Interface Lands Development Brief http://www.medway.gov.uk/pdf/The%20 Interface%20Land%20SPD%20October %202010.pdf	2010	Conforms with a number of local plan policies. Relates to a site between the Chatham Historic Dockyard and Chatham Maritime
15	Other	Strood Town Centre Masterplan http://www.medway.gov.uk/strood_town centre_masterplan_report - final.pdf	2009	Endorsed by the Cabinet to inform the Local Development Framework Core Strategy and planning decisions in the area
16	SPD	Amherst Hill Design Brief <a href="http://www.medway.gov.uk/PDF/Amherst%20Hill%20Design%20Brief%20Oct%202010.pdf">http://www.medway.gov.uk/PDF/Amherst%20Hill%20Design%20Brief%20Oct%202010.pdf</a>	2010	Conforms to local plan policy H1 and relates to a site to the rear of Kitchener Barracks
	Other Ad	opted Supplementary Planning Docume	ents	
17	SPD	A Building Heights Policy for Medway A Building Heights Policy for Medway Part 1 (pdf 4,075 KB), Part 2 (pdf 3,968KB), Appendix (6,275KB)	2006	Prepared in accordance with CABE/English Heritage guidance. Covers central Medway
18	SPD	Development Contributions Guide <u>Developer Contributions Guide</u> (pdf 2,438KB)	2008	Conforms with Policy S6 of the Medway Local Plan. Covers the whole of the administrative area
	Conserva	ation Area Appraisals		
19	CA	Brompton Lines Conservation Area Appraisal, 2006 <a href="http://www.medway.gov.uk/brompton_lines_ca_appraisal_all-2.pdf">http://www.medway.gov.uk/brompton_lines_ca_appraisal_all-2.pdf</a>	2006	Not prepared under planning legislation but material considerations in the areas covered
20	CA	Upper Upnor Conservation Area Appraisal, 2004 <a href="http://www.medway.gov.uk/upnor_ca_a">http://www.medway.gov.uk/upnor_ca_a</a> <a href="ppraisal_publication_1105.pdf">ppraisal_publication_1105.pdf</a>	2004	
21	CA	Upper Bush Conservation Area Appraisal, 2004 <a href="http://www.medway.gov.uk/upper-bush-conservation-area">http://www.medway.gov.uk/upper-bush-conservation-area</a> appraisal rev.pdf	2004	
22	CA	New Road, Chatham, Conservation Area Appraisal, 2004 http://www.medway.gov.uk/new_road_c hatham_adopted_version.pdf	2004	
23	CA	Maidstone Road, Chatham, Conservation Area Appraisal, 2004 <a href="http://www.medway.gov.uk/maidstone_r">http://www.medway.gov.uk/maidstone_r</a> <a href="maidstone">oad chatham adopted version.pdf</a>	2004	



			_	
Item	Type*	Title	Date	Remarks
			Adopted	
24	CA	Historic Rochester Conservation Area	2010	
		Appraisal		
		http://www.medway.gov.uk/index/enviro		
		nment/9984.html/conserveareas/10281		
		6.htmwill		
(	Conserva	ation Guides		
25	Other	Conservation Areas in Medway	2007	General guides
		·		
		http://www.medway.gov.uk/conservatio		
		n areas jan 07.pdf		
26	Other	Listed Buildings in Medway		
		http://www.medway.gov.uk/listed_buildi		
		ngs_leaflet.pdf		
27	Other	Watts Avenue/ Roebuck Road design		
		guidance		
		http://www.medway.gov.uk/watts ave b		
		ooklet.pdf		
28	Other	Gillingham Park design guidance		
		http://www.medway.gov.uk/gilingham_p		
		k_bklt-5.pdf		



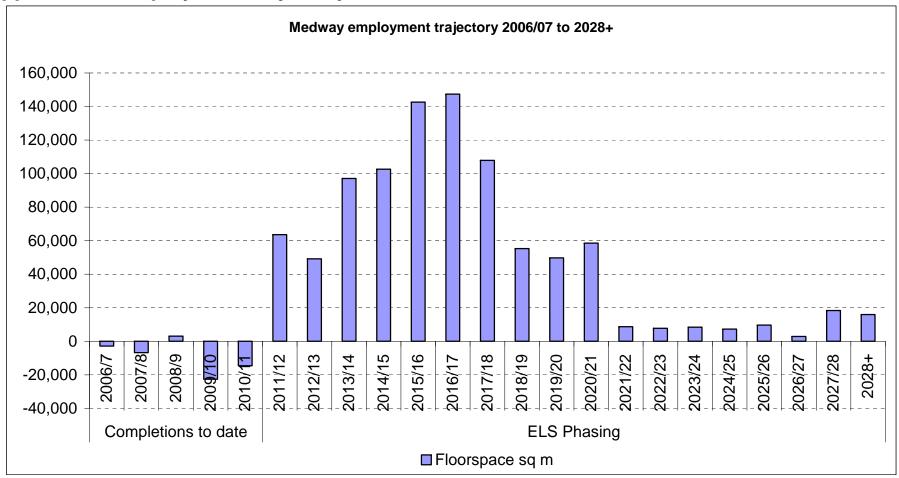
## Appendix C: Housing Trajectory and Sources of Supply 2006 - 2028+

	06/07	07/08	08/09	09/10	10/11	11/12	12/13	13/14	14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	2028+	TOTAL
Past Completions	591	761	914	972	657																			3895
Projected completions Identified Sites						631	627	640	718	1016	1331	1150	1295	1272	1298	1132	941	932	759	645	364	508	1504	1 16763
Projected completions Small Sites with Planning Permission						69	49	86	40	39	2													285
Total Projected Completions						700	676	726	758	1055	1333	1150	1295	1272	1298	1132	941	932	759	645	364	508	1504	17048
Cumulative Completions	591	1352	2266	3238	3895	4595	5271	5997	6755	7810	9143	10293	11588	12860	14158	15290	16231	17163	17922	18567	18931	19439	20943	3
Cumulative Requirements	815	1630	2445	3260	4075	4890	5705	6520	7335	8150	8965	9780	10595	11410	12225	13040	13855	14670	15485	16300	17115	17930		
Cumulative Surplus/Deficit	-224	-278	-179	-22	-180	-295	-434	-523	-580	-340	178	513	993	1450	1933	2250	2376	2493	2437	2267	1816	1509		
Annual Requirement	815	815		815	815	815			815		815	815	815			815	815							17930

Source: Housing Phasing Estimates as at June 2011. This data will be incorporated into the next review of the SLAA and the Annual Monitoring Report at the end of 2011.



### **Appendix D: Employment trajectory**



Data source Employment Phasing Estimates as at June 2011. This data will be incorporated into the next review of the SLAA and the Annual Monitoring Report at the end of 2011.



# Appendix E: Transport Objectives, Schemes And Actions In The Third Local Transport Plan (LTP3)

#### **Transport objective 1: Highway maintenance**

#### Schemes/actions:

- Maintenance of highway assets including improvements to street lighting, traffic signals and highway drainage
- Medway Tunnel upgrade including operating and control systems
- Structural infrastructure maintenance including to bridges retaining walls etc.
- Carriageway maintenance
- Footway and cycle track maintenance
- Public rights of way maintenance.

#### **Transport objective 2: Improving Infrastructure Capacity**

#### Schemes/actions:

- Network management, guided by the Network Management Plan
- Operation of Urban Traffic Management and Control. This is currently being implemented and is expected to
  - o Improve the operational efficiency of the highway network;
  - o Provide real time travel and parking information to drivers;
  - Respond to incidents on the network;
  - Enable bus routes to be more punctual and reliable with improved journey times;
  - Measure traffic related air quality and mitigate pollution episodes where possible;
  - Link to neighbouring local authorities and the Highway Agency to enable sub regional traffic management.
- Tackling congestion hotspots. These are listed below, along with the
  intended programming of schemes designed to achieve improvements.
  Normally this will be in the form of capacity improvements to junctions to
  relieve bottlenecks and aid free flowing. They are also intended to
  improve air quality.

Location of existing and predicted congestion hotspots on key strategic corridors							
Location (link or junction)	Programme period	Justification of programme position					
A229 gyratory junction with former Mid Kent College, Horsted	Short	To be delivered as part of the upgrading of the existing Park & Ride site					
A289 link between Four Elms roundabout and Medway Tunnel including	Short / medium	Phased intervention to link to the development of Lodge Hill, Chattenden development to					



	I	<u>, , , , , , , , , , , , , , , , , , , </u>						
Sans Pareil and Anthony's Way roundabouts and exit from Medway City Estate.		improve capacity and junction operation. Currently under investigation						
A2 Corporation Street	Short /	Works to be delivered as part						
junctions with The	medium	of the current bus priority						
Esplanade & Gas House	mediam	scheme						
Road		Scheme						
A2 junction with Canal	Short /	Delivery timeframe dependant						
Road	medium	on the completion of the A2						
		Corporation street works						
A2 junctions and link	Medium	Significant localised						
between Chatham Hill and		congestion. Major intervention						
Canterbury Street		required to tackle problem and						
junctions		increase capacity						
A2/A228 links through	Medium	Delivery timeframe dependant						
Strood town centre		on the completion of the						
		Darnley Arch bridge widening.						
		Scheme to be developed						
A228 junction at Darnley	Medium	Delivery timeframe dependant						
Arch Bridge, Strood		on the completion of the						
		Darnley Arch bridge widening						
A2 Star Hill junction with	Medium	Delivery timeframe linked to						
A229 City Way roundabout		the development of Rochester						
		Riverside and the completion						
		of the A2 Corporation street						
		bus priority and public realm						
		works						
A231 Dock Road junction	Medium	Transport modelling indicates						
with Wood Street		increasing congestion hence						
roundabout		this position in programme						
A278 junction with	Medium	Transport model results						
Sharsted Way/Wigmore		indicate increasing congestion						
Road		hence this level of priority						
A2 junction with Mierscourt	Medium	Significant localised						
Road, Rainham		congestion. Major intervention						
		required						
A2 junctions with A278	Long	Transport modelling indicates						
Hoath Way & A289 Ito		this position in programme						
Way								
B2004 link through Lower	Long	Transport modelling indicates						
Rainham		this position in programme						

- Strategic car park management. Actions will focus on:
  - The rationalisation of existing spaces in Chatham and the development of three strategically located car parks
  - A review of parking charges to discourage long stay parking in identified locations (this action to be delivered in conjunction with the expansion of Park and Ride facilities)
  - o Review the overall parking provision in centres of regeneration
  - A robust process to secure developer contributions towards the provision and operation of town centre parking and Park and Ride sites
  - Operation of real-time monitoring and display of car parking availability.



- A temporary additional car park at Strood Civic Centre
- · Management of freight, including through:
  - Further improvements to the A228 to Grain
  - Improvements to the Thamesport freight line, including Hoo junction (in Gravesham)
  - o Directing HGV traffic away from unsuitable roads
  - Ensuring major freight traffic generating developments provide access to the rail network for freight movements
  - o Encouraging freight operators to use rail and river transport options
  - Monitoring growth in freight movements originating from International Gateways throughout Kent and working sub-regionally to mitigate negative consequences
  - Investigating the provision of faster and more reliable highway linkages from business, storage and distribution sites to the strategic highway network.

#### Transport objective 3: Improving public transport

Schemes/actions:

- Improving travel by bus and taxi, including through:
  - Development of Fastrack style bus links to Chattenden and other major development sites
  - The development of new Park & Ride sites together with supporting routes and infrastructure
  - Expansion of Quality Public Transport Corridors routes to support service improvements
  - Development of traffic management schemes that contribute to more reliable bus journey times
  - Expansion of the real-time information system and/or text messaging service to all stops across the bus network
  - Development of sub-regional bus services in partnership with operators and neighbouring authorities
  - Improved ticketing and fares initiatives, including investigating the introduction of Smartcard technology potentially in partnerships with neighbouring authorities
  - Continued support for initiatives that encourage young people to use bus services.
  - Improved promotion of bus services, in particular through workplace and residential travel plans and personalised travel planning
  - Enhanced promotion of bus services through all forms of media.
  - Review of taxi rank locations and waiting facilities for accessibility and personnel safety
  - o Investigating the provision of CCTV in all taxis operating in Medway
  - Investigating the opportunities for concessions to use travel credits in taxis or buses using a smartcard based system
  - Investigating the potential for a new river crossing to support public transport, walking and cycling between the Medway City Estate and Chatham
  - Improved partnership working with operators to identify opportunities to improve the operational environment for public transport
  - o Improved customer care training for front line staff, including considerate driving skills and supporting vulnerable user groups
  - The introduction of bus stop improvements, which aid accessibility for passengers whilst assisting in reducing layover times at bus stops
  - The use of on-bus CCTV parking enforcement to ensure bus priority routes remain congestion free.



- Developing park and ride, including:
  - Expansion of the existing Park & Ride site at Horsted
  - New Park & Ride site at Whitewall Creek (developer funded)
  - New Park & Ride sites to be identified near Strood
  - New Park & Ride site to be identified to the east of Gillingham, possibly located on or close to Gillingham Business Park
  - Quality Public Transport Corridors linking Park & Ride sites to key destinations
  - Operation of bus services between Park & Ride sites and key destinations
  - Implementation of town centre parking strategy to reduce long stay car parking spaces in town centres.
- Improving travel by train, including through:
  - Major station improvements, including:
    - □ Reconstruction and possible relocation of Rochester station (identified in Kent RUS, 2010);
    - Reconstruction of Strood station
    - Reconstruction and reconfiguration of Chatham station to support regeneration and improve the gateway to the town centre
  - Delivery of accessibility improvements to stations, including forecourt improvements at Rainham station
  - Capacity improvements at Rochester bridge junction as part of East Kent resignalling (identified in Kent RUS, 2010)
  - o Improved transport interchange opportunities at key mainline stations
  - Encouragement of cycling to stations by improved cycle links and more secure cycle parking.
- Coach travel, focussing on coach park and ride
- Community transport, focussing on the further development of the Villager service
- River transport and river crossings, focussing on:
  - Maintaining and developing a comprehensive network of piers that could support a river taxi and other leisure related services
  - Seeking a partner to operate a river taxi or possibly an amphibious vehicle
  - Investigate the potential for a new river crossing for pedestrians, cyclists and public transport.

# Transport objective 4: Encouraging active travel and improving health Schemes/actions:

- Accessibility to bus services by:
  - A programme of bus stop improvements, building on a network where 60% of the high frequency bus stops are accessible
  - Alterations to bus stops to increase patron's feelings of safety whilst waiting for services including the introduction of CCTV
  - Investigation of measures to allow those with learning disabilities to undertake independent travel
  - Partnership working with operators to investigate opportunities to reduce costs and utilise savings in the reduction of fares and /or increased frequency of services.
- Encouraging walking, including through:
  - The development of schemes that allow easy access to local shopping facilities and amenities with priority given to those in areas of socio-economic deprivation



- Improving accessibility to public rights of way through network and waymarking improvements, including making more of the network accessible to people with mobility difficulties
- Participation in the regional Coastal Access project and subregional Valley of Visions project
- Ensuring new development provides adequate facilities to access facilities by foot
- Expanding the walking bus initiative.
- Increasing opportunities to access play and park facilities as a pedestrian
- Develop schemes that remove barriers to pedestrian movement including a programme of installing drop kerbs at junctions.
- Encouraging cycling, including through:
  - Participation in the development of a sub-regional cycle network and enhancement of the National Cycle Routes
  - Promotion of cycle facilities and the health benefits of cycling
  - o Organised cycling activities
  - Ensuring new development provides adequate facilities for cyclists, including off-site cycle links
  - Supporting the Sustrans cycle ranger scheme
  - Enhancing existing routes by improved maintenance and minor improvements
  - o Increasing and improving secure cycle parking
  - Creating new opportunities for recreational cycling, by developing more facilities off-road and on quiet roads
  - Expanding the existing utility cycle network by infilling gaps and making linkages to key destinations.
- Green Grid through the delivery of the transport elements of the strategy and ensuring major developments are linked to the Grid where this is practical
- Improving air quality, including through:
  - Development of air quality management area (AQMA) traffic management schemes with the key objective of improving local air quality
  - Development of operational protocols, to enable UTMC to respond to episodes of poor air quality
  - Supporting interventions that contribute to tackling poor local air quality
  - Working with Network Rail to widen Darnley Arches, which have been identified as a significant point of constriction on the network associated to poor air quality
  - Investigate opportunities to disseminate high-resolution air quality data to hospitals and doctors surgeries to assist patients with respiratory illnesses
- Design guidance for developments by:
  - Taking account of new design guidance when considering estate layouts, for example Manual for Streets
  - Updating current design standards and parking standards
  - o Reviewing and publishing a highways adoption manual
  - The use of shared space at selected locations
- Travel Plans, with outcomes focussing on:
  - o Increasing active travel by encouraging walking and cycling
  - Promoting public transport use



- Improving accessibility to goods, services and employment for people without access to a car
- o Reducing the need to travel, particularly during peak periods
- Proactively monitoring the success of travel plans associated with new development and seeking additional measures if targets are not achieved

#### Targeting travel plans for:

- Existing and new schools without an active travel plan (developed in conjunction with the Safer Routes to School initiative in objective 5)
- o Significant employers or areas of employment
- Major new residential developments
- Further and Higher education establishments

#### Transport objective 5: Improving travel safety

#### Schemes/actions:

- Road safety schemes, including:
  - Alterations to the road environment to modify road user behaviour
  - Alterations to the road layout (on a varying scale) to control vehicle movements
  - Additional on-street parking restrictions in locations where road safety is compromised
- Road safety education and training, with actions including;
  - Continuing Bikeability cycle training for school students
  - o Practical pedestrian training
  - Monitoring and training school crossing patrols
  - Working with schools to deliver the correct road safety message to the correct age group
  - Educational Resources loaned to schools
  - Working with partners to focus on vulnerable road users including young drivers and moped riders
  - o Extend the Junior Road Safety Officer scheme
- Road safety publicity and promotion, with campaigns and promotion focussing on:
  - Drink and drug driving
  - o Distractions in collision causation
  - Being visible on the highway network
  - Walk to School schemes throughout the year
- Road safety enforcement
- Safer routes to school, including through;
  - Improvements to key pedestrian routes from key catchment areas to schools
  - Expanding the existing walking bus initiative
  - Appropriate highway infrastructure and focused parking enforcement in the vicinity of school entrances
  - Campaigns and initiatives
  - Information and education on safer walking
  - o Providing bus safety education
  - Encouraging schools to work with neighbouring schools so that joint initiatives can reflect any wider issues within the area
- · Community safety initiatives.



## **Glossary of Terms**

Affordable Housing Housing provided for those people who need to be

in an area but who are unable to afford open

market prices or rents.

Ancient Semi Natural

Woodland

Woodland likely to have existed prior to 1600 and containing trees and shrubs that are predominantly native. All stands of ancient woodland, which does

not obviously originate from planting.

**Annual Monitoring Report** 

(AMR)

Authorities are required to prepare annual monitoring reports to assess the implementation of

the local development scheme and the extent to which policies in local development documents are

being achieved.

**Appropriate** Appropriate Assessment is a requirement of the EC **Assessment** Habitats Directive 92/43/EEC and EC Birds

Habitats Directive 92/43/EEC and EC Birds Directive 79/409/EEC and is used to assess the impacts of a land use plan against the conservation objectives of a European Site and to ascertain whether it would adversely affect the integrity of

that site.

Area Action Plan (AAP) Planning frameworks for areas of change and

areas of conservation.

**Biodiversity** The number and variety of species found within a

specified geographical area

Brownfield sites/Land

(Derelict land, Recycled land)

Previously developed land that is, or was, occupied by a permanent (non-agricultural) structure and associated fixed surface infrastructure. The

definition covers the curtilage of the development (except housing). It may occur in both built up and

rural settings.

**Call for Sites**The process of asking landowners and developers.

to put forward sites to Medway Council to consider for development for the period up to 2026 and beyond. Sites should be able to accommodate 5 or more dwellings or are 0.15 hectares or greater in

size

Carbon Capture and Storage This is a means of mitigating the contribution of

fossil fuel emissions to global warning, based on capturing carbon dioxide and storing it away from

the atmosphere by different.

Category A Trees Trees that are particularly good examples of their

species, especially if rare or unusual, of significant conservation, historical, commemorative or other value or those of particular visual importance.

Climate Change Rising global temperatures which will result in

changes in weather patterns, rising sea levels and



increased frequency and intensity of extreme

weather

Cluster A geographical concentration of inter-connected

businesses

Coastal squeeze Areas of mudflat or salt marsh that are reducing in

area as a result of rising sea levels against

increasingly defended land.

Combined heat and power

(CHP)

Technology for energy recovery systems, which provides both electricity and heat and can be linked to community heating schemes or to individual

premises.

**Commitment** A development proposal which is allocated in a

development plan or for which planning permission

has been granted.

Comparison
Shopping/Goods

Higher value non-food goods (consumer durables such as clothing, footwear, jewellery, books, etc) – purchases tend to be less frequent than everyday items, and often involve comparison between different items and brands. Traditionally associated

with High Street shopping.

Conservation Area An area designated under the Town and Country

Planning (Listed Buildings and Conservation Areas) Act 1990 on account of its special

architectural or historic interest where its character

and appearance should be preserved and

enhanced.

Convenience

**Shopping/Goods** 

Food, drink and other frequently purchased lower value items e.g. household cleaning materials,

newspapers, and confectionary.

Core Strategy A development plan document, forming part of the

local development framework that sets out the long term spatial vision for an area with strategic policies and proposals to deliver that vision

**dB** A decibel is a unit for measuring the intensity of a

sound.

**Derelict land**Land so damaged by industrial or other

development that it is incapable of beneficial use

without treatment.

**Development** The carrying out of building, engineering, mining or

other operations in, on, over or under land, or the making of any material change in the use of any

buildings or other land.

**Development Brief** A supplementary planning document prepared in

support of policies and proposals within the Development Plan. They inform developers and other interested parties of the constraints and opportunities presented by a site and the type of development expected or encouraged by local



planning policies.

**Development Plan Document** 

(DPD)

Spatial planning documents covering a range of policy areas that will undergo a process of

consultation and are subject to alteration following

independent examination.

**District Centre** Shops, separate from the town centre, usually are

containing at least one food supermarket or superstore, and non-retail services such as banks,

building societies and restaurants.

Ecological Footprint An ecological footprint is a concept based on how

much land and water area a human population needs to produce the resources required to sustain itself and to absorb its wastes, given prevailing

technology.

**Ecosystems** A complex set of relationships between species

and habitats of an area. Ecosystems vary in size with each species dependant on one another

Edge of centre A location that is well connected to and within easy

walking distance of the primary shopping centre.

Environmental

**Compensation/Mitigation** 

Mechanisms whereby the loss of environmental resources can be mitigated or compensated for where an environmental feature is lost, with a

feature of at least equivalent value.

Green Belt Green Belts are specifically established through

development plans and consist of predominantly

open land around urban areas and other

settlements with the strategic role of preventing the outward expansion of built up areas, safeguarding the surrounding countryside from encroachment, assisting urban regeneration and providing areas

for outdoor recreation.

**Green Corridors/Green Grid** A network of open spaces, often linear in nature,

possibly linked and providing connections between

town and country.

Greenfield land/sites Previously undeveloped land within or beyond the

confines of built up areas. National definition of this (PPG3) includes former mineral working which has

been the subject of an agreed restoration

programme.

**Greenhouse Gas** A gas in the Earth's atmosphere (such as carbon

dioxide) that absorbs infra-red radiation emitted by the Earth's surface as a result of exposure to solar ultra-violet radiation, thus increasing the mean

temperature of the planet.

Green Infrastructure Sustainable Drainage systems (SUD's), flood risk

management water resource management, tackling

of heat island effect e.t.c.

GEA Gross External Area



**Gross Value Added** 

Measures the contribution to the economy of each

individual producer, industry or sector in the United Kingdom and is used for the estimation of Gross

Domestic Product (GDP)

**Household** One person living alone or a family or group of

people living at the same address and sharing

domestic facilities and housekeeping

arrangements.

**Landbank** A supply of land intended for a particular purpose.

For minerals it relates to the mineral reserves associated with land that has planning permission.

Landfill The deposition of waste onto hollow or void space

in the land, usually below the level of the surrounding land in such a way that pollution or

harm to the environment is prevented

**Listed Building** A Building of special historic or architectural

interest. Listing gives a building statutory protection against unauthorised demolition, alteration and

extension.

**Local Centre** A small group of retail and services outlets usually

comprising a newsagent, a general grocery store, a sub post office and occasionally a pharmacy, a

hairdresser and other small shops of a local nature.

**Local Development** Introduced in the Planning and Compulsory **Documents (LDDs)** Purchase Act 2004, they comprise both statutory

development plan documents (DPD's) and nonstatutory Supplementary Planning Documents (SPDs). LDDs include core policies, area action plans, proposals map, site-specific policies and a

Statement of Community Involvement.

**Local Development** Introduced in the Planning and Compulsory **Framework (LDF)** Purchase Act 2004, they comprise a 'folder' of

Local Development Documents (LDDs). They have replaced the former framework of District Local Plans, Minerals and Waste Local Plans and Supplementary Planning Guidance. They form the framework for delivering the spatial planning strategy for the area. The series of documents, which when adopted will replace the adopted Local

Plan

**Local Development Scheme** 

(LDS)

The LDS is a public statement identifying which local development documents will be produced, in

what order and when.

**Local Plans**The lower tier of the former statutory development plan setting out detailed policies and proposals for

a local authority's area, or for a particular subject (e.g. the Kent Waste and Minerals Local Plans were prepared for the Kent & Medway area). Local Plans were required to be in general conformity

with the adopted Structure Plan for the area.



**Local Strategic Partnership** 

A single body that brings together at a local level the different parts of the public sector as well as the private, business, community and voluntary sectors so that different initiatives and services support each other and work together. They are responsible for developing and driving the implementation of Community Strategies and Local Area Agreements (LAAs)

**Low Cost Market Housing** 

Housing provided at a purchase price significantly below prevailing open market prices in the locality. Does not mean either smaller housing or housing built to a lower standard.

**Mixed Use Development** 

Areas/Buildings where a mixture of commercial, retail and residential uses predominate thereby meeting social, economic and cultural needs in one area and contributing to communities with good access to a full range of services and reduced need to travel.

**Multi Area Agreement** 

A voluntary agreement between two or more authorities, their partners and the government working collectively to improve local economic prosperity

**National Nature Reserves** 

Areas defined by English Nature and considered to be of such national importance as to require preservation and management. Designated under section 19 of the National Parks and Access to the Countryside Act 1949 or section 35 of the Wildlife and Countryside Act 1981.

Permitted Development Rights (PD)

Small scale developments, which do not require planning permission from the Local Planning Authority.

Planning and Compulsory Purchase Act 2004

An act to make provision relating to spatial development, town and country planning and the compulsory acquisition of land

Planning Policy Statement (PPS)

Subject specific national Government policies, on national land use in England that replaced Planning Policy Guidance (PPGs) notes.

**Previously Developed Land** 

Land in urban or rural areas, which is, or was, occupied by a permanent (non agricultural) structure and associated fixed surface infrastructure, including the curtilage of the development (except housing). It includes defence buildings and land used for mineral extraction and waste disposal where provision for restoration has not been made.

**Primary Road Network** 

Those inter-urban routes, which provide access to within five miles of the larger urban centres. These roads include motorways, trunk roads and primary "A" roads.

**Quality Bus Corridors** 

Quality bus corridors are uncongested, have real



time bus information at bus stops and easy access

onto and off the buses.

**RAMSAR Site** Sites designated under the RAMSAR Convention

> on the Conservation of Wetlands of International Importance Especially Waterfowl Habitat, ratified by the British Government in 1976. Natural England has the responsibility of identifying

RAMSAR sites.

**Regional Spatial** Identification and definition of policies relating to Strategy (RSS) the development and use of land in the region that

were prepared by the regional planning body and

approved by the Secretary of State.

Retail Park Groups of retail warehouses formed into "Centres"

generally with shared car parking

Retail

Stores specialising in an aspect of comparison Warehousing/Warehouses goods retailing, frequently trading in bulky goods

such as home improvement products, major electrical items, motor accessories, furniture, carpets and garden products and bulky DIY items. catering mainly for car-borne customers and often

Designated by locally developed criteria to cover

in out-of-town locations.

**Regionally Important** Geological and

**Rural Service Centre** 

the most important places for geology and **Geomorphological Sites** geomorphology outside statutorily protected land

such as Sites of Special Scientific Interest (SSSI).

Settlements within rural areas that provide an important service role (e.g. employment, shops, community facilities) to their local population and

their immediate rural hinterland.

**Scheduled Ancient** Monument

An archaeological site of national importance (buildings or other structures) included within a schedule compiled by the Secretary of State for Culture, Media and Sport under the Ancient Monuments and Archaeological Areas Act 1979 (as amended by the National Heritage Act 1983), as being of significant archaeological importance. Consent is required from the Secretary of State for works affecting a Scheduled Ancient Monument.

**Semi-Natural Areas** An area of native flora and/or fauna species that is

apparently natural but has been significantly

modified by human activities.

**Shoreline Management Plans** 

(SMPs)

Prepared by a group of agencies including local maritime authorities and the Environment Agency.

SMPs provide a large scale assessment of the risks associated with coastal processes and present a framework to reduce these risks to

people, property and the environment.

Sites of Nature Conservation

Interest (SNCI)

Identified by the Kent Wildlife Trust (KWT) and

considered to be of countywide importance.



Sites of Special Scientific Interest (SSSI)

Nationally important areas for the conservation of wildlife habitats, geological features and landforms. SSSI's are areas of land that have been notified by English Nature as being of special interest under the Wildlife and Countryside Act 1981 or the National Parks and Access to the Countryside Act 1949.

Social rented properties

A form of housing tenure owned and managed by the state or not-for-profit organisations, usually with the aim of providing affordable housing

South East Plan

The South East Plan is the Regional Spatial Strategy (RSS) that set out a vision for the future of the South East Region until 2026, outlining how to respond to challenges facing the region such as housing, the economy, transport and protecting the environment

**Spatial Planning** 

Spatial planning goes beyond traditional land use planning to bring together and integrate policies for the development and use of land with other policies and programmes which influence the nature of places and how they function.

**Spatial Portrait** 

A description of the main social and economic characteristics which sets out the context for the LDF

Special Areas for Conservation (SAC)

Areas designated under Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna. They contribute to the conservation of biodiversity.

Special Protection Area (SPA)

Areas designated under European Community Directive 79/409 on the Conservation of Wild Birds, to conserve the habitat of rare or vulnerable birds and all regularly occurring migratory birds.

**State of Medway Report** 

One of a series of factual reports produced to inform the preparation of Medway's LDF

Statement of Community Involvement (SCI)

The statement of community involvement explains to local communities and stakeholders how they will be involved in the preparation of local development documents, and the steps that authorities will take to facilitate this involvement.

Strategic Land Availability Assessment

An assessment to identify sites that are available or could become available for housing, employment or other developments in the period up to 2026 and beyond. Sites should be able to accommodate 5 or more dwellings or are 0.15 hectares or greater in size

**Strategic Gap** 

An area of predominantly open land between existing urban areas which serves to maintain their separate identity and prevent their coalescence with each other or with smaller nearby settlements.



Sustainable Urban Drainage (SUD)

A sequence of management practice and control structures designed to drain surface water in a more sustainable fashion than some conventional

techniques.

**Superstores** Self-service stores selling mainly food or food and

non-food goods, usually more than 2,500 square metres trading floor space, with supporting car

parking.

Supplementary Planning

Document (SPD)

Issues and sites for which the local planning authority wishes to provide detailed policy guidance, which will supplement policies and proposals in the development plan documents.

Sustainability Appraisal (SA) Assessment of the environmental, economic and

social impact of policies, to ensure that all policies and proposals reflect sustainable development

principles.

**Sustainable Community** 

Strategy (SCS)

A document prepared by a local strategic partnership which sets out a vision and plans for agencies, organisations and communities who work together to improve the quality of life in an area

Sustainable Development Commonly defined as "development that meets the

needs of the present without compromising the ability of future generations to meet their own needs" (World Commission on Environment and

Development, 1987).

Sustainable Urban Drainage

System (SUDS)

SUDS provide for more environmentally sustainable urban drainage through systems designed to reduce run off, slow its rate or provide for filtering, sedimentation and biological

degradation of the water.

**Thames Gateway** The regional growth area on both sides of the

Thames Estuary within North Kent, South Essex and East London which is of national and regional

importance for economic regeneration, redevelopment of brownfield sites and the promotion of sustainable development.

**Town Centre** City, town and traditional suburban centres, which

provide a range of facilities and services and which fulfil a function as a focus for both the community and for public transport. It excludes small parades

of shops of purely local significance.

Traffic calming Measures to reduce vehicle speeds to improve

safety and enhance an area's quality of life.

**Thames Gateway Planning** 

Framework

A planning framework that established a set of principles to guide the consideration of future proposals for the development and environmental

enhancement of the Thames Gateway.

**Travel Plans** A package of practical measures to encourage staff

and/or visitors to a development to choose



alternatives to single occupancy car use and to

reduce the need to travel.

**Urban Capacity** An estimate of the potential for additional

development that can be accommodated within an

urban area.

**Urban Extension** A large expansion of a town or city

**Urban Fringe**Countryside on the periphery of urban areas often

subject to development pressures or activities that threaten the appearance/management of the

countryside.

**Use Classes** A classification of land uses for development

control purposes defined by the Town and Country

Planning (Use Classes) Order 1987 and

subsequent amendment orders. Changes of use of buildings or other land between uses within a single 'use class' are excluded from the definition of development in the Town and Country Planning Act 1990, thus making planning permission unnecessary i.e. A Statutory Instrument which defines broad categories of use of land and

buildings.

Waste Refers to all types of waste including trade,

commercial, industrial, construction and demolition, agricultural, mineral, quarrying and household

waste.

Windfall sites Sites, which become available for development,

which were not previously identified as allocations or identified as commitments through previous

planning permissions.

World Heritage Site Cultural and natural sites of outstanding world-wide

value designated by the World Heritage Committee

for inclusion on UNESCO's World Heritage Site list

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## **ATTACHMENT 2**

## Schedule of Responses to Representations Received on the Pre-Publication Draft Core Strategy

August 2011

Medway

Serving You

Submitted By	Points Raised	Council's Response
Anna Bloomfield	Strongly disagrees with Woolley's Orchard SLAA Assessment.	McCulloch Homes states that the
(McCulloch		SLAA assessment does not justify
Homes, Palm		the entire area of Woolley's
Investments,		Orchard being excluded for other
General Aviation		uses as the area includes derelict
Awareness		and despoiled Land. When the
Council, Port		Council carried out a call for sites
Medway Marina &		for the SLAA in 2009, two separate
Medway Sports &		submissions were made. These
Leisure Park Ltd,		were by Nathaniel Litchfield and
		Partners and Goddard Planning
		Consultancy, which were received
		on 30.01.09. In both cases, the
		completed survey forms described
		the site as greenfield and in neither
		case did the constraints section
		describe the site as including
		derelict and despoiled land. This
		conclusion was confirmed by the
		site survey carried out by the
		Council. The representations only
		sought housing development and
		did not seek any other uses on the
		site. Given that the site is adjoined
		on three sides by residential
		development, the Council does not
		consider other uses would be
		appropriate.
	Aviation activity at Rochester Airfield must be retained.	The draft core strategy does not
		propose the removal of general
		aviation activity from Rochester
		Airfield.
	McCulloch Homes, Palm Investments Ltd. and Palm Developments Ltd. consider	Although the South East Plan no
	the caveats in Policy CS7 to be such that virtually no new development could ever	longer includes a strategic gap

meet them. The concept of the strategic gap, having been deleted from the South East Plan, has been reintroduced. The concept of openness in bullet point one is more applicable to the Green Belt and is more stringent than necessary elsewhere. References to "the separation of settlements" should be removed and the first bullet point clarified.

policy, Policy KTG1.x seeks to protect from development, the Metropolitan Green Belt, the Area of Outstanding Natural Beauty and avoid coalescence with adjoining settlements to the south, east and west of the Medway urban area and to the west of Sittingbourne.

The first bullet point of policy CS7 seeks to retain the openness and intrinsic character of the countryside. This policy is derived from PPS4: Planning for Sustainable Economic Growth and PPS7: Sustainable Development in Rural Areas. One of the Government's objectives, set out in paragraph 10 of PPS4, is to promote thriving, inclusive and distinctive rural communities whilst continuing to protect the open countryside for the benefit of all. Medway Council considers that the maintenance of the separation of rural settlements contributes both to the retention of distinctive rural communities and to the protection of the open countryside.

Policy EC6.1 of PPS4 requires local authorities to protect the countryside for the sake of its intrinsic character and beauty, the diversity of its landscapes, heritage

	and wildlife, the wealth of its natural resources and to ensure that it is enjoyed by all. Policy CS7 of the core strategy seeks to implement this requirement and consequently deals with a variety of landscape, ecological and other issues.
	Both PPS4 and PPS7 seek to strictly control development in open countryside away from existing settlements. (EC6.2 of PPS4 and paragraphs 9 and 10 of PPS7). Paragraph 15 of PPS7 also seeks to protect the quality and character of the wider countryside.
The assertions in policies CS8 and CS30 to North and East Rainham are not accepted with regard to factual analysis and justification.	It is not clear what the substance of the objection is and the Council can therefore only note the position.
Proposes a strategic allocation of land at Mill Hill for the relocation of Gillingham Football Club.	The Mill Hill site was rejected in the SLAA because sufficient land had been identified for residential and employment development without the need to encroach upon Greenfield land to meet Medway's development requirements. When the site was submitted as part of the "call for sites" it contained no proposal for the relocation of Gillingham Football Club. In order to be considered as a strategic allocation, far more information would be required to demonstrate that alternative sites had been

	Bridgewood Rochester Ltd. claims that much of the land identified for economic	considered, that this was the most appropriate site and that there was a reasonable prospect of delivery during the plan period. Consequently, this proposal is rejected. Sufficient land has been identified
	development is not readily available and if land can be delivered in the short term, this should be considered favourably.	in the SLAA to meet Medway's economic development requirements and its delivery has been confirmed with the owners. Consequently, no further land is being considered.
Arriva Southern Counties	<b>2.24 Transport -</b> suggests a revision to the 2 <sup>nd</sup> bullet point to read as follows: "transport links to and within new developments" We would strongly support the third bullet point and intend to work closely with the Council together with the university and college authorities to achieve this. I also welcome the fourth bullet point on highway capacity improvements and Strood town centre.	2:24:Agreed. Second bullet point of paragraph 2.24 to read "Ensure good public transport links to <b>and within</b> new developments and improved links to existing neighbourhoods".
	2.27: Neighbourhoods - I welcome the fifth bullet point on road and retail improvements in Strood town centre. I also strongly support the proposed new development at Lodge Hill. Concentrating development onto a key site will give excellent opportunities to provide a good quality public transport service.	Noted.
	3.32: Employment Land - I note the proposal for development at Grain and Kingsnorth for further employment uses. However, the remoteness of these sites may prove difficult to serve effectively by public transport if additional employment numbers are small.	Paragraph 3.32. Planning permission has already been granted for the development of the Isle of Grain and Kingsnorth sites but there are likely to be opportunities for new bus links associated with the future role of Lodge Hill as a hub for the Peninsula.
	3.45: Interface Land - I would support the development of the interface land for additional University uses as a good network of bus services are available to meet	Noted.

additional student needs at this location.	
Page 24: Spatial Vision: Paragraph 5 - The network of quality bus corridors is strongly supported and will be vital to ensure that the existing road network is not swamped by additional car traffic generated by the new developments. However, it might be useful to clarify and define what is meant by "quality bus corridors" at this point in the text.	Page 24 Paragraph 5: Quality bus corridors are uncongested, have real time information at bus stops and easy access onto and off the buses. Given the brevity of each of the spatial vision paragraphs, the definition of quality bus corridors is to be included in the glossary.
Policy CS13 - I strongly support the proposed new development at Lodge Hill.  Concentrating development onto a key site will give excellent opportunities to provide a good quality public transport service.	Noted
<b>7.5: Economic Development -</b> 3 <sup>rd</sup> bullet point: I strongly support the proposed new development at Lodge Hill. Concentrating development onto a key site will give excellent opportunities to provide a good quality public transport service. The proposal to accommodate operations from the universities is also welcomed as it is planned to link the new site with the main campus. 5 <sup>th</sup> bullet point: whilst Kingsnorth may be well connected to the main road network, this is not true of public transport and its location is unlikely to assist in improving this without a significant increase in the number of employment opportunities at this location.	As Kingsnorth is developed, the opportunities for extending bus services to the site can be explored.
<b>Policy CS18 -</b> 3 <sup>rd</sup> bullet point: The plan to develop the evening economy is very welcome. Bus services are currently poor in the evenings in Medway which is a reflection of the currently poor evening opportunities. Development of this should enable the bus network to be improved at this time of day. However, the policy does not indicate the suggested locations or types of activity that are sought and a paragraph outlining this in section 7 would therefore be welcome.	Policy CS18: It is not appropriate to identify specific uses or locations of activities for the development of the evening economy in a core strategy. However the term is generally known to refer to entertainment and leisure activities located in town centres with good public transport access.
<b>9.4: Thames Gateway Funding -</b> The securing and deployment of this funding to improve transport infrastructure is very welcome and will be a key part in developing the quality bus network envisaged in this Framework.	Noted
9.7: Context and Priorities - I would fully support the need for more effective management of the network with selective investment to tackle congestion hotspots.	Noted

Our customers still see service reliability as a key issue and reducing the variable	
congestion on Medway's roads will assist in resolving this concern.	
<b>9.10: Key Actions -</b> The Fastrack system is a very workable example to quote and deploy in Medway. However, whilst this paragraph quotes a number of links, elsewhere in the document, the text only refers to Lodge Hill as a Fastrack style link. Other paragraphs should be expanded to envisage Fastrack links elsewhere on the core bus network including the A2 corridor which is in receipt of Thames Gateway funding. Indeed, I am surprised that this section does not include the A2 bus measures as a key action as most of the main bus routes in the Medway Towns use the A2 corridor. This section should also include a key action of public transport playing its part in reducing traffic congestion and linking with the strategy on network management.	The core strategy reflects proposals in the Medway Local Transport Plan 3 2011-2026. The branding of particular services will be a matter for further discussion between the Council and the operators.
9.25: Lodge Hill - Given that the document elsewhere quotes the vital need for a high quality public transport links to Lodge Hill, including Fastrack style services, the emphasis on public transport in paragraph 9.25 is strangely understated. I would therefore propose that this paragraph is amended to read as follows: "Public transport has a vital part to play in the development of Lodge Hill if the additional demand is not going to significantly exceed the capacity of the road network, particularly in the Strood and Chatham Maritime areas".	The paragraph refers to a wider area than Lodge Hill.
Policy CS24 - I note the proposed policy. However, I would suggest that there is not sufficient positive emphasis on how a positive public transport approach can have a significant impact on traffic levels and indeed match the sentiments of the preceding paragraphs in this section.  Policy CS26 - I am concerned that this policy does not acknowledge the need for improved public transport in assisting in the success of development of the district centre.	If the explanatory text is satisfactory there is no need to repeat it in the policy itself. The policy adequately sets out the measures to develop a quality bus network.
	The future success of Strood as a district centre is contingent on a number of factors; in transport terms circulation is being specifically addressed by policy CS26. Policy CS24 addresses public transport. It states, amongst

Figure 11.4: Lodge Hill - I note and welcome the aim of ensuring that public transport provision is introduced from an early date. However, given the layout shown in Figure 11.4, it is not clear how this might be achieved given the linear nature of the public transport routes through the development. Further dialogue on this topic would therefore be very useful. One success of Fastrack has been the impressive penetration of the service along central spines in a new development. It is therefore of concern that the concept diagram shows a suggested Fastrack route along the edges of much of the development. This would not assist in achieving a strong passenger take up rate.	other matters "the development of a quality bus network and selective junction improvements in congestion/air quality hotspots".  Also Strood is identified as a location for a potential park and ride facility. To state these things again in Policy CS26 would be unnecessarily repetitious.  Fig 11.4 is not intended to show the public transport routes, it is intended to show, or be indicative of the primary road network. The key shows that bus priority measures will need to be integrated. The intention is that the masterplanning work will identify how the public transport penetration of the site will occur. The Medway Core Strategy supports that work via policy CS24
Page 129: Victory Pier - I note that the significant development at Victory Pier remains in the plan. It was originally proposed that a bus link, funded by the development, should be installed at the Pier Road major junction. This would allow frequent service 176 to achieve a more direct passage through this junction, reducing delays and producing a faster more direct service for users. I am sure that this scheme would achieve the aims set out when it was proposed and would therefore request that, if the funding source is still available, its introduction should be revisited. The scheme will meet the aims of policies for public transport set out in this document and at little cost to the Council.	This is a detailed matter that can be considered separately from the Core Strategy
Page 131: Maritime and Brompton - I am surprised that public transport improvements are not included to assist with meeting these new demands.	The Infrastructure Delivery Schedule of the Medway Core Strategy reflects the Local Transport Plan; this is a very generic document and is flexible to

		changing circumstances over its 15-year life and is part of the evidence base for the Medway Core Strategy. Within the plan is detailed the development of quality bus corridors to support bus service reliability. The A road through Brompton would be part of this project.
	Appendix C - Table of predicted hotspots: I am surprised that whilst A2/Canal Road is included, A2/Station Road is not quoted. This is a significant source of delays. I would also request that North Dane Way/Capstone Road is included as a source of peak period delays. The suggested bus lane would significantly assist services at this location.	Appendix C is quoted verbatim from the Local Transport Plan. Amendments to that document cannot be made in the core strategy but need to be addressed through the Transport Plan consultation process.
	<b>Page 141 -</b> Developing Park & Ride: in the 6 <sup>th</sup> bullet point, it is not important to link the Park & Ride sites to each other. However, the emphasis does need to be on how the sites are effectively linked to the key destinations.	P141: The transport objectives on page 141 are reproduced from the local transport plan.
	<b>Page 142 -</b> Travel Plans: I would suggest that the 2 <sup>nd</sup> bullet point should be to promote and increase the use of public transport.	The second bullet point is quoted verbatim from the Local Transport Plan.
BAe Systems (CB Richard Ellis)	Please find below representations submitted on behalf of our client, BAE Systems (BAES). These representations refer to the following sites, both of which are within the ownership of BAES:  The Sports and Social Sports Club, Bells Lane, Hoo St Werburgh; Rochester Airfield, Maidstone Lane, Chatham.	
	Sports and Social Club As the Council will be aware, BAES have aspired to redevelop land at the Sports and Social Club for a number of years. The Council recommended a refusal for the previous proposals to rejuvenate the sport's facility (aided by residential development east of Bells Lane), despite a huge amount of local	The proposal to develop the BAe Systems sports and social club will be considered when the Site Allocations

support for the scheme. The Council's recommendation resulted in BAES withdrawing the planning application in March 2009.	DPD is being prepared.
We note that paragraph 3.19 of the Core Strategy Pre-Publication Document states that 'the BAe Sports Club is simply an individual site of insufficient size to be dealt with as part of the options process'. We accept the Council's position that the Sports Club is not a strategic location for development and acknowledge that it will not be considered as a strategic development location in the Core Strategy. However, we expect the Council to give full consideration to allocating the site (both east and west of Bells Lane) for a mixed use residential and leisure scheme as part of the forthcoming Site Allocations Document.	Noted.
In light of the Coalition Government putting overwhelming importance on localism and its place at the heart of policies, we would urge the Council to take heed of the Hoo St Werburgh residents who turned up in large numbers to offer support to the proposal submitted in 2009.	Noted but see above.
The Sports and Social club is an important community facility in Hoo and the Council can act to ensure its future. We have no further comment to make in respect of the Sports and Social Club site at this stage but reserve the right to comment on the draft site allocations document.	Noted.
Rochester Airfield In respect of Rochester Airfield we note that the Core Strategy Spatial Vision identifies the site as being suitable for a 'technology and knowledge hub'. This is reflected in Policy CS17 (Economic Development), which states that the Council recognises 'the continuing opportunities at Rochester Airfield to develop a technology and knowledge based cluster'. The policy also notes that the Council will seek to protect established employment areas from other development and promote reinvestment strategies.	Noted
We highlight that the adopted Medway Local Plan (2003) allocates the existing main factory and ancillary buildings on the BAE site as an 'existing employment area' where, development will be permitted for Business (Class B1), general industry (Class B2) and storage and distribution (Class B8) uses. In addition, the wider Rochester Airfield site was also allocated as part of the wider Rochester Airfield site under Policy S11 (which was deleted in 2007) for a high quality business, science and technology development comprising Class B1, B2 and B8 uses.	Noted.

	With regard to the above we highlight that national guidance set out in PPS4 (EC2.1) states that 'existing site allocations should not be carried forward from one version of the development plan to the next without evidence of the need and reasonable prospect of their take up during the plan period. If there is no reasonable prospect of a site being used for the allocated economic use, the allocation should not be retained, and wider economic uses or alternative uses should be considered'.	Noted but its importance to the Medway's economic strategy has been confirmed consistently as the evidence base for the Core Strategy has been compiled.
	The adopted plan policy [S] 11 clearly did not have the desired effect and has not attracted the type of development envisaged and we would therefore request further flexibility within the draft policy. Whilst BAES support the identification of Rochester Airfield as a technology and knowledge hub, BAES request that sufficient flexibility is incorporated into any site specific policies to ensure a viable scheme can be delivered on site. As stated in PPS4 the Council should not merely carry forward the existing Local Plan designation without sufficient evidence to justify such an approach. As such we request that in taking the Core Strategy forward wider uses (e.g. trade counter and bulky goods activities) are considered at Rochester Airfield.	Noted but the uses quoted would not be consistent with the evidence base.
	We would emphasise that BAES remain committed to Rochester Airfield and will continue to work with the Council in preparing a development brief and masterplan for the site.	Noted and welcomed.
Barratt Strategic (Judith Ashton Associates)	Doubts raised in relation to Strategic Land Availability Assessment assumptions, and compliance with national land supply guidance.	Paragraph 6.12 of the SLAA explains that given that 263 sites have been assessed as suitable for development, the Council has not attempted to carry out a detailed assessment of the economic viability of sites, given time, complexity and cost constraints. Instead, owners and developers have been consulted in conformity with paragraph 41 of the Practice Guidance.
	The level of housing development proposed in policy CS13 should be increased to at least 19,320 by 2028.	A reason for this is not given but the SLAA confirms that the identified capacity is of this order.

	Policy CS13 refers to "at least 17,930"
The scale of development to be achieved at Lodge Hill by 2028 is reduced to 3,000 dwellings and policies CS13 and CS33 amended accordingly.	Land Securities has advised that the timing and rate of house building at Lodge Hill can be achieved.
The level of development to be accommodated in the Hoo Peninsula is maintained at 5522 dwellings and policy CS13 provides for an extended Hoo site (1500 units) encompassing Hoo, St Werburgh, and the nearby villages of High Halstow and Cliffe Woods;	An extended Hoo St. Werburgh option was considered and rejected in the Council's Issues and Options report in 2009.
The level of development proposed within Chatham, Rochester and Gillingham is increased accordingly and additional growth is also considered at Rainham.	The first review of the Medway Strategic Land Availability Assessment (SLAA) has identified a surplus supply of 2135 dwellings up to 2028. Consequently, this provides a contingency reserve should other sites fail to come forward. No additional sites are therefore required.
That a reserve site policy is promoted in the event of non-delivery at Lodge Hill Chattenden / the other strategic allocations.	As indicated above the Core Strategy allows for a substantial contingency.
CS3&4 - should not be explicit in stipulating code level requirements.	The Government's Code for Sustainable Homes proposes that by 2010, all new homes should achieve a grade three rating and by 2016, a grade 6 rating should be achieved. Policy CS3 is only asking for consideration to be given to other measures set out in the bullet points. Consequently, no changes

	are proposed to this policy. Policy CC1 of the South East Plan does not include a standard of 10% for renewable energy resources in new developments.
CS14 – should be amended to refer to reduced provision / off-site contributions when development viability is an issue, and refer to all residential developments within class C3.	CS14 makes the provision of affordable housing to be subject to site viability. There is therefore no need to elaborate further as any solutions would be negotiated with the developer. There is no need to specify the use class of dwelling houses.
CS15 – Strategic allocations should provide executive housing and elderly accommodation.	Policy CS15 allows for the development of both executive housing and elderly accommodation.
CS31 – should make provision for an extended Hoo settlement.	The Issues and Options Report, 2009, considered and rejected an option for the expansion of Hoo St. Werburgh in favour of the development of a new settlement at Lodge Hill, Chattenden. No amendment is therefore proposed for policy CS31.
CS33 – unrealistic delivery rates for Lodge Hill.	The delivery rates for Lodge Hill in policy CS33 have been provided by Land Securities, the disposal agents for the site, who are confident that they can be delivered.
CS34 – reference should be made to infrastructure costs in terms of viability.	Paragraph 12.14, which relates to policy CS34, refers to Medway Council's Guide to Developer Contributions. It states that

		developers are expected to take account of, and meet the requirements of this document, before submitting planning applications. The document points out that the Council's initial negotiations will be based on the guide and only where there are good and valid reasons for departing from the guide, will
		alternatives be considered. An example is given as where the normal level of contribution is unaffordable. Consequently, no amendment is proposed to policy CS34 and any questions of viability will be addressed during negotiations.
Berkley First	Considers that the 20% renewables target is too high.	The 20% 'Merton Rule' is regarded as a general starting point for renewable provision for new development, subject to certain caveats. There is no evidence why this is inherently unacceptable as being 'too high'.
	Considers that only 25% affordable housing provision should apply across all of Medway.	The two levels of affordable housing requirement (25% and 30%), set out in policy CS14, are based on recommendations included in a Viability Study carried out by consultants in parallel with the North Kent Strategic Housing Market Assessment. No changes are therefore proposed to policy CS14.

Worried about the Housing Space Standards (which should be guidance rather than strict standards) stifling development and increasing dwelling prices, and potential over supply of housing shown in the trajectory for 2013-18.	Examination of recent housing schemes in Medway has revealed that most house and flat designs either meet the proposed Medway standards or come close to meeting them. Those designs, which failed by a substantial margin were cramped and unfit for purpose.
Considers that there is a need for further student accommodation.	Paragraphs 6.35 to 6.37 address the issue of student accommodation and it is stated in 6.37 that the Council will work with the universities and Mid-Kent College to help deliver student accommodation.
Opposed to the need for Health Impact Assessments to accompany planning applications.	The provision of health impact assessments can help at the planning or pre-planning application stage to identify and remedy any shortcomings in the proposal with regard to its impact on health and thus to smooth the path of an application through the planning system.
Table 11.10: The Victory Pier development has outline planning permission for 808 residential units – not 776 as stated in the table.	It is agreed that there is an outline planning permission for 808 units but it is understood that 32 of those units have been replaced by a planning permission for student accommodation.
Table 11.11: Victory Pier has outline planning permission for an employment capacity of 1510m <sup>2</sup> . Furthermore we have permission for 1333 m <sup>2</sup> of restaurant. This should be included in the table.	Table 11.11 will be amended by the addition of Victory Pier with a capacity of 1510 sq.m. The tables in chapter 11 only list housing employment and retail uses.

		Therefore there is no need to include a restaurant.
	Table 12.2: The Victory Pier site should be adjusted to 808 dwellings.	See response in relation to table 11.10.
	CS34: Berkeley First welcomes Medway Council's decision not to implement the Community Infrastructure Levy as we believe that any contributions should directly benefit the locality in which the development is made. We recognise that developer's contributions are necessary when bringing forward certain large-scale developments, however it is important that they are kept at a realistic level. Setting the contributions too high could be a contributing factor in making a development site unviable.	The Community Infrastructure Levy (CIL) should be introduced by April 2014 when S106 agreements will be less important. However S106 will still be around and used under certain conditions. Therefore, there will be some explanation of the CIL and how it will be dealt with in the Core Strategy.
Bourne Leisure (NLP)	Vision and Strategic Objectives Bourne Leisure disagrees with the current wording for the Vision, as the Company considers that specific recognition should be given to the importance of tourism to the district and the need to enhance its tourism role and accommodation base. Bourne Leisure also considers that the Vision and its strategic objectives should specifically support the development of tourism throughout the District and encourage the enhancement of existing provision, as well as the development of new tourism accommodation and facilities. This would then help to achieve one of the six ambitions in paragraph 4.10 of the consultation document, which is for, "Medway to be recognised as a Destination for Culture, Heritage, Sport and Tourism. Paragraph 8.1 of the State of Medway Report: Retail, Leisure and Culture, August 2009 recognises that tourism is important to Medway. Indeed, point 1 of paragraph 8.1 notes that already, "tourism employs over 5,000 local people and is worth in the region of "£250 million annually to the local economy". This value is reiterated at paragraph 7.28 of the pre-publication draft, which also states that, "continued growth is projected in the national and international tourism economy and Medway has the potential for further growth ". Point 1 of paragraph 8.1 of the State of Medway Report adds: "National and international forecasters project continued growth in the tourism economy. Medway has the potential for significant further growth in its local tourist economy." These attributes and the potential for tourism growth and development should be fully recognised in the Core Strategy, which should also, in its Vision, refer to the Council's objective of	Add tourism references to Vision and Strategic Objectives.

developing Medway as " a city of culture, tourism, learning and technology " (paragraph 3 of the State of Medway Report: Retail, Leisure and Culture, August 2009). This overall change in approach would be consistent with national guidance, as set out in the CLG Good Practice Guide on Tourism (May 2006), which recognises the economic importance of the tourism industry, as well as its contribution to social and environmental well-being and its regenerative impact. It would also reflect Policy SC18: Tourism of the pre-publication draft Core Strategy. Disagrees with the current wording of the Vision. Specific recognition should be given to the importance of tourism and to enhancement of it and Medway's accommodation base.	
Proposed Changes to the Vision and Strategic Objectives  Bourne Leisure considers that the Vision should state: "By 2028 Medway will have become a destination for culture, tourism, learning and technology. For tourism, this will have been achieved by: (a) It becoming an important year round tourism destination; (b) existing tourism accommodation and facilities having been enhanced; and (c) new tourism developments provided. There will be a diverse range of high quality tourism accommodation and more visitors to the area, providing significant economic benefits to the local community ". An additional strategic objective should then state: "To enhance the role of Medway as an important tourism destination, where improvements to the quality of tourist-related accommodation and facilities will be encouraged, in order to extend the tourist season, attract higher spending customers and additional tourism-related expenditure and boost the local economy	More abbreviated references added to Vision and Strategic Objectives
Agree with <b>Policy CS5</b> : Development and Flood Risk - Development and Flood Risk Policy CS5: Development and Flood Risk Bourne Leisure notes the first paragraph of Policy CS5 which states: "Permission will not be granted unless, following a flood risk assessment, it can be demonstrated that: It would not be at an unacceptable risk of flooding itself; and The development would not result in any increased risk of flooding; and The development is designed to be compatible with potential flood conditions; and There are no alternative sites in a lower flood risk zone; and The development would make a significant contribution to the overall sustainable development objectives of the LDF, such that the wider sustainability benefits of the development outweigh the flood risk; and It can be demonstrated that any residual flood risk are adequately mitigated to avoid an increased risk of flooding either on the site or elsewhere; and It is only for uses which are not defined	All proposals for development in flood risk areas will be determined on their individual merits in the light of policy CS5.

as highly vulnerable by PPS25." In addition, the Company would stress the importance of the draft policy taking full account of the specific characteristics and	
vulnerability of any existing and proposed land use (for example, certain tourism uses need to be, or to remain, located adjacent to water); and whether the proposed development makes a positive contribution to reducing or managing flood risk, when	
considering the acceptability of the development proposal. Bourne Leisure would also emphasise that in the case of proposals to expand existing tourism accommodation and holiday park sites within flood risk areas, only the extent of the	
new development itself, within or adjacent to the existing holiday park, and not the whole site, should have to be assessed sequentially. Moreover, the Company considers that new, tourism-related development will be justified in areas of risk of	
flooding, where it provides regenerative benefits and increased contributions to the local economy.	
Proposed Change to Policy CS5 – An additional paragraph should be added to the end of Policy CS5 stating that: In assessing the suitability of development proposals within flood risk areas, the Council will take full account of the specific characteristics of the proposed use, and whether the proposed development makes a positive contribution to reducing or managing floor risk. In the case of existing tourism uses, only the extent of the new development will need to be assessed sequentially.	All proposals for development in flood risk areas will be determined on their individual merits in the light of policy CS5.
Disagree with <b>Policy CS6</b> : Preservation and Enhancement of Natural Assets - Bourne Leisure notes that the first paragraph of Policy CS6 states: "Wildlife habitats and sites, populations of wild species and other biodiversity features will be protected, maintained and enhanced, especially through long term management and habitat enhancement schemes, particularly where they have been identified as being of international, national and local importance" Bourne Leisure considers, however, that in order to be effective, and to take account of other objectives for Medway such as promoting tourism, it will be important for Core Policy CS6 and its supporting text to recognise the need to carefully balance environmental matters, and the protection of sites of nature conservation value, with a development proposal's economic and social benefits. Specifically in relation to enhancing	Medway Council does not accept that policy CS6 should allow for the extension of existing tourism facilities or any other forms of development in areas that are important wildlife habitats. The essential thrust of the policy is not to achieve a balance between development and the preservation and enhancement of natural assets but to give priority to the
tourism, Policy CS6 should allow for the extension of existing tourism facilities, including on sites within areas adjacent to sensitive areas, provided that commensurate mitigation measures (such as the inclusion of a buffer zone and appropriate landscaping) can be implemented to mitigate both direct and indirect	maintenance and improvement of habitats and species. It will be for a developer to demonstrate that any proposal is of such importance that

impacts.	it should override that principle. Consequently, no amendment to policy CS6 is proposed.
Proposed Change to Policy CS6 - Bourne Leisure considers that paragraph four of Policy CS6 should be revised to state: " where the negative impact cannot be avoided, but the importance of the development is considered to outweigh the impact, taking full account of the economic and social benefits of the development proposal, then environmental compensation will be sought by the creation of the developer of new habitats or features on other suitable sites and their long term management will need to be secured."	For the reasons set out above, no amendment is proposed to policy CS6.
Agree with Policy CS18: Tourism - Policy CS18: Tourism Bourne Leisure agrees with the first paragraph of Policy CS18, which states: "Medway Council will positively promote sustainable tourism development. A diverse and high quality tourism offer will be encouraged that seeks to lengthen the tourism season increase the number and length of visits, provide job opportunities and sustain the tourism economy, whilst maintaining and where possible, enhancing Medway's natural and built environment qualities". However, the Company then considers that additional and express policy support should be given to the enhancement and expansion of existing holiday park accommodation, particularly where proposals improve the range and quality of accommodation and facilities on a site, attract higher spending customers and result in permanent and significant improvements to the layout and appearance of the site and its setting in the surrounding landscape. The aim to improve accommodation would be in accordance with Annex A of the CLG Good Practice Guide on Planning for Tourism, which draws attention to the importance of modernising existing facilities, and its scope for bringing life back to otherwise wasted assets and helping the local economy. Adding to the Core Strategy policy in this way would also reflect paragraph 22 of Annex A of the CLG Good Practice Guide on Planning for Tourism, which recognises that there may be valid reasons for extending or improving existing holiday parks, and Policy EC7: Planning for Tourism in Rural Areas in PPS4: Planning for Sustainable Economic Growth (December, 2009), which provides support for extensions to existing tourist accommodation, where the scale of the extension is appropriate to its location and where the extension may help to ensure the future viability of such businesses. Bourne Leisure has itself experienced increased visitor demand for higher quality	Noted but the additional detail sought is not considered appropriate for a core strategy.

accommodation and facilities, and improved park standards, services, entertainment and eating establishments in recent years. The Company has responded by upgrading its sites and facilities and this has enabled a move towards more extensive use at off-peak times. In 2008/2009 alone, Bourne Leisure invested £184 million on improving facilities and accommodation on its existing sites. It is therefore important that Policy CS18 and its supporting text recognise current market trends of the "staycation", and the shorter, more frequent holidays that are being taken closer to home, by specifically supporting the upgrading of tourist sites and facilities to meet the needs these changes create. This revised and more detailed approach to policy for tourism in turn will help to meet the Council's objective of lengthening the tourism season.	
Proposed Change to Policy CS18 An additional paragraph should be added to Policy CS18 to state: "The Council will support proposals which result in the enhancement and expansion of holiday parks, particularly where the proposal improves the range and quality of accommodation and facilities on site, results in permanent and significant impacts to the layout and appearance to the site and its setting and contributes to the Council's objective of lengthening the tourism season and increasing the contribution to the local economy".	The improvement of holiday parks is already covered in policy CS18, which supports the maintenance and enhancement of existing tourist and visitor facilities. Consequently, no change to policy CS18 is proposed.
Agree with <b>Policy CS24</b> : Transport and Movement - Bourne Leisure notes that at bullet point 2 (un-numbered), Policy CS24 states: Car growth will be balanced by increasing the capacity, reliability and quality of public transport; and Bullet point 6 (un-numbered) adds: "Walking and cycling networks will be extended". However, the Company considers that Policy CS24 and its supporting text should recognise that in relation specifically to tourism uses, there is often no feasible alternative available, other than the private car, for reaching more remote areas. This revised approach would reflect advice in the CLG Good Practice Guide on Planning for Tourism (May 2006), which at paragraph 5.3 states that: "Planners will need to recognise that the wide variety of developments that are inherent in the tourism industry means that there are some developments (e.g. touring sites for caravans) that are car dependent ". Paragraph 5.4 of the Good Practice Guide continues, "There will be some occasions where development for tourism is sought at a location where it will be difficult to meet the objective of access by sustainable modes of transport Developers and planners may find that in such cases there will be limited	The CLG good practice guide can be taken into account when considering planning applications in remote areas. There is no need to include a reference to this in policy CS24.

Brett Aggregates (Mr Richard Ford)	opportunities to make the development accessible by sustainable modes of transport or to reduce the number or proportion of visits by car ". Moreover, the Guide then notes that: " For small scale schemes, the traffic generated is likely to be fairly limited and additional traffic movements are therefore unlikely to be a reason for refusal for otherwise suitable tourism development ".  Agree with Policy CS22: Provision for Minerals; Paragraphs: 8.13 8.14 - 2. 8.16 8.17 8.18 Policy CS22: Provision for Minerals - 8.13 - We are supportive of the	Noted and Brett Aggregates will be aware of legal developments
(Mr Richard Ford)	requirement to safeguard and secure steady and long term supplies of aggregates from terrestrial and marine sources. The Brett site at Cliffe, is a long established marine won sand and gravel wharf, with mineral processing facilities and railhead for large, bulk mineral exports. We believe that this facility is one such site that should be identified and safeguarded against alternative development, as it provides an important and environmentally sustainable site for the distribution of minerals in Medway and beyond. 8.14 - We are supportive of the use of imported marine resources, where environmentally sustainable sources are present. The Brett site at Cliffe is used as such a facility and should be seen as a long term aspiration of Medway to maintain. 8.16 - We do not agree that the South East Plan has now been revocated. The CALA Homes High Court judgements, in November and December, against the DCLG's revocation of RSSs in July, effectively re-instated the RSSs, until such time as emerging legislation is brought onto the Statute books. The Governments Localism Bill is yet to emerge, and it will be some time before it is brought onto the Statute books. Therefore, we are of the opinion that all RSSs are extant and that the statement made in paragraph 8.16 is incorrect. Medway is still obliged to meet a sub-regional apportionment. 8.17 - We are supportive of the recognition of the importance of wharves and railheads for the importation and exportation of minerals and it is important that these facilities (such as the Brett site at Cliffe) are safeguarded. 8.18 - We are supportive of the recognition of the Brett site at Cliffe, and again, it is important that such as facility as this is safeguarded.	aware or legal developments concerning regional spatial strategies since their representations were submitted.
Bride Hall	Looks forward to working with the Council with regard to future improvements to the	Noted.
(The Pentagon)	Pentagon Shopping Centre and how it might accommodate residential development as part of town centre regeneration.	
Bridge Lodge	Figure 11.3 (Lodge Hill Strategic Allocation Map) and Figure 11.4 (Lodge Hill	Access can be achieved without
	Concept Diagram); both exclude from the boundary of the proposed Lodge Hill development, an extremely important piece of frontage land to the A228 at the critical position where this parcel of land may either be required following detailed	this parcel of land (as shown by the evidence base).  Masterplanning work and the

	technical examination, as a main access point into the Lodge Hill development, or will, by its immediate proximity, become the "gateway" approach to the Lodge Hill development. For identification purposes the attached plan shows the boundaries of the subject land edged and cross-hatched in red.  Either way, the site should, for the successful development of Lodge Hill, be included into the overall planning of the Lodge Hill development. Without this area of land included, it is possible that 'the requirements of a comprehensive Access Strategy' as clearly set out and emphasised in Policy CS33 could be seriously inhibited from attainment.	Development Brief will further refine the proposals for this area, and will consider the relationship of the site to adjoining land. This land is within the sensitive, narrow gap that separates Lodge Hill from urban Medway, which severely limits any development potential. As the Bridge Lodge site is not essential to the delivery of Lodge Hill or the Core Strategy generally, it would not be appropriate to include it in the strategic allocation.
	Therefore, it is imperative that the particular parcel of land concerned is, at this stage, clearly identified as an important 'gateway' site, and accordingly <u>included</u> within the defined boundary of the designated Lodge Hill development proposals. Accordingly, the boundary of the Lodge Hill development as shown on both figures 11.3 and 11.4 should be amended to <u>include</u> this particular parcel of land as shown edged and cross hatched red on both attached plans. Furthermore figure 11.4 should also be amended to show this parcel of land <u>coloured yellow</u> .	No amendments to policy CS33 or figures 11.3 and 11.4 are proposed.
Broomhill Gospel Hall Trust	The Trust is short of worship space in the Wigmore and Rainham areas.	Noted.
	Opposes the provision of places of worship being left to be considered in the Land Allocations and Development Management Policies DPD. This fails to ensure that the voluntary sector and faith groups are supported. It fails to protect and provide space to operate in Medway.	Noted.

	DIA needs to take account of not only ethnic minorities, but all minorities, as faith groups often face discrimination because of their religious beliefs. Policies should be aimed at providing a range of accommodation types and sizes, the protection of future community facilities and provision of suitable burial sites.	
	Proposes changes the strategic objectives, to paragraphs 5.107 and 5.108 and to policy CS 9.	the reference to improved cultural facilities already encompasses faith facilities and there is therefore no need to add a separate reference to faith facilities.  In paragraph 5.107, delete paragraph from "but it is not clear" onwards and replace with "Current provision is not thought to be adequate and more will be required. Faith groups, characteristically, are self funding but need support to find space for their congregations."  In paragraph 108, insert "some of which are faith based" after "voluntary and community associations". Add "with national organisations." To the end of the paragraph.  In policy CS9, insert "and facilitating new" after "Protecting and enhancing existing".
Cemex	More emphasis should be made about the Halling site.	Noted and additional references will be added in the areas chapter.
	Protection of obsolete wharves should not be required.	The wharf at Halling is not considered obsolete and important for the future. Underused wharves may well come back into use

Church Commissioners (DTZ)	11.85 – 11.110: supports a new settlement at Lodge Hill but has doubts whether this area will be able to deliver a truly sustainable mixed-use community at the scale proposed given all the necessary infrastructure requirements. Additional land should be allocated to address any shortfall. A sustainable urban extension to Hoo is proposed.	through time. Halling Wharf has the particular potential advantage as a rail linked wharf making multi modal transport over sea, rail and road a possibility into the future.  Land Securities has confirmed the quantity and rate of development at Lodge Hill. A strategic option to develop an urban extension at Hoo St. Werburgh was considered and rejected in the Council's Issues and Options report in 2009.
	CS7 – potential consideration should be given to the review of green belt boundaries.	Sufficient land has been identified to meet Medway's development requirements up to 2028, without the need to amend the boundaries of the Green Belt.
	CS12 – the policy should be made more robust by adding reference to PPS5, and in particular the provisions of HE11 in relation to enabling development (the Church Commissioners own many listed buildings).	Policy HE11 of PPS5 relates to the consideration of an application for enabling development. This should more appropriately be addressed in the context of a site specific and development management development plan document.
	CS13 – reference should be made to the importance of delivering growth through sustainable means, commensurate with the rate of employment growth. The Land Allocations DPD should make contingency in case development doesn't come forward as envisaged (monitoring).	Policy CS2 and other policies deal with sustainable development. Sufficient sites have been identified in the Strategic Land Availability Assessment to provide a contingent supply if development doesn't come forward as envisaged.
	CS33 – concerned whether or not sufficient land exists at Lodge Hill to accommodate a 5,000 dwelling settlement. Particularly given changes to PPS3	A masterplan being prepared by Land Securities has demonstrated

	density requirements. Wants surplus surrounding land identified to meet any shortfall in delivery.	that a settlement of approximately 5,000 dwellings can be accommodated on the site. The Council is preparing a development brief in accordance with policy CS33, which confirm this and will be published before the core strategy is submitted to the Secretary of State. Therefore, there is no need to identify additional land.
	Supports CS34.	Noted.
Cliffe and Cliffe Woods Parish Council (Chris Fribbins, Vice Chair)	Concerned about the traffic and environmental impacts (particularly in relation to Lodge Hill, and the natural heritage (wants ALLI's retained).	Noted.
	CS1: Regenerating Medway - There is a need to identify the importance of the natural heritage and its contribution and importance to regeneration.	CS1: Policy CS1 deals specifically with the redevelopment programme for Medway. The importance of the natural heritage is recognised elsewhere in the core strategy.
	CS5: Development and Flood Risk - This policy is supported and is practical in limiting developments unless they can meet strict criteria.	Noted.
	CS6: Preservation and Enhancement of Natural Assets - Support this policy. However where negative impact cannot be avoided, the wording the 'compensation will be sought' should be strengthened to 'compensation will be provided and functioning prior to the damage occurring	CS6: Delete "sought" and replace with "provided". The timing of the creation of new habitats and their maintenance arrangements will be a matter of detail to be included within an appropriate, legally binding agreement.
	CS8: Open Space, Green Grid and Public Realm - Support and welcome this policy. Public access however does need to be managed, in particular environmentally	These considerations are reflected in the revised core strategy.

sensitive sites and at certain parts of the year.	
CS12: Heritage Assets - Support the policy, but would want to see more recognition	CS12: It is considered that the
of the assets that do exist and policies to protect and enhance them where possible.	explanatory text and the policy adequately describe the compass of the historic assets of Medway and the necessary scope of the policy to protect and enhance them.
CS13: Housing Provision and Distribution - While generally supportive we recognize the pressure that 17,930 new homes would have on the wide infrastructure of the Medway Towns and need to ensure that infrastructure improvement matches the development and where possible precedes it.	CS13: An infrastructure plan, which sets out the infrastructure necessary to be provided to support the development proposed in the core strategy, will be submitted to the Secretary of State together with the strategy itself.
CS21: Conventional Energy Generation - We recognise the strategic, regional and national nature of power generation on the Hoo peninsula but feel that the area has not benefited from that commitment. We would want to see that provision recognised as the area carries a larger burden because of this.	CS21: Policy CS21 makes provision for the recruitment of local labour, local supply chains, district heating and further added value research and development activities which would all benefit the local area.
CS22: Provision for Minerals - Existing mineral wharves in our parish are a valuable asset, but such use does conflict with policies that recognise the Historic Monuments and right of access to the riverside and public footpaths. We would want to see specific mention of the need to develop more compatible ways of working that allow this without impacting on the wharf operations.	Noted. Action to address the issue is possible outside the core strategy.
CS23: Waste Management - Concern that the only identified sites for disposal to land appear to be on the Hoo Peninsula with the impact that would have on the area and further contribute to traffic concerns.	CS23: There is a recognised need for all waste planning authorities to be self sufficient in their waste management capacities. Final disposal to land is a recognised part of the overall waste hierarchy. Medway has no non-inert or

	hazardous waste disposal capacity. The Hoo Peninsula, in the main, is overlain with London Clay. This formation is suitable from an engineering standpoint for the creation of final disposal capacity for these wastes. Other areas, on the Chalk geology are not as suitable for this type of waste disposal.
CS24: Transport and Movement - Concern about the lower car parking standards in areas with already or potentially good public transport availability. An attractive, accessible and affordable public transport alternative to reduce car usage is required, but there will still be need for private transport out of peak times that public transport cannot meet and car ownership will remain high.	Provision will still be made for private car parking but it is expected that a higher proportion of journeys in areas with good public transport will take place by public transport.
CS31: Hoo Peninsula and the Isle of Grain - Support this policy and look forward to working with others to achieve the aims. However experience has shown that it is difficult to generate interest in the local community and this will require dedicated resources to achieve.	Noted.
CS33: Lodge Hill - Recognise the intent of the policy but have some concerns regarding the scope and size of highways improvements suggested. This will be insufficient to respond to the pressures on the local highway network that this development, along with Kingsnorth and Grain will generate. Other conflicts from Medway City Estate (Park and Ride) and increased usage of the site will also feed onto the same highway network. Traffic management to limit access between Lodge Hill/Chattenden and Upnor (Upnor Road/Upchat Road) would also create problems for some local residents and especially the ability of Upnor residents to access the facilities at Lodge Hill.  There needs to be much more work done to mitigate against the environmental impacts which could include, for example, the direct loss of habitat supporting the	The Council recognises that Four Elms roundabout and the road network to Sans Pareil and the Medway Tunnel are a congestion hotspot. Development proposals for Lodge Hill will have to provide sufficient, appropriately phased improvements to this road network to ensure that its impact is limited as far as possible. This is reflected in the existing wording of Policy CS33.
nationally important population of nightingale present. The remaining population	

	within the adjacent Chattenden Woods SSSI will also need to be protected.	Measures to discourage rat running will have to provide local accessibility for residents of existing communities, as noted in policy CS33 and on the Concept Plan (Figure 11.4). The Council is also preparing a development brief for the site, which will consider both of these issues in greater detail.
		The importance of the site for nightingales, among other ecology, is recognised. Land Securities and Medway Council are working closely with Natural England to ensure that this is protected. All designated habitat areas (including the SSSI and ancient woodlands) are to be protected, as shown on the Concept Plan (Figure 11.4)
	CS34: Developer Contributions - While other councils are able to access this funding there should be a requirement to consult with parish councils on larger developments in their area, or on their boundaries, to see what community facilities should be provided.	Consultation with parish councils is undertaken as a matter of course on all aspects of larger development proposals affecting their areas.
Countryside Properties (London & Thames Gateway) Ltd	Introduction We welcome this opportunity to comment on the emerging Medway Core Strategy DPD (MCSD), and are seeking a constructive dialogue with the Council about the development potential of the Horsted Campus site. Countryside Properties has been a major investor in the Medway area for some years now, and has most recently enabled the development of a new building at Gillingham for Mid-Kent College through purchase of the redundant Horsted campus site for residential-led development in accordance with the principles established through the 2005 resolution to grant planning permission. The Company will be submitting shortly an application for the first phase of the development, in the context of a revised master-	Noted

the on Co	an for the whole site. It is intended that this development will form the next stage of e Company's investment programme in the Borough. We set out comments below the principle elements of the draft core strategy that are relevant to the ompany's scheme for regenerating the Horsted campus site.  **Rection 11 - Area Policies**  The welcome the inclusion of the site within Table 11.17 potential housing evelopment sites in Chatham with an assessed capacity of 414 dwellings, which is possistent with the 2005 decision. However we have concerns about its inclusion in ithin Table 11.8 of potential employment development sites with a capacity of 480m². Although this figure is consistent with the level of B1 floorspace included in the 2005 scheme, we will shortly be submitting evidence to the Council which emonstrates that there is insufficient occupier-demand in the local area to support is element of the scheme. Countryside Properties does anticipate that its evelopment will be able to make a contribution to local employment provision, the inclusion of care accommodation in the scheme and related small-scale stail and community facilities. Such an approach is supported by draft policy CS17 in the core strategy which identifies health and social care as one of the employment sectors that will be encouraged.	Table 11.8: reflects figures included in the SLAA. Any variation to the current planning permission would need to be considered on its merits.
Th De im Gy of su	ection 12 - Implementation, Monitoring and Review the company welcomes inclusion of the site in Table 12.2, the Infrastructure elivery Schedule and its recognition that the Horsted Campus scheme will deliver reproved bus and pedestrian facilities and contribute towards improving the Horsted yratory scheme. We are concerned however that the table indicates that two-thirds the proposed housing will not be delivered until after 2016. The company is ubmitting its new application shortly with the aim of securing the Council's support or a start on site in 2011.	See above. In the absence of a planning permission the SLAA applies standard assumptions concerning deliverability. Subject to planning permission being granted there is no planning impediment to the pace of development.
Se Th aft the sh is	ection 6 - Housing the company welcomes the recognition in draft policy CS14 that the provision of a fordable housing must be subject to site viability as this is a key issue in respect of the Horsted campus site. The recognition in draft policy CS15 that a mix of housing thould be developed is welcomed. We note that para 6.30 acknowledges that there little justification for moving away from the provision of flats and apartments in edway, unlike in other districts. We consider that this paragraph should be	Whilst paragraph 6.30 refers, in particular, to the opportunities for high quality schemes for flats and apartments at the waterfront regeneration sites, there is nothing in the core strategy which prevents

	expanded to recognise that there is a need to provide such accommodation in suburban locations, and not just in waterfront schemes. However, the company has concerns about the criterion in draft policy CS15 that schemes should comply with the new Medway Housing Design standards. These are also subject to consultation at present. Representations are being submitted separately on behalf of a number of parties, including Countryside Properties, which identify a significant number of flaws with the new standards.	them being developed in other locations.
		Responses to the consultation over Medway Housing Design Standards are being carefully considered. A decision has not yet been made as to what amendments to them might be justified.
CPRE Protect Kent	Generally supportive of the Draft Core Strategy, but considers that the intention to primarily develop previously developed land to protect natural environmental assets should be more specifically promoted in the 'spatial vision'.	It is considered that this is an explicit thrust of the strategy and is referred to at various points in the document.
	There is no indication of which of the saved Local Plan policies will continue to be retained, and those that will be replaced by policies contained in the Core Strategy.	The Pre-Submission version of the core strategy will list the local plan policies to be replaced.
	Reference should be made to changes likely as a result of the Localism Bill (and the role of Neighbourhood Plans).	The localism bill is currently subject to amendment as a result of Parliamentary scrutiny. In the meantime, local planning authorities are required to prepare their local development framework in accordance with the planning acts and regulations in force at the

	time. Appropriate references will however be made in the next draft.
Paragraph 2.15 needs to add reference to the nationally important Green Belt and AONB designations, and also to the Strategic Gap.	It is agreed that reference will be made to the Green Belt and AONB in paragraph 2.15, Other references are made to the need to avoid urban calescence.
Support Lodge Hill as a designation but has concerns about quantity of development proposed.	Noted.
Key Diagram isn't clear about nature of constraints.	The Key Diagram is not a constraints diagram but national and international constraints will be illustrated.
Policy CS3 – a specific policy commitment to rising code level / building regulation standards over time should be made.	Amendments to the policy are being considered. The core strategy has no influence over building regulations.
Policy CS7 – Concerned that important matters in the Green Belt, Strategic Gap / settlement Separation and local landscape designations are not specifically included in the policy.	Paragraph 5.74. Correction <b>Delete PPS2 and Insert PPG2.</b> Policy CS7. <b>Insert PPG2, before PPS4.</b> Strategic Gap. The South East Plan has discontinued the concept of a
	strategic gap designation and replaced it by Policy KTG1(x). This states that the policy is to avoid coalescence with adjoining settlements to the south, east and west of the Medway urban area and to the west of Sittingbourne.
	Add a paragraph after 5.74 to explain this policy plus the fact that policy CS7 extends the principle of anti-coalescence to

	the whole of the rural area. As the designation of a strategic gap is no longer included in the Core Strategy, paragraph 11.79 will be
	amended by deleting "a strategic
	gap that" and insert "an area where it".
	The Core Strategy is not retaining
	areas of local landscape importance or special landscape
	areas. If the Government changes
	its policy on local landscape areas
	before the core strategy is adopted, the strategy will be amended in
	accordance with that policy.
	Consequently, paragraph 5.67 will
	be amended by the deletion of "However, the Coalition
	Government has indicated that it
	may reintroduce local
	designations", delete "could replace" and replace with
	"replaces" and the deletion of
	"but this may be amended if the
	Government confirms further changes."
	Paragraph 25 of PPS7, states that
	local landscape designations
	should only be maintained where it can clearly be shown that criteria
	based policies cannot provide the
	necessary protection.
The focus of the second bullet point of policy CS10 should be on the legacy of the Olympic Games rather than the benefits arising from the Games themselves.	The second bullet point of CS10 covers both the Games and its
erympto Cames tather than the benefite another from the Cames themselves.	future legacy.

Concerned that the approach seems to be that all housing potential identified in the Strategic Land Availability Assessment is to be automatically included in the LDF.	That housing potential is almost exclusively on previously developed land and on sites that otherwise accord with the strategy. This is the reason for their inclusion
Policy CS 13. Concerned at impact of Lodge Hill development on the environment. The capacity of the site should be determined by an assessment of the environmental capacity of the area. Potential yield should be expressed as a range of 3,000 to 5,000 dwellings.	Work has been undertaken at present to ensure that the development of approximately 5,000 dwellings can be accommodated without detriment to the environment. Consequently, no amendment is proposed to the capacity of the site.
Policy CS17 – concerned about the very high jobs target being met. Considers that a less ambitious target should be set, and that the third alternative figure be pursued.	CS17: The job target is explained in paragraphs 4.2.28 of the Medway Employment Land Review Consolidation Study, 2010. Consequently, a high growth scenario was adopted by the study, consisting of natural change, (5,600 jobs), increased economic activity (8,600 jobs) and reduced outcommuting (7,300 jobs). (see paras. 4.2.48 and 4.2.49).
Policy CS21. An additional criterion should be included, that requires proposals to be subject to "compliance with Government objectives on climate change and the need to reduce greenhouse gas emissions."	This requirement is already covered in the policy which states that proposals will be supported subject to their impact on the natural environment."
Policy CS30 – should make it clear that development that would extend Rainham eastwards will not be acceptable.	CS30 An option for strategic development to the east of Rainham was rejected in the Issues and Options report in 2009. Land in

	this area will be protected from unsuitable development by the application of policy CS7.
Policy CS31. We support the policy	Noted.
Policy CS32 – should make reference to Medway valley being subject to extensive 'strategic constraints' (as shown on the Key Diagram).	The supporting text to policy CS32 refers to the constraints. The Medway Valley will be protected by the application of policy CS7 and there is no need to repeat this in policy CS32.
Policy CS33:The yield from Lodge Hill should be expressed as a range of 3,000 – 5,000 dwellings. The resident working age population should also be expressed as a range.	See above.
The site should not include the SSSI.	Although the site boundary includes the SSSI, no development is proposed within it.
In the 6 <sup>th</sup> bullet point of CS33, "having regard " to these matters is not strong enough and each item should be a requirement. Furthermore, an additional requirement should be that the design solutions should respond to the setting in the landscape and the particular features of the surrounding landscape which is a designated Area of Local Landscape Importance.	Whilst many of the items under bullet point 6 could be made a requirement, some degree of flexibility is necessary. For example, not all trees will be worthy of protection and a tree survey will be necessary to determine which ones should be retained. Also, one or more of the heat and power measures may prove to be impractical or uneconomic. Consequently, the items in bullet point 6 provide a checklist for the development brief, which will firm up the requirements as necessary.
Agree with <b>Policy CS24</b> : Transport and Movement - Support policy but request that Rainham train station is listed in the list of stations to be improved.	There are no current plans to upgrade Rainham station and it is the most modern mainline station in Medway. However upgrading

		proposals can still be considered outside the core strategy.
	Agree with Policy CS30: Rainham - support policy.	Noted
Dickens Country Protection Society (Chris Fribbins)	Overview - The DCPS appreciate the pressure for further development (both industrial/commercial and residential in the Medway Council area and support the policy of limiting this to specific areas on the Hoo Peninsula (Kingsnorth/Grain and Lodge Hill/Chattenden). However there is concern about the impact of all of these developments on the road network (in particular Four Elms Hill and Sans Pareil Roundabouts and potentially Hollywood Lane and Hoo Road and roads into Strood). These are all within our area of benefit. With the importance of the Lodge Hill development meeting both residential and community facilities for the wider peninsula, access may be a significant problem. We would also be concerned should the development of Lodge Hill be restricted or does not take place as developers are looking at other sites on the peninsula. We would hope that the policies and assessment of these developments would hold even if Lodge Hill is restricted.	NotedThe traffic impact of the Lodge Hill proposal has been tested using the Council's traffic modeling system, SATURN, and has been found to be acceptable, subject to a package of improvements. Were the Lodge Hill development not to take place, the core strategy as a whole would need to be re-examined. The fact that Lodge Hill is on the Hoo Peninsula does not automatically mean that any replacement would necessarily have to be on the peninsula.
	Context and Issues - There appears to be insufficient recognition of the historic heritage of the area. There is a current exercise by English Heritage which is investigating the historic landscape of the Hoo peninsula and surrounding areas. There are a number of historic monuments across the peninsula and in our area and beyond which need to be clearly identified and protected.	Further references to this will be added in the next draft.
	Options and Alternatives - We recognise the long term aim of developing Grain and Kingsnorth as major employment areas, however do have concerns regarding the traffic impacts of these.	Traffic impact of the development of these sites was taken into account when the planning applications were being considered.
	Vision and Strategic Objectives - Support the vision and the importance of the quality of development in Lodge Hill and the need to complement other villages in the area and not impact on them (loss of shops and services that are replaced at Lodge Hill as an example) To nurture Medway's rural area and economy, including through village improvements projects, enhanced land management and local	Noted.

access strategies is welcome and would be willing to work with Parish Councils and others on this.	
CS1: Regenerating Medway - There is a need to identify the importance of the natural heritage and its contribution and importance to regeneration.	Policy CS1 deals specifically with the redevelopment programme for Medway. The importance of the natural heritage is recognised elsewhere in the core strategy.
<b>CS5:</b> Development and Flood Risk - This policy is supported and is practical in limiting developments unless they can meet strict criteria.	Noted
CS6: Preservation and Enhancement of Natural Assets - Support this policy. However where negative impact cannot be avoided, the wording the 'compensation will be sought' should be strengthened to 'compensation will be provided' and functioning prior to the damage occurring.	Delete "sought" and replace with "provided". The timing of the creation of new habitats and their maintenance arrangements will be a matter of detail to be included within an appropriate, legally binding agreement.
CS12: Heritage Assets - Support the policy, but would want to see more recognition of the assets that do exist and policies to protect and enhance them where possible.	It is considered that the explanatory text and the policy, adequately describe the compass of the historic assets of Medway and the necessary scope of the policy to protect and enhance them.
<b>CS13:</b> Housing Provision and Distribution - While generally supportive we recognize the pressure that 17,930 new homes would have on the wide infrastructure of the Medway Towns and need to ensure that infrastructure improvement matches the development and where possible precedes it.	An infrastructure plan, which sets out the infrastructure necessary to be provided to support the development proposed in the core strategy, will be submitted to the Secretary of State together with the strategy itself.
<b>CS21:</b> Conventional Energy Generation - We recognise the strategic, regional and national nature of power generation on the Hoo peninsula but feel that the area has not benefited from that commitment. We would want to see that provision recognised as the area carries a larger burden because of this.	Policy CS21 makes provision for the recruitment of local labour, local supply chains, district heating and further added value research and

	development activities that would all benefit the local area.
CS22: Provision for Minerals - Existing mineral wharves in our area are a valuable asset, but such use does conflict with policies that recognise the Historic Monuments and right of access to the riverside and public footpaths. We would want to see specific mention of the need to develop more compatible ways of working that allow this without impacting on the wharf operations.	See response to Cliffe and Cliffe Woods PC.
<b>CS23: Waste Management</b> - Concern that the only identified sites for disposal to land appear to be on the Hoo peninsula with the impact that would have on the area and further contribute to traffic concerns.	See response to Cliffe and Cliffe Woods PC.
CS24: Transport and Movement - Concern about the lower car parking standards in areas with already or potentially good public transport availability. An attractive, accessible and affordable public transport alternative to reduce car usage is required, but there will still be need for private transport out of peak times that public transport cannot meet and car ownership will remain high.	Noted.
<b>CS31:</b> Hoo Peninsula and the Isle of Grain - Support this policy and look forward to working with others to achieve the aims. However experience has shown that it is difficult to generate interest in the local community and this will require dedicated resources to achieve.	Noted
CS33: Lodge Hill - Recognise the intent of the policy but have some concerns regarding the scope and size of highways improvements suggested. This will be insufficient to respond to the pressures on the local highway network that this development, along with Kingsnorth and Grain will generate. Other conflicts from Medway City Estate (Park and Ride) and increased usage of the site will also feed onto the same highway network. Traffic management to limit access between Lodge Hill/Chattenden and Upnor (Upnor Road/Upchat Road) would also create problems for some local residents and especially the ability of Upnor residents to access the facilities at Lodge Hill.	The Council recognises that Four Elms roundabout and the road network to Sans Pareil and the Medway Tunnel are a congestion hotspot. Development proposals for Lodge Hill will have to provide sufficient, appropriately phased improvements to this road network to ensure that its impact is limited as far as possible. This is reflected
There needs to be much more work done to mitigate against the environmental impacts which could include, for example, the direct loss of habitat supporting the nationally important population of nightingale present. The remaining population within the adjacent Chattenden Woods SSSI will also need to be protected.	in the existing wording of Policy CS33.  Measures to discourage rat running will have to provide local

		accessibility for residents of existing communities, as noted in policy CS33 and on the Concept Plan (Figure 11.4). The Council is also preparing a development brief for the site which will consider both of these issues in greater detail.
		The importance of the site for nightingales, among other ecology, is recognised. Land Securities and Medway Council are working closely with Natural England to ensure that this is protected. All designated habitat areas (including the SSSI and ancient woodlands) are to be protected, as shown on the Concept Plan (Figure 11.4)
Environment Agency	<b>Key issues (page 10) -</b> It is not clear on how Medway needs to work with or who they will need to control/influence to tackle the core issues e.g. reducing pollution affecting the estuary. It is stated that it needs to be done but there is no reference to who you should work with or how it might be done.	Further references to this issue will be added to Chapter 12
	Water - There is not much in the draft Core Strategy (CS) about water infrastructure (drinking water and waste water) costs and needs. There is limited evidence on water and waste water requirements for deciding on the 'Key Issues' in the CS Section 2.22 Page 10. No water cycle strategy has been carried out and there is no reference to Water Company Plans, therefore water is not represented in the evidence list in the CS Section 2.29 Page 12. Water as a limiting factor is mentioned	Further references to water issues are being added to the next draft in response to a number of representations and initial results from the SA.
	in the SA Section 3.33. Water supply is a crucial sustainability issue, but not addressed in the CS.	Although the evidence list on page 12 does not include a reference to a water company plan, there is a reference elsewhere. Paragraph 5.23 refers to proposals in Southern Water's Final Resources

	Management Plan 2010 to 2035, to ensure an adequate water supply and policy CS3 supports these proposals.
Wastewater treatments works are mentioned under the infrastructure requirements for Hoo and Rochester (Table 12.2 CS Page 127) but no other water infrastructure (potable or waste) has been identified as a requirement for these or other sites. The water and wastewater infrastructure needs to be in place to support any new development. The CS strategy needs to ensure that it is clear that this, as well as other essential infrastructure, is provided in a timely manor.	Again, Southern Water Plc is engaged with the Council in the development of the Medway Core Strategy. Their comments on what additional infrastructure that will be required for the main areas expected for development are addressed by their representation. Also, the Infrastructure Plan, part of the Medway Core Strategy's evidence base, has considered what the potable and waste water treatment infrastructure requirements to support the area's expected growth will be. This evidence is integral to the Medway Core Strategy and supports the rationale for the growth identified to support the area's renaissance.
<u>Using water wisely – Retrofitting Very little is mentioned in the CS regarding retrofitting.</u> Little outline is given regarding what is meant by retrofitting. We recommend that the retrofitting section explains that energy and water demand management should be considered. The SA section 6.76 states that "retrofitting in support of 'crucial sustainability issues'" and section 11.5 says "retrofitting is supported through the core strategy policies". Something more explicit should be included to describe what Medway envisage as retrofitting and which policies support it. We agree with section 6.81 of the SA that this needs firming up.	The sections of the sustainability appraisal referred to, were mainly references to retrofitting technologies relating to energy. In the core strategy, paragraph 5.30 refers to the problems of bringing older housing stock up to new thermal standards (i.e. insulation), it being neither cheap nor easy to achieve. It is noted that retrofitting could be applied to water as well as energy,

Water Quality - One of the six ambitions in the CS Section 4.10 Page 24 is to have a safe and high quality environment. Green infrastructure is well represented later in the document but the blue ribbon network of water courses is missing. There is an opportunity to link high quality water bodies to place making and a high quality built environment. More could be made, generally, of the benefits of a good quality water environment. This link could be made in the green grid and green space section – Policy CS8 Page 43. Contributing to improved river water quality is not an indicator in the River Medway Policy. The SA suggests that CS should look at how to monitor the impact of water policies, but none seem to be included in Monitoring section. We agree with 6.33 of SA that states that water quality is missing.	although the Environment Agency does not give any examples of water retrofitting. One example could be universal water metering which is included in the core strategy as one of Southern Water's proposals that is supported by policy CS3.  The Medway Core Strategy does address the need to integrate watercourses into 'place making'. Policy CS7: Countryside and Landscape, the policy sates amongst other matters that, "Appropriate designs of development shall accord with which it is located, including having regard to and conserving: The landform and natural patterns of drainage."  References to water quality, pollution and the 'blue grid' are being added to the river chapter.
Policy CS3 – Whilst the use of Code for Sustainable Homes (CfSH) is fine, for water code level 3 and 4 are the same. There is no discussion over why level 3 has been chosen over any of the higher levels. The guidance identifies some really cheap and simple ways of gaining points for each level. Its disappointing that Medway appears to lack the ambition of other councils who have adopted policies driving for higher standards when the development is on a larger scale (a threshold number of dwellings), to account for economies of scale. Policy CS3 should also include state the importance of working with utility providers to ensure phasing and timing of development to allow plans to work and deliver as planned.	A number of refinements are proposed to policy CS3, including the introduction of a water usage target.
<b>Policy CS6</b> should include a commitment to work within Medway responsibilities to deliver the objectives of the Water Framework Directive (WFD) including actions	The end of para. 5.23 will have the following sentences added:

	soon as possible, and get as many of the UK's water bodies as possible to GES by 2027. The Council will support the objective to increase the proportion of Medway's water reaching GES through: Infrastructure capacities, timing and delivery for new development.  Proper integration of Sustainable Urban Drainage systems and/or water neutral developments."  Policy CS3 will be amended with the following wording added to the end, as follows:  "It will also support the objectives of the Water
The River Medway policy CS25 makes no reference to improving water quality in	Framework Directive for water bodies to reach a Good Ecological Status by 2027"

strategy. There is an action within the Thames river basin management plan specifically for the Medway (TH0091) - Education campaign for boat users regarding disposal of toilet waste, oil, solvent, paint and cleaning products in waters at risk from diffuse pollution, which lists the Local Authorities as delivery partners. As they have put quite a lot of emphasis on the river it may be appropriate to require contributions from developers for the maintenance and improvement of the river, as they get a premium for developments that benefit from proximity to the river. We and the wildlife trusts have made similar requirements in other councils e.g. Hastings and Eastbourne, where developers are required to contribute to green networks or a green network fund. The council seemed quite amenable to it, and asked to have it in our formal response. Policy CS25 seems to be promoting new marinas and other landing places quite a lot within the River Medway policy. The council is advised that such proposals are not likely to have no environmental impact.

action TH0091 of the Thames River Basin Management Plan in 2012. This is an educational campaign and the core strategy is not the appropriate vehicle for implementing this proposal.

Contributions towards the maintenance and improvement of the river can be considered on a site-by-site basis through the development management system and does not require a specific policy in the core strategy.

Otherwise a number of changes are proposed to the river chapter.

## **Brownfield Land**

The CS lists re-use of previously developed land (PDL) as its primary key strategic objective (CS page 25) but does not develop this objective further to say how this re-use can be delivered.

Policy CS1 will be amended by the insertion of a new paragraph at the beginning, which states " The development strategy for Medway is to prioritise reinvestment in the urban fabric, particularly by the redevelopment and re-cycling of underused, derelict and

	previously developed land with a focus on the Medway Riverside and the town centres."
Section 12.5 highlights the location of Medway within the Thames Gateway that has some of the most complex and difficult development sites thanks to legacy of past industrial use, flood risk and land contamination, but again does not suggest mechanisms to help deliver other than say public subsidy will be required to bring them forward.	Policy CS1 states that Medway Council will continue to work in partnership with all relevant bodies and commercial interests in taking the regeneration programme forward. The problems of taking difficult sites forward will therefore be addressed on a site by site basis in conjunction with the relevant parties.
It would be of benefit to the core strategy to suggest mechanisms by which partners could work together towards delivery of brownfield land locally. There are some activities which in order to bring benefits locally is best delivered at a more strategic level where significant economies of scale exist and can be made.	Policy CS1 states that Medway Council will continue to work in partnership with all relevant bodies and commercial interests in taking the regeneration programme forward. The problems of taking difficult sites forward will therefore be addressed on a site by site basis in conjunction with the relevant parties.
Assessment and sustainable remediation of brownfield and land contamination is something that can be done at this level and there are opportunities within Medway to facilitate this for the numerous brownfield land sites in this area.	Noted.
There are a number of strategies, concepts and evidence based work streams that could be developed and delivered to help unlock brownfield sites in Medway including Global Remediation Strategies, Custer Initiatives and Local Brownfield Strategies. We suggest they should be incorporated into the CS possibly under a new "Land Quality" or "Brownfield Land" heading in section 5, Cross Cutting Themes.	Medway Council will give consideration to these and other measures when considering means to unlock difficult development sites but it does not consider it necessary to describe them in the core strategy.

Promoting Sustainable Remediation – Cluster initiative, Cluster is a method for developing and remediation of a group of sites that are relatively close to each other that would be either uneconomic to develop on their own or represent an opportunity to act in a more sustainable manner, for example to save on costs, reduce resource consumption and environmental impacts. In addition, significant reductions in the timescale of projects may be achieved. With the added advantage of bringing a number of contaminated and derelict land back into beneficial use with associated community gains. After treatment on the hub site, some or all of the material may be suitable for use on either the originating site or on another site within the Cluster group. In addition, some materials may be treated to enable their reclassification from hazardous to non-hazardous, thereby providing the opportunity to dispose of materials with no reuse potential in local waste management facilities. A soil treatment centre or soil hospital was developed for the Olympic Park remediation works and a something similar could be developed for the Medway area. Such a centre would act as treatment hub for local treatment of soils and would be linked to section 3.52 of the core strategy that discusses treatment of waste close to origin. Flood Risk

Such a system is attractive and the Medway Core Strategy will be permissive rather than prescriptive of where this would happen in the area. However the Council has found no evidence of market demad for such facilities.

Pages 34 to 36 Section 5.33- This sentence 'Where development is unavoidable next to rivers and the coast, as is the case in much of urban Medway, robust flood defences will be required' should be changed as it does not reflect the variety of techniques that can be used to manage flood risk.

'Where development is unavoidable next to rivers and the coast, as is the case in much of urban Medway, a range of sustainable flood risk management measures should be incorporated, including a mixture of formal flood defences land raising, flood resilience and resistance measures'.

Noted. The second sentence of section 5.33 in the Draft Core Strategy shall read:

'Where development is unavoidable next to rivers and the coast, as is the case in much of urban Medway, a range of sustainable flood risk management measures should be incorporated, including a mixture of formal flood defences land raising, flood resilience and resistance measures'.

Section 5.45- This whole paragraph is incorrect. It will need to be changed to read as follows - 'to encourage the uptake of SUDs the Flood and Water Management Act 2010 amends section 106 of the Water Industry Act 1991, which removes the automatic right for development to connect surface water runoff to the public sewer system. The Act creates SUDs approval bodies which will be unitary/county local authorities. SUDs approval bodies will be required to approve SUDs in line with new national standards (which are being drawn up by CIRIA and WRc). Where SUDs drainage systems drain more than one property the SUDs approval body will be required to adopt and maintain them.'	Paragraph 5.45 will be deleted and replaced by the following " The Flood and Water Management Act, 2010, creates SUDs approval bodies which will be unitary/county local authorities. SUDs approval bodies will be required to approve SUDs in line with new national standards, which are currently being drawn up. Where SUDs drainage systems drain more than one property, the SUDs approval body will be required to adopt and maintain them."
Section 5.46 – The word 'defence' should be changed to 'flood risk management'. The sentence saying 'potential defence works and strategies that should be applied to meet the required defence standard' should be changed to read 'potential works and strategies that should be applied to ensure flood risk is managed sustainably'	Noted, the sentence 5.46 shall now read:  'potential works and strategies that should be applied to ensure flood risk is managed sustainably'
Policy CS5 – The following should be changed to more accurately reflect the outputs of the study, 'Relevant flood defence works as identified in the Medway Strategic Urban Flood Defence Strategy should be incorporated, if applicable' this should be changed to 'Options to manage flood risk as identified in the High level appraisal of the potential solutions to manage Flood Risk in the Urban Medway should be incorporated where applicable.'	Where policy CS5 states:  'Relevant flood defence works as identified in the Medway Strategic Urban Flood Defence Strategy should be incorporated, if applicable' replace with:  'Options to manage flood risk as identified in the High level

Section 10.8 (page 90) – This whole paragraph needs to be changed to more accurately reflect the outputs of the defence study. Suggested wording: 'Currently consultants are completing an update of the Strategic Flood Risk Assessment for the Medway and are preparing an associated appraisal of the potential options to manage flood risk in the Urban Medway. This high level study puts forwards options for managing flood risk in the urban Medway for new development, the options presented are largely based on flood defence asset replacement and do not consider protection that could be afforded by a combination of flood risk management measures. Currently, there are different standards and levels due to different land ownerships and engineering works of different ages. It is accepted that, although a large part of the urban waterfront is located within the flood plain, it needs to be defended due to the long established settlement form and the value of the commercial assets that would otherwise be at risk. Beyond the current urban boundaries however it is important to avoid inappropriate development that would increase flood risk and reduce the capacity to store flood water.	appraisal of the potential solutions to manage Flood Risk in the Urban Medway should be incorporated where applicable.'  Agreed. Paragraph 10.8 will be amended by deleting the first two sentences and inserting "Currently, consultants are completing an update of the Strategic Flood Risk Assessment for the Medway and are preparing an associated appraisal of the potential options to manage flood risk in the Urban Medway (the basis for the Strategic Urban Flood Defence Strategy). This puts forward options for managing flood risk for new development which are largely based on flood defence asset replacement and do not consider protection that could be afforded by a combination of flood risk management measures."
Section 10.9 - An important area of regeneration the sequential test (ST) will conclude that development in some flood risk areas is appropriate. As such, flood risk must be taken into account at the earliest opportunity.	Noted.
Policy CS25 (page 92) – This policy currently does not have regard to PPS25 and the sequential test. It should be amended to include ST and exception test. This policy needs to make it clear the ST will be informed by the Strategic Flood Risk Assessment and the Medway Strategic Urban Flood Defence Strategy. We are unclear as to what is meant by the 'natural floodplain'. PPS25 definitions should be used for functional floodplain. We recommend a policy of no encroachment into the river channel, encroachment as a result of development can have significant	Flood risk is currently dealt with in policy CS5 as well as paragraph 10.8 and policy CS25. It would be more appropriate for all flood risk issues to be consolidated into a single policy. Consequently, the fifth bullet point of policy CS25

acts on erosion and sediment transport in estuarine environments and can lead ndermining of defences as well as loss of habitat.  will be deleted, paragraph 10.8 will be inserted after paragraph 5.46 on page 35 and any necessary amendments will be made to policy CS5.
Pritidal Habitat Creation - We strongly support CS Section 10.7 Page 90. Our Immes Estuary 2100 Plan sets out how to manage tidal flood risk for London and Thames estuary through to the end of the century. We also used our climate nge and geomorphological modeling to understand the potential loss of ignated intertidal habitat in the estuary due to sea level rise, identifying 1200 tares of habitat that will potentially need to be replaced. We published our ings in the interactive web based Coastal Habitat Management Plan (CHaMP), ch was endorsed by Natural England.  Preferred Intertidal Habitat Creation and Replacement sites within Medway – St. sys, Grain and Allhallows.
Site Ecological development
Site 1 Tidal in first 20 years of plan
Site 2 Tidal in first 20 years of plan
Site 3 Tidal mid century
Site 4 Tidal in third quarter of century
don's Waste Exports - Whilst the South East Plan has been revoked, that does necessarily mean that government may not require waste from London to be It with by other areas. Medway, need to have a contingency plan.  Given the introduction of a new zero waste hierarchy, rapidly declining demand for landfill generally and no interest in Medway from London Boroughs or commercial operators it is considered that there is no basis for

The Strive for Overall Self Sufficiency - Section 8.59 (page 80) looks at waste arising just from Medway. Whilst we recognise that an element of self-sufficiency is required, realistically, Medway is part of Kent and the South East Region (section 8.49) and has in some areas the most suitable geology for potential new landfill sites in Kent. It is preferable not to transport waste long distances for disposal, however in some circumstances it may be necessary because other constraints such as environmental constraints. This section needs to look at the potential for Medway to accept not only waste from Medway but the whole of Kent. The council also seems to have overlooked the fact that transportation may not just be by road but by water.	making provision for London's waste.  Self-sufficiency at Medway is a guiding principle of national waste planning policy, although it is understood that waste movements across administrative boundaries do occur.  Multi-modal transport for waste is something occurring at Chatham Docks at present. Further opportunities exist at Grain and Halling. The text of the Core Strategy acknowledges this inherent potential.
Policy CS23: Waste Management (Page 81) - Within this policy it is stated that "Provision will be made for the collection, reuse, recycling, treatment and disposal of Medway's waste by: Assessing the potential for an inert waste landfill site etc". As previously stated the council needs to consider not just its own waste but from other areas within the region and potentially London. We are also not sure how the council can justify assessing the requirement for a new inert landfill when this material can be reused and recycled, and there are already existing inert landfills within the region. This goes against the principles of the waste hierarchy as outlined in the Waste Strategy 2007. One of the criteria used within the policy to help assess the proposal for new void space for a non-inert and hazardous waste disposal site, is the site being well related to the primary road network. The council needs to consider other modes of transport, for example by rail or by sea. Another criterion is "That all the reasonable requirements of the Environment Agency can be satisfied". It is the council who will determine if a location is appropriate or not with our advice on the potential impacts the proposed facility may have on the environment. As such, it is in fact environmental constraints that will determine whether a proposed location for a facility is appropriate or not. As such, we would recommend that this bullet point is amended to reflect this. We are keen to work with the council and its	References to inert waste are being deleted in view of the new zero waste principle.  The proximity principle requires the authority to approach waste management capacity planning in a manner that discourages rather than simply accommodates increased 'waste miles'.  Assessment of site suitability as to whether it is a sustainable location with multi-modal transport opportunity will be a function of other, site specific, development plan documents. The Core Strategy does identify broadly such

	partners on future projects, particularly where our evidence base and advice can help in decision making, and where it meets the needs of other priorities and directives such as flood risk management and WFD.	sites; Medway City Estate, Kingsnorth and to a lesser extent the established employment areas. Chatham Dock is already undertaking waste processing and is an established employment site.
Friends of the North Kent Marshes	Policy CS1: Regenerating Medway - This regeneration policy does not mention Medway's globally important natural heritage and the need for its protection and enhancement; indeed Medway's regeneration cannot take place at the expense of our rich natural heritage. Therefore, both our globally important natural heritage as well as our globally important cultural heritage should be at the heart of this policy. The scale of development proposed in this policy could have a negative impact on the Medway Estuary and Marshes SPA/Ramsar Site. We strongly recommend that riverside regeneration sites be fully assessed in the Appropriate Assessment (AA) of the Core Strategy.	Policy CS1 deals specifically with the redevelopment programme for Medway. The importance of the natural heritage is addressed elsewhere in the core strategy. An appropriate Assessment will be carried out on the core strategy before it is submitted to the Secretary of State.
	Policy CS3: Mitigation and Adaptation to Climate Change - There is much concern about the sustainability of water supplies within Medway, therefore water efficiency must be a priority and all new developments must be required to meet the strictest water efficiency standards as well as new technologies i.e. rainwater harvesting. We strongly urge that for new developments this policy should say 'a minimum of level 4 rating of the Code for Sustainable Homes' and not merely try to 'achieve level 3' so that Medway is able to meet its carbon reduction targets.	An amendment has been proposed elsewhere in the document that will introduce a water usage target.
	<b>Policy CS4: Energy Efficiency and Renewable Energy -</b> We support the target of energy from renewable for new developments to be 20%.	Noted.
	Policy CS5: Development and Flood Risk - We support the commitment to address coastal squeeze and work with the Environment Agency to identify and implement positive solutions. We would strongly urge that Medway Council includes the RSPB in this partnership to identify work that needs to be undertaken in order to investigate the issue further and evaluate the sites that have been identified. We note and agree with the statement in the Medway Wildlife, Countryside and Open Spaces Strategy 2008-2016 that 'RSPB advocates that compensatory habitat is provided for lost intertidal habitats by managed realignment, but not at the expense	Noted.

	<u> </u>
of internationally designated freshwater areas'. We also note that these are not the only locations identified in the TE2100 Plan there are another four sites within the Thames Estuary. We trust that Medway Council will do all in its power to protect our internationally designated freshwater habitats.	
Policy CS7: Countryside and Landscape - We strongly urge that Areas of Local Landscape Importance are given special consideration; they compliment other designations and contribute significantly to our sense of place. This policy talks about landscape but with no particular reference to the North Kent Marshes Special Landscape Area (SLA) and the Medway Wildlife, Countryside and Open Spaces Strategy 2008 - 2016 Located in North Medway, the North Kent Marshes Special Landscape Area occupies 19% of rural Medway. The landscape of the North Kent Marshes is of county importance and is recognised as a Special Landscape Area in the Local Plan and Kent and Medway Structure Plan. The marshland landscape, with its broad and low horizons is of particular importance for wetland birds, which visit in tens of thousands during the winter. Key features of the landscape are their sense of remoteness, the ditches that form wet fences controlling the movement of people and cattle, and the winter flooding which creates wetlands for feeding birds and breeding. The remoteness of the North Kent Marshes is a product of its separation from urban Medway. The rural hinterland, which acts as a buffer between the marshes and urban Medway, provides this physical separation and therefore also requires careful management. This policy should reflect the importance of this rural green buffer that must be maintained.	Paragraph 25 of PPS7, states that local landscape designations should only be maintained where it can clearly be shown that criteria based policies cannot provide the necessary protection. No evidence has been provided of this and therefore the local landscape designations will not be retained. The landscape characteristics of Medway are described in the Medway Landscape Character Assessment.
Policy CS8: Open Space, Green Grid and Public Realm - This policy text states that access to open spaces will be improved and that the strategy seeks to protect the important natural environment while enhancing sensitive access to the area. There is potential that increased access to coastal sites in Medway could have a negative impact on designated sites, through increased recreational disturbance. We strongly recommend this matter be fully assessed in the AA of the Core Strategy.	Noted
Policy CS12: Heritage Assets - Support the policy, but would want to see more recognition of the assets that do exist and policies to protect and enhance them where possible. Indeed Cliffe has one of the finest collections of buildings on the Hoo Peninsula.	It is considered that the explanatory text and the policy adequately describe the compass of the historic assets of Medway and the necessary scope of the policy to protect and enhance them.

Policy CS17: Economic Development - Employment development in an inappropriate location and/or without effective mitigation could have a negative impact on features of nature conservation concern, including internationally designated sites, for example by increased noise and disturbance through construction activities. We therefore strongly recommend that this matter be fully assessed in the AA of the Core Strategy.	Noted
Policy CS21: Conventional Energy Generation - This policy states that 'proposals for additional power generation and energy storage capacity on the Hoo Peninsula and the Isle of Grain will be supported subject to their impact on the natural environmentbeing acceptable'. This matter must be fully assessed in the AA of the Core Strategy. We would encourage sustainable energy to be used wherever possible, to be developed in a way that guarantees the protection of sensitive and important wildlife sites and species.	Noted
Policy CS22: Provision for minerals - We are concerned about the location of the safeguarded areas for sand and gravel extraction (part of and adjacent to the Medway SPA/Ramsar site) and the consequent direct and indirect impacts on these designated sites. This matter must be fully assessed in the AA of the Core Strategy. All mineral extraction sites should have a presumption that restoration will be to nature conservation after use, including reed bed and open water habitats, enabling Medway to make a positive contribution to the Kent Biodiversity Action Plan targets.	Noted
Policy CS23: Waste management - We are concerned that the only identified sites for disposal to land appear to be on the Hoo Peninsula with the impact that would have on the area. In addition to the listed criteria, land raising or the creation of a void space to facilitate the disposal of hazardous and non-inert waste on the Hoo Peninsula and the Isle of Grain should be considered against the environmental impacts, particularly on the SPA/Ramsar sites. This matter must be fully assessed in the AA of the Core Strategy.	Noted.
Policy CS24: Transport and Movement - We are supportive of this policy to extend walking and cycling networks.	Noted.
Policy CS25: The River Medway - We question why there is a policy specific to the River Medway, but not the River Thames. Some text in this chapter is equally relevant to the Thames, for example the section titled 'Management of the Natural Ecosystem'. This policy supports greater use of the river by recreational boat users.	The River Medway passes through the urban area and is subject to many pressures resulting from the use of the river itself and adjacent

	Given the potential impacts of increased recreational disturbance to the SPA/Ramsar sites, this matter must be fully assessed in the AA of the Core Strategy.	development. The Thames coastline remains essentially undeveloped and the Council has no proposals either for increased use of the river or development on adjacent land. Consequently, no specific policy for the River Thames is deemed to be necessary.
	Policy CS31: Hoo Peninsula and the Isle of Grain - We are generally supportive of this policy. It is worth noting that the farmland in this area also acts as a vital rural green buffer protecting the internationally protected marshland sites from disturbance from more urban areas, this must be maintained.	Noted.
	Policy CS 33: Lodge Hill - We have serious concerns about the direct and indirect environmental impacts of this development which will result in the direct loss of habitat supporting a significant proportion of the nationally important population of nightingale present at the site. The remaining population within the adjacent Chattenden Woods SSSI will be likely to suffer significant indirect urbanisation effects, including recreational disturbance and cat predation.	Land Securities are working closely with English Nature to ensure that the natural environment in the vicinity of Lodge Hill will be adequately protected.
Frindsbury Extra Parish Council (David Coomber, Chairman)	2.25 Water Supply in Medway is a major concern as more development comes on stream (e.g. Lodge Hill), this needs urgent attention.	When the overall level of development in Medway was being considered during the preparation of the South East Plan, water supply was taken into account and it was concluded that there would be an adequate supply of water to serve this development. Any specific issues relating to water supply at Lodge Hill will be addressed in a masterplan and development brief for the site.
	2.27 – supports the implementation of road and retail improvements to Strood.	Noted.
	5.25 – not in favour of wind farms in the middle of the Hoo Peninsular.	There are no proposals in the core strategy for wind farms in the

	middle of the Hoo Peninsula.
5.36 – Both Medway City Estate and Hogmarsh Valley need protection from possible flooding.	Noted.
5.54 – Fully supports the designation of the SSSI for Tower Hill to Cockham Wood.	Noted.
5.75 – Supports the enhancement of the southern gateway to the area of Medway City Estate and Manor Farm.	Noted.
CS8 – Supports bullet points 3-5.	Noted.
5.100 - Supports additional and enhanced health facilities at Wainscott.	Noted.
5.119 – Supports conservation and improvements to visitor facilities for Rochester Castle and Upnor Castle.	Noted.
6.19 – Affordable housing: supports final paragraph, and believes that direct consultation should take place between developers and Parish Councils.	Noted.
6.33 – Supports special care accommodation, and identifies the former site of Temple School as a suitable location.	Noted.
7.48 – Retail and town centres – keen on the provision of traffic management measures needed to address the impacts arising as a result of the new Sainsburys store that has just been permitted.	Noted
8.43 – Construction, demolition and excavation waste – in any planning application to develop an alternative facility for waste treatment, the Parish Council would need to pay particular attention to potential routes taken by HGV vehicles to and from Medway City Estate.	Noted.
8.54 – Supports self sufficiency, but monitoring required.	Noted
8.58 – Supports infilling of large chalk pit at Frindsbury.	Noted.
9.19 – Supports retention of Lower Upnor Pier for water transport.	Noted
11.8 – supports upgrading of Strood Station.	Noted
11.14 supports retail development in Wainscott Road and its safeguarding as a neighbourhood centre.	Noted
Lodge Hill – Concerns over amount of potential construction traffic passing through the parish.	The routing of construction traffic will be addressed at the planning application stage to ensure that local amenity is safeguarded.

Frindsbury & Wainscott Community Association (Mrs Anne Wade)	Page 7 - 2.11 Social Profile. We note 150th - housing development encourages over-population - result deprivation.	Both population growth forecasts over the plan period and the way people are now choosing to live has resulted in pressure for the development of further housing. Good design, appropriate infrastructure and use of previously developed land will both deliver the required numbers of new units and help to regenerate the area
		resulting in a reduction rather than an increase in deprivation.
	Page 10 - 2.23 <u>Hoo Peninsula.</u> Grade 1 Farmland - conserved only if Chattenden development is scaled down.	A small proportion of Grade 3 agricultural land would be affected by the development. No Grade 1 land would be. The vast majority of the development site area is previously developed land.
	Page 15 - 3 Options and Alternatives. 815 dwellings annually are excessive. Infrastructure does not and cannot cope. We should be removed from the Thames Gateway.	The Thames Gateway remains a growth area that Medway Council cannot ignore or withdraw from, as it is national government planning policy. The projected 815 new dwellings annually reflect a balance between local needs, growth area requirements and the availability of previously developed land.
	Page 39 - Countryside & Landscape 5.70 Fringe Land - protection from urban sprawl. Should receive far stronger protection - frequently fails against Developer policies and the Appeal System.	The Strategic Land Availability Appraisal (SLAA) has identified sufficient within the main urban areas, plus Lodge Hill to meet Medway's housing requirements without resorting to the release of fringe land for urban extensions. This land will be protected by Policy

	CS7 that sets out strong criteria for the protection of the countryside, which the Council considers, will stand up in the appeal system to ad hoc proposals for development.
5.75 - Medway City Estate is a 'hotch potch' of buildings without landscaping.  Promised improvement has not happened. Many services should remained in Town Centres.	The employment area was developed under the auspices of an enterprise zone during the 1980's. The need to improve the estates overall setting is well understood.
Page 41 - 8.7 <u>Countryside &amp; Landscape</u> Urban sprawl, has not been contained under present Planning System.	Noted.
Page 46 - 5.102 <u>Sustainable Communities</u> St Bart's Hospital (listed) should remain as a centre for Rehabilitation; centrally located - well adapted to need, should be retained at all costs. <u>Remove this policy</u> from the L.D.F.	The local Primary Care Trust regard the building as no longer suitable for local health care needs and will be seeking to replace the facility with a more modern site in the area over the plan period.
Page 49 - Conservation Areas need even stronger Protection.	Noted.
Page 53 - 6. <u>Housing.</u> Housing figures unacceptable - even excessive; present Infrastructure cannot cope.	Noted and see above.
Page 63 <u>Economic Development</u> .2 More available housing results in commuting.	Employment land is being planned as well as new dwellings to counter this.
Page 70 - 7.48 Retail Warehousing - another example of Urban Sprawl.	Noted.
Page 78 - Energy Waste & Minerals.  8.43 - Alternative Facility Medway City Estate. Access and Lorry movements in surrounding locality.	Noted; application has been withdrawn. The table in Appendix C identifies the Medway City Estate as a congestion hot spot where intervention to improve capacity and junction operation is currently under investigation.
Page 80 - 8.58 The Pit at Manor Farm - Conservation Area - unsuitable for	Noted.

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Infill; difficult access and amenity destruction - rejected by KCC and LA in 1996. We	
request this Policy be removed from L.D.F.	
Key Action, Bus transport from Hoo Peninsular is poor. Should be a service from Wainscott to the Town. Buses from Hoo are frequently overcrowded. Bus design is not Passenger friendly - lacking shopping space, narrow seating, fierce braking system.	The key actions (which are quoted from the Local Transport Plan) include improving the quality of bus services. This includes bus services to rural and peripheral areas. Policy CS33 (Lodge Hill) also includes a specific requirement for Fastrack-style bus links from the site to the Medway Towns, which should be able to benefit neighbouring communities as well.
9.13 - Four Elms Roundabout is poorly designed - too large - many road users consider it a traffic hazard.	The core strategy recognises that the Four Elms roundabout is a main congestion hotspot where investment is required to tackle the problem.
Page 104 <u>Area Policies -</u> 11.7 Strood Deprivation - translocation of business to City Estate and large supermarkets on the periphery. Demolition of Civic Centre was a retrograde move. The Civic Centre provided various public facilities for payment, meetings with Councillors and Groups, and adequate parking. Strood has nothing to offer as a replacement for these <u>lost</u> Amenities. Gun Wharf is <u>more than unacceptable</u> . No Parking and very limited space for Meetings.	Noted
Page 96 11.14 What is meant by a Neighbourhood Centre at Temple Waterfront? Why is it necessary, given Strood Town Centre problems?	The neighbourhood centre in this case is a mixed use centre comprising a small number of retail and office uses and a community use to serve the residents of 620 dwellings, all of which are part of an outline planning permission.
11.17 - Development figures denote overdevelopment with attendant problems. We emphasise that Frindsbury and Strood have very different backgrounds - historically and in many other respects. Strood was always an URBAN area - Frindsbury related to the Countryside. Identity is valuable and should be conserved. Planners	All the sites listed in table 11.1 are already committed, either through development briefs or planning permissions.

	please note.	
	Chatham Page 99 - 11.35 The New Civic Office is inadequate Parking facilities for visitors non-existent. Not served well by public transport.	Noted
	3. Distant from Town Centres of Strood and Gillingham and the Hoo Peninsular.	
	Hoo Peninsula Page 104 - 11.63 Hoo Peninsula, with its rural quality, will be lost if large settlements are allowed at Chattenden. Furthermore, a lower Thames Crossing would destroy the unique isolation it has enjoyed over the centuries.	View noted.
	Page 111 - 11.97 We request a relatively small development at Lodge Hill and Chattenden - the rest of the site should be a Country Open Space, managed to protect the very high ecological value - we need such a provision on the West Bank of Medway.	Land Securities are working closely with English Nature to ensure that the ecological value of the area is protected.
	Finally, we have found this document has much of the content we have met before in other Consultations - we wonder how much will come to fruition by 2026.	Noted
Geoff Orton	Insufficient protection to the important SSSI sites in the area of Lodge Hill/Chattenden; breeding nightingales and ancient woodlands will be adversely affected (including direct losses) reducing the 'sustainable' profile of the project that will not, in the future, be an 'exemplar' example of development.	The Masterplan and Development Brief, currently being prepared, are addressing the issue of protecting the SSSI.
	Use of buffer zones around development even if this means a reduction in the area allocated to housing development (Lodge Hill/Chattenden)	The Masterplan and Development Brief, currently being prepared, are addressing the concept of a buffer zone.
	ALLI should not be disbanded as there is no real justification.	Noted and see earlier responses on this issue
	Implementation incorrectly spelt in Chapter 12. heading.	Noted.
	Glosser of terms would benefit from the inclusion of LNR's, ALLI's and the differentiation of "Country Park" and "Countryside Park"	Noted.
Goodman (Barton Willmore)	The Kingsnorth employment area is now known as the 'Kingsnorth Commercial Park'. Amend text accordingly (inc. policy CS7)	Policy CS17 to be amended to read "the large Isle of Grain employment site and the Kingsnorth Commercial Park".
	In relation to Kingsnorth, the Core Strategy is too prescriptive. The references to	Paragraph 7.5 identifies some

	specific industrial centres are not supported by any evidence base. The outline consent provides for a broad range of occupiers as possible (B1C and B2-B8 uses)	possible types of development which could be come forward in a number of locations
Graham Simpkin Planning	There should be an additional policy committing to a future review of settlement boundaries in a future DPD	This will be undertaken as part of the normal planning process and there is no need for an additional policy in the core strategy.
	Policy CS7 should be amended or another policy added to ensure that the needs of food production are balanced against the strongly worded protectionist policies relating to the countryside, ecology, heritage etc.	Policy CS7 already addresses the issue of food production by seeking to protect the best and most versatile agricultural land.
	Policy CS9 on health & social infrastructure should be expanded to embrace the provision of care homes/sheltered/extra care housing by the private sector	The provision of care homes/sheltered and extra care housing is addressed in policies CS14 and 15.
	Policy CS14 should enable affordable housing to be provided by the private as well as the public sector. The policy should also enable the provision of privately funded affordable housing to meet the needs of elderly owner-occupiers who may require sheltered/extra care housing.	Policy CS14 does allow for the provision of the private as well as the public sector.
	Policy CS19 deals with retail and town centres, but there is no mention of garden centres.	If necessary, garden centres will be the subject of policies in the Site Allocations and Development Management development plan document, which will be prepared after the completion of the core strategy.
	Policy CS31 should be expanded to support proposals for economic development and specialist housing nursing and care homes.	Economic development, housing and nursing and care homes are dealt with in other policies in the core strategy and there are no grounds for including them in policy CS31.
	Policy CS33 should ensue that access to the new Lodge Hill development should be by connection to the existing roundabout rather than as shown on the diagram linking to Four Elms Hill.	The eastern access to the site is currently shown to be via Dux Court Lane. The evidence base for the

		Core Strategy shows that the
		accesses currently proposed will be
		suitable to serve the amount of
		development shown and there is
		therefore no justification for
		insisting that access be taken from
		the Main Road roundabout.
		However, detailed proposals for
		site access will be progressed
		through masterplanning work.
Gravesham	Why GBC is making representations: GBC needs to know what the impact of	Noted.
Borough Council	development in Medway will be on its area as development in the Medway area will	
	impact upon the available options and ability to deliver dwellings in Gravesham	
	because of capacity constraints on existing infrastructure, etc. Duration of Spatial	
	Strategy (to 2028) Gravesham Borough Council welcomes Medway Council's	
	decision to look beyond 2026.	
	para 1.16 - Whilst Gravesham BC do appreciate that an appropriate assessment in	A draft report on an appropriate
	its entirety does not need to be published until Reg 27, Medway are putting forward	assessment is scheduled to be
	proposals that individually or in combination at their present level may be harmful to	completed by August, 2011 and
	Natura 2000 sites and thus be incapable of being delivered in a manner presently	this can then be taken into account
	envisaged. Policy CS6 whilst suitable for local wildlife sites etc (potentially) cannot	in making final amendments to the
	be applied to Natura 2000 especially as a. they don't define what impact would be	core strategy before submission to
	beneficial and thus outweigh damage to a habitat and b. its not within Medway's gift	the Secretary of State.
	to decide what impact to a Natura 2000 site is appropriate and if mitigation is	The implications for the Natura
	suitable, this impact has to be 'for imperative reasons of over-riding public interest'	2000 network are being fully taken
	and would require Defra's approval.	into account but it is also noted that
	and would rodule bond approval.	the greatest threat to the network is
		climate change resulting in coastal
		squeeze. The Council has been
		seeking to work with the EA to
		address this.
	Policy CS13: Housing Provision and Distribution - Why GBC is making	Given that Medway has achieved
	representations: Medway lies within the same housing sub-market area as	an average of 702 housing
	Gravesham and it is important that there is clarity in terms of what Medway is	completions over the last 11 years,
	seeking to achieve so that we can take this into account: In setting our own housing	the South East Plan requirement of

targets for both market and affordable housing in order to identify and, if needed, mitigate any negative impacts to our Borough and the community as a result of adverse environmental and infrastructure impacts Rationale and justification for setting housing requirement Para 3.3 of the plan advises: When the South East Plan was being prepared Medway Council supported the proposed housing requirement for the area of an average of 815 dwellings per year for the 2006 to 2026 period. This was considered to represent a realistic balance between meeting local needs and contributing to growth in the Thames Gateway, a national priority area for both growth and regeneration. This remains the case... A higher option is therefore not required and unlikely to be deliverable. Gravesham BC recognises that, as explained in para 1.24 of the Medway pre-publication Core Strategy, that the Core Strategy is being prepared at a time when there is some uncertainty over the future of the planning system. When the plan was written the Coalition Government had revoked the South East Plan, although this has subsequently been re-instated. Setting housing figures is therefore taking place in a arena of considerable flux but one of the factors that should be considered will be demographic housing need. We do recognise that one of the key problems with focusing on demographic projections, especially trend-based projections, is that they can be subject to considerable variation. However the sub-national population projections for Medway from 2006 to 2026 (or 2008-2028 for the latest projections) are surprisingly similar irrespective of whether the 2004, 2006 or 2008-based population projections are considered. For the equivalent household projections is more variable ranging from 21 to 18,000 households and this suggests that Medway may be under-supplying slightly against trend. This is entirely within Medway's determination but Gravesham BC is concerned that the justification for Medway's distribution is not predicated on the rationale submitted by KCC and Medway at the start of the South East Plan process, which is flawed. The housing distribution methodology document submitted by KCC and Medway in December 2005 included KCC Trend Based Demographic Forecasts - September 2005 in annex 7 and this showed that SEERA's option for Kent Thames Gateway of 48,000 dwellings 2006-2026 was close to that implied by the long term migration trend (47,900 dwellings). Within the sub-region (paras 81 to 83 and annex 7) Gravesham only had a trend requirement for c 4,000 dwellings and Dartford 5,000 dwellings from 2006-2026. In comparison, the zero net migration and trend forecasts identified a trend requirement for 20,400 to 21,900 dwellings for Medway and 12,500 to 16,100 dwellings in Swale.

815 new dwellings per year is an ambitious target. Consequently, Medway Council considers that setting a higher figure would be unachievable. That notwithstanding, the Medway Strategic Land Availability Assessment First Review, May 2011, has identified sufficient land for the development of 20,125 dwellings between 2006 and 2028, a surplus of 2195 over the South East Plan requirement should Medway's expectations be exceeded. This is close to the lower end of the trend requirement of 20.400 identified in Gravesham's representation and represents an annual average of c.915 completions.

Deliverability remaions a key issue – particularly in the current economic climate and the Council remains confient that the level of growth proposed is the most realistic in all the circumstances.

Finally, the KCC projections and all subsequent work was subject to independent examination and the EIP Panel concluded that, taking account of all available evidence a figure of 815 per annum was appropriate for Medway.

Fundamentally the advice submitted by KCC and Medway in December 2005 was that Kent Thameside could identify a significant supply of dwellings on a number of key strategic sites without the need to use Greenfield or Green Belt land. Alternative options were tested (para 136) that resulted in a distribution that more closely matched the scale of housing requirement generated by the existing communities, but this was rejected as it would have continued to require new greenfield development in the Medway and Swale areas, whilst restraining brownfield potential in Kent Thameside. It was recognised in the SE Plan EIP Panel report (para 19.4) that delivery of essential infrastructure would be a key determinant of both economic growth and the phasing of development and the current funding constraints make this even more important. This sub-regional approach also needs to be reconsidered with the anticipated demise of the SE Plan. Greater clarity is needed for the reasons given above	This should not be confused with circumstances elsewhere in the Kent Thames Gateway, which are for individual districts to determine.
Policy CS24: Transport and Movement - Transport section shows that there are capacity issues at many locations, however CS24 does not include any text that says development should not be permitted if negative impacts can't be negated.	The text makes clear that overall congestion will be as a result of background traffic growth. It is unlikely that this would result from a single development but transport assessments accompanying planning applications will nevertheless need to consider this.
Policy CS33: Lodge Hill - Gravesham made comments to the July 2009 Issues and Options consultation which has not been responded to as part of this consultation, although we believe that responses were taken to Cabinet but do not appear to have been published as supporting documentation. The accompanying maps usefully show Lodge Hill in context (which is appreciated) and it is apparent that the Lodge Hill proposal has the potential to significantly impact on the M2 junction and Higham. Unfortunately it still reads as a proposal that has been considered in isolation, purely within a Medway perspective. Pg.99 of the Medway Strategic Land Availability Assessment (SLAA) Draft Final Report November 2010 (Subject to approval by the Medway Strategic Housing Partnership Board)	It is recognised that traffic from Lodge Hill is likely to have an impact on the M2, particularly junction 1. This is identified in Figure 9.1. Discussions with the Highways Agency are ongoing and suitable mitigation measures will need to be provided for as part of any development proposals.
http://www.medway.gov.uk/pdf/Medway%20SLAA%20November%202010.pdf Says: The indicative phasing in table 1 should reflect Land Securities' assessment, which is based on delivery rates in line with market absorption rates. Consequently, table 1 should show 2011-2016, 1000 dwellings, 2016-2021, 1,800 dwellings, 2021-	The provision of fast, frequent bus links to the main urban area including appropriate rail interchanges will limit any potential

2026, 1,800 dwellings, 2026+, 400 dwellings. The information from http://www.lodge.httpli.nlo/dwebistelites/lodge hill newsletter issue 1 final.pdf explains that a planning application is expected in 2011 and therefore it is unfortunate that Gravesham is still requesting additional information about the Lodge Hill proposal and its infrastructure delivery milestones and the spatial implications of these - particularly in respect to transport and the impact on Higham and there is no evidence of adverse effects in Gravesham beyond Junction 1 on the M2 - a matter which is being addressed.  Harrisons  Surveyors (John Porter)  Harrisons  Surveyors (John Porter)  Assumption that 70% of employment sites could be developed is overly optimistic, consequently, additional employment land will need to be identified and allocated.  Harrisons  Surveyors (John Porter)  Assumption that 70% of employment land will need to be identified and allocated.  The employment land availability position in Medway is as follows:  A total of 811,556 sq.m. of B1, B2 and B8 is identified in the area.  The Employment Land Review Consolidation Study 2010 demonstrated that a floorspace requirement of these uses up to 2026 totals 384,963 sq.m. only 47% of the identified supply.  A surplus of 426,593 sq.m. only 47% of the identified supply.  A surplus of 426,593 sq.m. (53%) is available for flexibility in delivery over the plan period till 2026. Consequently there is no case for allocating additional land.  Health and Safety Executive  Refers to information on its website. If there are any major hazard sites and pipelines, or associated consultation zones, within the local development plan area it			
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		Refers to information on its website. If there are any major hazard sites and	Noted.

	would be helpful to indicate this to potential developers.	
	Suggested wording for a policy statement that could be included in the Plan.	Noted.
	Any major hazard sites (and pipelines) should be shown on the proposals map.	These matters would be addressed in the Site Allocations DPD that will follow the Core Strategy.
Highways Agency		
	In the area surrounding Medway, the Highways Agency has responsibility for the M2, the A2 west of M2 Junction 1 and the A249 north of M2 Junction 5. The section of the M2 comprising Junctions 1, 2, 3 and 4 is of primary concern in context of Medway. The Strategic Road Network serves an important function in facilitating the movement of traffic over long distances. It is the Highways Agency's role to safeguard this core function. It is recognised that junctions which adjoin the M2 south of the main Medway urban area serve a dual role of providing access/egress to the Strategic Road Network and forming a part of important local distributor and cross-country routes, including the A289 to/from Hoo Peninsula, the A228 to/from Snodland and Ditton, the A229 to/from Maidstone and the A249 link between M2 Junction 5 and M20 Junction 7, Maidstone.	Noted.
	Economic Development - Hoo Peninsula (DCS Paragraphs 3.31 - 3.34, p.19) DCS Paragraph 3.31 indicates that the Economic Development Strategy adopted by Medway Council in December 2009 raised concerns about the scale of employment development on Hoo Pensinula distorting the labour market because the proposed employment sites are remote from the main Medway urban area where a large proportion of the labour force will reside. Despite the conclusion of the Economic Development Strategy, which was adopted prior to planning permissions being granted at the Isle of Grain and Kingsnorth, DCS indicates that employment development should occur at these locations and it is considered that residential development at Lodge Hill will provide a larger local workforce for new jobs on Hoo Peninsula in the future (DCS Paragraph 3.34).	Noted and one effect of this should be to 'pull' traffic way from the A2/M2
	Given there is now more certainty surrounding the development of Isle of Grain and Kingsnorth as strategic locations for large scale employment following the recent planning permissions, the Highways Agency notes that the DCS does not suggest extension of the proposed Fastrack style high quality public transport system to the Isle of Grain and Kingsnorth. Such high quality public transport links would improve	Any extension of bus services to the Isle of Grain and Kingsnorth will be a matter for the commercial bus operators. Estimated passenger numbers do not indicate that this

connectivity with the main Medway urban area and the proposed Lodge Hill development. Recognising that these sites are remote from any major residential area, it is important that attractive public transport services are provided and these form part of a wider Fastrack style public transport system proposed for Medway.	would be commercially viable but the Council will continue to monitor the situation and advocate such services where these can be justified.
Economic Development - Rochester Airfield (DCS Paragraph 3.38 p.20)  DCS Paragraph 3.38 indicates that Medway Council is currently working with BAE systems in preparing a development brief and masterplan for a technology and knowledge hub clustered around existing aviation facilities at Rochester Airfield. Employment development at this location could generate additional traffic at M2 Junction 3 and on adjoining links. M2 Junction 3 can experience significant congestion during peak periods and this could be further exacerbated by additional development traffic. The Infrastructure Delivery Schedule incorporated within the DCS does not indicate any required infrastructure to support development at this location.	Saturn modeling is currently being carried out. This includes the inputting of more details into the model that take into account the overall package of measures proposed in the core strategy. Detailed capacity assessments will be required on any junctions that are seen to be affected.  In any event, Junction 3 is still within its 'design period' and it is considered that the Highways Agency should be considering appropriate remedial measures for the junction in view of this.  This notwithstanding the Council will work proactively with the HA and KCC (as the relevant transport authority) to determine what measures might be taken to reasonably manage movements at
The Highways Agency recommends that assessment be undertaken as part of the development brief and masterplan work of the potential impact of proposed development at Rochester Airfield on M2 Junction 3 and adjoining links and	this strategic junction.  Noted

junctions. The Highways Agency would like to be consulted on this process and is happy to offer any assistance.	
The Highways Agency requires more detailed assessment of the impact to the Strategic Road Network arising from proposed development across Medway. Where the impact to the Strategic Road Network is found to be material, detailed capacity assessments should be undertaken of the junctions and links affected. These capacity assessments should identify if the Strategic Road Network has sufficient spare capacity to accommodate Medway's development aspirations. Where the Strategic Road Network is found to be over capacity, suitable mitigation should be identified. In addition to assessing Medway's preferred option, consideration should also be given to the assessment of reasonable alternatives.	Given the other policy objections to the alternatives identified in the Issues and Options report, Medway Council does not consider it necessary to carry out further, detailed highway assessments, particularly as all of these are considered as likely to have markedly greater implications for the motorway network.
The Highways Agency is happy to work with Medway Council in identifying any existing and future capacity issues on the Strategic Road Network.	Noted.
A further key action set out under DCS Paragraph 9.10 is "The introduction of Fastrack style services on major urban and inter urban routes, including to and from Lodge Hill".	Noted.
The Highways Agency welcomes this proposal and believes that a Fastrack style high quality bus link between Lodge Hill and the main Medway urban area is crucial in reducing car dependency. It is the Highways Agency's view that implementation of a high quality public transport link should be regarded as the minimum level of intervention necessary to achieve sufficient mode shift away from the car and minimise the impact on the local and strategic road network which may otherwise occur.	Noted and Policy CS33 allows for the early provision of high quality and high frequency bus services which could include a Fastrack system.
It is expected that such a high quality public transport link would be provided in addition to a sufficient mix of residential and employment land uses at Lodge Hill which will increase the containment of the development and give residents the option of walking and cycling to local job opportunities rather than having to resort to using the car to travel further away. The balance of residential and employment land uses at Lodge Hill is crucial and the quantum suggested in DCS Tables 11.16-11.18 should help towards reducing external car trips at source.	Noted.
The Highways Agency believes that a high quality public transport system should comprise of bus priority at key junctions, particularly at congestion hotspots such as	Noted and all these aspects are being taken into account in the

the Four Elms roundabout, in order for services to remain attractive and reliable. Consideration should be given to providing a segregated route free of general traffic similar to sections of the Fastrack route in Kent Thameside. Consideration should be given not only to links with Strood railway station (the nearest railway station and importantly served by High Speed 1) and Strood town centre via the Medway City Industrial Estate and the proposed Strood Riverside Sustainable Transport Link, but also to/from other parts of Medway in particular Chatham town centre, railway station, new bus interchange and Rainham/Gillingham.	detailed planning of the proposals for the settlement.
It is noted that the DCS Spatial Vision (bullet point 2 p.24) proposes that Chatham should be the main town centre of Medway and will be transformed with the necessary shopping, leisure and employment activities to become a centre of regional significance. High quality public transport links between Chatham and proposed residential and employment development at Hoo Peninsula is therefore crucial.	Noted.
It is noted that the North Kent Multi Area Agreement (published by the Thames Gateway Kent Partnership in July 2009) indicated that it is unlikely that the Chattenden development on its own can support a frequent and high quality bus service of a Fastrack standard, but there are opportunities for a Lodge Hill service to integrate with other proposals in the local area. This potential issue is not recognised in the DCS. The Highways Agency suggests that in order to maximise ridership of Fastrack-style bus services through Lodge Hill that consideration could be given to extending services to large scale employment developments at Isle of Grain and Kingsnorth as previously discussed.	See response above in relation to Kingsnorth and Grain. Related matters are addressed in the Local Transport Plan 3.
Transport and Movement - Park and Ride (DCS Policy CS24, p.87)  DCS Policy CS24 indicates that four Park and Ride facilities are proposed at Horsted, Whitewall Creek, Strood and between Gillingham and Rainham. While the Highways Agency recognises the potential benefit of Park and Ride in reducing car use within the main Medway urban area, and the possibility for integrating the facilities with a wider Fastrack-style public transport system, it may be that the number of car trips will not reduce overall and could potentially increase on sections of the Strategic Road Network.	Noted but no evidence has been provided to justify this assertion.
The Highways Agency recommends that a Transport Assessment is produced for each of the Park and Ride sites as and when they are brought forward which includes trip rate and trip transfer calculations in addition to details regarding proposed bus service frequencies, parking and fare arrangements.	Policy CS24 makes provision for all significant development proposals to be subject to an agreed transport assessment. This would include the

	park and ride sites.
The Highways Agency requests clarification of whether the Park and Ride facilities have been reflected in the Medway Traffic Model.	When the initial modelling was taking place, an area wide parking strategy was still evolving and the park and ride element was not included. However, the modal split would have included some park and ride trips. A further model run, incorporating all proposals in the Core Strategy and LTP3 is planned and will be shared with the Agency.
Area Policies – Lodge Hill, Hoo Peninsula (DCS Table 11.17 p.105) The Highways Agency requires clarification regarding the quantum of employment development proposed at Lodge Hill. DCS Table 11.17 (p.105) indicates that 43,353sqm is proposed, whereas the DCS Infrastructure Delivery Schedule (Table 12.2 p.127) indicates that 60,303sqm could be provided.	The development brief for Lodge Hill will make provision for a possible maximum of 70,000 sq.m. of employment floorspace. The Core Strategy sets an absolute minimum of 43,353.
Infrastructure Delivery Schedule (DCS Table 12.2 p.127) In relation to the proposed Lodge Hill development, the DCS Infrastructure Delivery Schedule (p.127) indicates that further infrastructure schemes may be required by the Highways Agency, such as ramp metering access on the Strategic Road Network. Ramp metering could be a potential means of mitigating the impact of development on the SRN in particular at M2 Junction 1. The potential to implement ramp metering at the other M2 junctions may be more limited due to the required stacking space for traffic on the entry slip roads. There is a potential need for Integrated Demand Management on the A2 through Kent Thameside, a scheme which is being considered by the Highways Agency, the objective of which is to manage predicted high volumes of traffic on this section of the Strategic Road Network. The implementation of ramp metering on junctions upstream within Medway could help to manage traffic flows reaching the Strategic Road Network within Kent Thameside as well as helping to mitigate the impact of development	Noted.

traffic on the Strategic Road Network within Medway.	
The Highways Agency would like to continue to be involved in discussions relating to all development which could have an adverse impact on the Strategic Road Network and recommends that a holistic view is taken in terms of quantifying the cumulative residual impact of development after implementation of measures to reduce car dependency and minimise trips at source and formulating appropriate mitigation measures.	Agreed.
Transport Evidence Base – Medway Traffic Model  The Highways Agency understands that the Medway Traffic Model tests the preferred Option 1 strategic development strategy scenario. It is the Highways Agency's understanding that the alternative strategic development Options 2 to 5 as indicated in the 2009 Core Strategy Issues and Options document have not been tested using the Medway Traffic Model. PPS12 paragraph 4.36 indicates that Core Strategies must be justifiable and the most appropriate strategy when considered against reasonable alternatives. The preferred option put forward could be challenged in this respect. The Highways Agency is concerned that insufficient evidence has been presented which assesses the relative impact of each strategic development option, especially on the Strategic Road Network. The Highways Agency is concerned that the potential imbalance of housing and employment development across Medway in the preferred option with a large proportion allocated to Hoo Peninsula could adversely impact M2 Junction 1. An alternative spatial distribution of development growth within Medway may reduce the scale of impact on the M2.	The Council is concerned that this view is not backed by any objective analysis. All the other options considered have been rejected for sound planning reasons but it is also considered that all would have more serious and direct impacts for the motorway network – particularly Junctions 3 and 4 on the M2.  Transport modelling is an exceptionally expensive activity and modelling every possible alternative is not considered realistic or proportionate.
The Highways Agency requests detailed outputs from the Medway Traffic Model forecast scenario as soon as they are available so that an understanding can be gained of the predicted impact arising from proposed development in Medway on the Strategic Road Network. To reiterate paragraph 12 of this letter, where the impact to the Strategic Road Network is found to be material, detailed capacity assessments should be undertaken of the junctions and links affected. These capacity assessments should identify if the Strategic Road Network has sufficient spare capacity to accommodate Medway's development aspirations. Where the Strategic Road Network is found to be over capacity, suitable mitigation should be	The findings of the SATURN testing will be the subject of consultation with the Highways Agency.

	identified. In addition to assessing Medway's preferred option, consideration should also be given to the assessment of reasonable alternatives.	
	The Highways Agency would like to continue to remain engaged in all matters regarding Medway Council's LDF, any possible future stakeholder engagement required in respect of infrastructure schemes against which the Highways Agency is a named delivery agent or partner.	Agreed.
Historic Rochester Residents Association	The document would benefit from a more comprehensible structure in terms of chapter headings and content. It does not convey the importance of the individual issues, or how the different parts of the document lead on from one another.	Noted. Clearer signposting is being developed for the next version.
	The Core Strategy fails to adequately reflect the full analysis of the SOM reports as it fails to effectively analyse and identify key issues in local centres. The Rochester element appears thin on content and analysis.	Noted but the level of detail appropriate to a core strategy and the need to avoid repetition of information in other documents has been taken into account.
	The Retail, Leisure and Tourism SOM is revisited and clarified, and further qualitative evidence obtained in order to identify the strengths and weaknesses of Medway's tourist destinations, particularly Rochester.	Noted. Though the process of updating will continue if new evidence becomes available.
	There appears to be no evidence base assembled on the quality of the tourist experience of Rochester (nor other tourist destinations in Medway) to underpin policy CS18.	The 2009 Tourism South East Rochester Visitor Survey is part of the evidence base that supports the Policy CS18 and a copy has been supplied to the Association.
	Considers that the text is misleading as the night time economy of Rochester is likely to deter, rather than attract, visitors.	View noted. Policy CS17: Economic Development seeks to address Medway's economic development in all sectors and specifically identifies Chatham as a site for the development of a centre of regional significance and to have a diverse and vibrant evening economy, across the whole area. The focus on Chatham as the main centre would help alleviate Rochester's current role as the

		main evening economy offer.
	The importance of the image of Medway to tourism could be given greater emphasis, given that the Medway Economic Development Strategy 2009-12 cites image building as being one of five strategic priorities. Rochester does not figure strongly in the Core Strategy's projected image for Medway.	Medway has several town (5) centres; they have different scales and historical roots. Rochester has a historical prominence that is afforded the appropriate weight in the Medway Core Strategy.
	Policy CS27 lacks substance and vision. It should be revised and developed to include strategies to address identified problems and to outline a positive vision for the future.	The policy will be updated in the next version of the core strategy but the level of detail needs to be proportional to that appropriate for a core strategy.
Hoo St Werburgh Parish Council	It is mentioned in Para 3.16 that the BAe Sports and Social Club should be included as part of the housing provision. This site has already been refused because of recreational reasons and we see no reason now why it should be included. This area is protected within the current draft plan.	Noted.
	In Para 3.17 we are also of the opinion that there is no guarantee that up to 5000 dwellings can be delivered within the plan period. However if that were the case and the figure quoted becomes a reality then all the services, transport, education, medical and other major infrastructure must be in place before dwellings are extensively occupied.	Enabling infrastructure will have to by part of the development as it proceeds. Less tha 5,000 homes are expected to be delivered during the plan period.
	Strategic Objectives: Para 1, Para 12. In Para 1 we would like to see within those objectives protection of not only the area's many natural and heritage assets but also the protection and the non-use of 'Greenfield Sites'.	The identified 20% oversupply above the projected housing trajectory (16,500 dwellings) in the plan indicates that 'green field' sites are unnecessary; particularly as the identified sites are within the main urban mass and at Lodge Hill. The countryside is protected for its own sake in any event.
	In Para 12 we would like to feel that by 'complementing' does not mean to compromise at the expense of the existing villages of the Hoo Peninsula.	Noted.
	Policy CS 2: Quality & Sustainable Design.  It is stated within the Policy that 'new build will respect strategic and local views and	The Council's adopted Building Heights Policy (2006) sets out in

insta the v	ngs'. It is hoped this will be enforced as past history shows a different story – for ance the multi-stored development at the Akzo site in Gillingham Strand where vista will be lost to all but those who are close to the waters edge.	Part 2 Appendix A of the document all the strategic views in Medway. It is an objective methodology that is applied through the Development Management process. The policy supports this approach that is as objective as it can be given the highly subjective interpretation of the matter of what constitutes a view or a strategic view and to what extent can these be retained for the benefit of the area collectively while allowing needed development to proceed.
highe	development site known as Coes Green in Main Road, Chattenden where the est point of the site overlooking the Medway is also taken up with a multi-storey k of apartments, this we believe is a travesty when it comes to site design.	The view from the lower area of the R.Medway valley below the Coes Green development is uninterrupted. There is no significant building visible above the tree line.
	height of new build within the rural area must also be in keeping and in a ner that is sympathetic with its locality.	Policy CS2: Quality and Sustainable Design supports this objective.
Beca educ pand Para	cy CS 6: Preservation and Enhancement of Natural Assets.  ause of its unique position and its incorporation with the Saxon Shore Way, its cational use by the Arethusa Venture Centre at Upnor and the exceptional bramic views high above the River Medway we would like to see included within a 5.59 the area known as 'Hoo Common' designated as a local nature reserve. o Common is in the ownership of Hoo Parish Council).	Given that the area is within the ownership of the Hoo Parish Council it could pursue this matter with the local authority if it so wished. Contact with the Greenspaces Team is recommended.
Hoo (Mille situa	rly 10 years ago a corner of Kingshill Recreation Ground off Four Wents Road, was planted with many native tree species to create an enclosed wood ennium Wood), the first Hoo had seen in many generations. This new wood is sted high up on the Hoo Ridge giving a panoramic view of the River Medway to the far reaches of the Rainham waterfront. It is because of this that we wish	See above.

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	to include the Millennium Wood as an additional part of Medway's local nature	
	reserves. (Kingshill Recreation Ground is in the ownership of Hoo Parish Council).	
	Policy CS 7: Countryside and Landscape.	<del>-</del>
	There seems to be no definition of the land deemed to be Countryside within this policy. Because of recent over-development within the Hoo Peninsula land that is now designated as grade 1,2 & 3a agricultural land must be preserved and protected at all cost if we are to be sufficient in home production in the future and not be reliant on imported produced goods.	The policy supports these stated objectives. The countryside is, by definition, the non-rural area. The Medway Landscape Character Assessment, March 2011 has been adopted and is now part of the Medway Core Strategy evidence base. It details the varying character types in the rural area and will assist the policy's objectives as it underpins them with an objective analysis.
	Policy CS 9: Health and Social Infrastructure	
	Because of the remoteness of the Medway Maritime Hospital to the Hoo Peninsula there is a necessity for patients, would be patients or visitors to patients to use private transport rather than non-existent public transport, especially at evening time. It is because of this that we feel that the Hospital Trust must not monopolise their position when extra new car-parking spaces become available (Para 5.103).	The use of the trust's private land is not a matter that the Medway Core Strategy, or the local authority has any influence over. Public transport to the hospital is far from non-existent. Starting at Hoo St. Werburgh Bus No. 191 (stops at St.John's Road, Hoo Marina and Five Bell PH) is every 20 minutes to Chatham Bus Station. From there Bus No. 176 to the Medway Maritime Hospital is every 12 minutes, Bus No. 116 is every 20 minutes, Bus No. 116 is somewhat less frequent, and Bus. No 120 are every hour.
	Charging private vehicle users when other means of transport is not available is unreasonable. Until public transport is available to the Hospital by direct access to	The trust's parking charges are not a matter the Medway Core Strategy

all including those folk on the Hoo Peninsula, car-parking charges should either be reduced or eliminated.	or local authority can address. Public transport to the hospital is available.
Policy CS 10: Sport & Recreation We would like to include within the Policy Hoo Leisure Centre in Main Road as part of Medway's multi-sport facility although needing improvement and uplift serves the local area admirably.	The Medway Core Strategy's Policy CS10 does not identify any particular centre, but is a collective policy and all are included.
The municipal Golf Course at Deangate with its subsidiaries we feel ought to also be included as a Medway multi-sport facility.	Noted.
Both the Leisure Centre and the Golf Course if upgraded and improved could serve 'Lodge Hill' in addition to the new development's on-site recreational facilities.	Noted and this is being taken into account in the planning of Lodge Hill.
We have this large catchment area of employment, housing development and potential tourism on the Hoo Peninsula supposedly without commitment to good reliable affordable public transport.	Increasing populations enables higher levels of public transport and a range of initiatives are being considered for the Peninsula related to the planned new developments there.
We also request a feasibility study be set up to further the use of the local railway network on the Hoo Peninsula for the carriage of goods and materials and finally passengers.	The railway line is single track along the peninsula; to make it a full commuter service type would require an additional track and new station development. The demand, even with a fully occupied Lodge Hill settlement, would not justify the necessary investment that the track owners would have to finance. The line currently is a freight line (Thamesport containers and aggregates from Grain
Policy CS 19: Retail & Town Centres There is growing concern that a convenience store at Lodge Hill and the new	This is a recognised issue and ir
Superstore on the Medway City Estate, because of shopper's migration, could either eliminate or reduce some retail facilities within the village of Hoo. Additional large retail facilities should enhance the local economy not destroy it.	being addressed, in part, through the development brief for Lodge Hill.

For those parishioners that are not easily mobile can there be assurances that this will not occur?	See above.
Policy CS 22: Provision for Minerals  This policy is suggesting that the land east of Hoo is the only viable area for aggregate extraction. If this is the case then there has to be limits set upon said extraction. If this parish is to witness the extraction of at least 1.2 million tons as so mentioned then a feasibility study has to be included within the policy to include the possible movement of aggregate by rail and by water wherever possible.	
Policy CS 23: Waste Management The Hoo Peninsula, a rural area of natural beauty has been a direction for antisocial type development for well over 50 years. If you were to include three Power Stations, an Oil Refinery, Natural Gas Storage Depot, Container Handling Depot, Waste Tips, Mineral Extraction Sites, Industrial Sites is there no suggestion that is more than what is felt to be reasonable.	View noted.
If we are to preserve and enhance our natural assets and to sustain development in the countryside then there must be a requirement to structure limitation or to bring some form of conclusion to the expansion of the Hoo Peninsula for waste treatment and mineral extraction.	View noted.
We therefore have to have a rigorous development and enforcement policy on the dis Medway's Waste, but not at the expense of its rural areas.	View noted.
Policy CS 24: Transport & Movement There must be some form of guarantee of a 'Fasttrack' style service before substantial inroads are progressed at Lodge Hill.	Noted and this is a planned feature of the new settlement.
To prevent peripheral localities becoming second-rate in the public transport stakes the 'Fasttrack' style service must be afforded to adjacent villages especially Hoo St Werburgh.	Options are being looked at that would incorporate Hoo withina loop service.
It is mentioned that main line railway stations will be improved but not any improvement of the rail network to the Hoo Peninsula The single track could be	See above.

utilised close to Dux Court to serve the Hoo/High Halstow areas Kingsnorth	
Industrial Site and Lodge Hill.	
Lowering car-parking standards will only alienate those users who wish to use their own transport. There is no alternative to the private car at unsociable hours and to those rural folk without public transport access.	The intention of the policy is to reduce domestic parking standards in the main urban centres, though car parking in town centres is to be rationalised but not reduced. Indeed contributions from developers are to be sought to develop new town centre car parking. No changes to the standard applying to the rural areas is currently proposed.
It is mentioned good quality connections to key markets unfortunately that is not so for the Hoo Peninsula especially for those wanting to visit 'Bluewater', 'Hempstead Valley' and the Maritime Hospital all of which have no direct access by public transport.	Noted but new services from Lodge Hill should improve this situation.
To harmonise with existing networks both sides of the River Medway walking and cycling networks ought to be made available to those users via the Medway Tunnel.	The tunnel is unsuitable for pedestrians and cyclists on health and safety grounds. Though the local authority is seeking resources with a transport bid to have a transit system to run through the tunnel at peak times so that it is able to transport bicyclists as well as pedestrians.
Whilst the existing (Lafarge) Mineral excavation is taking place the wharf facility at Buttercrock Wharf could be made available to prevent excessive HGV road miles.	Buttercrock Wharf is assumed to be the coal-importing wharf that serves the Kingsnorth power station. This is dedicated to coal importation and is unlikely to be operationally suitable for dual use as an aggregate export conveyor and jetty.
Policy CS 31: Hoo Peninsula and the Isle of Grain This policy has to be rigorously	Noted.

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enforced at all costs.	
Although it is mentioned in Par 11.66 that 'the development at Lodge Hill creates a challenge to Hoo Saint Werburgh' that current role presently enjoyed by Hoo as a community, should not be at its expense because of that challenge.	This is the policy's intention.
Policy CS 33: Lodge Hill  We are mindful of the significance and the requirement in having a workable transport solution within the planning process at Lodge Hill. It is our belief that as part of that solution prevention is better than cure. Delays at Four Elms Hill are not going to be eliminated without a major prerequisite which should include at least one direct major road access westwards away from the A228 highway towards for example, the western end of the Wainscott bypass.	The direct linking of the site with the A289 with a new 'relief' road to 'bypass' the A228 and its connecting roundabouts would require the use of the protected open countryside. This area (Cliffe Woods Farmland, base of bald Top Hill and upper reaches of Hogmarsh Valley) is, in landscape terms, highly sensitive. Therefore the emphasis is on ensuring that the highway infrastructure improvements relate to the 'online' improvements at Four Elms Roundabout and the access/egress points onto the A228 to serve the new development. Improvements at known or predicted congestion hotspots are detailed in the Medway Local Transport Plan 2011-2026 page 37.
To have two access points onto the A228 separated by one mile is ludicrous, undesirable and unreasonable to Peninsula parishioners. Access to the eastern end of the site would cause 'rat-running' through villages if the A228 were inaccessible. A similar action would occur at the western end of the A228 if the junction of the A228/A289 were inaccessible. How would traffic management prevent this in the short to medium term?	Hoo St.Werburgh is similarly served by 2 access/egress points off the A228 within a comparatively short distance. There is little to suggest that such an arrangement is inherently inefficient, it is more a matter of how the historic road systems can be adapted to meet the needs that they will have to serve as development progresses

		into the future, at Lodge Hill and elsewhere.
	Bus priority measures on the highway network must be in addition and not be at the expense of private transport users.	Noted.
	Securing Section 106 agreements for burial provision and for community/recreational purposes within Hoo St Werburgh. If 4,600 dwellings are not forthcoming within the plan period will the reduction in dwellings because of the Section 106 agreements being pro-rata mean a reduction or even a stop in health and welfare, and education facilities and all the other infrastructure programmes? Most facilities should be put in place before the major influx of people is settled.	Infrastructure requirements (including such matters as burial space) to enable the development to progress will have to be phases such that the needs of the development are met progressively, whatever the pace of development.
Jennifer Owen & Associates Ltd	Policy CS23. Support the inclusion of provision for the identification of an inert landfill site.	Noted.
	Policy CS23. Object to the failure to include provision for the treatment and disposal of a proportion of London's waste and also the potential to provide a sub regional facility for the treatment of contaminated soils.	See responses above on these issues.
	Policy CS25. Support the retention and reuse of wharves along the Medway.	Noted.
Kent County Council	Para 3.38 & 3.39 Comment: During the Second World War Rochester Airfield was designated as an emergency landing ground and provided with limited facilities for refuelling and rearming. There are some important significant remains, including a light anti-aircraft position, machine gun 'butts' for test firing and a number of wooden huts. There are also significant survivals of both the Shorts bomber factory, the Elementary Flying School and ancillary buildings. It is hoped that the masterplan referred to in the text will take full account of the remaining heritage assets at this historic airfield. In the past several structures have been demolished without proper recording. Earlier archaeological remains may also survive.	Noted.
	<b>Spatial Vision &amp; Objectives</b> Comment: The Vision and Objectives recognise the importance of Medway for the importation of minerals, but do not mention the need to safeguard existing economic land-won minerals and associated infrastructure, secondary and recycled aggregate sites or waste facilities that are required to meet	Objective 14 is to ensure that there are sufficient minerals and waste management/disposal capacity to meet local requirements and
	the waste targets for the authority for the duration of the plan. Nor is there any mention here of an aim to push waste management up the waste hierarchy and rely	contribute to regional and national needs. This encompasses the

less on disposal in the future. Consideration could be given to expanding the	safeguarding of all relevant
statements about minerals and waste here.	minerals.
Page 24 Core Strategy 'Spatial' Vision Comment: The spatial vision states that Medway's rich built heritage will be valued and promoted but does not mention Medway's archaeological heritage or its historic landscape. These are also essential components of the area's historic environment and should be identified in the vision. The vision needs to emphasise the importance of conserving and, where possible, enhancing the historic environment such that it can contribute to the future growth, economy and social wellbeing of Medway. It should recognise the full range of heritage assets in the area: listed and historic buildings, archaeological sites and monuments, and historic landscapes. Kent County Council has two datasets that can support this. Historic Towns Survey reports exist for Chatham, Rochester and Gillingham. These were formerly adopted as part of the Kent and Medway Structure Plan (2006) as SPG3 guidance on Archaeology and Historic Towns and are still highly relevant guidance for development affecting the historic environment in these towns. The historic landscape has also been studied to produce the Historic Landscape Characterisation (HLC) Survey (2001) which provides an important tool for understanding the time-depth and historic character of Kent's countryside. It would be helpful if this strategic HLC could be deepened by more detailed analysis	Agreed. In item 8 of the Spatial Vision, replace "rich built heritage" with "rich historic legacy". This is a wider term, which will encompass archaeology and landscape as well as the built environment.
to support the LDF level of decision-making. English Heritage is carrying out a landscape assessment on the Hoo peninsula which will provide useful additional information on all areas of the historic environment. A study to help decision-making in relation to historic farmsteads is also being undertaken on behalf of English Heritage, KCC and Kent Downs AONB.	
<b>Key Diagram</b> Page 27 Comment: The plan contains one strategic site, Lodge Hill (mixed housing, employment and community facilities); and two large employment allocations, Kingsnorth and Isle of Grain, but the latter are not referred to as strategic sites in the text but are on the key diagram, which is slightly confusing. Chatham Town Centre is also identified as the preferred location for significant retail expansion. By representing the sand/gravel resources and mineral wharves for safeguarding as stars on the key diagram, the reader is unable to estimate the extent or size of these areas. These would perhaps be better represented as crosshatched areas, similar in style to the 'waste disposal to land resource areas'.	The size of the employment sites at Kingsnorth and the Isle of Grain qualify them as being of strategic importance. However, they are already allocated in the Medway Local Plan and have planning permission. Consequently, there is no need to allocate the sites again in the core strategy and the Key Diagram will be amended to replace "strategic" with "major"

	in relation to these two sites. The Key diagram is intended to be diagrammatic. The text includes two, more detailed, maps showing the waste disposal and sand and gravel resource areas and there is therefore no need to show greater detail on the key diagram.
Policy CS2 Quality and sustainable design Support: The strong commitment to "Respecting local context, townscape and landscape - including the character, scale, street and settlement patterns of the surrounding area" is welcomed. The street patterns in particular are often neglected when considering appropriate development and it is encouraging to see that they will be respected and, hopefully, conserved. There is no reference to the Kent Design Guide despite Medway participating in the KDI Initiative. Medway needs to be part of whole Kent approach.	The Kent Design Guide is a 'guide' and is used as such on a daily basis
Policy CS3: Mitigation and Adaptation to Climate Change Comment: Further work needs to be done around proposed policies CS3 and CS4 and the relationship between them. Given the time horizon of the plan, CS3 needs to cover the transition from where we are now i.e. Code 3 and BREEAM Very Good to zero carbon and articulate this expectation for both residential and non-residential development. The policy as drafted does not do this at present. This policy focuses on the measures that developments will be required to attain in order to reduce the impacts of climate change. 'PPS: Planning and Climate Change – supplement to PPS1' states that spatial strategies should "conserve and enhance biodiversity, recognising that the distribution of habitats and species will be affected by climate change". While the first paragraph of Policy CS3 could be interpreted to include biodiversity adaptations, it is quite broad in its terminology and KCC would like to see explicit reference to facilitating the ability of habitats and species to adapt to climate change.	These matters will be addressed in the next version of the core strategy.
Policy CS4 Comment: In respect of CS4, it is well documented that addressing the energy performance of buildings is a key to achieving zero carbon. Renewable energy solutions, either building integrated or community scale will have an important role. The proposed 20% requirement is a step forward from the 10% figure which has been widely used and this is to be welcomed. However, it is unclear how this figure has been derived and how it fits in with progression towards zero carbon development. Reference is made to offsetting the requirement on nearby buildings	The 20% 'Merton Rule' is regarded as a general starting point for renewable provision for new development, subject to certain caveats. There is no evidence why this is inherently unacceptable as being 'too high'. See also response

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where the obligation cannot be met on site. This is one possibility but the policy should really refer to offsetting into local community schemes which might include a	above.
range of initiatives to lower carbon.	
Policy CS6: Preservation and Enhancement of Natural Assets Comment: This	The Kent Biodiversity Opportunity
policy is welcomed as it aims to ensure that all the natural assets of Medway are	Areas web-site states that
protected and enhanced through land management measures and the planning and	biodiversity opportunity areas are a
development process. KCC would though like to see the inclusion of the Kent	spatial reflection of the Kent
Biodiversity Partnership's work on Biodiversity Opportunity Areas incorporated into	Biodiversity Action Plan. Policy
Policy CS6, with particular reference to habitat creation schemes. Please contact	CS6 already refers to the action
William Moreno for further details on this (William.moreno@kent.gov.uk).	plan and there is therefore no need
	to include the opportunity areas.
Policy CS8: Open Space, Green Grid and Public Realm Comment: Within the	Further clarification on these
text associated with this policy there are several statements relating to green space	matters will be included in the next
planning and biodiversity conservation, however the policy itself is unclear in its use	version of the core strategy.
of the terms 'open space' and 'green grid'. The policy could be strengthened with	
regards to the provision and enhancement of natural habitats within the green grid	
that enables biodiversity to exist and move between areas. KCC and Medway need	
to work jointly in developing, implementing and marketing green spaces along the N	
Kent Marshes stretching from London to Swale. The idea of a 'necklace' of green sites that underpins the Parklands approach of the last government needs to be	
captured. Medway has important sites on the Hoo peninsula and the new enhanced	
wildlife site at Cliffe. The internationally protected SPAs and Ramsar Sites in the	
North Kent area are the subject of ongoing research into declining numbers of birds,	
coordinated through the North Kent Environmental Planning Group, of which	
Medway Council is an integral partner. If the research reveals that recreational	
disturbance is a key factor in the bird declines, there will be a need to ensure that	
policies within the Core Strategy are not causing an unmitigated increase in	
recreational disturbance and there may be a need to include more explicit measures	
within the Core Strategy to ensure that this is not the case.	
Policy CS8 and Figure 5.3 The Green Grid corridors are shown as extending from	Figure 5.3 will be amended to
Medway into Kent and the text notes that projects will extend via Coastal and Valley	show more clearly and
of Visions. Beyond that there is no detail of any kind that sits at odds with the rest of	accurately the routes of the
the document, which goes into great detail about housing numbers, details of	principal routes of the green
infrastructure etc. This network should extend into Kent.	grid, but a greater level of detail
	would be inappropriate in a core

5.124 Heritage Assets Comment: There is a strong commitment to Medway's historic environment reflected in this section of the text, it is particularly pleasing to see that Medway Council is committed not only to the protection of designated heritage assets but also recognises that "the historic environment in Medway is much more widespread than this", listing historic street patterns and forms of development, unlisted buildings and areas of archaeological importance as valuable elements. The text does, however, suggest that the areas of archaeology range "from the Bronze Age through to the 20C (1st and 2nd World Wars)." In fact the archaeological heritage of Medway is significantly more ancient than this. Medway contains numerous sites dating to the Palaeolithic, Mesolithic and Neolithic periods especially along the Hoo Peninsula. In addition, Medway does contain a few sites that are more recent than the Second World War such as the Civil Defence Control Centre in Strood. Many of these are of considerable importance and the text should be amended to reflect this. At present the text underplays the importance of Medway's historic landscape. The modern landscape is a product of historical processes over a long period of time. The resulting historic landscape defines the 'grain' of existing patterns of settlement and landscape in Medway and as with urban development new development is more likely to be successfully integrated into area if it complements what has gone before. The layout of any new development should take account of the historic landscape of the area. Existing patterns of roads, lanes, paths and field boundaries can help to shape new development, allowing the older landscape to show through the modern development. Medway Council could consult the Historic Landscape Characterisation Survey (2001) that provides an important tool for understanding the time-depth and historic character of Kent's countryside. Policy C3 of the South East Plan states that in terms of the countryside, policy should "protect and conserve its distinctive qualities". If decisions are to be taken about which areas of the landscape are more important to conserve than others then this will require a more detailed assessment of the various options. Detailed historic landscape analyses will allow a comparison between different areas of the landscape for their historic importance and so enable decision-making to be more informed. Schemes should only be permitted where the design of the scheme complements any existing local historic character that the area may have, and the materials used in the design are appropriate to the existing character, if possible using locally sourced and traditional materials.

strategy.

Agreed. The fourth bullet point of paragraph 5.127 be amended after "dating from" to read "the Palaeolithic, Mesolithic and Neolithic periods to the 20<sup>th</sup> Century."

The second bullet point of policy CS12 provides for the assessment of new development within the setting of historic landscapes with a view to the preservation and enhancement of the special qualities of these areas. This policy, together with policy CS7, enables historic landscapes to be fully taken into account when development proposals are being considered.

Policy CS 12 Heritage Assets Support: It is pleasing to see the historic environment awarded such prominence in the draft document. The historic environment is central to the future of Medway. Rochester is already a town steeped in history with many exceptional historic assets, an ancient road plan and a wide range of nationally important monuments. In Chatham the regenerating role of the dockyard and its surrounding fortifications is widely acknowledged to be one of the benefits of the World Heritage Site status that is being applied for. Gillingham has a less remarkable historic environment but the structures that do survive are therefore all the more important. Within the rural areas of Medway the historic environment is similarly important and the area is particularly important for its military and industrial survivals as well as its pattern of historic villages and lanes. This heritage must be properly cared for within the development control system but also provides a means by which Medway's sense of place can be fully developed as well as an important economic driver through tourism. Comment: At present the detail in the policy text only really discusses the built environment although the first bullet point does refer to the historic environment in general. As the supporting text states, the built environment is only one element of the historic environment and it would be helpful if the policy text reflected this by also referring to Medway's archaeological and landscape heritage assets. The first bullet point could be reworded to:  Supporting the conservation and, where appropriate, the enhancement of the historic environment, whether historic buildings, archaeological sites or historic landscapes, and the contribution it makes to local and regional distinctiveness and sense of place.	The historic environment is defined in PPS5 as all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora. Given the all encompassing nature of the definition of the historic environment, there is no need to amend policy CS12 to include archaeology and landscape.
The text states that design statements will be required where development impacts on the historic environment. Following on from PPS5 which requires heritage statements to be submitted with planning applications that affect heritage assets I would hope that these design statements would include an assessment of the archaeological impact and not solely the impact on the built environment which has been the traditional role of design statements.	Archaeology is covered sufficiently by the relevant Policy HE6 of PPS5. However, the supporting text (paragraph 5.127) will be altered to reference archaeology, historic landscape and historic development patterns.
Page 60 Existing Housing Stock - The text currently states that "a significant proportion of Medway's housing stock dates from before 1919 and is not readily adaptable to modern standards in terms of thermal insulation and fuel efficiency. This presents difficulties in bringing the older stock up to modern standards and adds significantly to the incidence of fuel poverty. In the past the perceived	Noted.

difficulties of making older buildings more energy efficient has been used as an excuse to demolish them and replace them with new construction. In fact, the	
historic environment has a significant role to play in the conservation of resources required for development and also in energy efficiency. Old buildings can often be	
more energy efficient than newer ones and of course have already been built. Thus it may take fewer overall resources to adapt an old building than to demolish it and	
build a completely new one. English Heritage has recently produced guidance ('Climate Change and the Historic Environment', 2008) that reviews the threats to	
the historic environment posed by climate change. The guidance also demonstrates	
that historic structures, settlements and landscapes can in fact be more resilient in	
the face of climate change, and more energy efficient, than more modern structures and settlements.	
Policy CS17 Economic Development Comment: Port expansion and	Noted.
manufacturing (e.g. advanced manufacturing, low carbon technology) activity in	
Medway needs to complement activity in adjoining areas of N Kent. The new Medway Innovation centre needs to be part of a 'network' of innovation centres	
which can be marketed and work together. This joined up approach combining	
Medway and Kent is likely to become more important as Local Enterprise	
Partnerships develops and need for clear direction. Rochester Airfield, has some	
important remains from the during the Second World War, it is hoped that the masterplan referred to in the text will take full account of the remaining heritage	
assets at this historic airfield. Lodge Hill was formerly a barracks and training	
facilities for the Royal School of Military Engineering, there may be buried	
archaeological remains here and in the immediate vicinity and these will need	
appropriate treatment during redevelopment. Medway are keen to develop an 'environmental technologies cluster' and are developing an 'entreprise strategy'	
which will be looking to encourage all types of entreprise including social enterprise,	
this is very much supported and something that KCC would like to replicate across	
the County.  Policy CS20 Support: Medway Council has been successful in utililising universities	Noted.
to become effective economic drivers, and are good at promoting their university	Noteu.
sector e.g. hoping to retain and expand new campus at Chatham Maritime for	
University of Creative Arts and this is to be applauded.	
Para 8.9 to 8.31 Support: The recognition of both national minerals policy and the	Noted.
on-going need to make provision for economic mineral apportionments derived from	

MPS1 and the current sub-regional apportionment is welcomed. Similarly, the recognition of the importance of the aggregate wharves in Medway, and the proposals to safeguard them, in accordance with MPS1 is considered to be a key issue here. The current joint Kent/Medway research being undertaken to update the Kent/Medway mineral import report from 2006 will provide an important part of the evidence base to inform the next stage of the plan.  Para 8.24 Comment: This para discusses the need to safeguard reserves of clay in Medway, but this does not appear to have been taken forward to a situation where these reserves have been mapped on an OS base. The mapping of economic mineral reserves for safeguarding is also something that could perhaps also be tackled as a cross border issue between Kent/Medway. Whilst 3 areas are shown on Figure 8.1 as 'Safeguarding Areas Sand and Gravel' there does not appear to be any reference to safeguarding of chalk reserves in Medway.	The London Clay is a massive deposit in Medway; much of the Hoo Peninsula is an outcrop of this formation. The level of detail sought is also inappropriate for a core strategy.
Para 8.36 Comment: It would be helpful if the existing waste facilities (including HWRCs) which are required to provide capacity for the plan period could be identified on a plan and safeguarded by policy; It is recognised that it would be difficult for Medway to be self sufficient in all waste management streams, however the identification of potential final waste disposal to land resource areas on Figure 8.2 is welcomed as a step towards this goal. KCC would welcome the opportunity to discuss the possibility of joint working on other minerals/waste issues that have cross border issues.	A core stratedy is not site specific. This is a matter for a subsequent DPD.
Chapter 8 Energy, Waste and Minerals Comment: Mineral workings have the potential to impact on the historic environment in a very significant manner and where this occurs the applications will need to be dealt with in accordance with PPS5, which emphasises the importance of pre-application consultation and KCC Heritage Conservation team would be happy to advise at an early stage as to which sites should be avoided for mineral extraction, which will require further evaluation before a decision can be made and which can go ahead with mitigation measures. A staged process of desk-based assessment, field evaluation, archaeological excavation and/or preservation in situ is likely to be required. This possibility, together with the costs of post-excavation analysis and publication needs to be taken into account at the outset. KCC would be pleased to discuss the precise wording of policy statements in this area in more detail. There are many elements of the historic landscape that give character to Kent and which should be conserved	The importance of the historic environment with regard to mineral workings is understood.

and if possible enhanced. The Kent Historic Landscape Characterisation (2001) has	
identified the broad historic character of the landscape of Kent and this study is an	
essential resource for consideration of the landscape impact of new minerals or	
waste proposals. Indeed, the consideration of sites for extraction could be usefully	
informed by more detailed and localised historic landscape assessment so that	
impacts can be more clearly identified and mitigated.	
Figure 9.1 Comment: In Fig 9.1 congestion hotspots are defined as those junctions	Junction 5 is not in Medway and it
over 85% saturated in 2007 and in 2026. They have shown M2 J5 as a hotspot in	would be inappropriate to reference
2026 but not 2007. It should however be referenced in both years, and is in fact	it in the core strategy.
more congested than all of the other junctions on the Motorway network they have	
identified as being worse.	
Policy CS24 Comment: Rather than referring to The use of "Fastrack type bus	References to Fastrack style
services" this should be described with the technical term of "Bus Rapid Transit	services have been taken from the
(BRT)" with "Fastrack in Dartford and Gravesham" cited as an example of BRT in a	Medway Local Transport Plan.
neighbouring authority. Fastack is a brand name of that particular BRT. With this	Consideration will be given to
document being part of a Local Development Framework, the transport initiatives	amending the terminology when the
are very localised and therefore would have negligible impact on Kent. However,	Transport Plan is next reviewed but
there could be impacts on neighbouring authorities in Kent. The links to surrounding	in the meantime, in order to avoid
districts in the Thames Gateway Regeneration Area and to Maidstone and	confusion, the term Fastrack will
other parts of Kent are not fully considered. There is very little mention of the high	continue to be used in both
speed services to Medway and how they intend to better utilise this improvement to	documents.
the transport network. Brief references are included in relation to design and parking	
standards and a brief mention of Manual for Streets and Shared Space, KCC	
significant amounts of information and intelligence on these which could be shared	
with Medway Council. There is no reference to the research into IGN3 for parking	
standards. A number of policies refer to improving walking and cycling and more	
widely quality of life/ healthy lifestyles etc. These are to be welcomed and will assist	
KCC in delivering joint projects where we have cross boundary issues - especially	
alongside the River Medway. However there is no reference to "Movement in	
Medway - Medway's Public Rights of Way Improvement Plan 2007. Large scale	
development is proposed for Lodge Hill, Hoo Peninsula and Isle of Grain, which are	
all close to the boundary with Gravesham and are likely to result in additional stress	
being placed on local roads and the A2/M2 corridor. Whilst the proposals within the	
Core Strategy if delivered may accommodate transport issues within the Medway	
area, this does not appear to spill over into the neighbouring area. In particular	

Higham and Gravesend may be more attractive connections to rail services and with	
the potential increases of flows on the A2/M2 serving these development there is a	
real risk of displacement of vehicles onto the local road network by current through	
traffic in attempt to avoid congestion. Mitigation may therefore be required across	
boundary and this is not covered in the document.	
Chapter 10 The River Medway Support: Reference is made to the historic nature of	Noted.
the river frontages in Medway, and in particular the military sites in Medway that is	
welcomed. It should be appreciated, however, that in addition to the major sites	
mentioned in the text (Chatham Dockyard, Grain fortifications), there are many other	
military sites along the river frontages that are less well known but that are	
nonetheless are of local importance and that contribute to local character. These	
include forts at Cliffe, Slough, Hoo, Darnet and elsewhere, pillboxes across the	
region and a range of observation posts, pillboxes, searchlight emplacements and	
others. There are also a number of important industrial archaeology sites including	
gunpowder works at Cliffe as well as a range of archaeological sites of all periods.	
The wharves, hards, jetties, sea-walls and drainage ditches that line the coasts are	
also often of historic importance. The river frontages are therefore of significant	
historic interest and KCC would wish to be consulted when any modifications or	
developments are planned so that we can advise of likely heritage impacts. It should	
also be remembered, however, that river valleys contain more than visible heritage	
assets. Valleys have been attractive locations of settlement for thousands of years	
and both the Medway and Thames valleys will contain numerous unknown	
archaeological sites that must be treated appropriately suring any development. The	
river corridor also has high palaeoenvironmental potential with the likelihood of	
significant waterlogged buried archaeological remains in some areas.	
Policy CS34 Para 12.14 to 12.16 Comment: Medway has a well developed SPD	Noted.
dealing with development contributions. The proposed Core Strategy policy CS34	
and the accompanying text in para's 12.14 to 12.16 reflects the uncertain nature of	
the CIL proposals and will require some updating following recent government	
announcements. Policy CS 34 however correctly expresses the situation and is	
supported in principle. The SPD, which will also require some amendment, is a	
useful tool, and KCC have sought more information around the viability system as	
this may provide a guide that KCC might also find useful. One particular issue which	
KCC and adjoining districts need to be aware of is the possible	
economic implications where adjoining authorities operate slightly different charging	

mechanisms under a CIL or tariff mechanism. This could have unforeseen consequences when developers decide to implement particular planning permissions. Medway is clearly having difficulties in bring forward some sites which have been damaged by previous industrial activity and thus are less commercially attractive than other sites beyond the borough boundaries. However it is notable that both Gravesham and Swale, also part of the Thames Gateway, may have similar issues. Whether it is economically viable to impose a CIL or tariff requirement on these areas is questionable. One obvious issue is how far the needs of the Medway area might impact on cross boundary service requirements. For example, parents may decide to send children to schools outside of the borough and located within the KCC area, if they offer a presumed better standard of primary and secondary education? This type of situation is experienced elsewhere in North Kent, which makes prediction of education places very problematic. Equally being a major provider of university and higher education, the implications for Chatham of absorbing some of the demands from the rest of Kent need to be appreciated. It is not clear how far other KCC community services might be considered to be discrete and how far they could impact upon, or be impacted by, needs arising from within Medway or within Kent generally, similar to that described for education. Spatially the three sites referred to above are at some distance from the Kent boundary so it is not expected that they will have a detrimental impact on KCC service provision. Rather it is incremental development in the other parts of the Medway area, which	
Glossary Comment: A reference to the Thames Gateway Planning Framework is mentioned in the definition of Traffic Calming, which would appear to be a typo.	The glossary contains a definition of the Thames Gateway Planning Framework but the heading is not in bold typeface. The glossary will be amended accordingly.
The State of Medway Report 'Waste' dated January 2009 Comment: Both this report and the one on Minerals are very informative. However, the section on C&D waste appears to have omitted 'Excavation' wastes in Para 2.1. For clarity it should be grouped with Construction and Demolition wastes.	Point noted.
A section of this report discusses the South East Plan as 'emerging', so it will require some updating before the Pre-submission stage of the LDF is consulted upon.	Point noted.

	It does not appear to mention the Defra Review of Waste Policy, which was consulted upon during 2010. This has major implications for the waste hierarchy	Point noted.
	and discusses the ambition of working towards zero waste. Perhaps this should also be considered as part of the evidence base?	
	Similarly PPS10, an important reference appears to have been omitted.	Accepted.
	Medway has significant recycling capacity – primarily at Pelican Reach on Medway City Estate – permitted recycling capacity is 0.67mtpa, which is in excess of its needs for its own C&I wastes.	Accepted.
	Medway also has an anaerobic digestion facility and a facility for treating animal waste from abattoirs (which receives waste from outside Medway).	Correct
	Medway has no composting facilities in its own area.	Correct
	Medway is estimated to be generating 300,000tpa of C&D wastes. However Cliffe KKB 3R Ltd process around 1mtpa of concrete, hardcore and road surfacing.	Accepted. Though as of early 2011 KKB 3R Ltd no longer operate from Cliffe
	State of Medway Report 'Minerals' dated 2009 Comment: This needs to be updated in the light of the 2009 Panel Report into the revision of Policy M3 of the adopted South East Plan.	Point noted.
	The sites listed in Para 5.5 would benefit from a location plan.	The Pre-publication Draft Core Strategy does show theses locations.
	The following facts are noted: Permitted reserves of land won sand and gravel =1.4mt, though the big reserve (1.2mt) at Lafarge's site at Hoo was not implemented by 2009.	Correct.
	Importation of aggregates in Medway is regionally important. There are 3 operational wharves (at Grain Terminal, Brett at Cliffe and Hanson at Eurowharf), which have a combined potential capacity of 3mt.	Correct.
	One further site at Halling (Cemex) has planning permission but is not operational.	Correct.
	Cliffe imports only Marine Dredged Aggregates (MDA) and Grain imports only crushed rock from Glensanda. Eurowharf imports both crushed MDA and crushed rock for local markets, with no further transhipment, though the site has been subject of heavy investment recently.	Correct.
L	1	I

	Deep buried gravels centred on Cliffe and Grain are overlain by very deep overburden, but these could release circa 35-36mt, if ever exploited, however there are major environmental constraints. Comment: Consideration of identifying and safeguarding of these resources for future generations should be given in the next consultation of the CS.	This has already been considered and rejected given their location within areas of international importance for nature conservation
Kent Downs AONB Unit		
	National and Local planning policies are very clear that highest priority should be given to the conservation and enhancement of Areas of Outstanding Natural Beauty. Policy Statement 7 (PPS7) (at present being revised and as amended currently by PPS4) confirms that AONBs are equivalent to National Parks in terms of their landscape quality, scenic beauty and their planning status. The status of AONBs has been enhanced through measures introduced in the Countryside and Rights of Way (CROW) Act 2000, which gave greater support to their planning and management. The statutory duties state that in exercising or performing any functions in relation to, or so as to affect, land' in these areas, relevant authorities "shall have regard" to their purposes (Page 3 of DEFRA guidance). The Act requires a management plan to be produced, and accordingly the first Kent Downs AONB Management Plan was published in April 2004. Subsequently the first revision management plan (2009- 2014) was published in April 2009. This has been formally adopted all the local authorities of the Kent Downs. The management plan may be viewed on our web site www.kentdowns.org.uk.	Noted.
	Relationship of the Management Plan with production of Local Authority LDPs	
	and Development Management (control)  Under the CROW Act the AONB Management Plan must 'formulate the (Local Authority) policies for the management of the AONB and for carrying out their functions in relation to it'. The policies of the Kent Downs AONB Management Plan are therefore the adopted policies of all the Local Authorities in the Kent Downs. Whilst these policies should not be repeated in the Local Authority LDFs, LPDs and SPDs this relationship should be clear. Any KDAONB responses on consultations on LDF and planning applications under the agreed protocol will reflect the policies of the KD Management Plan and other Kent Downs AONB guidance.	Noted.
	Key issues:-	

	which relates
POLICY KTG7: GREEN INITIATIVES	all
POLICY LF9: GREEN BELT	all
MANAGEMENT - management plans for	
the Surrey Hills, Kent Downs and High	
Weald Areas of Outstanding Natural Beauty	
supported.	
POLICY CC1: SUSTAINABLE	Climate Change is acknowledged
DEVELOPMENT	by all policies in AONB Mgt Plan.
	Particularly:
	GNR7-10
	WT5
	WT11
	LCC
	VC3SDT policies
POLICY CC2: CLIMATE CHANGE	Climate Change is acknowledged
	by all policies in AONB Mgt Plan
	GNR7-10
	WT5, WT11
	LCC
	VC3
	SDT policies
POLICY CC3: RESOURCE USE	GNR7-10
	WT5, WT11
POLICY CC4: SUSTAINABLE DESIGN AND CONSTRUCTION	GNR policies
POLICY CC6: SUSTAINABLE	SD5-SD12
COMMUNITIES AND CHARACTER OF	
THE ENVIRONMENT	
POLICY CC7: INFRASTRUCTURE AND	SD5-SD12
IMPLEMENTATION	
POLICY CC8: GREEN INFRASTRUCTURE	, , , , , , , , , , , , , , , , , , , ,
	AEU12, VC2,
	SDT7-9
	BD1

POLICY C6: COUNTRYSIDE ACCESS	AEU policies	
AND RIGHTS OF WAY MANAGEMENT POLICY BE5: VILLAGE MANAGEMENT	VC3	
POLICY BES: VILLAGE MANAGEMENT  POLICY BE6: MANAGEMENT OF THE	HCH policies	
HISTORIC ENVIRONMENT	11011 policies	
POLICY TSR2: RURAL TOURISM	AEU	
	FL	
	SDT	
	VC	
Setting		
In particular we would draw your attention to the is addressed in <i>SE policy C3</i> . This is not cover to the setting of the Kent Downs AONB was a complete to the setting of the Kent Downs AONB was a complete to the setting of the Kent Downs Attended to a state of the Kent Complete to the Kent Complete to the Kent Downs All and its setting will be conserved and enhanced statutory AONB Management Plan.	red by National policy. The detriment determining factor in the recent ent International Gateway proposal, examination of Sevenoaks' Core wording to include the setting of the policy CS7: rea of Outstanding Natural Beauty	Policy CS7 to be amended by the addition of "and its setting." To the 4 <sup>th</sup> bullet point. Enhancement is already covered by the 5 <sup>th</sup> bullet point.
Woodlands SE Policy NRM7 and our management plan pospecifically in the Core Strategy either in CS6 of woodland management and use of wood chip as be made in para 5.26 by insertion of a paragral based on locally sourced woodchip this would of CS4; an addition to Policy CS3 covering the be integrated into design of new build would also we would wish the Core strategy to make use of AONB guidance as applicable. (Refer above paragrated in the Core Strategy and DPDs.)	or CS7. The link between good as a renewable energy resource could ph supporting district heating systems then be covered by the final sentence use of renewable energy sources to so support this approach. In general of and mention all the Kent Downs age 2) For instance use of the Farm and Lanes Handbook, Kent Downs	The protection and enhancement of woodland, including ancient woodland, is already addressed in policies CS6 and CS7 and in paragraphs 5.64 and 5.65.  Policy CS4 states that the Council will positively promote the installation of all forms of renewable energy systems. This would therefore include wood cp district heating. The policy also states that direction for which technologies would be most appropriate should be taken from the Medway Renewable Energy

	Capacity Study, 2010. This includes wood chip energy generation. There is no need to list all the documents, which might be drawn upon in the implementation of policies in the AONB.
Implementation There is no mention of the Kent Downs AONB or the Valley of Visions in Table 12.1 Monitoring and Implementation framework. Partnership working and support for the landscape and restoration work with the Valley of Visions and the AONB should be mentioned. (Refer comment above regarding 'Medway') Policies CS7,8,11,12,18,25,32 relate to our work.	Table 12.1 is being comprehensively amended to include all relevant monitoring indicators and implementation partners.
Delivery Mechanisms  An indication of how the Land Allocations and Development Management DPD will address implementation of each policy would be useful with specific reference to proposals for Master Plans, Landscape assessments, etc. This could include for instance working in partnership with Valley of Visions on production of the landscape master plan for the Medway Valley proposed by the Valley of Visions.	Work has not started on the preparation of the Site Allocations and Development Management DPD and consequently it is not known how it will address the implementation of each of the core strategy policies.
'Conserving and enhancing' In the context of the AONB it is noted that wording 'maintaining' and/or 'protecting' is used. As a general point we would recommend replacing this with 'conserving and enhancing' to be in line with the CROW Act, Government Guidance, and the Kent Downs Management Plan.	Paragraph 15 of PPS7 refers to the <b>protection</b> and enhancement of the quality and character of the countryside, with particular regard being paid to areas designated for their landscape qualities.  Paragraph 21 refers to AONBs as having <b>the highest state of protection</b> in relation to landscape and scenic beauty.  Policy CS7 reflects these paragraphs in PPS7 and refers to protection, conservation, repair, enhancement, extension,

Kent Police (DHA Planning)	In response to policy CS10, we are concerned that consideration should be given to maintaining a policy wording similar to that employed with policy L3 of the existing Local Plan regarding protection of Open Space. For example, if there is open land in the urban area, that does not have existing public access, consideration should be given to a policy which enables enhancement of that land and provision of some recreation facilities, available to the public, through redevelopment of a part of that land.	maintenance and connection of landscape characteristics in the countryside, including the AONB.  The principle of protecting existing open space is included in policy CS8 of the core strategy. This allows for the preservation and enhancement of open space. A more detailed policy will be included in the Site Allocations and Development Management development plan document. In the meantime, policy L3 of the existing local plan will be carried forward.
	It is important that Core Strategy policy CS17 should be amended to include wording which supports the intensified use of existing industrial sites for use for construction and regeneration purposes as yards and open storage places. This will ensure that all sectors of Medway's workforce are appropriately catered for whilst complying with national and regional policy and guidance that promotes the sequential development of land, by minimising the need for the development of greenfield sites. I therefore also feel it would be appropriate to include reference to Rural and Peripheral Employment Sub-Areas, as it should be ensured that best use is made of such sites.	Insert "support higher density development where appropriate" after "protect established employment areas from other development" in the eighth paragraph of policy CS17.
	In relation to policy CS19 we consider that it is essential, due to the likely slow timescale and uncertainty of delivery of town centre retail sites that allowance should be made within policy for the expansion of existing out of centre retail and service sites such as that at Bredgar Road and Beechings Way in Gillingham. Additional retail floorspace should be provided at these locations in the short term by conversion of existing buildings to ensure that retail expenditure leakage from the borough is minimised whilst investment in major town centre redevelopments is undertaken. In the absence of this the local economy will suffer and it is significantly less likely that the Council's retail strategy will be effective.	The expansion of out of centre retail and service sites would not necessarily reduce leakage of expenditure from the borough but could lead to further competition with the existing town centres in Medway resulting in a further reduction in their vitality and viability. Consequently, no change is proposed to policy CS19.
	Given the significant cuts that have recently been made to public sector budgets, including Kent Police, it is now more important than ever that the needs of Kent	Given that policy CS34 depends upon section106 contributions, it

Delice about the teleprints account when a maring developing acceptable time. It is	would be a seed on the sleep of the f
Police should be taken into account when agreeing developer contributions. It is therefore essential that the infrastructure needs of Kent Police should form part of Development Plan policy. Inclusion of such a policy within the Core Strategy would ensure that the document complies with South East Plan policy CC7, which requires Local Authorities to include policies which secure contributions to help facilitate the delivery of infrastructure. The South East Plan identifies the Police as a key infrastructure provider for which contributions should be sought. Without such a policy, Medway's Draft Core Strategy is currently contrary to the South East Plan and should be found 'un-sound'. It is our view that Medway Council have formed policy CS34 in a way which directs those contributions sought primarily towards services which the Local Authority provides. We do not consider it likely that this prioritisation of services accords with what Medway's residents would judge to be most important, and believe it likely that they would place the importance of fighting crime above that of, for example, library contributions. On this basis, Kent Police object to Draft Core Strategy policy CS34. In order to make the policy acceptable, Kent Police would wish to see a specific request for developer contributions towards infrastructure. The term infrastructure should then be defined within the policy or its sub-text, and this definition should include the Police and other emergency services.	would be necessary to show that additional infrastructure is required to serve a need specifically arising from a particular development. No evidence has been presented in this representation to justify contributions to policing on that basis.  Whilst "Secured by Design" is taken
suggests that all new developments should be required to meet this standard as a minimum. On this basis, it is considered that Draft Core Strategy policy CS15, which seeks to create sustainable communities and sets out various requirements which new developments should seek to achieve, should include a specific requirement for new development to meet Secured by Design standards.	into account when considering planning applications, together with advice from the police architectural liaison officer, this has to be balanced against other design considerations. Consequently, it would be inappropriate to require new development to comprehensively meet all Secured by Design standards. With these qualifications, it is remains the Council's intention to use design to minimize crime. Secured by Design Standards are desirable- but not at the expense of other requirements.
Policy CS8, addresses public realm, currently requires that development should	Whilst "Secured by Design" is taken

	"create or maintain attractive and safe streets and public spaces". Kent Police suggest that the policy should go further than this, to require all new development to meet Secured by Design standards, with advice being provided by their local Architectural Liaison Officer to ensure that housing development layouts and public spaces minimise crime and fear of crime as far as possible.	into account when considering planning applications, together with advice from the police architectural liaison officer, this has to be balanced against other design considerations. Consequently, it would be inappropriate to require new development to comprehensively meet all Secured by Design standards. With these qualifications, it is remains the Council's intention to use design to minimize crime.
Kent Wildfowling & Conservation Association (John Nottage)	Policy CS5: Development and Flood Risk - KWCA are pleased that while Medway have recognising that inter-tidal habitat could be lost due to coastal squeeze they have not specifically committed the three areas identified as potential mitigation sites (Cliffe, Cooling and High Halstow Marshes) as policy in the Core Strategy Plan. Until coastal squeeze and the area to be replaced have been fully investigated by the Environment Agency it would be inappropriate for the Council to offer up land. We must be careful to avoid the destruction of one good habitat for another.	Noted.
	Policy CS8: Open Space, Green Grid and Public Realm - Although KWCA support greater access to open green space we believe that it must be achieved sympathetically and not be at the expense of wildlife and fragile environments. We have many SSSI's, SPA's, and RAMSAR sites of international importance to overwintering wildfowl and waders in Medway. These birds are vulnerable to disturbance that could affect their feeding and roosting patterns. Disturbance effects include complete avoidance of an area and increased levels of vigilance, resulting in reduced foraging efficiency that may lower survival and breeding rates.	Agreed. Proposals to extend the Green Grid in policy CS8 will be balanced against the conservation and enhancement of wildlife habitats in policy CS6.
	Policy CS25: The River Medway – KWCA are concerned that increased leisure activity and access to the river, as noted in our response to Policy CS8, we have many SSSI's, SPA's, and RAMSAR sites of international importance to overwintering wildfowl and waders in Medway. These birds are vulnerable to disturbance that could affect their feeding and roosting patterns. Disturbance effects include complete avoidance of an area and increased levels of vigilance, resulting in reduced foraging efficiency that may lower survival and breeding rates. We are also	The increased access to and use of the river will need to be balanced against the support for measures to protect and enhance the river as a valuable resource for wildlife and biodiversity afforded by policy CS25.

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	concerned that due consideration is taken to the potential loss of one habitat for	
	another when replacement inter-tidal habitat. Inter-tidal mudflats are a U.K.	
	Biodiversity Action Plan priority habitat and therefore of national importance, the	
	high density of marine invertebrates in the mud providing good foraging habitat for a	
	variety of bird species. Breaching the sea wall as part of flood defences does not create mud flats.	
Loforgo	Comments on its minerals site at Kingsnorth which has potential extensions which	Noted.
Lafarge	i i	Notea.
Aggregates	could ensure the security of land won aggregates supply to Medway throughout the	
(Heaton Planning)	plan period.	Natad
Lafarge Cement	Agree with <b>Policy CS1</b> : Regenerating Medway - We support the emphasis given in	Noted.
UK (A Owen,	Policy CS1 to regeneration in Medway, and welcome the identification of Temple	
LCUK)	Waterfront as a key site. This site, along with other regeneration sites, will play an	
	important part in Medway's future, and their delivery should be supported.	
	Agree with <b>Policy CS8</b> : Open Space, Green Grid and Public Realm - We support	Insert "well maintained" after
	Policy CS8 and the commitment to delivering high quality green space in Medway. It	"high quality" in the first
	is important, however, that investment in green space is supported by ongoing	paragraph of CS8.
	maintenance and management regimes which ensure that high standards are	
	maintained. We suggest that the first sentence of policy CS8 is amended to read:	
	"The Council will seek to provide equal opportunities for all people to enjoy	
	accessible, high quality and affordable open space, and is committed to the long-	
	term maintenance of its green space network. It will ensure.	
	Agree with <b>Policy CS13</b> : Housing Provision and Distribution - We support the	Noted.
	approach set out in Policy CS13 of recognising that development sites subject to	
	adopted Development Briefs should form part of the housing land supply for	
	Medway.	
	Strongly disagree with <b>Policy CS15</b> : Housing Design and Other Housing	Not agreed. The draft Medway
	Requirements - Policy CS15 seeks, in the third bullet, to enforce standards which	Housing Design Standards are
	are open-ended in their scope and which are not yet defined in the explanatory text.	available and have been consulted
	Whilst we agree that delivering high quality and sustainable housing is critical to	upon at the same time as the LDF
	Medway's future success, it is unreasonable to set out policy which requires	in a fully transparent way.
	adherence to standards whose scope and detail is not explained in the Core	Examination of recent housing
	Strategy and whose content will be agreed by way of a separate process not fully	schemes in Medway has revealed
	explained. Furthermore, the cost of establishing specific space and quality	that most house and flat designs
	standards has been recognised by the governmentas a barrier to housing delivery,	either meet the proposed Medway
	and so must be treated with caution. In the present (and foreseeable) economic	standards or come close to meeting

climate, it is quite likely that establishing mandatory higher internal and external space standards will translate directly into a higher build cost and hence higher property purchase costs. For thoselooking to purchase homes, either astheir first home, or looking to trade from an older to newer homes, any additional cost may make the difference between being able to afford to buy or not. We believe that there is considerable risk, therefore, of new homes subject to these standards becoming less affordable and may preclude households from entering the property market. This will undermine affordability and housing take-up, and may lead to further stagnation of the local property market in Medway. In the current economic climate, we believe that it is in Medway's interests to seek to underpin market recovery by encouraging, rather than obligating, improvements in housing standards. We recommend that the third bullet of Policy CS15 be deleted.	them. Those designs that failed by a substantial margin were cramped and unfit for purpose.  There may be a case for relaxing standards in specific cases where affordability is an issue. However, this is likely to apply to relatively few schemes and to only a proportion of dwellings within each scheme. This matter is best decided on a case-by-case basis upon the submission of specific and relevant information from developers.
Disagree with <b>Policy CS24</b> : Transport and Movement - Whilst we support the Council's stance on transport matters, and recognise that the Council has limited influence on commercial bus operations, we are disappointed that no reference is made to the Council's role in coordinating new public transport investment which supports new development. Major regeneration sites will be expected to provide S106 contributions towards public transport provision, with precurement secured by the Council. This provides an opportunity for the Council to manage the procurement of services to ensure that new or amended services are coordinated and complementary and serve the widest public interest. We suggest that a further bullet point be added to Policy CS24 which reads: The Council will seek to coordinate and support the provision of public transport services through coordinated procurement of new services funded by planning obligation receipts and through its own actions.	Policy CS34 allows for the provision of infrastructure through section 106 agreements on larger developments. This includes the provision of new or extended bus services and there is therefore no need to include the role of the Council in policy CS24.
Agree with <b>Policy CS25</b> : The River Medway - We support the regeneration objectives highlighted in Policy CS25. It is important that the Council coordinates its efforts in linking regeneration sites with its own investment in the public realm, and that it consults effectively with major landowners to deliver a coordinated and comprehensive public realm improvement strategy. This should include	Agreed.

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considerations of implementation and ongoing maintenance.	
Strongly agree with <b>Policy CS26</b> : Strood - We support Policy CS26 which identifies	Noted.
the important role of regeneration sites in the renewal of Strood. We also welcome	
the safeguarding of the future neighbourhood centre at Temple Waterfront, which	
will become an important asset serving future residents, visitors and those employed	
locally.	
This response is made on behalf of Lafarge Cement UK (LCUK) and addresses	Noted.
aspects of Draft Core Strategy Chapter 8 (Provision for Minerals) as they relate to	
the permitted Medway Cement Works at Holborough. LCUK has recently responded	
to the Kent Minerals & Waste Development Framework consultation and aspects of	
this present response are concerned with consistent planning treatment across the	
boundary between Kent and Medway.	
Paragraph 8.14 - This states at point (4) that the Core Strategy will "Make provision	It is noted that the reserve is
at existing cement manufacturing facilities for at least 15 years of production, and 25	estimated to be of a productive life
years at new sites." This does not completely quote national policy. MPG 10 states	of 35 years, though this is an
(para 58) that a new cement plant on a green field site should be provided with a	economic assessment of the
stock of permitted reserves lasting more than 25 years. At para 59 it stares that	demand for the material as well as
sufficient land should be allocated to maintain this landbank throughout, and at the	an assessment of the facilities
end of, the plan period. The Core Strategy has a horizon of 2028 and therefore the	designed output rate. To operate
cement works needs to have a landbank of reserves to 2043. In fact, the current	efficiently and to be cost effective it
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planning permission just about meets that requirement, but subject to the comments	is understood that the reserve is
below.	calculated at some 35 years and
Paragraphs 8.20/8.21 - These state that "There is a significant new cement	not 40 years as it currently says in
manufacturing site at Holborough in Tonbridge and Malling, owned by Lafarge UK,	the Medway Core Strategy.
that borders Medway. Preliminary site works have been implemented but it is not	
known if or when the plant itself might be constructed. The associated chalk	MPG10 para 58 does indeed state
reserves (in Tonbridge and Malling) are in excess of 40 years. 8.21 Given this	that green field sites for cement
situation there is no need to identify any additional chalk resources for the cement	production should have a stock of
industry at this stage." The following points arise.	permitted reserves lasting more
	than 25 years. The Holborough
The new facility does not just "border" Medway. Both the 2001 planning permission,	consent has 35 years life some
and the predecessor 1950 planning permission, lies astride the administrative	28% above this national policy
boundary between Kent and Medway. Although the majority of the total permitted	requirement. Para 59 states:
land area lies in Kent, some 15% lies in Medway, including in particular parts of the	
quarry and much of the road and rail sidings access. Therefore, Medway Council	59 Development plans should

has a full role to play as Mineral Planning Authority.

It is correct that it is not yet known when the full plant might be constructed, but it remains LCUK's intention to do so as soon as economic conditions allow. The permitted chalk reserves are not "in excess of 40 years". They are 35 years. However, the life of the planning permission is limited to 40 years beyond 2001 i.e. to 2041. Because of the delay in bringing the development on stream, the current reserve life now extends to 2045, beyond the cut-off dates of 2041 in the planning permissions and also beyond 2042 (when under current policy all mineral planning permissions cease to have effect).

Given the small differences between 2041 (when quarrying must cease under the current permission, 2043 up to when the Core Strategy should identify reserves, and 2045, which is the current reserve life, and acknowledging the uncertainty over when production will commence, LCUK would agree that there is today no justification for <u>allocating</u> specific further raw materials.

However, it is possible that there will be a need to seek to extend the permitted life much sooner than 2041, because in the light of the delay in bringing the Works into production the limited "guaranteed" life to 2041 is now a deterrent to investing to complete the project. Any application to extend the date by which the project must cease might include amendments to the permissions. It could well be, therefore, that during the plan period there might be a need to reconfigure the parameters of the permissions, possibly including changes to the project's design or geographical extent of the quarry.

normally allocate sufficient land for mineral extraction for cement manufacture to provide for the maintenance of landbanks.
Structure plans should set out the general principle of maintaining a landbank for cement plant, and mineral local plans should seek to identify areas where minerals will be worked. Sufficient land should be allocated to maintain this landbank throughout, and at the end of, the plan period.

This part of the national planning policy for providing mineral reserves for cement production is significantly out of date. The Kent and Medway Structure Plan has been abolished, as will the South East Plan once the Localism Bill is enacted at primary planning legislation. The Medway Core Strategy has to set out the spatial strategy for the area, including mineral supply, in accordance with national planning policy and with local circumstances being taken into account. With regard to the Chalk for cement manufacture it can be stated that Holbourgh will have, at plan end in 2028, and assuming production started now some 18 years of reserves remaining.

Land Securities	Within Paragraph 1.15, it is noted that "The Council's approach to SA incorporates the requirements of the Strategic Environmental Assessment (SEA) Directive". Please see the separate response on behalf of Land Securities to the Draft Sustainability Appraisal that accompanies the Pre-Publication Draft Core Strategy for full feedback on SA/SEA issues.	This is 7 years less than what can be reasonably be said to be the MPG 10 policy requirements. Therefore the securing of additional reserves would be able to be justified to enable continued production at the facility. The Medway Core Strategy is not a site allocation document but it should safeguard minerals that may be required from sterilising development. There is an absence of technical evidence that any of the surrounding Chalk reserves are suitable for cement production. The area around the site is already highly protected. Therefore the probability of significant new development in the vicinity of the works and quarry that would sterilise potentially valuable mineral reserves is negligible, now and well into the future.  Noted.
	Paragraph 1.24 of the draft Core Strategy states that the Coalition Government has revoked Regional Spatial Strategies (RSSs), including the South East Plan, which covered Medway's administrative area. Since the Pre-Publication Draft Core Strategy was published for consultation, the High Court has overturned the Secretary of State for Communities and Local Government's decision to revoke RSSs, through its judgement on the CALA Homes judicial review case. The	Given that it is still in force, the core strategy will reintroduce references to the South East Plan and the Council will ensure that it is in conformity with that plan.

implications of this are that RSSs have been re-established as part of the Development Plan at the present time, albeit that LPAs have been advised by CLG to have regard to the Government's intention to abolish RSSs as a material consideration in any planning decisions (given the Government's commitment to abolishing RSSs through the forthcoming Localism and Decentralisation Bill) although this is now the subject of a further challenge by CALA Homes. The CALA Homes judgement referred to above highlights the constantly evolving planning policy climate, which has implications for planning policy at all spatial scales. Land Securities therefore considers that the Core Strategy must be capable of adapting and responding to these changing times, as advocated in PPS12. It is encouraging to see that paragraph 1.26 of the draft Core Strategy recognises flexibility to deal with changing circumstances as an important requirement, and it will be critical that future iterations of the Core Strategy are in conformity with the latest planning policy requirements. Land Securities would suggest that within the next iteration of the Core Strategy, which is due to be published in advance of the anticipated timescales for enactment of the Localism and Decentralisation Bill, the spatial strategy should be justified on the basis of being in conformity with the RSS, as well as being (in the absence of the RSS) justified in its own right based on evidence. This will effectively enable the Core Strategy to respond to changing circumstances in accordance with the requirements of PPS12.

## Context and Issues

Paragraph 2.6 of the draft Core Strategy notes that a wide range of key evidence studies has been produced in order to inform the Core Strategy, and includes a list identifying some of the main reports. Land Securities considers that this list could usefully be added to, to reflect non-Council generated evidence base reports, that Medway has sought to "take ownership of" to the extent possible. One example of such third party generated evidence is the suite of draft site-specific technical information reports prepared by Land Securities and its consultant team in respect of the Lodge Hill site. These reports were prepared following site investigation works, and engagement with key stakeholders, to inform Medway Council's Core Strategy evidence base in respect of the future planning policy context for the Lodge Hill site; specifically to support the identification of Lodge Hill as a Strategic Allocation within the Medway Core Strategy. PINS Inspector Simon Emerson visited Medway Council in June 2009 and advised Officers, amongst other things, that where the Council intends to rely upon studies undertaken by others, it should seek

The core strategy will be amended to include references to all relevant sources of evidence.

to "own" this evidence as far as possible. Paragraph 5.5 of the Inspector's advisory note to Medway Council states: "It is for the Council to fully justify the submitted strategy. Where the Council is relying on evidence/studies undertaken by others e.g. consultants acting for the delivery body for Chattenden Barracks, [the site now known as Lodge Hill] it is essential that the Council can and does make that evidence its own and that it is part of the published evidence base accompanying the publication of the document." To seek to ensure Medway Officers could make the Lodge Hill-specific information reports their own as far as possible, Land Securities sought to engage Officers in the preparation of the technical documents. This process commenced at an early stage, when comments were sought on the scopes of the reports. Pursuant to this, the content of the draft reports was discussed at Medway Officer Working Group sessions attended by Land Securities and its consultant team, as well as at more discrete meetings focusing on particular topic areas. This has enabled Medway Officers to feedback on, and to seek to influence the content of, the site specific information reports. These reports are still evolving to reflect ongoing engagement with Officers and other relevant stakeholders. It is therefore considered that reference should be made to non-Council generated reports (for example the draft Lodge Hill-specific information reports) when referencing the Core Strategy evidence base. With reference to the Lodge Hill example, Land Securities is of the view that this suite of technical information presents the results of important "fact-finding" exercises that	
demonstrate the deliverability of a site critical to the Council's emerging spatial vision for Medway.  Paragraph 2.26 of the draft Core Strategy relates to green infrastructure. The second bullet point under this paragraph states that the protection and conservation of open spaces should be protected, whilst the third bullet point confirms that the diversity and abundance of habitats and species should be conserved and enhanced. Land Securities agrees with this approach in principle, however considers that the wording of these bullet points should be amended to take account of site-specific circumstances, and instances where this may not be possible (but where suitable mitigation may be provided as a compensatory measure). Land Securities supports the last bullet point under paragraph 2.27 which relates to the	Site specific circumstances are dealt with under policies CS6 and CS8.
creation and delivery of a brand new settlement at Lodge Hill that has strong links to the wider Hoo Peninsula.  Options and Alternatives	Noted. <b>The Medway Local</b>

Paragraphs 3.2 – 3.5 of the draft Core Strategy discuss the overall level of housing growth within Medway over the Plan period to 2028. It is noted that it is the Council's intention to "roll forward" the annual housing requirement for Medway proposed within the South East Plan (815 dwellings per year) to cover the period to 2028. It is considered that this approach is robust, given that the 815 figure is based on evidence gathered as part of the RSS process (and in view of the guidance issued by the Secretary of State for Communities and Local Government on 6 July 2010 that evidence that informed the preparation of the revoked Regional Strategies may be a material consideration). Now that (pursuant to the CALA Homes High Court judgment) the South East Plan remains part of the Development Plan, it is also considered appropriate that a housing target of 815 dwellings per year is proposed in the Core Strategy, to be in conformity with the RSS. We note that the Core Strategy will cover the period to 2028. Whilst we note that this extends beyond the RSS Plan period (which is to 2026), in order to meet the requirements of PPS12 paragraph 4.13, the Core Strategy must have a time horizon of at least 15 years from the date of adoption. We therefore agree with the approach that has been taken on this, although consider that the detail within the Council's Local Development Scheme should be amended to reflect the revised end date of the Core Strategy Plan period.

Development Scheme will be amended before the core strategy is submitted to the Secretary of State.

In relation to employment targets we comment below on some general and specific issues. On the general issues we agree with the Council that the 21,500 jobs target (paragraph 3.10) is ambitious, and, given current economic uncertainty and the wide range of outcomes identified in tables 3.1 and 3.2, we query whether setting a single target in this way meets the tests of soundness set out in PPS12, most notably that the document must be founded on a robust and credible evidence base, and must be deliverable. Specifically we would question the use of the 21,500 figure given that this does not appear to tally with the numbers set out in Tables 3.1 and 3.2, which in turn differ from the scenarios set out in paragraph 4.2.48 of the Medway Employment Land Review Consolidation Study (MELRCS), 2010, which is cited as the evidence base document for employment land allocations. The Council needs to clarify these numbers and present a single set of assumptions. The MELRCS itself uses three methods to identify a potential employment target, one based on employment projections, one based on natural change in population and a low increase in economic activity and one based on a high increase in economic activity and a large reduction in out-commuting. The former two methods suggest growth of

It is accepted that the use of the 21.500 jobs target based upon an end date of 2026, combined with tables 3.1 and 3.2, which are based on an end date of 2028, is confusing and inconsistent. Given that 2028 is the end of the core strategy plan period, it is appropriate to use the most up to date figures and therefore paragraph 3.10 will be amended by the deletion of "21,500" and its replacement with "20,300" as the jobs target. Paragraph 7.14 will be amended by substituting "chapter"3" for

approximately 6,500 jobs, and the latter 21,500 as proposed in the Core Strategy. Whilst Land Securities supports Medway's aspirations for the higher rates of growth it must be accepted that there is a reasonable possibility that growth will be lower and possibly require different types of land than can currently be forecast. We would therefore suggest that the Council needs to adopt an approach which allows for flexibility and contingency as set out in paragraph 4.46 of PPS12 should monitoring identify a lower growth rate.

"chapter 2".

Paragraph 7.15 will be amended by replacing "21,500 jobs" with "20,300 jobs".

Paragraph 7.16 will be amended by deleting the second sentence after "2008" and replacing it with "and the jobs target is now lower. Given that the Study has yet to be reviewed, the floorspace provision is therefore slightly higher than is required for this lower jobs figure but sufficient land is already committed to meet this requirement."

Given that the core strategy draws upon information in the Consolidation Study, paragraph 7.18 will be amended by by substituting "392,610 sq.m. on 54.44 hectares" for "348,963 sq.m. on 49.9 hectares" and Table 7.1 will be amended by changing the figures as follows:

Floorspace	Land
Sq.m.	На
150,352	11.37
183,747	32.25
31,121	4.29
27, 389	6.53
392,610	54.44

Table 7.2 will be amended by changing the figures as follows:

	F-space Req F-space Surplus/Deficit
	Supply
	150,352 76,376 -
	73,876
	183,747 49,505 -
	134,242
	31,121 666,290
	+635,169
	27,389 4,827 -
	l
	22,562
	392,610 796,998
	+404,388
	NB. Tables 5.6a and 5.6b of the
	Consolidation Study, the source of
	these figures is erroneously headed
	2021 instead of 2026.
Paragraph 3.15 confirms that Option 1 in the Core Strategy Issues and Options	Paragraphs 3.12 to 3.15 contain
Report (new settlement at Lodge Hill, Chattenden) was the only option supported by	references to the Issues and
the Council in terms of strategic locations for development. Land Securities	Options and Sustainability
submitted representations in July 2009 confirming support for this strategic option.	Assessment which set out in detail,
Land Securities considers that within the next iteration of the Core Strategy it would	the reasons for the selection of
be helpful to articulate that the reference to the site within the RSS is one of a	option 1. There is therefore no
number of reasons for being the most appropriate option compared to the	need to expand upon these in the
reasonable alternatives.	core strategy.
Paragraphs 3.16 – 3.21 of the draft Core Strategy detail a summary of the variations	Noted.
to the strategic options proposed at Issues and Options stage, and the Council's	
response to the variations proposed. With regard to the first bullet point under	
paragraph 3.16, which includes the consultation response that claims Lodge Hill	
could only deliver 3,000 dwellings during the Core Strategy Plan period, Land	
Securities would like to emphasise the existence of a comprehensive suite of site-	
specific information which demonstrates that 4,600 dwellings can be delivered over	
the Plan period. In accordance with the evidence-based approach advocated by	
PPS12, it is therefore considered that the choice made by the Plan (in referring to	

4,600 dwellings at Lodge Hill over the Plan period) is sufficiently supported by the background facts. This quantum of development is also essential for the necessary economic growth anticipated to be delivered, and to create the critical mass to support the delivery of a new settlement in terms of the full range of uses and facilities required for a balanced community. The approach to residential sales rate assumptions forms an important element of the draft site-specific information submitted to Medway Council on behalf of Land Securities. Within this evidence, it is noted that the sales rates assumed for Lodge Hill over the Core Strategy Plan period are the delivery of 4.600 private and affordable residential units within 15 years (average 306 private and affordable units per annum, 25.5 per month). Assuming a scenario whereby between 4 and 6 housebuilders are on-site at any one time and are each achieving sales rates of 5-6 dwellings per calendar month, this would equate to an absorption rate of 240 – 432 dwellings per annum. This range supports the case that there are good prospects of Lodge Hill comfortably achieving annual sales rates in excess of 250 private units per annum, particularly in light of the unique selling points of the Lodge Hill site. The third bullet point under paragraph 3.16 notes that at the Issues and Options stage of consultation on the draft Core Strategy, it was claimed that development at Lodge Hill was likely to take place at the "tail end" of the Plan period. Land Securities is aiming to commence development on the site in 2013 (with early infrastructure expected to start in 2012). The identification of the site as a Strategic Allocation within the emerging Core Strategy will provide the development plan policy framework to facilitate the early delivery of the site. As per the representations recently submitted to Medway Council's draft Strategic Land Availability Assessment (SLAA), Land Securities envisages the first phase of Lodge Hill coming forward within the first five years of the Plan period, thereby contributing to the growth agenda within Medway from an early stage.

Paragraph 3.17 of the draft Core Strategy notes that even if Lodge Hill were to deliver 3,000 dwellings up to 2028 instead of the 5,000 estimated by the Council in the draft SLAA, Medway's housing trajectory has identified a surplus of over 1,700 dwellings, which would compensate for the shortfall without the need to identify further land for housing development. Land Securities acknowledges that this is a potential 'fallback' position consistent with the need to consider contingencies set out in PPS12. Leaving this aside, Land Securities would like to comment on the

By reviewing the strategic land availability assessment annually, Medway Council can reconsider sites whose planning permission has lapsed and take into account new sites, which have been granted planning permission. With

"surplus" of supply identified by the Council. The housing supply evidence produced by Medway Council demonstrates, in terms of the overall quantum, a 15 year supply of "deliverable" and "developable" (PPS3) sites. In this regard, the approach is consistent with the requirements of paragraph 53 of PPS3. However, with reference to the "tests" for deliverable sites (paragraph 54 of PPS3) and the approach set out at paragraph 58 of PPS3 in terms of extant planning permissions, Land Securities is uncertain based on the evidence of there being reasonable prospects in terms of the "deliverability" of some of the sites that are assumed to be delivered within the first 5 years of the Plan period. This uncertainty is explicitly to do with the assumptions on the delivery of: (i) extant planning permissions in advance of them lapsing; (ii) sites which currently do not benefit from planning permission; and (iii) allocations carried forward from the Local Plan. In our view, the robustness of the spatial strategy would be strengthened very simply by categorising these sites as "developable" to be delivered within the 6-15 year time horizon of the Plan period if it is appropriate to do so.	regard to sites without permission, the Council has taken into account the views of landowners/developers on when they expect to bring their sites forward for development.  Lodge Hill is such an example.  Given that Land Securities has not identified the specific sites which are causing it concern, the Council is not in a position to respond in detail to this representation and it would be illogical to re-programme all the sites in the three categories identified in the representation. The SLAA will be reviewed before the core strategy is submitted to the Secretary of State and concerns regarding specific sites can be investigated and any necessary amendments made to the SLAA.
Paragraph 3.21 of the Core Strategy confirms that none of the alternative strategic options suggested have been considered further. Land Securities welcomes the Council's interrogation of the alternative options put forward at the Issues and Options stage of consultation, in terms of the robustness of the approach and the "testing" of alternatives as advocated by PPS12, and supports the Council's continued preference for a new settlement at Lodge Hill. Central to the approach for town centre development is the retail hierarchy of the area which establishes where development should be directed to ensure that the vitality, viability and function of centres is not adversely affected by new development.	Noted.
Paragraph 3.29 of the emerging Core Strategy confirms that this has been considered, and based upon an up-to-date evidence base concluded that the established hierarchy of town centres need not be re-evaluated. However, as development comes forward at Lodge Hill, Land Securities is of the view that due regard should be given to the role and function of the Lodge Hill District Centre.	Agreed.

Paragraph 3.40 sets out the history of Lodge Hill's potential to contribute to employment within Medway, focusing on the content of the Kent and Medway Structure Plan 2006, which is no longer adopted planning policy. Planning Policy Statement 4: Planning for Sustainable Economic Growth clearly states that "Existing site allocations should not be carried forward from one version of the development plan to the next without evidence of the need and reasonable prospect of their take up during the plan period" (Paragraph EC2.1(h)). The MELRCS (2010) is the most up to date evidence base and does not confirm the Structure Plan allocation set out in paragraph 3.40. The detailed numbers should therefore be removed as they are no longer relevant. Land Securities is committed to ensuring that Lodge Hill has a thriving economy (see Paragraph 11.94 of the Core Strategy) and believes that consideration of employment uses on the site should be in the context of the definition of economic development as set out in PPS4 paragraph 4, which as well as "B Class uses", includes public, community and main town centre uses.	The Kent and Medway Structure Plan considered that provision should be made for a wide range of employment uses at Lodge Hill. It also considered that it could also help to meet Medway's wider strategic objective of reducing out- commuting. This is relevant because the question of whether Lodge Hill should meet more than local needs was carried forward into the Issues and Options report. It is accepted that the floorspace requirement in the structure plan is no longer relevant given that the plan is no longer extant and as a
Paragraph 3.42 of the draft Core Strategy notes that a "balance of provision" is proposed at Lodge Hill in respect of employment development, broadly matching the employment floorspace to be provided with the size of the resident workforce. We believe that this needs to be revised to be in line with Policy CS33 which refers to "Employment opportunities generally in balance with the resident working age	consequence, paragraph 3.40 should be amended by deleting "at least 20 hectares (70,000 sq.m.)" and inserting "land".  Delete the second sentence of paragraph 3.42 and insert "Accordingly, provision will be made for employment opportunities to be generally in
population" which allows for the employment generating uses which are comprised within the up-to-date PPS4 definition.  4. Vision and Strategic Objectives	balance with the resident working age population."
Paragraph 6 of the Core Strategy "Spatial" Vision on page 24 sets out the economic vision for Medway. This appears to be limited to educational and "B Class" employment uses, not properly reflecting the broader definition of economic development in PPS4. Sub section (e) of this paragraph identifies Grain, Kingsnorth and Lodge Hill as locations for environmental technologies and building products/construction, amongst other activities. It is considered that in the case of Lodge Hill, this is too narrow, and should include reference to the broader economic	Insert "and higher value, higher quality, prestigious economic activity" after "construction" in paragraph 6e of the Spatial Vision.

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role set out in Policy CS33 and paragraph 11.94.  Land Securities supports Paragraph 9 of the Core Strategy "Spatial" Vision, which	Noted.
states that by 2028, "the new settlement at Lodge Hill will have been substantially completed and recognised as a beacon of best practice in terms of its design and sustainability. It will provide a new focus for services on the Hoo Peninsula, whilst relating sensitively to nearby villages".	
Paragraph 4 of the Strategic Objectives on page 25 of the consultation document seeks to focus employment growth at certain locations, including Lodge Hill. Land Securities considers that the Council should instead consider referring to the Lodge Hill site as playing a specific role within Medway for employment growth and economic regeneration.	Insert "economic and" after "to focus" in paragraph 4 of the strategic objectives.
Land Securities welcomes the identification of Lodge Hill/Chattenden as a new settlement on the Core Strategy Key Diagram (Figure 4.1), although considers that for completeness it would also be appropriate to identify the site as a "Strategic Allocation" on this Plan, in accordance with PPS12.	It would be inappropriate to refer to the diagrammatic representation of Lodge Hill on the Key Diagram as a strategic allocation as it is not site specific. The precise boundaries of the allocation are shown in Figure 11.3.
5. Cross-Cutting Themes	
Paragraph 5.2 of the draft Core Strategy confirms that the effective regeneration of Medway's town centres and urban waterfront is the single biggest challenge facing the area and must therefore be the priority for this Core Strategy. It is recognised that this established regeneration programme is of critical importance, however is considered to represent one of a series of priorities. Given the strategic importance of the Lodge Hill site to the Council's growth agenda, Land Securities is of the view that reference should also be made to this Strategic Allocation as one of the Council's priorities over the Plan period and beyond.	Because of the length of time that the regeneration process has been taking place in Medway, since the closure of the Royal Navy dockyard in 1984, the complexity of the regeneration sites, the level of upfront expenditure already incurred, the need to revive Chatham as a vibrant sub-regional centre and the need to enhance the overall image of Medway, the completion of the existing regeneration programme must remain the overriding priority of the core strategy.
Within Paragraph 5.12 of the Pre-Publication Draft Core Strategy, it is noted that for,	Agreed in part. The term design

inter alia, large sites (100 dwellings or more, or 10,000 sq m commercial development), good design will best be ensured by agreeing design principles with the Council via a design brief for each site. Land Securities would welcome the opportunity to understand the need for these design briefs in more detail, in terms of legislative requirements and whether it is the Council's intention to apply this requirement to all large sites. If the Council is minded to retain this requirement, Land Securities would welcome confirmation of who will be expected to produce the design briefs (i.e. LPA or applicant), together with clarification on the status and scope of these briefs, as well as their role relative to Design and Access Statements (which are submitted alongside planning applications).

brief infers the production of a supplementary planning document to be adopted by the Council. Whist this may be relevant in some circumstance this is too prescriptive. However, agreeing basic design/ development principles with the Council and carrying out extensive consultation on these principles prior to the submission of planning applications is an important part of ensuring that consultation is real and meaningful.

The precise form of the information that forms the basis of consultation can be agreed on a site by site basis. The term 'design brief or statement', loosely applied, allows for flexibility. In the absence of a detailed, site specific development proposal the statement should normally be prepared by the applicant or by the Councildependant upon circumstances. In many cases the information that will be of relevance will be similar to that which might normally be contained within a Design and Access Statement.

It is realised that the above goes beyond statutory requirement. However, given the extent or regeneration that will occur in

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	Medway, it is good practice.
	Paragraph 5.12 will therefore be amended to read as follows:
	"For significant regeneration sites (100 dwellings or more, over 10,000m2 of commercial development, or sensitive sites which will be visible or prominent within the surrounding area or in close proximity to important heritage assets) good design will best be ensured by agreeing basic design principles with the Council.
	These principles should normally be laid down in a pre- application design statement or brief to be produced by the applicant. Consultation should take place on this prior to the submission of planning applications. Consultation will be expected to conform with the Council's statement of community
Draft Policy CS2 relates to quality and sustainable design. This confirms, amongst other things, that applications for major sites (25 houses or more) should be accompanied by an Accessibility Assessment and a Design Statement. The draft Policy goes on to state that applications for significant regeneration sites, large sites or sensitive sites should be accompanied or preceded by a design brief that is subject to a public consultation process. In common with its response to the principle of design briefs (see comment in respect of Paragraph 5.12, above), Land	involvement. " See comments above. Final paragraph of policy CS2 to be amended as follows:  "Applications for significant regeneration sites, should be preceded by a design brief or

Securities queries the need for a requirement for stand-alone Accessibility Statements, Design Statements, and design briefs. If it is the Council's intention to pursue a requirement for these documents, Land Securities would like to understand more about the proposed content, scope, purpose, hierarchy and inter-relationship of each of these documents, not least to avoid any unnecessary duplication with	statement that is subject to an extensive consultation process."
Design and Access Statements.  Draft Policy CS3 confirms that residential development will be required to achieve at least Level 3 of the Code for Sustainable Homes, and that commercial buildings over 1,000 sq m will be required to meet the BREEAM "very good" standard. Land Securities considers that, in order to provide sufficient flexibility over the lifetime of the Core Strategy, reference should be made within Draft Policy CS3 to meeting "relevant standards", in recognition of the fact that technologies and standards may change over time.	See responses to previous representations on this matter
Draft Policy CS4 states that all new development will be expected to show reduced energy loads through passive design and the inclusion of energy efficiency measures. The draft policy goes on to state that in developments of 10 dwellings or more, or over 1,000 sq m of floorspace, it will be expected that 20% of the remaining on-site energy loading will be delivered from renewable energy sources. The draft Policy notes that the direction for which technologies would be most appropriate should be taken from the Medway Renewable Energy Capacity Study, and that if it is demonstrated that this target cannot be met economically, compensatory measures will be sought and applied to current buildings in the locality. It is understood that the 20% target for renewable/sustainable energy is based on the Renewable Energy Capacity Study undertaken by Scott Wilson, et al. That study identified the availability of 641MW of energy from low and zero carbon technologies. The Council's desire to achieve 20% of energy from renewable sources alone is acknowledged, however Land Securities is of the view, given the evidence within the Scott Wilson study, that the requirement within Policy CS4 should be amended from 20% renewable energy sources to renewable or low or zero carbon sources (or 20% carbon emission reductions, since differing sources of energy have different carbon factors). The Scott Wilson report also emphasised that district heating systems should be considered by Medway in association with gas CHP and biofuel. In line with this approach, the energy solutions for the Lodge Hill	The 20% 'Merton Rule' is regarded as a general starting point for renewable provision for new development, subject to certain caveats. There is no evidence why this is inherently unacceptable as being 'too high'.

potential option. Should this option be pursued, the fuel source for the primary infrastructure heat network would not be reliant on any one source, nor would it specifically address renewable energy targets (i.e. the strict 20% renewable energy requirement within Policy CS4 as currently drafted) but it would be determined by an Energy Services Company (ESCo) in such a way as to be financially viable and to maximise the carbon reduction opportunities. Having regard to the findings of the Scott Wilson report, which states that district heating systems are a key element that should be investigated further, Land Securities considers that Draft Policy CS4 should be amended to refer to a 20% reduction in carbon emissions, in order to provide sufficient flexibility to enable the recommendations of the Scott Wilson evidence base study to be investigated. Land Securities also considers that reference to the "reduce, reuse, recycle" energy hierarchy could usefully be made within Policy CS4.	
Emerging Core Strategy Policy CS6 confirms that any negative impact on recognised wildlife habitats or other biodiversity features should be avoided or minimised through the appropriate siting and/or design of development. Where the negative impact cannot be avoided, environmental compensation will normally be sought on more than a like-for-like basis. Land Securities considers that where compensation is deemed appropriate, it should be calculated on a site-specific basis, according to the scheme in question and the nature of the new habitats proposed to be created.	Noted.
It is recognised within Paragraph 5.67 of the draft Core Strategy that in PPS7, the Government no longer accepts the need for local (landscape importance) designations that may unduly restrict development and economic activity, but that the Council is taking a flexible approach to the drafting of a policy dealing with the countryside and landscape in order to be able to respond appropriately to announcements by the Coalition Government on such matters. Land Securities supports this flexible approach, and reserves the right to comment on any future iterations of this draft policy as they emerge. To avoid ambiguity as to the delivery of a new settlement in the context of emerging Core Strategy PolicyCS7, Land Securities consider that explicit reference should be included within Paragraph 5.67 relating to Lodge Hill. Land Securities also considers that paragraph 5.72 should go further in terms of the provisions within PPS4 for development in the countryside to set the context for the Lodge Hill Strategic Allocation, given that PPS4 explicitly recognises (at Paragraph 6) that the policies for economic development in the	In order to avoid ambiguity as to the delivery of a new settlement at Lodge Hill, a paragraph will be inserted after paragraph 5.73, as follows:" The core strategy is proposing a new settlement at Lodge Hill which conforms with paragraphs 36 and 38 of PPS3, in so far as it takes the opportunity for the provision of housing on surplus public sector land, it gives priority for development on previously developed land and it takes up the option for

statement apply to rural areas as they do to urban areas. Furthermore, PPS7 sets out the Government's objectives for rural areas, which include good quality, sustainable development. Land Securities is also of the view that the last sentence of paragraph 5.73 should be amended to acknowledge – in a Medway context – the focus of housing on existing settlements and a new settlement at Lodge Hill.	accommodating new housing growth through the creation of a new, free-standing settlement. Consequently, the planning and control of the development of Lodge Hill will take place through the implementation of policy CS33 and the masterplan and development brief which will be prepared in accordance with that policy."
Policy CS7 concerns countryside and landscape matters. Land Securities welcomes the use of the Medway Landscape Character Assessment in the formulation of the policy, in its role as an important element of the Core Strategy evidence base. For the avoidance of doubt, Land Securities considers that it would be useful to include a reference to the strategic allocation of the Lodge Hill site for a new settlement on the Hoo Peninsula, within the text of the policy.	A new paragraph to be inserted after paragraph 5.73 adequately explains the position with regard to Lodge Hill and there is therefore no need to amend policy CS7.
Draft Core Strategy Policy CS10 relates to sport and recreation. The emerging policy states, inter alia, that the Council will safeguard existing facilities for sport and leisure. Land Securities agrees with the principle of this approach, however considers that the draft policy should be amended to include a caveat that seeks the safeguarding of existing facilities unless these facilities form part of a package of wider improvements that include new sports facilities. This would better reflect circumstances where, as recognised in PPG17 (paragraph 13), development may provide the opportunity to exchange the use of one site for another to substitute for any loss of open space, or sports or recreational facility (where the new facility should be at least as accessible to current and potential new users, and at least equivalent in terms of size, usefulness, attractiveness and quality). It would also reflect the statement within Paragraph 13 of PPG17 that wherever possible, development should aim to achieve qualitative improvements to open spaces, sports and recreational facilities.	This issue is addressed in policies L1 and L3 of the Medway Local Plan, 2003. These policies will be carried forward and will be applied alongside policy CS10 until replaced by the Site Allocations and Development Management DPD
Emerging Policy CS12 (Heritage Assets) includes a requirement for Design Statements which accompany new development proposals to demonstrate an understanding of how the historic environment has informed the development of the	The requirement to 'demonstrate an understanding of how the historic environment has informed

design. In common with Land Securities' response to draft Policy CS2, further clarification on the proposed scope/content/responsibilities in respect of the Design Statements proposed is sought, particularly relative to the existing requirement for Design and Access Statements, Heritage Statements and Listed Building and Conservation Area Assessments. The policy refers to 'valuable heritage assets'. The inclusion of the word 'valuable' would appear unnecessary given the clear definition of Heritage Assets in Annex 2 of PPS5. Paragraphs 5.129 and 5.128 reflect national policy with recognition that change in the historic environment is managed and that it may not be possible or desirable to maintain all aspects of the historic environment. Policy CS12, however, is based on the premise that Medway's heritage assets, including undesignated assets, may only be preserved or enhanced. The policy, it would seem, has the potential to be at conflict with national policy on this matter. Policy CS12 refers to the 'local list'. Land Securities seeks clarification on whether it is the Council's intention to maintain, or indeed add to, the local list over the Core Strategy Plan period, or whether the introduction and use of 'Heritage Assets' will supersede this.

the development of the design' does not set out to impose further information requirements. Its purpose is instead to focus the designers' minds on the historic environment.

## Agreed- the word "valuable" will be deleted from the first line of policy CS12.

It is the Council's intention to compile a 'local list' over the plan period. PPS 5 and its reference to 'heritage assets' have not superseded the concepts of 'Local lists'. English heritage is in the process of forming new guidance on local lists and is encouraging Councils to compile such lists.

## Housing

Land Securities welcomes the confirmation in Paragraph 6.6 of the draft Core Strategy that the new settlement at Lodge Hill will be a key component for housing supply in Medway going forward. Paragraphs 6.9 – 6.11 of the draft Core Strategy confirm that the Council has a "healthy surplus" with regard to the overall housing supply requirement over the Plan period to 2028, even without any windfall assumptions. Land Securities would like to comment on the "surplus" of supply identified by the Council. The housing supply evidence produced by Medway Council demonstrates, in terms of the overall quantum, a 15 year supply of "deliverable" and "developable" (PPS3) sites. In this regard, the approach is consistent with the requirements of paragraph 53 of PPS3. However, with reference to the "tests" for deliverable sites (paragraph 54 of PPS3) and the approach set out at paragraph 58 of PPS3 in terms of extant planning permissions, Land Securities is uncertain based on the evidence of there being reasonable prospects in terms of the "deliverability" of some of the sites that are assumed to be delivered within the first 5

By reviewing the strategic land availability assessment annually, Medway Council can reconsider sites whose planning permission has lapsed and take into account new sites, which have been granted planning permission. With regard to sites without permission, the Council has taken into account the views of landowners/developers on when they expect to bring their sites forward for development. Lodge Hill is such an example. Given that Land Securities has not identified the specific sites which

years of the Plan period. This uncertainty is explicitly to do with the assumptions on the delivery of: (i) extant planning permissions in advance of them lapsing; (ii) sites which currently do not benefit from planning permission; and (iii) allocations carried forward from the Local Plan. In our view, the robustness of the spatial strategy would be strengthened very simply by categorising these sites as "developable" to be delivered within the 6-15 year time horizon of the Plan period if it is appropriate to do so.

are causing it concern, the Council is not in a position to respond in detail to this representation and it would be illogical to re-programme all the sites in the three categories identified in the representation. The SLAA will be reviewed before the core strategy is submitted to the Secretary of State and concerns regarding specific sites can be investigated and any necessary amendments made to the SLAA.

Draft Policy CS13 relates to housing provision and distribution. This emerging policy states, inter alia, that the sources of housing provision should include sites allocated in the Medway Local Plan 2003 not already having the benefit of a planning permission. It is considered that, as with new sites proposed, sites allocated in a previous (and to be superseded) iteration of the Development Plan should be assessed against the key deliverability tests within PPS3 (which was first published some three years after the adoption of the Medway Local Plan) as they would not have previously been required to have been considered against the criteria within PPS3. PPS12 requires evidence that the choices made by DPDs are backed up by the background facts, and therefore Land Securities considers that sites allocated in the Medway Local Plan 2003 that do not benefit from a PPS3 paragraph 58 "developable" extant planning permission should only be included within the Council's housing supply schedule where there is sufficient evidence of either their deliverability over the first five years or their developability over the longer Plan period. Land Securities considers this is particularly relevant given that some Local Plan allocations date back to the mid-1990s and still have not been delivered. Land Securities supports the third bullet point within draft Policy CS13, which confirms the Strategic Allocation of land at Lodge Hill will contribute 5,000 dwellings (with approximately 4,600 to be delivered during the Plan period) towards the supply of new homes in Medway. In respect of the fourth bullet point within draft Policy CS13 (and also reflected within paragraph 6.12), this states that "other sites identified in the Medway Strategic Land Availability Assessment 2010" will contribute towards housing provision. As currently drafted, this implies that all the housing sites within

The housing allocations in the Medway Local Plan which have been carried forward are listed in table 6.3 of the core strategy. These have all been reassessed in the Strategic Land Availability Assessment.

All the sites identified in table 1 of the SLAA have been assessed as being suitable for development for housing. This is the reason for preparing the SLAA. The SLAA clearly states that the inclusion of a site does not imply that it will be allocated or granted planning permission. However, it does demonstrate that sufficient land has been identified for housing to meet Medway's requirements during the plan period of the core strategy. At present, Medway Council is not aware of any reasons why those sites should not be allocated but

the SLAA are suitable for residential allocations. Land Securities considers this	the SLAA will be regularly reviewed
reference should be "tightened", given that inclusion of sites within a SLAA	and the precise allocations will be
document does not automatically guarantee that they will be allocated within the	subject to the circumstances
Development Plan. The policy should be drafted to recognise this.	prevailing when the Site Allocations
	and Development Management
	DPD is prepared.
Paragraph 6.19 confirms the Council's intention to maintain the current affordable	The use of other viability models
housing policy target of 25% within the existing urban area boundary and at Hoo St	will be a matter for negotiation at
Werburgh, but that elsewhere a 30% policy target will apply. It is noted that	the detailed planning stage.
Paragraph 6.16 reiterates some of the findings of the Medway Council Affordable	
Housing Viability Study. It should also be noted that, within that Study, sample 1	
Hectare sites were tested with a limited set of assumptions concerning Section 106,	
Infrastructure and Code for Sustainable Homes costs, the introduction of which	
remains mandatory at Code Level 6 in 2016, during the Core Strategy Plan period.	
The nature of the assumptions used in the study may not therefore entirely reflect	
the specifics of developing the Lodge Hill site, which Paragraph 11.89	
acknowledges "is defined as "previously developed" due to its military use, including	
ordnance manufacture" and at paragraph 11.101 will require remediation early in the	
development process. In part these issues were previously recognised in the South	
East Plan Policy KTG4 and its supporting text Paragraph 19.13, which considered	
that the target of 30% affordable housing "is the maximum judged practical in the	
sub-region." It is for this reason that the flexibility to negotiate affordable housing	
levels through Policy CS14 having due regard to viability and other considerations is	
supported. This flexibility is considered to be consistent with the requirements of	
PPS12. It is important to consider that The Medway Affordable Housing Toolkit (as	
noted in Paragraph 6.19), whilst being useful to aid the negotiation of the majority of	
sites coming forward within Medway, may not offer the flexibility required to consider	
major developments such as Lodge Hill. It is therefore recommended that, subject to	
discussion with the Council, other viability models may be proposed to assist in	
planning negotiations where appropriate, and provision should be made for this	
within the Core Strategy.	
Policy CS14 (Affordable Housing) should incorporate the reference within the	The provision on alternative sites or
supporting text to provision on alternative sites or financial contributions where the	financial contributions will be a
Council and applicant both consider this to be preferable to on-site provision and	matter for negotiation at the
where to do so would contribute to the creation of mixed communities. As Paragraph	detailed planning stage.
 miles to do do modia definibate to the disalient of mixed definition. Not diagraph	astanou piarining stage.

29 of PPS3 notes this should follow the principle of broad equivalence, a principle Add "The provision of" to the also followed in the Medway Council Affordable Housing Viability Study (reported in beginning of the second Paragraph 4.14 of the Study). Further, 'The quantum of' should be inserted to the paragraph of policy CS14. second paragraph (i.e. "The quantum of affordable housing to meet local needs...") Housing "mix" is defined in policy to aid understanding and clarity of the policy. We understand the use of the word CS15 as size, type, tenure and "mix" in the last bullet point to mean size, type and affordability, although this should affordability. There is therefore no be clarified in the next iteration of the Core Strategy. need to repeat it in policy CS14. Paragraph 6.38 of the consultation document confirms that Health Impact This is appropriate for a significant Assessments will be sought in relation to larger housing proposals. As the Council new settlement/proposal; this approach is gaining greater will be aware large planning applications are accompanied by voluminous documentation covering a wide range of issues, including most of what is contained importance in understanding the within a health impact assessment although not necessarily presented as such. In health implications of new order to avoid unnecessary duplication of information we would suggest that the development and their linkages Council makes clear that such assessments might form part of the scope of other with the wider community. An reports such as the socio-economic assessment section of an Environmental important material consideration for Statement or a Social Infrastructure report, rather than necessarily be a stand-alone the local authority in excise of its document. planning responsibilities. Emerging Policy CS15 relates to housing design and other housing requirements. Medway Council is aware of the The first paragraph within the draft policy refers to the ways in which sustainable need to keep all relevant sources of residential communities can be created, and notes that regard should be had to the evidence up to date and there is North Kent Strategic Housing Market Assessment (SHMA). It is considered that therefore no need to make specific reference should also be made here to the fact that, as an important component of reference to that need in the core the LDF evidence base, the SHMA should be updated on a regular basis, and that it strategy. will be equally important to review additional evidence if sustainable residential The need to have regard to sitecommunities are to be considered holistically. The first bullet point of draft Policy specific circumstances and place CS15 states that the Council will seek to ensure that housing developments help to making is addressed in policy CS2. balance the size, type, tenure and affordability of the local housing stock. When Deviation from housing design creating a free-standing settlement (in line with guidance in Paragraph 38 of PPS3) standards will be a matter for such as that proposed at Lodge Hill, it is considered to be critical that regard is had negotiation at the detailed planning to site-specific circumstances and the making of place, and that this should be stage of a development. reflected within the policy. The third bullet point of emerging Policy CS15 states that The sixth bullet point in Policy Medway will seek to ensure that housing complies with space and other standards CS15 will be amended by the laid down in the Medway Housing Design Standards. It is considered that this bullet addition of "or which can be made accessible to public point would also benefit from increased flexibility to recognise site-specific circumstances, and that in exceptional cases it may be permissible to deviate from transport."

the design standards where there is a justifiable reason for doing so. Bullet point 6 of draft Policy CS15 seeks the effective use of land so that higher densities are achieved in locations well served by public transport. It is considered that the policy should be expanded so that it also includes reference to higher densities on sites that can be made accessible to public transport (as per the guidance in Paragraph 46 of PPS3 that encourages Councils to have regard to current and future accessibility when developing housing density policies), and those with current or future access to a range of amenities. 7. Economic Development Land Securities has been working with the Council and Higher education partners to The third bullet point of assess the potential economic role of Lodge Hill and supports the statement in the paragraph 7.5 will be amended third bullet point of Paragraph 7.5 that it could house educational functions, and by the insertion of "smaller, higher value added activities. Whilst strongly supportive of the Universities of higher and further education Medway, we feel that this reference alone may be too specific and that there may functions, for example," after also be opportunities to work with other institutions in Medway, Kent and possibly "accommodate". further afield. We would therefore suggest that the paragraph is amended to read "The location is also suitable to accommodate smaller further and higher education functions, for example, satellite operations from the Universities at Medway at Chatham Maritime, and higher value activities associated with the developments at Kingsnorth and Grain". In relation to Chapter 7, Economic Development, we reiterate our points above relating to the employment target and data sets out in paragraphs 3.6 to 3.11 of the Issues and Options section which deal with the employment target. Paragraph 7.4 of the Draft Core Strategy confirms the significant uncertainty in current economic prospects, and paragraph 7.15 states that "a number of factors point towards the lower end of the [job targets] range unless a step change occurs in employment and out commuting patterns." The text then goes on to set an ambitious jobs target at the top end of the range which is seemingly inconsistent with the scenarios set out in paragraph 7.14. Whilst the desire for Medway to maximise its economic potential is strongly supported, Land Securities is of the view that where targets are proposed there should be a reasonable and demonstrable prospect of achieving them and/or monitoring, flexibility and contingency where there is significant uncertainty. The Council should consider what its response would be to lower rates of employment growth occurring than the proposed target. In relation to Lodge Hill, Land Securities would question the appropriateness of its definition as an "M2 Access site". As is noted elsewhere in the

document it is more likely that it will provide specific markets for certain occupiers and businesses rather than a "generic" business park offer. In this context we support the identification of Lodge Hill, in Policy CS17, as having the potential to create a high quality environment for the development of employment. We would add that this will be as "part of a wider mixed use development which helps develop a new image for Medway."  Draft Policy CS18 concerns tourism and confirms that local tourism will be supported by, inter alia, encouraging proposals for new hotel accommodation and conference/exhibition facilities in locations which complement regeneration opportunities, particularly along the urban waterfront. It so considered that this bullet point within the policy should also refer to encouraging new hotels in locations which have (or which will have) access to services and facilities to create a mix of uses and encourage visitors. The proposed freestanding settlement at Lodge Hill is considered to be an excellent opportunity to provide additional visitor	Paragraph 11.99 and Table 22, associated with policy CS33, both include proposals for hotels at Lodge Hill. These proposals will be incorporated into the masterplan and development brief and there is therefore no need to make specific reference to them in policy CS18.
accommodation on the Hoo Peninsula, which complements the Council's objectives for the urban waterfront and supports the development of the rural tourist economy.  Paragraph 7.37 of the draft Core Strategy sets out the current hierarchy of town centres in Medway. Areas defined as Regional or District Centres are noted within the text, however Local, Village and Neighbourhood Centres are undefined. Land Securities considers that for completeness it would be beneficial to list these existing centres.	Local centres, villages and neighbourhood centres are identified in chapter 11: Area Policies. Bullet point three of paragraph 7.37 will be amended by adding (identified in chapter 11).
With regard to Policy CS19, Land Securities notes that there is an inconsistency between emerging Core Strategy Policies CS19 and CS33 (and Table 11.22) with regard to the quantum of retail floorspace at the Lodge Hill site. Policy CS19 identifies a higher quantum, which Land Securities does not consider to be inappropriate, having regard to the fact that Lodge Hill will be a new settlement which is expected to develop incrementally over time. It will be important for the retail element of the settlement to be appropriate in terms of the scale of development it will serve, particularly in the context of national guidance in PPS4 and PPG13 which, inter alia, promote linked trips. Land Securities is of the view that Policies CS19 and CS33 need to be consistent with regard to retail quantum. (Please refer to our comments elsewhere in these representations for detailed comments on Policy CS33). Bullet point 3 of Policy CS19 refers to 'smaller scale	Noted. The fourth bullet point of policy CS19 will be amended by the insertion of "5,000 sq.m." after "Rochester and".  As it stands, the third bullet point of policy CS19 is unclear. Paragraph 7.51 makes it clear that a range of comparison shopping facilities and serves will be provided catering for the immediate catchments of the district centres. It also refers to small scale provision. It is not clear,

comparison goods floorspace' in certain areas. Land Securities considers this to be inappropriate, given the acknowledgment in the same bullet point to Lodge Hill being a district centre. PPS4 defines a district centre as comprising groups of shops often containing at least one supermarket or superstore, and a range of non retail services, such as banks, building societies and restaurants, as well as local public facilities. Lodge Hill is a new settlement that will evolve over time. PPS4 and PPS12 emphasise that policies should be flexible enough to accommodate sectors not anticipated in the Plan and allow a quick response to changes in economic circumstances. To ensure this flexibility, as well as to ensure due consideration is given to appropriateness of scale and sustainable economic growth, it is considered that reference to 'smaller scale' within Policy CS19 should be replaced by 'appropriate scale'.

in the paragraph, that small scale refers to the unit sizes rather than the overall floorspace.

Consequently, the second sentence of paragraph 7.51 will be amended to read

sentence of paragraph 7.51 will be amended to read "Opportunities to develop additional, small scale shop premises will be encouraged," The third bullet point of policy CS19 will be amended to read "Smaller scale comparison goods shopping units at the district centres with a cumulative total floorspace as shown:"

8. Energy, Waste and Minerals

Paragraph 8.8 of the draft Core Strategy sets out opportunities for the future in the context of energy generation. Land Securities considers that, particularly in light of recent announcements from EON in respect of the Kingsnorth Power Station, provision should be made within the next iteration of the Core Strategy for alternatives/contingencies to be considered in order to demonstrate an appropriate level of flexibility. Where large-scale district heating projects are not a viable solution. Land Securities is of the view that the focus should be alternative local decentralised energy schemes and funding to promote strategic sustainable low carbon developments and Community Energy Projects. Paragraph 8.34 of the Draft Core Strategy refers to the provision for the disposal of a certain amount of London's waste to landfill and to the reduction on the demand for this. However, Paragraph 8.50 notes that the Home Counties, including Medway, are no longer required to make provision for a proportion of London's waste disposal needs following the revocation of the South East Plan in terms of landfill. It is considered that it would be helpful to expand on this in Paragraph 8.34 to gain an understanding of what has been required and what will be required. Furthermore, sufficient flexibility is required within the text to deal with changes in planning policy at all spatial scales (most notably the fact that the South East Plan now (for the time being at least) forms part of the statutory Development Plan once more). It is considered

The second paragraph of Policy CS4 will be amended by the insertion of "or alternative local and community energy projects, decentralized energy schemes." After "conventional power generation."

The South East Plan has not been revoked, though the Localism Bill will, once it has received Royal Ascent, will abolish regional spatial strategies. London waste exports to Kent and Medway were never formally disaggregated.

The Localism Bill, once enacted will revoke the South East Plan. Till then the requirement of Kent and Medway to have regard for London's waste exports will

that Paragraph 8.34 of the Draft Core Strategy would benefit from additional background information on the waste hierarchy, and that Paragraphs 8.34 and 8.50 should be consistent in terms of the disposal of London's waste. It is considered that Paragraph 8.39 of the Draft Core Strategy would benefit from additional background evidence on the recycling and recovery rates and how it is increasing in Medway. This paragraph also states that landfill will continue as the only option for certain types of waste and that this can also be expected to continue to decline as costs for this disposal method increase and new methods of recovery are introduced. Land Securities is of the view that priority should be given to new strategic development opportunities that can target waste reduction practices at a community scale, thus further reducing the amount of waste requiring to go to landfill.	The State of Mediusy Benert
With regard to Policy CS23, Land Securities is of the view that the start of the policy should include a reference to moving construction waste up the waste hierarchy. As well as ensuring all new built developments make appropriate provision for the separation, storage and collection of waste materials, the inclusion of reused and recycling materials and on site reuse and recycling of construction, demolition and excavation waste should be encouraged.	The State of Medway Report details the waste hierarchy and the need for an intergraded approach to waste management into new development. The amended waste hierarchy will be discussed in the updated State of Medway Report on waste.
Paragraphs 11.56 – 11.72, Tables 11.16 – 11.18, and emerging Policy CS31 all concern development over the Plan period on the Hoo Peninsula and the Isle of Grain. It is noted that the Lodge Hill site is considered separately elsewhere in Chapter 11 given the scale of development proposed, although there are some references to Lodge Hill within the Hoo Peninsula section of this chapter. In particular, paragraph 11.66 states that "the development of Lodge Hill creates a challenge to Hoo's current role. The impact of Lodge Hill on Hoo St Werburgh and the surrounding villages will need to be carefully managed so that existing services and facilities are not undermined." Land Securities and its consultant team are acutely aware of the need to integrate proposals for the redevelopment of the Lodge Hill site into the existing area, and the masterplanning work that continues to be undertaken is alive to these sensitivities. It is therefore considered that Lodge Hill should not be identified as a "challenge" to Hoo's current role; it should instead be highlighted as an opportunity to enhance the facilities that already exist. The remainder of Chapter 11 of the Pre-Publication Draft Core Strategy from Paragraph	Lodge Hill will be both an opportunity to expand the facilities on the Hoo Peninsula as a whole and a challenge to the role of the individual settlements. Both should be reflected in the paragraph.  Paragraph 11.66 will be amended by inserting "both an opportunity to enhance the services and facilities on the peninsula and" after "Lodge Hill creates" and at the end of the paragraph inserting "to the detriment of local residents".

11.88 concentrates on the Lodge Hill site, and is the focus for the majority of our	
comments on the area policies, given Land Securities' interest in the site.	
Paragraph 11.95 of the draft Core Strategy confirms that Lodge Hill is identified as a Strategic Allocation, and this is supported by Land Securities. The text goes on to	Given that the development of Lodge Hill will take place over
note that Policy CS33 (Lodge Hill) will be expanded on by a site-specific	about 20 years, it is appropriate to
development brief and a masterplan for the site, which will guide detailed planning	keep both the masterplan and the
decisions (see also bullet point 4 of draft Policy CS33). There is a requirement within	development brief under review. If
Paragraph 11.95 for the masterplan to be subject to regular reviews (at least every	a review proves not to be
three years) to ensure that the proposals for the site remain robust in the face of	necessary at any particular time, it
changing circumstances. Land Securities considers that there are two	can be determined at that time that
considerations in terms of a review mechanism, and the Core Strategy ought to	it will not take place. It is
clearly distinguish between the two. The first relates to a review mechanism of a	acknowledged that once planning
development brief. Land Securities is of the view that the need for and merits of this	permission has been granted, it is a
would be for the Council to determine, given that it would be undertaken by the	matter for the developer whether to
Council. The second relates to a review mechanism attached to (without prejudice)	implement it or not. The Council
a planning permission for the redevelopment of Lodge Hill. Land Securities	would not contemplate a review of
maintains that any such review mechanism should not require a cyclical, automatic	planning permissions without the
review of the masterplan; rather it should provide the <i>flexibility</i> to facilitate reviews if	cooperation of the developer as this
and when one is required, for example to enable the development to respond to	would undoubtedly result in costly
changes in the market over the lifetime of the development. Critically, whereas a	compensation. Such a review
"development brief" review mechanism would be controlled by the Council, a	process has been used
"permission" review mechanism should be controlled by the applicant/developer.	successfully in the past, often with
Land Securities therefore considers that paragraph 11.95 should be amended as it	the initiative being taken by the
currently implies that the masterplan would be subject to regular review even	developer.
following the grant of consent for the redevelopment of the scheme; this provides a	
high degree of uncertainty to developers which may affect the attractiveness of the	
site. Land Securities requests that the reference to three yearly reviews of the	
masterplan for the Lodge Hill site is omitted from Paragraph 11.97, as this provides	
a high degree of risk to potential developers by introducing an unspecified level of	
uncertainty as to the future nature of the Lodge Hill site, which it is considered will	
have a direct negative impact on values and therefore the viability of the scheme.	
With regard to emerging Policy CS33 that concerns the Lodge Hill site specifically,	All relevant policies of the plan will
the first bullet point notes that the provision of 30% affordable housing will be	apply and there is therefore no
sought. Land Securities considers it important to also link this requirement of Policy	need to link policy CS33 to CS14 in
CS33 to Policy CS14 and its supporting text for the purposes of decision making to	the text.

avoid having to repeat it here, and to ensure consistency and clarity in approach throughout the Core Strategy. Table 11.22 re-iterates that 30% of the residential dwellings on the Lodge Hill site should "be provided as affordable housing," though Land Securities considers that "provided" should be replaced with "sought" to ensure consistency with Policies CS33 and CS14. Paragraph 11.97 also refers to a Viability Study suggesting that the 30% requirement should be achievable. The Viability Study was undertaken incorporating the baseline that development was to Level 3 of the Code for Sustainable Homes and that Infrastructure and Section 106 obligations amounted to no more than £11,000 per unit. It should be further noted that limited sensitivity testing was carried out within the Viability Study with regard to the impact that the mandatory imposition of Code Level 6 will have in 2016 and of the nature of the Infrastructure and Section 106 contributions that a major site like Lodge Hill will need to make. It is considered that any references within the Core Strategy to the findings of the Viability Study should be qualified to reflect this. The second bullet point of Policy CS33 refers to "employment opportunities generally in balance with the resident working age population". Land Securities considers that the Core Strategy should acknowledge that future residents at Lodge Hill will be able to access employment opportunities beyond the site via sustainable modes of transport. Please also see the other comments that we have made on employment issues within these representations. The third bullet point of Policy CS33 states that the Lodge Hill site will provide retail floorspace of around 5,000 sq m GEA. It is considered that this element of the policy should be amended to refer to "at least" 5,000 sq m GEA so that the development of retail floorspace to serve the resident population is not unduly limited, and to provide the necessary flexibility required by PPS12 over the Plan period. It is also considered that the reference to retail floorspace within Table 11.22 should be amended in the same way. Lodge Hill will be a new settlement which is expected to develop incrementally over time. It will be important for the retail element of the settlement to be appropriate in terms of the scale of development it will serve, particularly in the context of national guidance in PPS4 and PPG13 which, inter alia, promote linked trips. The district centre needs to be of a sufficient size/critical mass to ensure the proper functioning of the centre, and therefore it is important that sufficient flexibility is included within the wording of the policy to achieve this. In planning for sustainable economic growth, Local Planning Authorities should ensure that their development plans set out a clear economic vision and strategy for their area, which positively and proactively

30% is the target for affordable housing at Lodge Hill. As with all affordable housing, its provision is subject to negotiation, taking into account viability and other considerations. Consequently, policies CS33 and CS14 allow for this by using the word "sought, rather than "provided". It is therefore considered appropriate to amend the first sentence of Table 11.2, by substituting "with a target of 30% being affordable" for "and with 30% of the residential dwellings to be provided as affordable housing." Rather than include details of the Viability Study methodology in the text of the core strategy, that methodology can be the subject of detailed negotiation in relation to the level of provision of affordable housing at the detailed planning stage.

By balancing employment provision with the working age population, the core strategy is increasing the opportunities for people to work within the community. However, it is recognized that people can take up employment anywhere and it is not necessary to state that fact in the text.

encourage sustainable economic growth. It is considered that ensuring an appropriate level of flexibility within the emerging policies will be essential to achieving the economic vision for Medway.

5,000 sq.m. of retail floorspace is considered to be an appropriate level to meet the needs of the local population whilst "at least" 5,000 sq.m. could be construed as an open ended commitment. However, a review of the masterplan at three year intervals will provide an opportunity to reconsider the level of provision if warranted by the circumstances at the time.

Paragraph 11.99 concerns the Lodge Hill site in the context of economic growth and employment opportunities. It refers to a "significant" business offer, which is considered to be somewhat ambiguous. Land Securities is of the view that reference to "business premises" would suffice here, particularly as the quantum of floorspace sought is referred to elsewhere in this paragraph. The reference to an "absolute minimum" space for business uses within Paragraph 11.99 is considered to be particularly onerous, and at odds with the flexible approach demonstrated elsewhere within the Core Strategy in line with PPS12 to enable the Plan to deal with changing circumstances. For this reason, it is considered that the wording "absolute minimum" should be amended to refer to a minimum floorspace requirement with a caveat that this applies unless there is robust evidence to justify a lower figure. As for the "need" to establish Lodge Hill as a high quality business location over time, if this statement is to remain within future iterations of the Core Strategy there needs to be sufficient evidence to demonstrate that a need exists.

## Paragraph 11.99 will be amended by deleting "a significant business offer" and inserting "business premises".

The Kent and Medway Structure Plan, 2006, made provision for 70,000 sq.m. of employment land at Lodge Hill. Now that the structure plan no longer exists, that figure has dropped to 43,000 sq.m. Medway Council is not prepared to allow this figure to be further eroded as it considers the employment component to be an essential part of the overall strategy for Medway and a rare opportunity to create high quality employment location.

In the economic profile in chapter 2 of the core strategy, it is stated that the Medway Sustainable Community Strategy highlights a whole range of evidence to support the contention that Medway

Paragraph 11.104 of the draft Core Strategy references the Lodge Hill site-specific evidence base for possibly the first time within the document. Land Securities is of the view that it would be worth providing a brief introduction of this work here, for clarity (see also our comments made in respect of the "Context and Issues" section of the draft Core Strategy). With regard to timescales, it is noted that Paragraph 11.105 of the emerging Core Strategy refers to commencement of the first phase of development on the Lodge Hill site in 2013. Land Securities notes that the delivery of infrastructure may commence in advance of this date (i.e. 2012), consistent with Draft Policy CS33 which makes provision for applications for preparatory works such as infrastructure provision in advance of the adoption of the development brief for the site. The fourth bullet point within the first "Target" box in Table 11.24 of the draft Core Strategy refers to reviews of the masterplan for the Lodge Hill site every three years or more frequently is required. Please refer to our comments made earlier in these representations objecting to this requirement.	remains a relatively low wage area with high numbers of people commuting out of the area to work, skill shortages and business start-up rates remaining well below regional and national rates.  Consequently, the core strategy is seeking to attract higher quality employment development to help address these problems.  The text will contain a footnote with a link to the relevant evidence documents.
12. Implementation, Monitoring and Review  Paragraph 12.4 within Chapter 12 of the consultation document confirms that as new developments are built, developers are expected to contribute towards a range of facilities through Developer Contributions. Land Securities is of the view that, for the avoidance of doubt, reference should also be made here to contributions being required which accord with Regulation 122 of the Community Infrastructure Levy (CIL) Regulations issued in 2010 (which provides for three statutory tests that planning obligations must meet in order for them to be deemed lawful).	Paragraph 12.4 to be amended by the insertion at the end, of "in accordance with Regulation 22 of the Community Infrastructure Levy (CIL) Regulations, 2010,"
With regard to the third bullet point of Paragraph 12.5, this confirms that the Council has "well developed systems in place to assess the viability of sites and negotiate in a transparent and consistent way with developers". It would be helpful to expand on	This will be a matter for negotiation at the detailed planning stage and there is no need to enlarge upon it

	T
this, to gain an understanding of what these systems entail.	in the core strategy.
Paragraph 12.15 of the consultation document refers to the Coalition Government's	Paragraph 12.16 will be deleted
intention to replace CIL with a system of local tariffs. It is our understanding that the	and paragraph 12.15 will be
Coalition Government is now intending to maintain the previous Government's	amended by the deletion of the
proposals for CIL, and the next Core Strategy should be sufficiently flexible to reflect	second sentence and its
this (or alternative approaches).	replacement with "The Council
	has not yet decided whether to
	adopt the CIL and in the
	meantime, will continue to use
	the Guide to Developer
	Contributions The following
	policy is consistent with that."
Paragraph 12.20 of the draft Core Strategy refers to work undertaken to prepare an	The Infrastructure Delivery Plan will
Infrastructure Plan. Land Securities would be grateful for confirmation of the status	be published in parallel with the
	Pre-Submission draft of the core
and an update on timescales towards finalising Medway's Infrastructure Delivery	
Plan (IDP), given that its preparation is a requirement within PPS12.	strategy.
Draft Policy CS34 relates to developer contributions and states that, amongst other	There is no need for core strategies
things, where the need arises directly from development, the Council will seek to	to repeat the contents of other
enter into a legal agreement with the developer(s) to provide for certain	statutary documents as the
infrastructure/facilities/mitigation. It is considered that reference should be made	provisions of these will be known to
here to the other statutory tests planning obligations must meet (in addition to being	all parties when negotiations take
directly related to the development) to ensure compliance with national guidance	place in relation to developer
and regulations; namely ensuring the obligation is necessary to make the	contributions.
development acceptable in planning terms, and is fairly and reasonably related in	
scale and kind to the development.	
Table 12.2 sets out the Council's Infrastructure Delivery Schedule (IDS). Land	Table 12.2 is being revised and
Securities notes that there is a detailed section on the infrastructure requirements	amendments relating to Lodge Hill
for the Lodge Hill site within the IDS, which differs quite considerably from the	both here and in table 11.23 will be
"Infrastructure Requirements for Lodge Hill" table included at Table 11.23 within	subject to consultation with Land
Chapter 11 of the Core Strategy. The most noticeable differences are the different	Securities before the tables are
start and end dates assumed for the phases and as a consequence there is a	finalized.
·	mianzea.
different scale of development quoted within each phase. Furthermore, it is noted	
that a range of floorspace figures have been included for flexibility, although in some	
instances these ranges are rather vast - for example, the range of employment	
floorspace in one particular phase reads "2,400 - 17,590 sq m". Land Securities is of	

	the view that there needs to be consistency between the IDS and Table 11.23 in the next iteration of the Core Strategy, having regard to any revisions that may have been made (by then) to the indicative masterplan for the site, in the context of ensuring amendments to the IDS are made as and when new information is available.  Appendix B	
	As referred to elsewhere in the consultation document, Appendix B contains the Council's housing trajectory over the Plan period, however is not labeled as such. It is considered that this table would benefit from a title, together with additional background evidence on how the numbers have been reached. This would enable interested parties to better understand the Council's approach to, and assumptions underpinning, the housing delivery rates identified. In order for the Core Strategy to be found "sound" at the end of the independent Examination process, it is considered critical that a robust and transparent housing trajectory is presented within the Core Strategy.	The housing trajectory in Appendix B is appropriately labelled. However it is derived from the SLAA and this source will be identified in a footnote. The SLAA has been reviewed and the information in Appendix B and Figures 6.2 and 6.3 will be updated accordingly.
Medway Countryside Forum (David Murr)	Policy CS7 & 5.67 – There is a strong presumption in the text that it is no longer appropriate to designate Areas of Local Landscape Importance (ALLI's). PPS7 is used as the justification for this. The Forum believes that ALLI's should be retained and refutes the argument that they are not "criteria based", or that they have hindered economic development or the provision of affordable housing in rural areas. It is essential that they should be protected as essentially open spaces.	Paragraph 25 of PPS7, states that local landscape designations should only be maintained where it can clearly be shown that criteria based policies cannot provide the necessary protection. However the Government has indicated it will bring in a new system of local designations and appropriate references to this will be made.
	5.59 – Considers that the Motney Hill reedbeds should have a specific reference given their importance.	Paragraph 5.59 lists existing and proposed nature reserves and Motney Hill reedbeds does not fall into either of these categories.  Paragraph 5.58 explains that local nature reserves are designated by local authorities and have to be in the ownership or under the control of local authorities. Motney Hill reedbeds is partly owned by the

	6.6 & 6.11 – In relation to the Lodge Hill development it is essential that the very important natural features of the area are fully protected. In addition to the Lodge hill	Kent Wildfowling and Conservation Association and consequently fails to meet the ownership requirements for designation. Practical measures for the protection the SSSIs at Lodge Hill
	woodlands and parts of the adjoining training grounds, there are extensive areas of ALLI's and SSSI's which could be adversely affected. The woodland fringes include extremely important habitats for breeding nightingales. Urbanisation of the countryside needs to be resisted.	are being addressed in the preparation of the masterplan. The core strategy is not retaining ALLIs and wider protection for the countryside will be provided by policy CS7.
Medway Magna (Graham Warren Ltd)	A letter dated 5 <sup>th</sup> December 2010 has been sent to the DP&R Team asking a number of questions regarding infrastructure. Consequently, the comments submitted in this response are interim until there has been a greater degree of clarification.	Noted.
	PPS12 states that a core strategy should be supported by evidence of what physical, social and green infrastructure is needed and its costs, phasing of development, funding sources and responsibility for delivery.	Noted.
	Failure to deliver the objectives for Lodge Hill and the riverside sites will result in failure to deliver the vision for Medway set out in the DCS.	Noted.
	Lodge Hill is not sustainably located, it is removed from the centres of Medway and requires substantial investment in public transport if it is to be a sustainable free standing settlement, as well as considerable improvements to the highway network.	Lodge Hill is the only major, previously developed site outside the urban area and as such, priority has been given to its development over other, large, greenfield sites. This accords with paragraph 36 of PPS3, which states that consideration should be given to the opportunity for housing provision on surplus public sector land and priority for development should be previously developed land. Both of these criteria apply to Lodge Hill.

Policy CS33 refer to 5 main delivery phases for the main settlement, but these are to be determined by the planning application process, which is unknown in terms of the timetable for delivery.	The submission of planning applications will be programmed to allow sufficient time for decisions to be made to bring forward the phases in accordance with Table 11.23 of the core strategy.
No indication of the detailed infrastructure required, when it will be provided, by whom and at what cost, thus making the document unsound.	The infrastructure requirements are set out in table 11.23 of the core strategy and in the infrastructure delivery schedule in table 12.2. Further details will be included in the separate Infrastructure Plan.
Other Lodge Hill issues include: how much of lodge Hill is brownfield as against Greenfield timing of release/disposal by the MoD provision of a public transport corridor on the Hoo Peninsular to serve Lodge Hill, Grain and Kingsnorth the level of community provision proposed e.g. schools – and when they will be provided	About 50% of Lodge Hill consists of undeveloped or Greenfield land. Release by the MoD is 2012. The provision of public transport is being considered in the preparation of the masterplan. The level and timing of the provision of community facilities is set out in the infrastructure delivery schedule in table 12.2.
Rochester Riverside – delivery numbers and viability are questioned.	No reasons have been given to support the questioning of the delivery numbers and viability.
The lack of specific highway improvements necessary to deliver Lodge Hill and the effect of this and the Kingsnorth and Grain developments will have on junctions 1 and 2 of the M2 Motorway are not detailed.	The provision of highway improvements is being considered in the preparation of the masterplan.
Medway's economic problems result from a lack of high quality, well located employment sites. Kingsnorth and Grain are not well located.	Medway's economy is not based solely on employment sites but includes a wide range of sectors such as tourism, higher education and retailing. Kingsnorth and Grain

	now have the benefit of planning permissions and preparatory investment is taking place.
There should be a hierarchy of employment land based upon quality, not quantity.	The employment sites identified in the SLAA, demonstrate a variety of differing qualities.
Clarification is required upon the forecast relating to the number of jobs anticipated to be created up to 2028.	See response to Land Securities representation on employment targets.
Correlation in Bakers Associates report between floor space available and job creation is a flawed concept as land quality does not appear to have been factored into the assessment.	The Baker Associates Consolidation Study points out in paragraph 4.3.13, that the land requirements are only indicative and will largely be determined by the employment density of development proposals as they come forward.
Table 7.1 confirms a greater requirement for M2 access with the lowest of the sub- area requirements on the Peninsular	Noted.
There is little justification for the 21,500 new jobs identified to 2028, as the employment allocation are contrary to the evidence base which shows demand is elsewhere.	The core strategy does not allocate any employment land. That will be a matter for the Site Allocations and Development Management DPD. Policy CS17 only states that a supply of land has been identified which will meet Medway's requirements. These sites are contained in the Strategic Land Availability Assessment.
The employment trajectory identifies no take up of employment floor space in 2009/10 but over 200,000 m2 taken up in 2010/11.	The take up rates are based upon information supplied by site owners/developers.
The employment trajectory to 2020 anticipates circa 780,000 m2 of floorspace taken up when the evidence suggests at best, a need for 349,000m2 (Table 7.2).	The high figure is based upon the current employment development committed through extant planning

	permissions, adopted development briefs and owner/developer expectations. The substantial surplus provides a significant cushion, should take up rates fail to materialise as envisaged, enabling
	the required floorspace figures to be achieved.
The chosen Employment Strategy is diametrically opposed to the evidence base in terms of both quantum and location	The strategy reflects the existing employment land commitments and the strategic priority of concentrating development on previously developed land.
Medway Magna has concerns about the following: relationship between the level of housing completions and the number of jobs anticipated to be created over the plan period	The jobs target is higher than that which would be required to match housing completions to allow for a
the effect of allocating large areas of employment land that are not close to and well served by Medway's population over reliance on regeneration sites to secure housing provision and employment	higher employment rate and lower out-commuting. The substantial areas of
growth	employment land at Kingsnorth and the Isle of Grain are already
failure to achieve a balance when allocating poor quality employment land and identifying and allocating well located, high quality employment land as part of a planned urban extension in the Capstone Valley.	committed as they both have planning permission. The priority given to the redevelopment of previously
discounting development in the Capstone Valley that could improve environmental capital rather than detract from it	developed sites reflects national priorities.
failure to acknowledge the transportation advantages, particularly public transport arising from the provision of a Southern Relief Road	High quality employment land has been identified at Lodge Hill, Chatham Centre and Waterfront,
the extent to which Lodge Hill takes the best and most versatile agricultural land out of production and encroaches on land of local landscape importance.	Temple Mars , Rochester Airport and elsewhere. The strategy is to develop a new settlement on previously developed land at Lodge

		Hill instead of urban extensions at
		Capstone and elsewhere.
		It is not clear how environmental
		capital would be improved by
		building on open countryside.
		Neither Medway Council nor Kent
		County Council, as the relevant
		highway agencies, consider that
		there are transport advantages in
		developing a southern relief road.
		Notwithstanding that the core
		strategy no longer includes land
		defined as being of local landscape
		importance, the level of
		encroachment on both the existing
		landscape and on agricultural land
	What are the reduct arrangements to anours that the site is brought forward	is relatively modest.  Land Securities has been
	What are the robust arrangements to ensure that the site is brought forward	
	effectively and in a timely manner	appointed to oversee the disposal
		and development of the site at Lodge Hill. It has commissioned all
		the necessary background studies
		·
1		Simultaneous development of the
		and is preparing a masterplan. It intends to apply for planning permission at the earliest opportunity and plans to engage up to five developers to undertake simultaneous development of the

Medway Swale Estuary Partnership	Agree with <b>Policy CS25</b> : The River Medway - The title of this policy should read 'The River Medway & Estuary. Introduction 10.1 Would be good to include something about the fact that the estuary supports international and nationally important populations of breeding and passage birds. 10.7 Part of the estuary is also a SSSI Policy Summary Box Whilst the policy supports leisure activities 'as long as they will not harm the environment', there is nothing to suggest that the same will also need to apply to the industrial usuage of the river. It is very likely that the Medway Estuary will become a Marine Coastal Zone, and this will potentially curtail certain activities (yet to be confirmed). Increased public access to the river can also have a negative effect on the river/estuary's wildlife if it is not managed correctly. Will the measures to 'enhance the river as a valuable resource' include areas of remaining saltmarsh, within the urban centre of Medway? There is no mention of the promotion of green tourism. There is no mention of the river's/estuary's archaeological importance.	The River Medway encompasses the estuary and there is therefore no need to change the title. Paragraph 5.52 already describes the importance of the Medway and Thames Estuaries and there is no need to repeat that description here.  Overall protection for wildlife habitats is afforded by the sixth bullet point of policy CS24 and by policy CS6 and there is therefore no need for further specific references in relation to industrial development.  Enhancement measures will apply wherever they are deemed to be necessary along the river.  Policy CS8 makes provision for green tourism through the development of a Green Grid.  Archaeology is addressed in broad terms in policy CS12.
	Agree with <b>Policy CS29</b> : Gillingham & Summary Box - I would like to see mention of the area north of Gillingham and Rainham, known as Lower Rainham. This area is highly distinctive, in terms of local architecture (including the C17 Black House), local ecology(BAP habitats and species), important landscape characteristics (Saltmarsh, Mudflats, Reedbeds,traditional orchards,hedgrows,etc), shoreline archaeology and offers unrivalled access to the Medway Estuary. As a result this area needs protection, to ensure that it remains free from urban encroachment. General comments Improvements should be made to allow pedestrian access to the estuary (and Saxon Shore Way) from local centres of population at Twydall and Rainham. This would link in with Medway's Green Grid and LTP aspirations and could reduce traffic along the Lower Rainham Road.	Policy CS29 deals with development proposed in the Rainham area. No development is proposed at Lower Rainham and therefore, there is no need to include it in the policy. Policies CS6,7 and 8 deal with the protection of the area and the Green Grid.

Medway Urban Parks & Green Spaces Forum (Mark Agate, Chairman) Is there adequate protection for urban greenspaces? We should identify areas deficient in this respect and suggest new areas for open space.

Outdoor Spaces are under threat when not used and / or "owned" by the local community and this is down to lack of management and budgets. They are often small areas left as a result of larger developments and fenced for "play" but become abused. Initial examples quoted were Gillingham South and Rochester East and we are reviewing further examples: Appropriate schemes which could involve the local community are: Otway Street, (Gillingham North), Middle Street, Brompton and Jubilee Fields.

<u>Is designation of potential open space an adequate safeguard</u> e.g. Copperfields, The Paddock, Chatham and Nursery, Priestfields.?

<u>Concerns re sea level change</u>; we cannot assume Medway coastline will be the same in 2026. Some green spaces may be lost under water. Noted that Medway Council is in close contact with Environment Agency and is awaiting an update. Shorne Marshes may cause concern. EA South East coastal website link to flood information required.

<u>Issue raised of gardens being sold off to build new houses</u> Government advice was previously for escalating higher density; new rules from there indicate need for planning permission to tarmac your drive. Suggest use grasscrete as remains permeable. Core strategy could establish a policy to protect character of existing neighbourhoods. Gardens can be part of that character and offset heat effect from hard surfaces

- 1.5 <u>Need for more than just a token green space in new developments</u> Rochester Riverside plans praised.
- 1.6 <u>We oppose encroaching on land with no satisfactory replacement</u>
  Example given of Kings School buying up land next to Watts Meadow and no access to residents. If a school disposes of land then continuity of use for young people should be ensured

Noted,

If open spaces are neglected they are likely to be under greater threat than well used and maintained spaces. Policy CS8 not only seeks to protect open space but also to enhance poor quality open space.

View noted.

The Environment Agency is considering managed retreat along parts of the coastline but have not reached any final conclusion. Consequently, the core strategy neither contains proposals nor safeguards land for managed retreat.

Gardens are no longer defined as previously developed land in PPS3 and are therefore afforded greater protection.

Agreed.

Policy L3 of the Medway Local Plan, 2003, allows for the development of small parts of an open space provided that such development will help to safeguard or improve the remainder of the site. It also allows for the replacement of open space on

	alternative, accessible site. This policy will be carried forward in parallel with the core strategy until it is replaced with the Site Allocations and Development
Where does LAA Indicator 28 "Protect and improve Medway's green and open	Management DPD. The Government has withdrawn LAAs
What major improvements in the way of key projects and areas should we be seeking by 2026 ?	
2.117,000 new homes are planned in Medway by 2026 to house Government requirement of an extra 50,000 population. Likely indication of an average of two adults and one young person.	Noted.
2.2 This leads to the <u>issue of density of development on new sites</u> ; standard proportion of greenspace per development needed. Heat sink effect discussed - gardens important.	Noted.
Discussion on need for Greenspace Services to link into Community Cohesion pack for new residents to inform them what there is; through Estate Agents and / or with Council Tax bills. Also Welcome Ambassadors for newcomers needing to know more about the area.	Noted.
Need to plan for (a) expansion and retention of play areas and (b) facilities for young people. What is perception of young people? They should not be seen as threatening.	Noted
2.5(a) Forum involvement with Play Partnership to be continued 2.5(b) Expansion of Playbuilder Scheme for eight to 13 year olds.	Noted.
Community facilities are needed especially for evening activities after dark.	Noted.
Need to ensure open spaces are welcome and safe for young people who are major	Noted.

users.	
Noted young people represent 66,000 of our 250,000 population and need a better voice. 41,000 up to 13 years old, 25,000 13-19 years old. (Medway Youth Parliament).	Noted.
Need to encourage older people talking to young people.	Noted.
Parks should not be locked at night and should be well lit. Note cemeteries suffer from vandalism.	Noted.
Encourage presence of Community Focal Points such as Cafes.	Noted.
Need to trial lights in a Greenspace and then use as best practice on other sites. Consultation has taken place about lighting of Hillyfields play area. Majority in support except residents close to the site. Police looking to take it forward. Eco Lighting Project didn't proceed at Woodlands Road / Rookery Fields although Police in favour	Noted
Youngsters crawl under the fence at Wigmore Park when locked. Residents complain. Therefore suggestion is to leave it open with youth worker locking it when leave i.e. with young people supervised.	Noted.
Look at Youth Bus touring a different area each night staffed with relevant workers.	Noted.
Leafleting of potential Friends Groups in appropriate areas, prior to Road Show and Events with pre-publicity.	Noted.
What facilities are needed as part of new greenspaces development?  We all share goal of Medway being a better place to live and work BUT who for?  Different aspirations at different ages. World in 17 years time can no longer rely on high energy consumption. See also 6.	Noted.
Smaller communities such as Brompton prove to work – quite crowded but not so large that individuals do not know each other Who owns this process to make it	Noted.

happen? If left to experts it could work but not part and parcel of every day lives. Ongoing work to make it happen is as important as end result. In a lower energy world and varying density of habitation community is key - listening to other people's needs and considering them as well as own. Include Pilot scheme involving young people / MYP as part of new "village" Noted and being taken forward. developments - Chattenden for instance - where a sustainable community could be delivered with allotments, local shops, green spaces etc. Include existing residents. Provide local services within those neighbourhoods, sustainable maybe smaller communities Primary Care Trust commendably working on a local level, measuring Sustainable neighbourhoods are a health and vitality; four new surgeries opening. key element of the core strategy We are advised Medway has the youngest average population in the UK. 3.5 Best ratio in England of population increase due to more births than deaths, yet by Demographic changes have been 2026 will have twice as many over 75 than currently but will still be young compared taken into account. to many other areas. Medway will still have a sizeable economically active population. Council Officers can try to be representative but need to think about everyone. How do we encourage existing over 75's to enjoy the outdoors at the moment? How do we cater for additional 100%? MYP has 60-70 active members and has to seek people to attend; the Forum and Council Officers are taking up offers. Noted. MUP&GSFcould add a section on engaging young people to its Resource 3.7 Pack. Project for discussion with Medway Youth Parliament. Noted. Schools should be opened up more to engage parents more in school life and to help build major community facility. LDF needs to support local community groups Core strategy promotes schools as wishing to work with schools who want to allow access to their grounds. Some community hubs. starting to do this, for example Chatham Girls Grammar School. 3.9 Royal Horticultural Society. has a Gardening for Schools campaign; are all Schools aware of it? Some Ward Councillors are putting in lots of money but Noted.

Schools should not be having to go cap in hand to Councillors to fund allotments.

All schools should be encouraged to be eco-schools. We recommend 3.10 collaboration with Medway Youth Parliament Environment Panel. Silverbank / New Noted. Brompton College / Brompton Westbrook Primary advised as examples of good practise. Suggestion to encourage Unemployed people to supervise youngsters out of school hours through training of them such as Forest Schools scheme at Capstone. Noted. Play Parks should be encouraged and expanded on site if not as near as possible to users. We learn in the final stages of preparation of this Report that 13 existing Noted. play areas are to be closed. Planners need to be more aware of full range of open space potential to the local A full audit is maintained. community Compass Close development at Copperfields an example of poor planning decision. Positive outcome is that a Friends Group now formed for Copperfields. View noted Should a Green Grid for Medway be promoted? Noted. Key issue for open space is promotion of connecting access by: Walking to sites - Grid to recognise all routes including seamless links between small greenspaces These are key features of the green Cycling – routes need to go through green spaces grid. Example of Riverside Country Park - Strand - Chatham link but hits Dockyard lack of access. Target to make pathway coherent and through routes. Noted. How to link new settlement at Chattenden to main urban area - Green Grid five fingers radiating out from the Great Lines to outskirts of Medway Should it be linear / radial / star shaped ? Detailed work is progressing on this. Keep alleys open and clean rather than gating when residents want this and are consulted.

Noted.

Another issue of how to link into the Green Grid is lack of bus service and cost

4.6 <u>Suggestion of "Round Robin" vehicle and trailer to transport cyclists, car owners and pedestrians between sites</u> so they can enjoy open spaces on bike or on foot once there. For example, Capstone Country Park to Ranscombe Farm; other sites on each side of the River Medway.

Noted.

Noted.

Has Medway got the balance right between improving sites and protecting our open spaces, yet ensuring public access?

<u>Walking Festivals</u> introduce people to spaces on their doorstep taking them to areas they would not normally go so must feel safe. Embarrassing if not well maintained. Community and authority respect for sites

There is a well established walking festival.

Other ideas to encourage people into our open spaces include Events, publicity, parks / green areas seen to be well-cared for, mutual co-operation between users (litter, dog-owners, good behaviour etc.)

Noted.

5.3 How to accommodate additional allotment plot requirements as major shortfall reliably estimated at 1,000? This equates to need to provide almost 100% more plots. This is the major issue as it is understood there is no revenue budget to provide the extra plots (also bearing in mind planned population increase of 20% in the time-frame of this Strategy).

An allotment standard is being introduced and new provision can be secured in conjunction with new developments.

Voluntary bodies need devolved power to run but sites must be in a good condition to devolve.

Initial cost of setting up allotments is the biggest issue with them not revenue. New sites could have devolved management from the start and form part of the community especially young families. Devolved management is an option not a priority, priority being to provide extra plots.

A range of services are provided by the Youth Service and others.

We must provide facilities for teenagers after school Previously noted there are 66,000 young people in Medway. For example those on GCSE and A level finish school early. What do they do then?

Example of bad practise - being moved on for grouping together on a green

5.5 Review projects post-implementation MUP&GSF has agreed to do this if

		<del>,</del>
	relevant Friends Group not in place.	Noted.
	Big vision projects	
	Communities need to be involved	
	Water Park possibly Cliffe – water skiing, boating, windsurfing. Inland Lake as River Medway is a prime feature but being tidal limits use.	
	6.3 <u>Military History sites linked by tours</u> for instance <i>HMS Wildfire</i> tunnels.	Likely to conflict with the SPA.
	"Chatham Defence Lines Heritage Trail – Medway's Military History Uncovered"	Likely to commet with the Of A.
	signed with 14 explanation boards in its 3.5 miles an example of good practise.	Noted.
	Re-use ex / spare military land - Interreg projects.	
	Bringing General History of the area to the public Medway Council to actively	
	encourage and use local enthusiasm and expertise.	Noted.
	Sustainable energy sources need to be considered.but balanced and compatible with use of urban parks and greenspaces Local knowledge must be utilised.	Noted.
		Noted and policy in the core strategy.
Medway	<b>10.6</b> - Navigation & dredging remains a critical issue on the Gillingham Waterfront	This matter can be pursued
Watersports Trust	especially at the Strand. Local agitation methods continue to be used by Gillingham	separately from the preparation of
Ltd (Colin Fuller)	Marina and in the GillinghamPier rather than removal from the river and depositing	the core strategy.
	on Hoo Ness Island as previously carried out by the MoD when the dockyard was in	
	operation. This has caused silting over a twelve month period to a depth of 0.6m	
	over the top of the causeway known as Commodore's Hard. This is the only all-tide	
	public landing on the River below Rochester Bridge. Unless the causes are	
	investigated and remedial action taken over the next twelve months then this iunique access will only be available from half-tide and rising. This precarious situation has	
	been brought to the attention of Medway Council (owners of the public causeway)	
	and Peel Ports (The Harbour Authority with responsibility for all dredging activities.	
	Little or no direct action has been taken to date. The matter can be remediated by	
	removing the fuel jetty at Gillingham marina which has adversely affected the flow of	
	the river downstrem from their lock entrance. Alternatively a more substantial	
	elevated structure could be provided at this point although a hydraulic survey and	
	modelling would identify the key causes and effects. We consider the Council and	
	Peel Ports should fund such a study and propose a solution to provide a clean	
	access to the River at this point for all boat users (The Trust, MCC, Segas SC and numerous casual users).	

Gillingha Rocheste Waterfro the prom Leisure I 10.11 - N needed i arrival ar affordab untapped greater p to Medw the Core	Regeneration – We would seek for greater emphasis to be placed on the am Waterfront since it has as much presence close to the River as the er and Chatham Waterfronts. It appears to be the 'Cinderella' of the onts! We fully support any proposals to improve the access to the River and menade at the Strand which will in turn increase the popularity of the Strand Park to the local community.  Marine Leisure – The public dock/marina at Gillingham Pier needs much investment with a half-tide cill on the boating side to provide much needed and temporary mooring facilities for east coast and continental visitors at le rates. The forgotten waterfront at The Strand at Gillingham remains and direvenue source with a minimal amount of investment. We believe that priority should be given to this area as highlighted in the Donaldsons Report ray Council (circa1999) which has never been properly assimmulated into estrategy. We believe there are development opportunities along the lines buthampton Ocean Village which need to be investigated.	Paragraph 10.10 does not describe the features of the Medway riverside. This is done in paragraph 10.9, which sets out what is contained in the Medway Waterfront Strategy of 2004. It would be inappropriate to amend this as it would then no longer represent that which is contained in that document.  Substantial redevelopment is already taking place at Gillingham riverside on the site of the former Akzo Nobel site. The Strand will continue to function as at present.
pierhead the silting water sp Pier since boating i Olympic Such face Chatham continen attending	Wharves, Piers and Jetties – We fully support any improvement to the don the eastern arm of Gillingham Pier for use by Pleasure Steamers. Again g due to agitation dredging has reduced the draught in this area at low brings to practically zero metres. We fully support any improvement to Sun the it could be used as a further access to the river for our users when in this stretch of the River. This should become a vital facility for use during any Year 2012 with additional temporary local moorings and a trot boat service. Cilities when co-joined with the HS1 link to Stratford International from the international from the internation of the many stal visitors that propose to use their boats for accommodation whilst gethe Olympics. The legacy of this opportunity could remain in place for the ears after as Rochester and Chatham Waterfronts begin to be developed.	Noted.
<b>10.15</b> - V provide a	We support the use of Chatham Docks for berthing large Cruise Ships to accommodation for continental and overseas visitors during the Olympics ttle bus access to HS1.	Noted.
10.16 - V CS25 sir Users. Ir	We consider that Peel Ports is not the appropriate body to promote Policy noce it lacks any interest in the environmental and leisure needs of River in fact it regards boat users as a nuisance to be tolerated due to their role as your authority. We support the idea of a new body championed by the	Noted.

	Regeneration Team of Medway Council and the Medway Yachting Association to refocus how Policy CS25 could become effective with key proposals supporting the development of the waterfront from Rochester Bridge to the Riverside Country Park in Rainham with strategic initiatives focussed on river access and community facilities which could encorage partnerships between community groups and commercial organisations. We would suggest the River Medway Tidal Waterfront Partnership.	
	Policy CS25 is the key to the whole Core Strategy. Solutions to this policy will allow many of the other policies to be better focussed. The River Medway is the 'Jewel in the Crown' which has been buried for far too long!!	Noted.
Medway Yachting Association	Agree with <b>Policy CS25</b> : The River Medway.	Noted.
	0.6 The Medway Yachting Association understand that the Port Authority have reduced their dredging activity and are focusing on areas that are of commercial interest. Even in these areas, dredging is not taking place as regularly as it had been in the past. As a result areas that were once accessible at all states of the tide are rapidly becoming inaccessible at low water and the situation will gradually worsen if the current policy continues. Certain of these areas, especially along Gillingham Waterfront and at The Strand, are important public access points to the river, indeed The Strand is the only all-tide public access point below Rochester Bridge and is used extensively by Medway Watersports Trust, Medway Cruising Club, Segas Sailing Club and a number of independent casual users. The area along Gillingham Waterfront should be protected as an area of public amenity. 10.8 When considering the Strategic Urban Flood Defence Strategy due consideration must be given to the areas that will be affected by flood waters that are displaced by the flood defence systems. The Environment Agency's policy is to allow old flood defences in certain areas, especially along the Upnor to Hoo waterfront, to fall into disrepair. The combination of these two strategies poses a potentially increased risk of flooding to Medway Yacht Club, Wilsonian Sailing Club, Hoo Ness Yacht Club and Hoo Marina, including the Hoo Marina Mobile Home Park. These premises, which are all along the South shore of the river, deserve as much protection as residential properties along the North shore and their presence and interests should be recognised and protected when flood defence plans are being formulated.	The dredging issue can more appropriately be pursued through other means.  Noted.
	10.11 The Medway Yachting Association represents, and is made up of	Noted.

representatives from, all the marinas, clubs and other establishments with an interest in leisure boating on the rivers Medway and Swale. The Medway Yachting Association is already in discussion with Medway Council about issues that are of concern to its members and is working with the Council to promote the use of the river for leisure purposes. The MYA would be pleased to establish a more consultative dialogue with Medway Council regarding the potential for improving/increasing the use of the river for leisure purposes. The residential houseboat moorings that are located at various points along the river, but in particular at Hoo and Strood, are a health hazard and urgent measures need to be taken to enforce the regulations that apply regarding, in particular, the discharge of untreated sewage into the river from these vessels. 10.12 More use could be made of the number 2 basin at Chatham Docks for leisure use. The Arethusa Venture Centre, a registered charity that already makes use of this basin for sail training and canoeing, is applying for a Lottery funded grant to improve the facilities it provides there. Provision could be made that would allow this facility to be developed so that other water sports, such as rowing, could be offered from this dock.

10.13 The decline/closure of the local piers, especially Gillingham Pier, Sun Pier, Strood Pier and Rochester Pier, all of which facilitated public access to the Medway Towns before they were closed, coupled with the lack of any visitor mooring facilities other that at the marinas at Gillingham and Chatham Dockside, does nothing to attract visiting boats to the area.

10.15 There are numerous boat clubs in the area that are happy to accommodate visiting leisure craft on vacant moorings but many of these clubs are run on a voluntary basis, their facilities are only open at weekends and often there is limited or no direct access to the shore from their moorings or, because they are situated in rural or isolated locations, there is very little public transport provision, which prevents visitors from exploring the wider area from these locations. Facilities for visiting boats, especially those from continental Europe where the facilities offered in almost every town are the envy of the British boaters that visit them, are essential if tourist visitor numbers are to be increased.

Policy CS25: The River Medway The Medway Yachting Association supports the objectives of this policy, especially the protection and development of the existing infrastructure that provides access to the river and the foreshore, and the promotion of leisure activities on and along the river. There is a thriving boating and sailing community in the river Medway which would benefit from support and

Noted.

Policy CS24 seeks to protect existing piers and encourage the provision of new ones.

Noted.

	encouragement in terms of preserving existing access to the water, making available new access points and the provision, or permitting the provision, of support facilities such as Clubhouses, boat storage and associated infrastructure. It is often the case that development plans for housing or industry actually reduce the existing access to waterfronts and impact adversely on access to the water for sport or leisure usage. The preservation of such facilities will not only provide leisure and recreation opportunities for local residents but will also encourage waterborne visitors to the area bringing associated expenditure and helping to support the local economy. This view is supported by a British Marine Federation study that suggests that a visiting yacht typically spends about £400 per visit in terms of berthing, provisions, meals and ancillary expenditure.	
Michael Dakers (Michael Gill Ltd and Dakers Marriott Solicitors for various clients)	Decisions have previously been taken which hinder turning Chatham into a city centre (e.g. changes to the road system which have created major traffic problems). Thus reducing the viability and vitality of Chatham as a retail centre.	The detailed proposals in the Chatham Centre and Waterfront Development Brief, the Pentagon Development Brief and the Chatham High Street/Best Street Area Masterplan, seek to address current problems and to develop Chatham as a sub-regional centre.
	Development of Chatham waterfront should not be looked at in isolation, or developed prior to sorting out the problems of the centre.  The strategy does not set out a prioritisation, which is practical to achieve the goal of creating a worthwhile city centre out of Chatham.	Noted.  Priorities have been established through the work of Medway Renaissance and others.
	A new central square needs creating (at the back of the Brook Street car park).	New public squares are included as proposals in the High Street and Best Street Masterplan.
	There should be no further waterside housing (enough already).	Housing will continue to be part of the mix of uses to be provided on the waterside and elsewhere.
	Residential development at Strood Esplanade is completely inappropriate (should be for employment instead).	Medway Council is committed to the development of housing at Strood Esplanade and has no plans

	to reverse this decision.
Wrong to rely upon 450,000 m2 of employment floorspace at the Isle of Grain and	The fact that the owners of the sites
Kingsnorth (unattractive to employers due to their remoteness from the main road network), thus leaving an inadequate supply.	at the Isle of Grain and Kingsnorth have now obtained planning permission, involving not insubstantial costs, demonstrates a high degree of confidence that they
	can bring forward development.
Chatham centre has few sites attractive to employers.	Medway Council is bringing forward land in its ownership for development in Chatham which will play its part in improving Chatham's image and attractiveness to investors.
Development at Rochester Airfield is constrained.	Whilst there are height restrictions on development in the vicinity of Rochester Airport on safety grounds, there are still opportunities for high value, high quality development.
The use figures in policy CS17 are not sustainable	The high employment requirements in policy CS17 reflect the Council's aim to meet the needs of a growing population, improve the employment rate and reduce outcommuting. They are ambitious, but, on the advice of the Medway Employment Land Review Consolidation Study, it was considered that simply making provision for the continuation of past trends would ensure that these aims would not be achieved.
Lodge Hill is mainly a residential proposal	The site is a mixed use development with employment and

	Concerned about Strood town centre (and the new Lodge Hill development) being undermined by the planning consent for the new Sainsbury's at Whitewall Creek.	retail provision. Thereby ensuring a more sustainable pattern of development.  The Council is confident that the modern Morrisons and the proposed Tesco stores in the centre of Strood will be able to compete with the proposed
	Concerned about Strood town centre's highway network.	Sainsbury at Whitehall Creek.  Noted. The Medway Local  Transport Plan addresses the issue of Strood's highway network.
	Would like a meeting given that he is a key stakeholder	Noted.
Mineral Products Association (David Payne)	Agree with <b>Policy CS22</b> : Provision for Minerals - We support the Policy to provide for 0.2mtpa of secondary (should also include ' and recycled') aggregates, and of 0.18mtpa of primary land won aggregates. Â Paragraph 8.16 refers to the revocation of RSS and there not being a need to make provision for the figures contained therein. RSS is currently part of the development plan and so notwithstanding that statement Medway's Policy is in conformity with the RSS and will make an important contribution to ensuring a steady and adequate supply of materials locally and regionally. We also support the intention to maintain a landbank of at least 7 years for sand and gravel throughout the Plan period, but this should be 1.26mt (0.18mtpa x 7). Add 'and recycled' to 'secondary' aggregates. Check landbank calculations (0.18mtpa x 7).	Noted. Policy CS22 will be amended to include the reference to recycled and reused aggregates. The supporting text will make the appropriate reference to the RSS and the development plan and the 1.26mt figure for the maintenance of a 7 year land bank is correct and will be used as the figure for land bank calculations.  Noted and there are references to
	safeguard wharves that are critical for the import of aggregates. The Policy or supporting text should set out how safeguarding will be implemented, including through not permitting non-wharf development that may compromise the existing operation or constrain future expansion in operations.  Agree with <b>Policy CS25</b> : The River Medway - We support the safeguarding of	inappropriate development in a safeguarding context.  Policy T10 of the Medway Towns
	wharves to enable continued and greater use of the Medway for transporting freight including aggregates. The policy or supporting text should state how safeguarding will be implemented through not permitting development that may compromise or constrain current or future operation of the wharves.	Local Plan, 2003, prevents development which would result in the loss of wharves or access to wharves and identifies those

		wharves on the Proposals Map. This policy will be carried forward in parallel to the core strategy until it is replaced by the Site Allocations and Development Management DPD.
National Grid (Entec)	Overview	The overview contains background information on the scope of the national grid's operations and its infrastructure that will be a valuable source of evidence. However, the submission does not address the contents of the draft core strategy.
National Grid (Alister Henderson, Planning Perspectives)	Disagree with Page 24, Paragraph 6.e - Whilst we have no objection to the land at Grain being identified as a location for ~environmental technologies and building products/construction, amongst other activities,' It should be noted that this should not be at the expense of wider employment uses and other strategically important energy generating facilities. National Grid's landholding at the Isle of Grain is designated within the existing Local Plan for Class B1 (Business), B2 (General Industry), Class B8 (Storage and distribution), special industrial uses and industrial uses not in a use class. These allocations should remain in place to allow the greatest flexibility for future uses of the site to encourage occupiers to locate their businesses on the Isle of Grain in order to maximise its employment and strategic potential. These uses could include environmental technology and related activities, but should not be limited to these elements. The amongst other activities' should be expanded upon to incorporate all future potential uses at this strategically important site.	The allocations in the Medway Local Plan will remain in place and the relevant policies will be carried forward in parallel with the core strategy. There is therefore no need for the allocations to be repeated in the core strategy. Furthermore, policy CS17 makes provision for the expansion of the existing economic functions of the Isle of Grain and Kingsnorth. The intention of paragraph 6 is to highlight locations where new, higher value activities and jobs will grow. This does not rule out other types of economic activity.
	Strongly Disagree with <b>Page 36</b> , <b>Figure 5 1</b> - Flood zone plan should also show flood areas which are protected by coastal defences. Flood zone plan should be amended to show flood protection areas, as are shown on the Environment Agency website.	The flood zones in Figure 5.1 have been taken from the Environment Agency website. The Agency does not provide maps showing areas protected by existing flood

Strongly Agree with <b>Policy CS17</b> : Economic Development - Strongly agree with the reference to the development of the Isle of Grain as an employment location and energy and port related area. The encouragement of energy and environmental technologies and engineering and manufacturing is welcomed. However, the inclusion of an employment allocation at the Isle of Grain as per the planning permission for 464,930 sqm should be treated within Medway's targets very much as a maximum figure for employment floor space on the site. Ultimately, it will be for the market place to determine how much of this land is taken up for B1, B2 and B8 uses, but it is likely that there will be demand for other uses listed within the policy (as mentioned above and in Policy CS21). Therefore, the Core Strategy should be sufficiently flexible to respond to market demand and secure a suitable balance of uses on the site.	defences. Consequently, the consideration of any planning proposals within the flood zones would need to take flood defences into account on a site-by-site basis based upon the advice of the Environment Agency at the time.  Noted.
Agree with <b>Policy CS21:</b> Conventional Energy Generation - Proposals for additional power generation and energy storage capacity are supported at the Isle of Grain. This is a strategically important site with existing power generation facilities of national significance and this policy is a welcome inclusion to the Core Strategy.	Noted.
Disagree with Page 105, <b>Table 11 17</b> -The inclusion of an employment allocation at the Isle of Grain as per the planning permission for 464,930 sqm should be treated within Medway's targets very much as a maximum figure for employment floor space on the site. Ultimately, it will be for the market place to determine how much of this land is taken up for B1, B2 and B8 uses, but it is likely that there will be demand for the other uses listed within the Core Strategy (including Policy CS21). Therefore, the Core Strategy should be sufficiently flexible to respond to market demand and secure a suitable balance of uses on the site. However, it is noted that the table refers to the employment elements as potential development and also recognises that the 464.930 sq.m figure as the "capacity' of the site. These references are	Table 11.17 shows the potential for employment development on the Hoo Peninsula. Consequently the figures represent the maximum that could be developed. Given the support in policy CS 21 to the development of conventional energy generation, it is accepted that some of the land could be used for that purpose and ultimately, the

	welcomed.	floorspace in table 11.17 may not be achieved. A similar situation has arisen at Kingsnorth with the grant of planning permission for a power station. Given the huge surplus of potential employment land in Medway as a whole, such a loss is not a problem.
Natural England	Welcomes vision and strategic objectives, and cross-cutting policies.  Policies have the potential to cause an adverse impact on the integrity of international designated wildlife sites for North Kent, in particular the estuarine SPA's and Ramsar sites. It is Natural England's view that a policy covering the need, timescales and mechanisms for delivery of evidence and appropriate mitigation in relation to these is required in order to comply with the Habitats Regulations. Natural England, Kent Wildlife Trust & the RSPB intend to produce a joint position statement shortly.	Noted.  Medway Council is undertaking an Appropriate Assessment that will address this issue.
	Chattenden Woods SSSI is not identified as a constraint on the Key Diagram map. It also comprises a number of other woods, which should not be identified as separate SSSI's.	The Medway Core Strategy Key Diagram deals with the strategic issues facing the area into the future, its key components and opportunities. SSSI can be at very local scales, their absence on the diagram does not mean that they are unimportant; merely they are not represented at this scale. Other documents will detail the extent of the SSSI coverage in Medway, and they are an established part of the evidence base for the plan.
	Policy CS6 should identify locally specific intentions and mechanisms to achieve the broad aspirations set out. Suggests that a link is made to the South East Biodiversity Forum's Biodiversity Opportunity Areas to identify what habitat opportunities would be most appropriate for Medway, in addition to the Kent Biodiversity Action plan targets.	An amendment has been proposed elsewhere in this document to address this issue.

	Policy CS7 should recognise that the enhancement of local landscape character and good design is as important in urban as rural areas.  Policy CS8 should be reworded to make it clear what the intentions are, particularly for the latter bullet points.	Policy CS2 takes into account the importance of landscape throughout Medway as a whole and seeks to achieve good design. There is therefore no need to repeat this in policy CS7.
	Policy CS18. Enhancement of the natural environment will be a key consideration in development of leisure use in the Medway and the implications of this policy will need to be considered in the Habitat Regs Assessment.	Noted.
	Wants to see flood risk management schemes that work with physical processes, involving creation of wetlands and washlands, and restoration of river and coastal floodplains.	Noted.
	Whilst welcoming recognition of the potential conflicts between leisure, commercial and environmental roles, would like to see solutions that recognise the interrelatedness of these roles, not just the balance between them, taking account of the Habitat Regs Assessment.	Noted.
NHS Medway (Jill Norton)	Firstly, the document needs to be amended on page 45, 5.1000. The 7 <sup>th</sup> line down should have "are considered likely" changed to "may", and the list of locations that may be affected by relocation schemes at the end of this paragraph should have Wisdom Hospice deleted.	Paragraph 5.100 will be amended by deleting "are considered likely" in the seventh line and replaced by "may" and the deletion of "Wisdom Hospice" from the last sentence.
	Other than this, there are only positive comments on the comprehensive draft strategy. The NHS Medway Estates Strategy is well summarised and there is good emphasis on the importance of health in delivering sustainability, and how public health will improve the overall life expectancy in Medway. The development of extra care housing in Medway is also welcomed.	Noted.
	The likely reduction in the number of houses included in the Lodge Hill development is noted. The reduced number of houses, 3000, will still need to be supported by the inclusion of a health facility.	The core strategy is not proposing a reduction in the number of houses proposed at Lodge Hill.
	To summarise, your proposed strategy is comprehensive forward planning for the benefit of Medway, and the Property Office of NHS Medway fully supports this.	Noted.
Nordic Recycling Ltd	<b>Policy CS3: Mitigation and Adaptation to Climate Change -</b> This policy contains a range of worthwhile aspirations, but should also make reference to the viability of	The measures set out in the bullet points are suggested for

/N 42 - 1 1 -	The second development of The second by the factor of the second	
(Michaela	proposed developments. There will be instances where, as a consequence of a	consideration and are not
Sullivan, Head of	range of possible factors, these aspirations can be met only partially, and it would be	requirements.
Planning, Forth	regrettable if the policy were used in a way that could prevent otherwise viable	
Ports PLC)	development from proceeding. Nordic requests that the plan is modified to	
	acknowledge that the viability of development is an important consideration, and that	
	the policy requirements will be reconsidered where they affect the viability of a	
	development and could prevent it from going ahead.	
	Policy CS4: Energy Efficiency and Renewable Energy - The acknowledgement	Agreed. The viability of providing
	in this policy that the renewable energy aspirations may not be capable of being met	20% on site energy will be a matter
	economically is welcomed. If that is demonstrably the case, then the requirement to	for negotiation at the detailed
	make contributions for 'compensatory measures' appears unreasonable. In	planning stage. This point is in any
	particular it is unreasonable to expect these to be made so that they can be applied	case covered by policy CS34.
	to unrelated buildings in the surrounding area. This proposal is also likely to fail a	Policy CS4 will be amended by
	number of the tests set out in Circular 05/05 Appendix B paragraph B5 including test	the deletion of "if it is
	ii) that the measures are "necessary to make the proposed development acceptable	demonstrated that this target
	in planning terms", and particularly test iii) that requires such contributions to be	cannot be met economically,
	"directly related to the proposed development", and test v) that the requirements are	compensatory measures will be
	to be "reasonable in all other respects". Nordic requests that this policy is modified,	sought and applied to current
	such that the reference to compensatory measures being sought and applied to	buildings in the locality."
	buildings in the locality is deleted. The policy should still, however acknowledge that	The question of whether the
	the viability of development is an important consideration, and that the policy	Council will promote the installation
	requirements should be assessed in relation to the overall economics of each	of all forms of renewable energy
	development proposed, to be met where it is viable to do so. The policy also	turns upon the judgement of how
	supports renewable energy systems, but states that this support is conditional on	significant any adverse effects will
	there being 'no significant adverse effects'. Where an Environmental Impact	be. This will need to be taken into
	Assessment is undertaken, the range of effects and proposed mitigation measures	account together with all other
	will be set out. The decision-maker must weigh these in reaching a decision. There	issues applying to a proposal and
	may be instances where, in the wider balance, a project may be approved despite	the recommended amendment to
	some residual significant adverse effects. The absolute nature of the policy wording	the wording will not make any
	is inappropriate in the context of the decision-making process. Nordic requests that	difference to this judgemental
	the policy is re-worded to state that subject to careful consideration of all identified	process. Consequently, no
	effects, and particularly any residual significant adverse effects, the Council will	amendment is proposed.
	promote the installation of all forms of renewable energy systems.	

0	Policy CS23: Waste Management - Policy CS3 and supporting text makes reference to recycling facilities in two locations, Medway City Estate and Kingsnorth. Nordic is an important recycling business in the area, however, and therefore requests that the policy and supporting text are altered to include Chatham Docks as a preferred location for recycling.	The policy does refer to "the existing established employment areas are the preferred locations for such activities". Chatham Dock is one such area and is recognised as having significant potential for waste management activity.
Open Spaces Society (Pat Wilson)	Comments on safety of pedestrian routes, improving health benefits, waymarking improvements, signage, walking, footpath signs, electric vehicles, retaining ALLI's, Local Nature Reserves, Medway Landscape Character Assessment.	Noted.
	Lodge Hill housing numbers are excessive, and the surrounding highway infrastructure is inadequate.  Questions what is meant by affordable open space (p.48).	With regard the scale of the new settlement it is considered that the approximately 5,000 dwelling units will ensure a degree of 'critical mass' required to ensure a sustainable pattern of development that will support a range of services enabling the settlement to have at least semi-autonomy from other established centres on the Hoo Peninsula that are currently serving their respective communities. It is recognised that the existing highways network around Lodge Hill (particularly Four Elms roundabout and the A289) is a congestion hotspot. This is shown on Figure 9.1. Policy CS33 requires a comprehensive access strategy which includes a requirement to contribute towards improvement of the off-site highways infrastructure. There is no reference to affordable open space on page 48.

Peel Group (NLP)	A 10.5 hectare parcel of land at Chatham Docks should be developed for employment/mixed-uses (600 dwellings) in order to ensure the long-term viability of the Docks.	The Medway Core Strategy is not a site allocation document. Ongoing discussions between the authority and Peel Group (NLP) will not be impeded by the ongoing formulation of the document.
Peel Environmental (Kieran James)	Supports policy CS23 and identifies land at Perry Farm at the Isle of Grain as a potential waste facility proposal that could deliver the additional landfill capacity that is required.	Noted.
Penshurst Planning (Peter Cooper)	CS7 is overly prescriptive and unwieldy. It is unclear as to which areas of the Plan area the policy applies. It should be deleted and replaced with two separate policies relating to landscape and countryside.	The policy addresses the whole of the rural area, with its component landscapes. Figure 5.2 is of illustrative value; it demonstrates where the different classifications of agricultural land are on the Hoo Peninsula.
	CS8 makes the assumption that existing open space will be preserved. No up to date assessment of standards is available. It may be that certain areas of open space perform no viable function and do not need to be protected from development.	The Open Space Study 2011 details the open space and its value to the area. This evidence will underpin the Medway Core Strategy.
	CS13 – Provision should be made for a wider variety of sites as it is over-dependent on large strategic sites (many of which are in need of major up-front infrastructure) and sites identified in the SLAA. It is doubtful whether they will be capable of delivering the level of executive housing required, as it is a strategy largely based on flat based developments. The policy also seeks to prejudge the sit allocation process.	The SLAA details the sites available, the Medway Core Strategy will identify the key sites that will delivery the housing strategy over the plan period. Executive homes are not identified on a site-by-site basis. To do so would not be appropriate at the Core Strategy level. Policy CS15 recognises the need for this type of development to provide a balanced range of housing in the area.
	CS15 should be amended to state that executive housing may be permitted on Greenfield sites within or adjacent to urban areas, in appropriate circumstances.	The SLAA demonstrates that greenfield release is not required to

		deliver the housing numbers required to meet the housing trajectory defined in the plan. This should be the case for all housing types. Sustainability principles
		should apply equally to all housing.
PRP Architects (Phillip Wright)	Disagree with <b>Policy CS7</b> : Countryside and Landscape - We support the promotion of sustainable development in the countryside and the criteria based approach to landscape protection. However, weight should be attached to support the conversion and re-use of existing buildings on brownfield land located within rural areas that currently detracts from the openness and character of the countryside. Where buildings have a negative effect on the countryside there should be a presumption in favour of redeveloping such buildings in order to improve the character of the countryside. It is therefore proposed to include a further point into the policy as follows: "Where existing built form has a negative impact on the	Policy BNE27 of the Medway Local Plan allows for the re-use of buildings in the countryside. This will be carried forward in parallel with the core strategy until it is replaced by the Site Allocations and Development Management DPD. There is therefore no need to include it in policy CS17.
	countryside, any development that has a positive impact will be supported.  Agree with <b>Policy CS8</b> : Open Space, Green Grid and Public Realm - We support the Council's strategic objective to enjoy accessible, high quality and affordable open space. In order to develop the Medway Green Grid outlined in Figure 5.3, the Council should have regard to sustainable development proposals and the opportunities to bring private land into public ownership and improve accessibility to Medway's natural assets. This could be achieved by permitting sensitive development proposals that make effective use of vacant and underused buildings in order to deliver environmental improvements. "Proposals that transfer private land into publically assessable open space are supported."	Policy CS8 already allows for the provision of open space associated with development proposals.
	Disagree with <b>Policy CS9</b> : Health and Social Infrastructure - We support the provision of additional health and social services the plan intends to deliver. Health and Social infrastructure should include a range of specialist housing tenures including opportunities for retirement villages in suitable locations at a scale and mass that enables a range of communal facilities that respond to site specific constraints and local need. Therefore a flexible approach to the location of Health and Social infrastructure will help deliver purpose built facilities. Such a flexible approach should support the development of vacant and underused, land and buildings. "The redevelopment of existing vacant and underused buildings for specialist housing are supported in areas that extend beyond the settlement	Specialist housing is addressed in policy CS15. The development of vacant and underused buildings is dealt with in Policy BNE27 of the Medway Local Plan.

	envelopes."	
	Disagree with <b>Policy CS14</b> : Affordable Housing; Paragraph 6.33 page 60 - We support the Core Strategy's need to bring forward new extra care and elderly housing provision. However, to secure delivery of special care accommodation requires a flexible and balanced approach to development in all locations. Special care accommodation of a suitable size can become a self contained retirement village providing a continuing care community. Therefore where urban brownfield sites are not suitable, viable or deliverable in facilitating specialist accommodation, appropriate rural locations should be taken into consideration. Sites such as Walnut Tree Farm, which can accommodate a comprehensive retirement village with supportive and independent living models, should therefore be identified.	The Site Allocations and Development Management DPD, which will be prepared after the core strategy has been adopted, is the appropriate vehicle for considering proposals for Walnut Tree Farm. No amendment to policy CS14 is therefore considered necessary.
	Disagree with <b>Policy CS15</b> : Housing Design and Other Housing Requirements - We agree with the need to ensure support is given to the provision of specialist housing, in particular residential care facilities. The variety of housing care typologies requires a flexible approach in determining the location of such provision in accordance with the scale of the development proposal. Where schemes propose self contained retirement villages, rural sites such as Walnut Tree Farm should be considered. We propose the following bullet point to be added into Policy CS15: Support is given to the provision of housing for vulnerable people and specialist housing, including nursing homes, residential and extra care facilities, in appropriate locations and should include those which maximise the use of currently vacant buildings.	The Site Allocations and Development Management DPD, which will be prepared after the core strategy has been adopted, is the appropriate vehicle for considering proposals for Walnut Tree Farm. No amendment to policy CS15 is therefore considered necessary.
Rochester Airport Consultative Committee (Dick Searle, Chairman)	Sections 3.38, 3.39 & 3.43  We are pleased to see acceptance of the concept of a fully functioning General Aviation Airport remaining on the site with appropriate use being made of surrounding land for the development of a technology cluster and associated employment facilities. However, we are surprised that no mention is made of the plans developed by Rochester Airport Ltd (in which Medway Council has had full involvement) or their involvement in future planning for the site. As the Airport Operator, Rochester Airport Ltd. has a vital role to play as a partner in the creation of any development plan as such a plan will require the seamless integration of both aviation and employment facilities and opportunities. Any future users of a technology cluster as envisaged will regard the availability of aviation facilities as an invaluable attribute. Indeed the existence of an aviation hub in the Medway Area (and the ease of access that such a facility provides) should be regarded as a significant advantage for any technology focussed business development. We note	Noted and work is continuing in drawing up suitable proposals for the area.

and support the concerns of Rochester Airport Ltd regarding the impact of the proposed closure of Medway Renaissance. We trust that steps will be taken to ensure that the Masterplan currently in their care will be completed before their closure.	
Section 5.118	The promotion of Rochester Airport
RACC note the aspiration that Medway Council should "actively realise the opportunities presented bythe Olympic Games in London in 2012". However, we have seen little evidence of the existence of any clear plan to actually capitalise on these opportunities. Indeed the LTP totally failed to recognise the importance of Rochester Airport as a transport hub to the Olympic Site – and the attendant advantages of collateral tourism to the Medway area. We refer you to our response to the latest LTP which is appended to this letter as Appendix 1. For your convenience, we have pasted below our specific comments on the potential importance of the Airport in respect of the Olympics:	in relation to the Olympic Games is a matter for Rochester Airport Plc. in conjunction with Medway Council's 2012 team and no further amendments to the core strategy are required.
"The 2012 Olympics will be a truly International event so it is very surprising that the LTP addresses only the issue of car parking! Whilst the facilities in Medway of themselves may be admirable, their accessibility for international visitors will be of great importance to the users and the positioning and existence of the Airport will be a major "selling point" to potential users. In addition, the Airports' importance will emerge over the coming months as a hub for visitors to the Games who wish to travel by light aircraft. The airport is in a unique location with its proximity to Ebbsfleet station (minutes by train to the Olympic station at Stratford – the preferred arrival method.) Tourism (not only from airport arrivals but those visitors to the Olympics who wish to stay in the Medway area rather than stay in London) is a great opportunity for Medway and the availability of transport facilities must be considered on a truly holistic basis".	
Sections 5.124 – Heritage Assets	Policy CS12 and its associated text
We fully agree with the comments of Rochester Airport Limited on the failure to	has not attempted to list all of
recognise the Cultural and Heritage importance of the existence and work of the unique and world renowned Medway Aircraft Preservation Society (MAPS) which is	Medway's heritage assets but to establish a policy to ensure that
based at Rochester Airport and who are themselves represented on the RACC. We	they are all preserved and

the Medwa have been by the ope work from profile in the the Lord Li HM The Qu viewed the been given and educat member's	d Leisure and Heritage Assets - Rochester Airport Limited feel that by Aircraft Preservation Society (MAPS) based at Rochester Airport ignored. This is a very special organisation financially supported rator and the only approved aircraft restorer for RAF Hendon. They a cluster of sheds/portakabins in one corner of the airport. Their he community has never been higher having had three visits from ieutenancy of Kent one to present a volunteers award on behalf of ieen culminating in a visit from HRH the Duchess of Cornwall who ir newly opened visitor centre. In our master plan allocation has for a working museum which in itself will have employment, tourist tional value. MAPS were unanimously applauded in a recent MC full council meeting <sup>1</sup> . The policy should include this previously hidden h is now towards the forefront of Medway's heritage".	they are named in the core strategy.
Sections 7.4 RACC fully point for inn developed a enhance the employers.	5, 7.13, 7.23 & CS 17 support the symbiotic development of the Airport environs as a focal novation, technology and advanced manufacturing. The existence of a and thriving aviation facility in the centre of such a cluster will significantly e attractiveness of such a development to potential investors and Accordingly, any such initiatives must fully involve the Airport Operators tunities are to be maximised.	Noted.
Section 9.1 We are astoral aviation issues operate from of date and a "place to amended to response to		This is a matter for the next review of the Local Transport Plan.
safeguardin	20 & 9.21  Dleased to see the confirmation that the Airport is subject to "airspace of the Council". We trust, in particular, that this will be borne fully in the application for development of the Horsted College site is presented	Noted and see response above.

	to Medway Council. Section 9.21 recognises the dialogue that is taking place between the Council and Rochester Airport Limited on the development of the Airport and the surrounding site. It is, therefore, rather odd that Section 3.38 makes no mention of Rochester Airport Ltd in the development of a Masterplan – referring as it does only to BAe Systems!	
	Policy CS24 Again, RACC are pleased to see confirmation of the Council's intention to work with Rochester Airport Ltd on the development of the Airport and its co-located strategic employment opportunities.	Noted.
	What's in a Name? Rochester Airport or Airfield? The Draft Strategy refers to Rochester Airport as Rochester Airfield on several occasions. For the sake of accuracy (and consistency), we suggest that all references should be to Rochester Airport as this is the correct and historical name for the facility. It will also make PDF word searching a lot simpler!	Rochester Airport is taken as referring to the operational airport. Airfield to the wider area surrounding that facility.
Rochester Airport Ltd (Paul Britten, Director)	4.88 - I will be responding on line to the draft strategy in due course. However, I am extremely concerned at one of the answers in the above document summarising all the responses received to the issues & options consultation, a copy of the extract (from page 51) is attached. The recommended response to para. 4.88 is: 'planning consent for residential development has already been issued and construction has commenced on the site.' This is simply untrue, the last planning application stalled and therefore construction cannot have commenced. I believe a fresh application is to be presented shortly but it is no means guaranteed that this will be approved. I believe this is material to the strategy in view of the number of dwellings involved (400+?) and the affect it has on the local area, it should not be dismissed.	This representation appears to relate to the Issues and Options report and not the draft core strategy.
	2.23. Economy and learning - We support the work to retain the University for Creative Arts but would add that with the aeronautical/high value cluster being developed at Rochester Airfield the Universities should be encouraged to develop courses/campus in this sector. Interest was shown by Greenwich and Imperial Universities on presentation of the Rochester Airport Limited Masterplan.	The universities have expressed no interest in developing in the vicinity of Rochester Airport.
	2.24. Transport – Medway is very lucky to have an airport which should be considered an important piece of its transport infrastructure. The airport has other positive effects on the local economy. The emerging Local Transport Plan (LTP3) is currently in draft form and Rochester Airport fully expects to be included in the final version. A small modern local airport is also a key driver for regeneration.	Noted.

<b>2.28. Miscellaneous</b> – Hidden away in this section is this comment "Improve the	Paragraph 2.28 is part of a section
overall image of Medway." We believe this should have a higher priority. Medway is	on issues that need to be
being developed on many levels and it is paramount if you wish to attract inward	addressed. The issue in this case is
investment that a positive message is sent. Would suggest "With Medway pushing	Medway's poor image. Proposals
for city status and with exciting developments in education, employment, tourism	for addressing the issues are set
and culture the overall image will improve which should be encouraged."	out elsewhere in the core strategy.
2.29. Evidence – The Future of Aviation White Paper 2003	Noted.
3.38. Potential designations Rochester Airfield – Rochester Airport Limited	See response to RACC above.
presented a professionally produced Masterplan 7 years ago, as per the	
Government White Paper 2003 which despite excitement from Medway Council	
(MC) has been largely ignored. Rochester Airport Limited supports the Masterplan	
currently under development but is cautious, as it is being prepared by Medway	
Renaissance who is earmarked for closure in March 2011. As one of the leading	
development and employment opportunities in Medway, pressure must be exerted	
to ensure the work is completed. We would like to see the airport operators	
acknowledged as a partner to any Masterplan as without an operational airport or	
the operators' expertise to plan around it the development brief may not work.	
Strategic Objectives (5) – We support maximisation of development opportunities	The universities have expressed no
created by the universities. MC also has a vision for a technology cluster at and	interest in developing in the vicinity
around Rochester Airfield. The universities should be included within these	of Rochester Airport.
developments joining up regeneration, education and employment.	·
CS10. Sport and Recreation - We support the strategy in respect of the Olympics	This is a matter for Medway's 2012
2012. Our sources (which include the Civil Aviation Authority (CAA) and National Air	team.
Traffic Services (NATS)) expect Rochester Airport to be extremely busy with visitors	
during the games. So much so that the operators are developing an aircraft	
occupants park and ride scheme to Ebbsfleet station. To encourage touring visitors	
to stay in Medway MC may wish to consider a similar scheme to those travelling by	
car to the games from Europe. Car parking is currently an issue at Ebbsfleet Station	
and may not be wholly in order by that time.	
CS11/12. Culture and Leisure and Heritage Assets – Rochester Airport Limited	Policy CS12 and its associated text
feel that the Medway Aircraft Preservation Society (MAPS) based at Rochester	has not attempted to list all of
Airport have been ignored. This is a very special organisation financially supported	Medway's heritage assets but to
by the operator and the only approved aircraft restorer for RAF Hendon. They work	establish a policy to ensure that
from a cluster of sheds/portakabins in one corner of the airport. Their profile in the	they are all preserved and

	community has never been higher having had three visits from the Lord Lieutenancy of Kent one to present a volunteers award on behalf of HM The Queen culminating in a visit from HRH the Duchess of Cornwall who viewed their newly opened visitor centre. In our master plan allocation has been given for a working museum which in itself will have employment, tourist and educational value. MAPS were unanimously applauded in a recent MC full member's council meeting1. The policy should include this previously hidden asset which is now towards the forefront of Medways heritage	enhanced, irrespective of whether they are named in the core strategy.
	7.5 (Bullet 1) & 7.13 (Bullets 5 & 6) Economic Development - Both schemes are supported but should be considered together. Pride of place at the proposed cluster should be the Innovation Centre which will encourage small businesses to incubate and flourish. It could become marginalised if the northern and southern areas are not considered together albeit they are some way apart.	Noted.
	CS17 Economic development - Ignores the influence of the airport on any development. Not only is the airport considered a good address rentals are higher on the fringes of the airport, particularly for aeronautical businesses. There is also the opportunity to capture companies which will use the operational airport for its business.  CS18. Tourism - See comments above for CS11/12.	The potential of the airport to develop a technology and knowledge based cluster is recognised in policy CS17.
	<b>9.14. Other transport Related Issues</b> - The strategy must consider aviation issues. Not only are there advanced plans to modernise the airport the affect on any development on its fringes must not ignored, particularly the aviation offering. We are led to believe that the airport will be a component of the published LTP3.	The last paragraph of policy CS24 addresses the issue of general aviation.
	<b>CS24. Transport and Movement</b> - The final bullet is written in very strange terms. "Considering the future of the facility" can be read in a number of ways. It could read "to consider how the airport can be modernised in conjunction with and considering its co-location with a strategic employment opportunity. The Rochester Airport airspace safeguarding policy should not be compromised by any development."	The safeguarding of the airspace is a matter that is always taken into account in the consideration of planning applications in the vicinity of the airport.
Rochester Bridge Trust (Mr D.J. Slack, Agent for)	Strongly Disagree with <b>Policy CS7</b> : Countryside and Landscape; The protection of 'versatile' and good quality agricultural land East of Rainham.	Noted.
	The agricultural land to the East of Rainham has variable agricultural quality and is not versatile for agricultural purposes by any stretch of the imagination. Sensitive and appropriate development should be allowed on the poorer quality land and	The agricultural land classification is a matter that the Council has no control over. It is maintained by the

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development in other towns will not be precluded on the basis of this policy, unless **Availability Assessment First** the available information suggests that it will have significant adverse impacts on Review, May, 2011. The figures Chatham. This may again be necessary to ensure consistency with national are indicative only and should planning policy in the form of PPS 4, which is necessary for the policy to be sound. not be treated as the maximum floorspace which will be permitted." Policy CS19 explains that town centre and edge of centre sites will be the preferred location for retail development. These will be as defined on the Medway Local Plan Proposals Maps. There is no need for further amendment. Policy CS19 does not solely aim to safeguard the vitality and viability of Chatham but also to substantially increase its retail offer in order for it to fulfil its function as a subregional centre. Consequently, it would be inappropriate to introduce criteria into the policy which could result in major retail development being developed elsewhere in the borough. Policy CS26 Strood The objective of CS26 is to strengthen Strood by inter alia, Retail quality is a generally 'improving the quality of retail provision and improving links between the retail areas understood term and can apply to and accessibility to the rail station and waterfront'. We note however that neither the range, choice and standard of CS26 nor the supporting text explore what improving the quality of retail provision goods, services and retail outlets, might involve. This may be necessary for the policy to be effective and therefore the amount of vacant floorspace sound. We feel that improving the quality of provision might involve smaller retail and the design and maintenance of units suitable for high street fashion and restaurants and cafes. Unlike the previous buildings and the public iteration of the Core Strategy, we note that neither CS26 nor the supporting text of environment. The provision of small this iteration refer to better 'knitting' the Centre together. We feel this evocative retail units, restaurants and cafes

would fall into this description. The

quality of retail provision is included

phrase particularly helped the reader to understand the Council's aspirations for

Strood and that it would be worthwhile reintroducing this phrase into the policy or

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supporting text.	in the last paragraph of policy CS19
	and improvements to the quality of
	the environment are included in
	policy CS26 Consequently, no
	amendments to the policy or text
	are considered necessary.
Masterplan Objectives Masterplan We support the inclusion in the supporting text	Figure 11.1 is included for
to CS26 of the 8 key objectives for Strood that were previously set out in the Strood	illustrative purposes only and does
Town Centre Masterplan (September 2009), especially those of improving the retail	not constitute an allocation map.
circuit and of improving the appearance of the Town Centre, including sites on	Site specific allocations will be
prominent corners. We also support the inclusion of Figure 11 1 Strood Town	included in the Site Allocations and
Centre, which reproduces the Strood Masterplan. We continue to feel however that	Development Management DPD to
this Masterplan should be amended so that the purpose of annotating sites is	be prepared after the completion of
specifically stated. For example, it might be stated that the areas highlighted for	the core strategy.
retail development are areas where development for this use that will optimise the	
potential of the site and support the objectives for Strood set out in CS26 will be	
supported in principle.	
<b>Demarcation of Town Centre Boundary</b> While our understanding is that Officers	The Medway Retail Needs Study,
accept that Strood Retail Park represents a 'functional' part of the Town Centre, we	2009, acknowledges that whilst the
are concerned that the existing town centre boundary, tightly drawn in the adopted	Core Retail Centre and Strood
Proposals Map, is unlikely to be updated to reflect this change in thinking until after	Retail Park are separated in
the Council's Land Allocations and Development Management document is	planning policy terms, they
adopted. We understand this is unlikely to be before 2013. In this context we	effectively function as a connected
recommend that a passage is inserted into the Core Strategy that specifically	centre and as a single attractor.
comments that the defined Town Centre boundary no longer reflects Strood's	However, the retail park is closely
functional Town Centre and that this boundary will be formally amended at the	bounded by an industrial area
earliest available opportunity so that it includes other surrounding town centre uses.	along Knight Road and Priory
carnost a randote opportarmy so that it molades strict same and the sound access	Road. Were the boundary of the
	central area be extended to include
	the retail park, the provisions of
	policy CS19, that town centres and
	edge of centre sites will be the
	preferred location for retail
	development, would put pressure
	on those industrial areas which the
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		Council wishes to retain for employment development and could lead to both the loss of employment land and the uncontrolled expansion of retailing beyond a reasonable walking distance of the town centre.  Consequently, no amendments are proposed to the boundaries of the core retail centre at Strood.
	Restaurants and Cafes Finally, we note that there is no longer reference made in this iteration of the Core Strategy to the under-representation of restaurants and cafés in Strood. We recommend that CS26 is amended to support in principle an increased level of A3 and A5 class uses in Strood, on the basis that: this would help diversify and qualitatively improve the town's offer; this could attract more visitors to the town and potentially result in increased local expenditure; and more linked trips with more journeys being made on foot.	Both policies CS17, Economic Development and CS18 Tourism, seek to promote the development of the evening economy throughout Chatham. This includes the development of restaurants and cafes. Consequently there is no need to repeat this policy in the individual policies for each of the towns, including Strood.
RSPB	Direct and indirect impacts from the Lodge Hill Development threatens a nationally important nightingales site.	Land Securities are addressing the need to safeguard the habitat of the nightingales in the preparation of the masterplan for the site.
	Housing provision total could threaten SPA / RAMSAR sites, an additional policy is required (Natural England, KWT & RSPB to publish joint policy statement).	All potential impacts of development on the SPA/Ramsar sites are being taken into account in the preparation of the Appropriate Assessment.
	Wants Code for Sustainable Homes Level 4 (not 3)	There is a need to remain consistent with the government's timetable for the Code for Sustainable Homes; Policy CS3: Mitigation and Adaptation to

		Climate Change is being amended in a number of ways.
	Replace 'Compensation will be sought' with 'Compensation will be provided'	Agreed. This amendment has been proposed elsewhere in this document.
	River Medway policy should also apply to the Thames	The River Medway faces far more pressures from development than the Thames and a specific policy for the Medway is therefore warranted. The Thames coastline is largely protected by its SPA/Ramsar status.
St. Mary's Island Residents Association (Alan Pestell, SMIRA Director)	Strongly disagree with <b>Policy CS14</b> : Affordable Housing & 6.19 - As a Director of SMIRA (St. Mary's Island Residents Association) I am passing on the feeling of the residents that Affordable Housing should be at 25% for St. Mary's Island and not the proposed 30%. Change the level of Affordable Housing to 25%.	St. Mary's Island falls within the defined boundary of the urban area and is therefore subject to a 25% affordable housing requirement.
Sainsbury's (WYG Planning & Design)	Supports policies CS13, CS19, CS26-30 and CS33 (including all area policies).	Noted.
	Advise the Council to increase flexibility when applying the sequential approach to site selection (PPS4 Policy EC15).to ensure that sites, including edge-of-centre and out-of-centre sites, are fully taken account of in site selection for retail uses. Incentre sites may not offer the right opportunities in terms of site size or configuration for such development and as such the opportunity for increased provision in a centre should not be lost as a result in centre sites being pursued without reward.	All relevant sites will be taken into account when applying the sequential approach and the requirements of PPS4 will be applied.
Scottish Power (Dalton Warner Davis)	Previous comments have largely been taken on board.	Noted.
	Supports policy CS21 provided that the reference to large scale district heating being provided by waste from new power plants is qualified such that they will be pursued where they are <b>both</b> feasible <b>and</b> viable (this is partly recognised in policy CS4).	Policy CS21 to be amended by the insertion of "The feasibility and viability of" at the beginning of the third bullet point.
	Welcomes policy CS17's support for the development of energy and environmental	Policy CS17 supports the

	technologies. But reference should also include conventional energy generation plants. which are designed and consented to facilitate future CHP and/or carbon capture and storage.	development of the energy sector at the Isle of Grain and Kingsnorth irrespective of the specific type of generation.
	There is also potential for renewable energy generation in the Hoo Peninsular / Isle of Grain.	Priority will continue to be given to the protection and enhancement of the wildlife habitats in the internationally important Ramsar sites and Special Protection Areas on the Hoo Peninsula.  Consequently, the core strategy cannot give unqualified support to renewable energy generation on the Peninsula.
	Welcomes the SLAA's identification of a healthy employment land supply (Kingsnorth & Isle of Grain sites).	Noted.
	Policy CS4 should make clear support for renewable technologies.	Policy CS4 states that subject to there being no significant adverse effects in terms of the natural environment and residential amenity, the Council will positively promote the installation of all forms of renewable energy systems. There is therefore no need to amend the policy.
SEEDA (Jane Griffin, Planning and Infrastructure Policy Manager)	We note the following:	
	That you will deliver 815 dwellings per year until 2028. This takes account of the currently successful housing market (914 delivered in 2008/9). In addition you are increasing the affordable housing threshold to 30% from 25% in the main new housing areas.	Noted.
	You will provide sufficient employment land to deliver 21800 jobs - a high growth target to potentially reduce out commuting and grow the economy.	Noted.

	New employment will be focussed at Kingsnorth and Isle of Grain where there is potential for environmental technology jobs.	Noted.
	In addition Technology and Knowledge based jobs will be based at Rochester Airfield.	Noted.
South East Marine Association	The Association has taken an active part during the steps taken in advance of this document including:- regular attendance at meetings of the Medway Executive Local Strategic Partnership Transport Group a specific consultation concerning the draft transport plan (at which it was promised further discussions with members) attendance at the presentation by the councils' economic consultants including follow-up correspondence attendance at the presentation by the councils' transport consultants including follow-up correspondence submission of a full response to the draft transport plan	Noted.
	The Association has received no response whatever from the Council or its consultants and is therefore reluctantly forced to agree with the view that Medway Council's idea of consultation is to hold many meetings and issue various documents designed to "tick the boxes" confirming that it has gone through required procedures without taking any notice of the results particularly those emanating from the business sector and those addressing strategic problems.	This does not address the draft core strategy.
	The draft acknowledges some of the issues that need to be addressed. It fails to acknowledge others some of which are even more important. Above all it does nothing to identify realistic solutions to those issues.	This paragraph does not state what the other issues are.
	The document fails to put Medway into the context of neighbouring authorities when considering investment opportunities that will arise during the plan period. It ignores the economic problems which stem from the identified issues of deprivation and social problems in significant parts of Medway; it fails to put forward any solutions to the problems associated with out commuting and the fact that many of the most affluent residents have little association with Medway. Its policy on employment land is unsustainable and unrealistic. Its policies for Chattenden are muddled. Major development is already taking place at Ebbsfleet to which Chattenden residents will be attracted. During the plan period a new Lower Thames crossing will be constructed with dramatic affects on the economy of North Kent but this is ignored.	The Medway Core Strategy is fully evidenced and has cogent policies to address social inequalities through physical and economic regeneration of the towns. The affect of London will never 'go away' as it is a reality and its attractive effects will continue to assert themselves on Medway as it does for much of the South East. Chattenden is being planned to

	have a sustainable pattern of development with employment and physical and social infrastructure necessary for it to be reasonably self-sustaining without being 'separate' from the rest of the area.
	The possible advent of a lower
	Thames crossing is too uncertain to
	be taken into account in any
	significant way. Though the LDF system enables an updating to
	occur if circumstances significantly
	change over the life of the plan.
The references to the River Medway are superficial and in particular ignore:- the need to provide opportunities for sustainable river transport to divert traffic from the	The ability of the R.Medway to respond to any economic drivers
highway system particularly in respect of wharves, warehouses and associated	such as increased use of the river
businesses upstream of Chatham Docks; the draft conflicts with national policies for	for transportation is not hindered by
coastal and short sea shipping of which the document makes no mention.	the policies of the Medway Core
	Strategy. The assertion that it is a mode of transport that is
	sustainable, or more sustainable
	than land based public transport
	systems is not evidenced. Both
	use fossil fuelsThe coastal shipping
	activity at the river's lower reaches are recognised by the plan, as is
	Chatham Docks. Policy CS25
	supports the greater use of this
	facility, as well as Thamesport at
	Grain. Indeed they are safeguarded by the policy so this
	important feature of the area's
	overall commerce activity is not
	lost.
The need for facilities for the numerous local marine businesses that its previous	The need to regenerate significant

	policies have evicted, the business having been driven elsewhere, in some instances to the near continent.	tracks of declined riverside industrial land is very apparent. This does not mean that all the traditional maritime employment along the river has gone, or is it necessary or desirable for it to go in its entirety; as its continued existence helps maintain a
	The need for houseboat facilities.	diversified economic base.  The MCore Strategy does not impede the ability of houseboat facilities to continue to be maintained and developed. The site allocations DPD would be the appropriate document to address this matter.
	The references to the River Medway and Rochester Airport are disingenuous since in both cases the council has consistently ignored reports which it itself commissioned from consultants who have specifically set out the steps which the council should take (but which it has ignored). Sun Pier (the most prominent rail/water interchange facility in Medway) has been unlawfully shut down by the Council.	View noted.
Southern Water	In its present form of the draft Core Strategy is no more acceptable than the first draft which had to be withdrawn following examination by a government appointed inspector. If this second effort meets the same fate it will surely be time for Medway Council to have its planning powers withdrawn or for the council to be amalgamated with Kent County Council.	This paragraph does not specify why the core strategy is unacceptable.
	With regard to area policies CS26, CS27, CS28 Have identified a lack of: Sewerage (underground) capacity at: Strood Riverside, Civic Centre and East of Higham Road Wainscott. Water (mains) capacity at: Strood Riverside, Civic Centre and Temple Waterfront. Sewerage (underground) capacity at: Rochester Riverside and R/O 329-377 High Street. Water (mains) capacity at: Rochester Riverside and R/O 329-377 High Street. Sewerage (underground) capacity at: RSME Kitchener Barracks, Mid Kent College,	All proposals in the core strategy will need to be matched by the provision of adequate infrastructure, including water supply and disposal. This will be addressed in the Infrastructure Plan.  The provision of adequate water

Horsted, Land at St Mary's Island Maritime Way, South of Basin 1 and St Mary's Island Maritime Way, Between Cross Street & The Brook, Sir John Hawkins Car Park, Chatham Waterfront, 2-8 King Street and 1-11 Queen Street and Wickes. Water (mains) capacity at: RSME Kitchener Barracks, Mid Kent College, Horsted, Land at St Mary's Island Maritime Way, South of Basin 1 and St Mary's Island Maritime Way, Between Cross Street & The Brook, Sir John Hawkins Car Park, Chatham Waterfront, 2-8 King Street and 1-11 Queen Street and Wickes. Sewerage (underground) capacity at Gillingham Retail Core.

Water (mains) capacity at Gillingham Retail Core.

Sewerage (underground) capacity at: Lodge Hill.

Water (mains) capacity at: Lodge Hill

These assessments are based on just these developments any further developments would need separate assessments.

Suggests the inclusion of the following policy wordings:

Where additional water or sewerage capacity is required to accommodate a development, the developer must connect to the system at the nearest point of adequate capacity, as advised by Southern Water.

Development proposals will be permitted provided existing underground water mains and sewers on site are protected, or appropriate arrangements are made for their diversion.

Development proposals will be permitted provided existing underground water mains and sewers on site are protected, or appropriate arrangements are made for their diversion.

Proposes the following text is included in policy CS33 to recognise the requirement for adequate utility infrastructure to serve the proposed development:

Additional water or sewerage capacity is required to accommodate this development, the developer must connect to the system at the nearest point of adequate capacity, as advised by Southern Water.

Section 5 of the Core Strategy- cross cutting themes should contain an additional policy to protect the amenity of residents:

infrastructure is normally secured through legal agreements between developers and the water companies under separate legislation and there is therefore no necessity for additional policies in the core strategy to achieve the same ends. However, policy CS34 does make provision for developer contributions to secure adequate infrastructure required as a result of new development.

Policy BNE2 of the Medway Local Plan, 2003, safeguards the amenity

Development proposals in proximity to existing waste infrastructure, including wastewater facilities, will only be permitted if there is no unacceptable impact on the amenity of future occupants. In the case of wastewater facilities, the distance between the infrastructure and the development must be sufficient to allow adequate odour dispersion.	of occupants. This policy will be carried forward in parallel with the core strategy until it is replaced by the Medway Site Allocations and Development Management Plan.
Section 5 of the Core Strategy- cross cutting themes should contain a policy to recognise the need for adequate utility infrastructure to serve the proposed development.	It would be inappropriate to include policies for each form of infrastructure that may be required to serve a development. Planning
New residential and commercial development will be permitted only if sufficient water and wastewater capacity is either available, or can be provided in time to serve it.	permissions are usually conditioned to ensure that infrastructure is provided and/or legal agreements are made to secure such provision.
Southern Water is very pleased that the Council supports its Water Resources Management Plan in Policy CS3:	Policy CS3 will be amended by the insertion of "and sub-regional" after "local" in the final paragraph.
"The Council will support the proposals in the Final Water resources Management Plan, 2010-2035 or other measures that have been agreed to improve the efficiency of water use and maintain supplies at the level required"	
However, we would request that the policy is amended to read:	
"maintain supplies at the level required to meet local and sub-regional needs"	
This is because water resources are planned over an area larger than the Council's boundaries. So, infrastructure required within one Council's boundaries may serve consumers in a number of other Council's boundaries. This addition would be in line with PPS 12 paragraph 4.17 which states that: "infrastructure capacity and planning may be more effectively and efficiently carried out over a larger area than a single local planning authority".	
Supports policy CS3 Mitigation and Adaptation to Climate Change.	Noted.
We have concerns regarding inconsistencies in the plan, the tables in section 11 showing main developments are not consistent with those listed in table 12.2 of the Infrastructure Delivery Schedule.	The Medway Core Strategy may well have an implementation policy that makes clearer the

	The following sites are listed in the tables in section 11 but not in the Infrastructure Delivery Schedule:  East of Higham Road (Strood)	infrastructure that will be required for most sites that area anticipated to come forward over the life of the Core Strategy.
	St Bartholomews (Rochester) South of Basin 1 and St Mary's Island, Maritime Way (Chatham)	
	There are also a number of sites listed in the Infrastructure Delivery Schedule table 12.2 but not in the tables in section 11.	
	An accurate schedule of future development sites is important for Southern Water's investment planning. At this stage it is not clear to us which sites we should include in future investment plans.	
Sport England	Sport England has an established role within the planning system which includes providing advice and guidance on all relevant areas of national and local policy, as well as supporting local authorities in developing the evidence base for sport. The principal aim of Sport England's strategy is the creation of a world class community sport system which ensures that: a substantial, and growing, number of people from across the community play sport; talented people from all backgrounds are identified early, nurtured and have the opportunity to progress to the elite level; and everyone who plays sport has a quality experience and is able to fulfill their potential.	Noted.
	Sport England's role is focused exclusively on sport, although it is recognised that sport can, and does, play an important role in achieving wider social, community and economic benefits, most notably in the context of health. Sport England also recognises the vital part that the planning system has to play in assisting with the delivery of its strategy. In addition, the development of sport within a local area can provide significant benefits to assist local authorities with the implementation of their Sustainable Community Strategies and Local Development Frameworks. As highlighted by PPG17 well designed and implemented planning policies for open space, sport and recreation are fundamental to the delivery broader Government objectives. The overall focus of Sport England's own planning policy objectives is that a planned approach to the provision of facilities and opportunities for sport,	Noted.

recreational needs of local communities are met.	
recreational needs of local communities are met.	
Given the above, Sport England welcomes many aspects of the Pre-Publication Draft Core Strategy, in particular the commitment to the protection and development of sport, along with the recognition of its benefits in enhancing the quality of life and enabling people to lead healthier lifestyles. However, the concerns raised in response to Issues and Options Report regarding the evidence base supporting the Core Strategy remain. Further to these comments please find below Sport England response to particular areas of the Pre-Publication Draft Core Strategy.	
The Core Strategy 'Spatial' Vision Point 13 (Page 25) - Agree with suggested amendment. Sport England supports the inclusion of point 13 within the vision but would expect the Core strategy to seek to ensure, rather than just promote, healthier lifestyles. Consequently, it is suggested that this point could be amended to read: 'Residents will lead healthier lifestyles as a result of enhanced opportunities to participate in sport and recreation along with the active promotion of intelligent design, walking and cycling'.	Agreed. Vision Point 13 will be replaced with:  "Residents will lead healthier lifestyles as a result of enhanced opportunities to participate in sport and recreation along with the active promotion of intelligent design, walking and cycling."
Strategic Objective 10 (Page 26) - Agree with suggested amendment. Sport England supports the principle of the tenth objective but would suggest that the wording should be strengthened and reference to 'sporting activities' be added. The amended point could read: 'To enhance the quality of life of local people by enabling them to lead healthier lifestyles through improved cultural, sporting, leisure and tourism provision and activities, including along the river Medway.'	Agreed. Objective 10 will be replaced by "To enhance the quality of life of local people by enabling them to lead healthier lifestyles through improved cultural, sporting leisure and tourism provision, including along the River Medway."
<u>Strategic Objectives</u> (Pages 25 & 16) - Suggested additional objective. Sport England suggests that an additional objective should be added which relates to the requirement of a number of the proposed policies and in particular CS34. The objective should seek to ensure that the demand for social and community infrastructure, generated by existing residents along with the projected population and housing growth, is adequately met. An objective covering this point could read:	The proposed amendment is not sufficiently comprehensive because it does not include physical infrastructure. An alternative objective 15, will be inserted as follows:

'To ensure that sufficient social and community infrastructure is available to meet the needs of existing and future residents through new provision or enhancing the capacity of existing facilities.'	"To ensure the provision of all necessary infrastructure to match the needs of development at the right time and in the right place."
Policy CS 2 & Paragraphs 5.10 & 5.11 (Page 30) - Agree with suggested amendment. Sport England welcomes the tenth bullet point in the policy text and the final sentence of paragraph 5.10, which highlight the role good urban design has to play in enabling sustainable lifestyles by ensuring easy connection to open space, recreational facilities and local services. However, further to the above comments and to ensure consistency with a number of areas of the Core Strategy, Sport England would suggest the wording of this bullet point, and the sentence in paragraph 5.10, are amended. The relevant text should read along the lines of: 'Good urban design, by ensuring easy connection and access to sufficient high quality open space, sport and recreational provision and local services, has a key role to play in enabling the development of sustainable and healthier lifestyles.' Along with the guidance set out in the policy text and paragraph 5.11, reference could be made to Sport England's Active Design Guidance. For more information on the guidance please refer to our previous response to the Issues and Options Report. The guidance is available to download via our website at <a href="https://www.sportengland.org/activedesign">www.sportengland.org/activedesign</a> .	Paragraph 5.10 and the tenth bullet point of policy CS2 will be amended by the insertion of: "sport and" before "recreational facilities".
Policy CS8 & Paragraph 5.83 (Pages 42 & 43) - Agree with suggested amendment. Sport England welcomes Policy CS8 and the commitment to protect, provide and improve access to open space. It is also pleasing that to see that the text within paragraph 5.83 highlights the importance of greenspace in relation to providing opportunities for healthy exercise, sport and recreation. Whilst linking with Policy CS10 it is assumed that the requirements of Policy CS8 will apply to outdoor sports provision and in particular playing field land. The third bullet point of the policy which seeks to preserve and enhance open space is therefore welcomed. However, it would be useful for the supporting text to provide some guidance on the interpretation of the wording 'unless an improved provision can be made by new development to the benefit of the local population', in line with the guidance in PPG17. Regarding the fourth bullet Sport England would expect the development of any standards to cover a range of relevant outdoor sporting provision. It would be useful for the supporting text to outline the process and timescale for developing	The open space standards will be included in the review of the Medway, Wildlife, Countryside and Open Space Strategy, which is currently underway and incorporated into the Site Allocations and Development Management Development Plan Document, which will be prepared after the core strategy.  The term "recreational" already encompasses "sporting".

these standards along with the evidence base on which they will be based. Further to the above, Sport England would also suggest that the word 'sporting' should be included in the seventh bullet point within the policy alongside recreational, amenity and civic space. Paragraphs 5.91 & 5.93 (Page 44) - Agree with comment. Sport England welcomes both paragraph 5.91 and paragraph 5.93 making particular reference to sporting facilities. It is noted that paragraph 5.91 refers to the Infrastructure State of Medway Report regarding the distribution of existing facilities. Sport England appreciates that the report is only intended to establish a baseline for further work and highlights gaps in the information base. However, whilst reference is made to the 2005-2010 Sports Development Strategy limited information is provided on the evidence base for indoor sports facilities and any update to the 2005-2010 strategy. In addition, as set out in response to the Issues and Options Report Sport England is concerned at the reference to and use of the information from the 2002 Playing Pitch Strategy. Regarding these points please see the below comments on the evidence base for sport. Policy CS9 (Page 47) - Agree with suggested amendment. Sport England Healthy communities are already welcomes Policy CS9 but in line with the above comments would suggest that text is referred to at the beginning of the added to ensure the enhancement of provision which enables people to lead policy and there is therefore no healthier lifestyles. The second bullet point in the policy could be reworded to read: need to qualify the bullet points 'Protecting and enhancing existing, along with providing new, facilities, services and separately. The fifth bullet point amenities that enable residents and visitors to lead healthier lifestyles.' The above seeks the timely provision of new suggested amendment to the second bullet omits the text relating to the quality of health and social facilities. life as this is referred to in the first sentence of the policy. Policy CS10 (Page 48) - Agree with suggested amendment Sport England As the policy already makes welcomes the inclusion of the 'Sport and Recreation' section within the Core provision for new facilities to meet a broad range of needs, it will enable Strategy, This section and Policy CS10 clearly demonstrates the Council's commitment to the protection and improvement of sporting provision, along with the residents to increase their recognition of its wider benefits in relation to quality of life and enabling healthier participation in sport and recreation lifestyles. Whilst Policy CS10 is therefore welcomed Sport England would suggest without having to state it within the the following amended wording for the first sentence and the first bullet point: policy. 'The quality of life of existing and future residents of Medway and their ability to lead Sport England's playing field healthier lifestyles will be improved by: safeguarding and enhancing existing sport policies will be taken into account in and recreational provision; the preparation of the Site

Allocations and Development

providing new provision which supplements the existing provision, meets identified

needs and enables residents to increase their participation in sport and recreation.	Management Development Plan Document.
Regarding the implementation of both policies CS8 and CS10 I would like to remind you of Sport England's statutory consultee status regarding planning applications	
affecting playing field land. In developing these policies further it may be useful to	
look further at both our adopted Playing Fields Policy and paragraph 15 of PPG17.	
Full details of our statutory consultee status and policy can be found on our website	
at <u>www.sportengland.org</u> > Facilities and Planning > Putting Policy into Practice >	
Playing Fields. With regard to our Playing Fields Policy Sport England welcomes the strategy's dismissal of playing field sites put forward in the call for sites for the	
SLAA, as indicated in paragraphs 3.16 and 3.44.	
The Evidence Base for Sport (Pages 47 & 48) - Disagree	
As you will be aware in response to the Issues and Options Report Sport England	Medway Council is currently up-
raised concerns with the evidence base for sport that currently supports the Core	dating its evidence base for the
Strategy. It is unclear from reading this version of the strategy, and looking at the	core strategy including a review of
evidence base documents available on LDF pages of your website, whether this	the Medway Wildlife, Countryside
evidence has developed any further. Rather than repeat the comments made in our	and Open Space Strategy and
previous response regarding the requirements and compliance with PPS12 and PPG17 I would refer you to the letter dated 18th September 2009. The principle of	paragraphs 5.113, 5.115 and 5.117 will be amended when the
setting out the key deficiencies in sporting provision within the Core Strategy is	results are available. In the
welcomed. However, any such statements and all relevant policies should be	meantime, paragraph 5.115 will
supported by a robust and up to date evidence base. Therefore, in addition to	be amended by the deletion of
referring to the previous letter please see the key points set out below regarding	the last sentence.
sections of the pre-publication draft:	
Paragraph 5.115 (final sentence) – Disagree. There appears to be no source	Medway Council is currently up-
provided for the statement referring to the need for four additional 4 court halls or	dating its evidence base for the
any spatial guidance regarding meeting this need. In addition, it is unclear why this	core strategy including a review of
detail only focuses on sports halls rather than also including other types of provision.  Sport England is aware of your authority's Sport and Recreation Strategy 2009-2016	the Medway Wildlife, Countryside and Open Space Strategy and
which it is assumed supports this statement. However, as set out in our response to	paragraphs 5.113, 5.115 and
the Issues and Options Report, Sport England holds concerns with the methodology	5.117 will be amended when the
used to assess the supply and demand of provision on which the strategy is based.	results are available. In the
	meantime, paragraph 5.115 will
	be amended by the deletion of
	the last sentence.

Paragraph 5.117 – Disagree. There appears to be no source provided for the statements made regarding the provision of playing pitches within Medway. It is assumed that the detail is taken from the 'Medway Wildlife, Countryside and Open Spaces Strategy (2008-2016)'. If this is the case then as set out in the response to the Issues and Options Report, Sport England is concerned that this evidence base is out of date and not sufficiently robust. As you will be aware the playing pitch information within this strategy is based on the results of the 2002 Playing Pitch Strategy. The Wildlife, Countryside and Open Spaces Strategy itself states on page 51 that: 'the Playing Pitch Study, which informs this part of the strategy, requires a review, which will be undertaken in the first delivery phase of the strategy'. In addition, Sport England is concerned at the reference to, and apparent use of, the National Playing Fields Association (now 'Fields in Trust') standards in assessing provision. As set out in paragraph 6 of PPG17 open space standards are best set locally as national standards cannot cater for local circumstances, such as differing demographic profiles and the extent of existing built development in an area.	Medway Council is currently updating its evidence base for the core strategy including a review of the Medway Wildlife, Countryside and Open Space Strategy and paragraphs 5.113, 5.115 and 5.117 will be amended when the results are available. In the meantime, paragraph 5.115 will be amended by the deletion of the last sentence.
Paragraphs 5.115 & 5.117 – Disagree. Given the above comments, Sport England is concerned with the reference within both paragraphs to 'Sport England advice' and the indication that this advice suggests certain levels of provision. It is assumed that these references relate to input to the outdated 2002 Playing Pitch Strategy, and the use of our spatial planning tools, albeit potentially incorrectly, in the development of the 2009 Sport and Recreation Strategy.	Medway Council is currently updating its evidence base for the core strategy including a review of the Medway Wildlife, Countryside and Open Space Strategy and paragraphs 5.113, 5.115 and 5.117 will be amended when the results are available. In the meantime, paragraph 5.115 will be amended by the deletion of the last sentence.
Despite welcoming many aspects of the Pre-Publication Draft Core Strategy we remain concerned that the evidence base, of which we are aware, does not meet the requirements of both PPG17 and PPS12. The absence of a robust and up to date evidence base is likely to compromise the soundness of the Core Strategy and the implementation of the positive sport related policies commented on above. As set out in our response to the Issues and Options Report, Sport England would be pleased to assist your authority to develop this evidence base further.	Medway Council is currently updating its evidence base for the core strategy including a review of the Medway Wildlife, Countryside and Open Space Strategy and paragraphs 5.113, 5.115 and 5.117 will be amended when the results are available. In the meantime, paragraph 5.115 will

	be amended by the deletion of the last sentence.
Policy CS15 & Paragraph 6.38 (Page 61) – Comment. Sport England welcomes both the statement in paragraph 6.38 that 'housing developments that encourage and deliver healthy living should be the norm', and the inclusion of sports provision and playing pitches in the list of means by which this can be done. However, it is disappointing that text regarding this point does not appear in the policy wording itself.	Policy CS8 refers to the establishment of a set of consistent open space standards that will apply to new development. These standards are being drawn up as part of the review of the Medway Wildlife, Countryside and Open Space Strategy and will be set out in the Site Allocations and Development Management DPD.
Policy CS20 (Page 71) - Agree (3rd Bullet). Sport England welcomes the third bullet of the policy, which promotes management arrangements for schools that fully exploit their potential as community hubs.	
Policy CS33 (Page 109-110) - Suggested amendment. Sport England welcomes the commitment within the policy to the provision of green infrastructure, open space and community facilities. However, in line with the comments above, the vision and objectives of the Core Strategy and a number of related policies, Sport England would suggest that the final bullet under 'Design Solutions' is amended to read: 'The need to create liveable neighbourhoods where the built form and layout of development enables future residents to achieve a good quality of life and lead healthy and active lifestyles' Sport England notes the references in paragraphs 11.103 and 11.104 to site specific evidence base studies. Further to our concerns regarding the evidence base for sport, set out above, we are aware that a study commenced to assess the sporting infrastructure requirements of the proposed Lodge Hill development. We would be pleased to assist this study to help ensure the development meets the Core Strategy commitment to provide for the needs of existing and future residents, the promotion of opportunities for sport along with enabling residents to lead healthier lifestyles.	A good quality of life can encompass healthy and active lifestyles and there is therefore no need to add these to the policy.
Policy CS34 (Page 119) - Agree with suggested amendment. Sport England welcomes Policy CS34 but would suggest that rather than the Council seeking to enter into an agreement the policy should be amended to read: 'Where the need	read

	arises directly from development, the developer(s) will be required to enter into a legal agreement with the Council to provide for' In addition, to ensure consistency with the wording used elsewhere in the document it is suggested that the word 'sporting' is included alongside recreation and community facilities.  Table 12.1 (Page 121) - Suggested amendment. It is suggested that the 'increasing participation in sport' indicator should be included under Policy CS10 rather than Policy CS11. In addition, an indicator could be added under Policy CS10 which measures the amount of new or enhanced sporting provision provided.  Table 12.2 (page 127) —  Comment. It is noted that Table 12.2 provides limited detail on specific infrastructure requirements relating to indoor and outdoor sporting provision. As mentioned above, Sport England would be pleased to assist your authority with developing the evidence base for sport further. This assistance could help to address the concerns raised along with assessing the likely infrastructure requirements for the key development sites e.g. Lodge Hill.	to make provision for infrastructure where the need arises from development and the Council".  CS10 does make reference to increased sporting activity. Table 12.1 page 20 details with the monitoring of the policies delivery; that would be supported by delivery partners set out in the monitoring and implementation framework.  The draft Medway PPS17 Open Space and Recreation Report 2011 will provide further evidence of the requirements for the area. If the Medway Core Strategy needs to
SSR Planning for Abbey Developments Ltd (Laura Tilston)	Policy CS7 - Whilst we recognise the importance of protecting the countryside and key landscape areas from large-scale significant development, we do however consider that this should not mean that no development takes place adjacent to the existing urban areas. We consider that any parcel of land put forward for development, which is adjacent to the existing urban area, should be assessed in terms of its contribution towards ecology, bio-diversity, agricultural production and settlement separation. If through this assessment it is found that these sites do not meet any of the above criteria we consider that they should be included within the urban area. Our clients land to the East of Rainham lies adjacent to the existing urban area; the site does not contribute to the ecology or bio-diversity of the area and is not used for any agricultural purposes. As per the criteria set out in Policy CS7 the site does not contribute to the openness and intrinsic character of the countryside in the area, nor it would it significantly cause the erosion or separation of individual settlements. This is because urban sprawl would not occur due to the site's defined boundaries. The site does not extend beyond the existing built urban area and we consider that development on the site would actually better define the	reflect further provision is required over the life of the plan it will do so.  Sufficient land has been identified in the Medway Strategic Land Availability Assessment to meet Medway's development requirements without the need to identify additional Greenfield sites outside the boundary of the urban area.

edge of the built up area. As can be seen from the attached aerial photo Meresborough Road bound the site to the East and to the South there is a strong field boundary. Development on this land would not extend development further East towards Sittingbourne past the existing line of development. Therefore it would not conflict with the aims of the policy.

Policy CS13 sets out that it is the aim of the Council to provide at least 17,930 new homes between 2006 and 2028 in the Medway area. As set out in paragraph 6.5 the Council therefore propose to deliver 815 dwellings per annum over the time period up to 2028. Whilst they note in paragraph 6.5 that despite the adverse economic conditions completion rates have been high up to 2010, forward monitoring suggests that if there is no early recovery in the national economic picture this figure will fall. Due to the current economic climate we consider that a fall in the number of dwellings brought forward in Medway is likely. We therefore suggest that in the current economic climate serious consideration has to be given to bringing forward sites that are less complex in terms of their planning, infrastructure and re-mediation. The complex nature of several of the urban regeneration sites and the costs associated with these, which are exceptional, is likely to lead to viability issues in the current economic climate which may delay or prevent these sites from coming forward and delivering the housing numbers. Smaller and less complex sites within and adjacent to the urban area which have considerably lower costs are more likely to be able to come forward in the current economic climate. These sites will be sustainable due to their location adjacent to, and within, existing developments and their size would mean that the level of additional infrastructure required would be minimal. We consider that releasing small sites would not have a detrimental impact on the viability of the larger Brownfield sites as any viability issues associated with these sites are more likely related to re-mediation costs and extensive infrastructure requirements rather than a lack of demand for reasonably priced homes. Smaller Greenfield sites could provide family housing, adjacent to existing family units in a sustainable location within a shorter time period. This would accord with the Council's Strategic Objective No 8 to ensure that there is sufficient housing to meet people's needs by providing for a range, mix, type and affordability of housing in locations that contribute to the regeneration and sustainability of the area. Our client has a small Greenfield site that is available for development. The site is located close to existing transport links, services and facilities due to its size, location and previous uses it would only

The SLAA has identified a surplus of over 1600 dwellings compared with the requirement up to 2028 and this would help to offset those sites that may not come forward as expected. Therefore, no additional sites need to be identified.

	require minimal infrastructure improvements and would be able to deliver housing within a short time frame.	
Swale Borough Council	As neighbours of Medway, Swale would wish to see more specific reference to the cross-boundary issues affecting both authority areas – particularly in light of the recent and anticipated changes to regional and national planning policy which actively encourage cross boundary working as part of the Localism Agenda. Whilst Swale notes the reference to water supply constraints within the Sustainability Appraisal it would be good to see an acknowledgment of the constraints on water supply as water companies' areas, waste water treatment works and abstraction areas cover both authorities. Reference should also be made to the impact Swale residents have on Medway by way of services users for further education facilities, Medway Maritime Hospital, retail and employment opportunities and in particular transport networks. Both authorities share the A2/M2 corridor and the associated congestion and air pollution that brings.	It is not clear what specific changes are sought from Swale in what part of the core strategy. Medway Council are not aware of any proposals in the document that raise cross boundary issues.
	Swale is vulnerable in terms of its healthcare reliance on Medway, having the only hospital easily accessible by public transport for many of our residents. Therefore any decline in services or indeed cross boundary bus and rail services would have a dramatic effect on health levels and Swale would wish to see this relationship reflected in the Core Strategy. Similarly the flow of residents the other way into Swale for recreation and access to the countryside as well as for employment within our borough should be noted, particularly given the increased recreation pressure on our protected areas by the increase in population anticipated in both authority areas.	Policy CS9 supports the continued redevelopment of Medway Maritime Hospital and efforts by the Trust to make the hospital a centre of excellence. Policy CS24 aims to develop a bus network with increased capacity, reliability and quality. There is a two-way flow of people between all the North Kent authorities and beyond, for employment and recreational purposes and Medway Council does not consider it necessary to refer specifically to each of them. In relation to employment, the strategy is seeking to increase opportunities within the Borough in order to reduce the level of outcommuting.

TBH Ltd	General: Paras 1.7, 2.6 & 2.29, Chapter 7 and para 11.39: the "evidence base "for the Core Strategy is unclear. All those wishing to read and understand the Core Strategy, both while it is an emerging development plan document and when it is adopted, need to have clarity about the information that has led to the vision, strategy and policies that Medway Council are pursuing. However, certain documents such as the "Employment Land Review Consolidation Study" (see para 3.9 and elsewhere), considered by Cabinet in September 2010, are not identified on the Council's website as part of the evidence base and have not been subject to previous public consultation. The Council's Cabinet approved the Strood Town Centre Masterplan in December 2009 as a "work in progress" on which there would be further opportunities for engagement with stakeholders but this further engagement has not occurred. Likewise the High Street/Best Street Masterplan, although subject to public consultation, has no statutory significance but its findings are relied upon within the Draft Core Strategy. There are within the Draft Core Strategy other examples of documents not identified or inadequately identified as part of this evidence base. TBH considers that the Core Strategy should not proceed to the next consultation stage or formal submission for public examination until these inadequacies are rectified by the Council comprehensively identifying what constitutes the evidence base and then allowing an appropriate period of time for those concerned to comment further.	The evidence base will be identified in full by the time that the Pre-Submission draft core strategy is published for public consultation.
	Chapter 1: Introduction: Paras 1.24 & 1.25: the recent High Court judgement in the case of Cala homes – v- The Secretary of State for Communities and Local Government has determined that the Government's revocation of regional spatial strategies (RSS) was unlawful. There is uncertainty over the timetable for the enactment of the Localism Bill that will pave the way for any lawful revocation of RSS. In the meantime, the Council's Core Strategy should identify which parts of the RSS it is in conformity and which parts it is not in conformity with and why. Where the Core Strategy is not in conformity with the RSS, the Council should identify why not and the alternative evidence base relied upon to justify that departure.	Before the Council submits the core strategy to the Secretary of State, it will ensure that it is in conformity with the South East Plan.
	Chapter 2: Context and Issues: Para 2.23: this paragraph identifies a range of economic and learning issues that need to be addressed. However, the Draft Core Strategy fails to assess to what	The core strategy will be amended to more closely identify the links between the issues,

extent the development plan is capable of addressing these issues, and where that capability is considered to assist specifically how each of these important issues will be addressed. TBH Ltd considers that it is important that the capability of a development plan to meaningfully address these issues in the period to 2028 is assessed so that Core Strategy has an appropriate focus.	objectives and policies that address them.
Chapter 3 Options and Alternatives: Employment; paras 3.6-3.11: this section of the chapter fails to set out any options relating to future provision for employment but rather sets out a deterministic view of how the Council wishes to see future employment and economic growth. Given current national issues relating to uncertainty about future economic growth, the Council's employment objectives may take longer to achieve than previously thought, but in the meantime there will be a continuing need to generate new employment opportunities. This chapter of the Draft Core Strategy currently represents a "missed opportunity" to consider a flexible employment strategy as a basis for economic development and employment policies in the current economic climate.	Policy CS17 sets out the employment strategy for Medway and includes the provision of additional land for new development and for the expansion of existing economic functions, the growth of new sectors, the growth of Chatham as a regional hub, an emphasis on higher value activity including a technology and knowledge based cluster of businesses, the improvement of skills and training, the expansion of the higher education sector and its links with local employers, the creation of a high quality working environment at Lodge Hill, the improvement of Medway's image and the encouragement of rural enterprise. This represents a multifacetted approach to economic development with sufficient flexibility to ensure continuing robustness in the face of changing circumstances.
TBH considers that splitting paras 3.6 to 3.11 and 3.30 to 3.47, all of which deal with employment, is confusing and that these sections should be consolidated.	Paragraphs 3.6 to 3.11 are part of a section on the overall level of growth, whilst paragraphs 3.30 to 3.47 are part of a section dealing

Options for Urban Medway; paras 3.22 to 3.28: there is a lack of clarity in this section about the status of the supplementary planning documents that are being relied upon to support the strategies for the main urban area. Some of these planning documents have not been subject to formal adoption procedures prescribed in PPS12 and some, such as the Strood Town Centre Masterplan, are emerging planning documents. The extent to which each of the supplementary planning documents have been consulted upon and formally adopted should be specified in the emerging Core Strategy so that appropriate weight can be attached to them at any public examination.	with the location of development. There is therefore no need to consolidate them.  The documents referred to in paragraphs 3.22 to 3.28 fall into four categories: the Medway Local Plan which was adopted in 2003, following a public inquiry; a valid planning permission for development at Rochester Riverside; the Strood Town Centre Masterplan, which is a technical document informing the core strategy and which has been the subject of public consultation and subsequent adoption by the Council in 2009; and a number of supplementary planning documents and guidance, all of which have been subject to public consultation
Rochester Airfield; paras 3.38 & 3.39: TBH Ltd considers that it is unsatisfactory that preliminary assumptions have been made as to the amount of new employment floorspace that may come forward at this location. There is no evidence base that sets out these assumptions. Rochester Airfield and land adjacent was identified as a strategic employment opportunity in the RSS in 2009 and before that in the Kent and Medway Structure Plan of 2006, both of which the Council must have supported. The Council has consequently had ample opportunity to assess the development potential of the site and publish its findings and this should be done to provide clarity at the next consultation stage of the Core Strategy.	and adoption by the Council.  The location of employment sites around Rochester Airport and the amount of floorspace capacity of those sites can be found in the Medway Strategic Land Availability Assessment, 2010.  Work is progressing on a masterplan for the area, jointly with the airport operator and BAe
Chapter 5: Cross Cutting Themes: Policy CS 1: Regenerating Medway: incorporates land use proposals that have emerged in non-statutory planning documents that have not been subject to formal adoption procedures, in particular scrutiny as to whether and when the regeneration proposals that they contain are deliverable (e.g. Best Street and Strood Town	The documents supporting the development proposals in policy CS1 have all been subject to public consultation and adoption by the Council and with the exception of

Centre).	the Strood Masterplan are all based upon policies in the Medway Local Plan. Deliverability is being addressed in the Infrastructure Plan.
Policy CS 7: Countryside and Landscape: the Medway Landscape Character Assessment on which this policy is partly based has not been subject to previous public consultation but has potentially important consequences for development opportunities on the urban edge of the Medway Towns.	The Medway Landscape Character Assessment is a technical document that does not require a statutory period of public consultation. However, prior to its adoption in 2010, consultation took place with the following bodies:

	Organisation
	Environment Agency
	Natural England
3	English Heritage
	Gravesham BC
5	Tonbridge & Malling
6	Medway Swale
	Estuary Partnership
	Greening the
	Gateway Kent &
	Medway
	Land Securities
	Kent Wildlife Trust
10	RSPB
11	Kent Downs AONB
12	Valley of Visions
	Cliffe & Cliffe Woods
	Parish Council
	Friends of North
	Kent Marshes
15	Allhallows Parish
	Council
	Isle of Grain Parish
	Council
	Frindsbury Extra
	Parish Council
	Maidstone BC
	Swale BC
	KCC - Heritage
	Cuxton Parish
	Council
	Groundwork Kent &
	Medway
23	Countryside Forum

Chapter 7; Economic Development: TBH welcomes the recognition by the Council that retail development can contribute to economic growth, reflecting the advice in PPS4, and should therefore be included in the Economic Development chapter of the Draft Core Strategy.	Combining the retail and economic development policies would make the resulting policy too long and unwieldy. All relevant policies should be read together to get a complete picture of economic development proposals.
With respect to the local development opportunity represented by BAe Systems at Rochester Airfield, TBH considers that the Council has focussed too narrowly on this one location and company while giving very little information about the actual development potential of the BAe site and existing buildings. There is a much wider economic development opportunity available on land close to Rochester Airfield, including provision for technology based companies with synergies with BAe. The Core Strategy should recognise and make provision for these wider development opportunities which would contribute to the strategic employment objectives, including amending Policy CS17: Economic Development to read "and the continuing opportunities at and in close proximity to Rochester Airfield to develop a knowledge and technology based cluster".	See above response in relation to Rochester Airfield
The local opportunity within Central Chatham is insufficiently specified in the Draft Core Strategy. In so far as this opportunity may depend on other regeneration opportunities it is unclear how deliverable these will be (see objection to Policy CS1 above and Chapter 11 Area Policies below).	The opportunities for development in the centre of Chatham are set out in detail in the Chatham Centre and Waterfront Development Brief, 2008, the Pentagon Development Brief, 2005 and the Chatham High Street/ Best Street Area Masterplan, 2010.
Paragraph 7.13 states that the Council and its partners will promote employment and economic activity through a range of measures. However, many of these measures are beyond the scope of a development plan document such as the emerging Core Strategy to directly influence. TBH considers that the Core Strategy should focus on those measures that it could influence through land allocations and development control decisions in terms of delivery of employment locations and floorspace in order to ensure that it remains focussed on matters relevant to and achievable through the planning system.	Medway Council is already involved, with other bodies, in the promotion of the measures in paragraph 7.13 and it is therefore appropriate to include them in the broader aspects of the economic strategy.

Paragraph 7.17: the Draft Core Strategy places reliance on the employment subareas identified in the Employment Land Review Consolidation Study (the Study). The origin of these sub-areas is not explained and so therefore cannot be understood. For example, what does the location "M2 Access" mean and on what planning criteria have the areas with this title been chosen? In Figure 7.1, some of the M2 Access areas appear to be in the urban area but the area between the M2 and Hoo is wholly rural, and consequently it is not clear how new employment development is intended to occur in such a diversity of locations. It is unclear what the presentation of the M2 Access Areas in this figure is intended to convey, therefore.

The M2 Access sites are those with relatively close proximity/quick access to junctions 1 to 4 of the M2. All the sites identified by a solid circle are specifically identified existing sites in the Employment Land Review Consolidation Study. The boundaries are purely to group those sites together and to encompass the relevant main roads leading to the motorway junctions. The boundary leading from junction 1 of the M2 does not contain a site because Lodge Hill is a proposed rather than an existing site. The fact that it is in the rural area does not mean that it will not be developed.

The findings of the Study have been incorporated into the Draft Core Strategy but with no opportunity for stakeholders such as TBH to consider, raise questions about and comment on its findings. Those parts of this Study that TBH has reservations about and objects to, at least until further clarification can be obtained from the Council, are:

The derivation of the figure to provide for 21,500 jobs up to 2026;

The derivation of the floorspace requirements by sub-area in Table 7.1;

How the floorspace requirements by sub-areas in Table 7.1 relate to the economic objectives and outcomes, and wider planning objectives such as regeneration, that the Council is seeking to achieve in the period to 2028;

The derivation of the employment floorspace supply in Table 7.2 which appears to indicate a very high density of development (a density that is considered undeliverable as well as being contrary to Government guidelines and other comparators);

The evidence base for the Study conclusion that development of new sites with access to the M2 would undermine investment in more central locations and the implications of this finding for the employment land strategy;

The Employment Land Review Consolidation Study is part of the evidence base of the core strategy and is available on Medway's web site for public inspection.

The evidence base for the conclusion in para 7.26 that "Not only is there sufficient floorspace overall to meet the employment requirements but that there are also a	
range of locations and types of sites to cater for all likely growth sectors over the	
plan period" including the assumptions relating to what will be employment growth	
sectors.	
Paragraphs 7.36 to 7.44 and Policy CS19: Retail and Town Centres; these	Noted and minor textural changes
paragraphs need amending to reflect the Council's decision to grant planning	proposed.
permission for a food superstore at Medway City Estate and the reasons why	
justification for this additional convenience floorspace was considered to exist.	
Paragraph 7.48 and Policy CS 19: Retail and Town Centres need amending to	See response above.
reflect the Council's decision to grant the foodstore permission at Medway City	
Estate and that this site will no longer be available for the development of 15,000 sq m of bulky comparison goods floorspace. This quantum of bulky goods floorspace	
will now have to be re-allocated to other sites within the Medway Towns in an	
amendment to the emerging Core Strategy. The site at Temple Park (formerly Alloy	
Wheels) at Priory Road, Strood owned by TBH provides an opportunity for such	
bulky goods retail floorspace development.	
Chapter 11: Area Policies:	View noted.
TBH as the owner of the former Alloy Wheels site at Priory Road, Strood, considers	
that the provision of 8494 sq m of employment floorspace on this site, as set out in	
Table 11.2, is not achievable without flexibility as to the mix of development on the	
site. A mixed development of the site of employment floorspace and bulky goods	
retail could be economically viable and enable an early start on regeneration of the	
site which has been a Council objective for over 10 years. It would also enable a re-	
allocation of part of the 15,000 sq m of bulky goods retail floorspace from Medway	
City Estate for end users wanting a presence in Strood, or not currently represented in the Medway Towns, so improving the retail offering without adversely impacting	
on existing retailers in Strood town centre. TBH would seek recognition of this mixed	
redevelopment opportunity at the former Alloy Wheels site in the emerging Core	
Strategy Tables CS19 and Table 11.3.	
Without some economically viable mix of development at the former Alloy Wheels	The site has significant potential as
site it will be very uncertain that the Council's employment floorspace allocation here	additional employment land for the
will be provided and instead the site will only be suitable and available for open	area as a whole and Strood in
storage or similar use requiring little or no new capital investment.	particular. The right type of uses,

	where they may be workshop, creative industries or research and development would have to be carefully worked up with a focused analysis on the site's potential in connection with the wider Medway economy and other site opportunity. The Medway Core Strategy will not focus down to individual sites in this way. Other, subsequent Development Plan Documents will do this.
TBH would wish to be assured that the Council's redevelopment proposals for the High Street/Best Street area of Chatham, which anticipate significant central area regeneration with provision of major new retail floorspace and employment floorspace, are realistic and deliverable. The Council's own SLAA put the development timescale of these areas as not before 2021 and, while this is within the Core Strategy timeframe to 2028, it is towards the latter part of that timeframe. There are significant constraints to delivery of that redevelopment even within that timeframe, namely:  - the economic climate and investor and lender confidence particularly with respect to complicated multi-million pound developments; and multiple ownerships and tenancies some of which have more than 5 years to run; If these Chatham redevelopment proposals do not come forward by then there will be implications for the delivery of needed retail development and employment floorspace on alternative sites in the Medway Towns.	The Medway Core Strategy will set the parameters for the regeneration of the Chatham High Street/Best Street that will accord with the adopted masterplan for the area.
Chapter 12: Implementation, Monitoring and Review: TBH has concerns about the justification for the level of developer contributions that the Council sometimes seeks, for example air quality monitoring. The new Community Infrastructure Levy and its proposed replacement by a system of local tariffs create an opportunity for a comprehensive review by Medway Council of its Developer Guide to Contributions, not least to ensure that there is no duplication or conflict between these existing and proposed methods of seeking developer contributions. TBH therefore seeks a commitment from Medway Council for a comprehensive review of its Guide to Developer Contributions when details of the	Noted. The CIL system will involve a review of contributions.

	new government local tariff system are available.	
	Conclusion: TBH considers that the representations set out above have implications for the test of the soundness of the emerging Core Strategy and need to be comprehensively addressed by the Council (including a meeting with TBH) prior to the next stage of consultation.	Noted.
The Coal Authority	No specific comments to make at this time.	Noted.
The Theatres Trust		
	Key Issues Para.2.27 Neighbourhoods - We <u>agree</u> and support the bullet point regarding a new waterfront arts complex, which will include the Brook and Central theatres and would be interested to learn how this is to be achieved.	The Brook and Central theatres will not form part of the waterfront arts complex but will fall within a wider cultural area.
	We suggest that numbering or Roman numerals are used for ease of reference instead of bullet points for individual items.	Noted
	Policy CS11 Culture and Leisure - We <u>disagree</u> with this policy as it provides no guidance for the future of leisure and cultural activities in Medway. Para.5.123 states that the Cultural Strategy 'outlines a number of further aspirations to work with partners to promote and develop the cultural offer.' We would therefore expect the salient elements from the Cultural Strategy to be put in this policy as the Core Strategy is the bedrock on which other strategies are based. We also recommend a paragraph in this policy to promote and protect your <u>existing</u> facilities and venues as without such a statement it could become difficult to retain an essential community asset particularly where land values become higher for an is other work will be influenced by also state that the loss of an existing facility will be resisted unless it can be demonstrated that the facility is no longer needed, or it can be established that the services provided by the facility can be served in an alternative location or manner that is equally accessible by the community.	View noted. The core strategy affords strong protection to existing facilities.
	Policy CS18 Tourism - We <u>agree</u> with this policy although we are surprised to see a bullet point for the new waterfront theatre and cultural hub here. We suggest that it would be more relevant to Policy CS11 as a guide for planning applications.	The mater can reside in either policy.
	Policy CS19 Retail and Town Centres - We <u>agree</u> with this policy because the policy text acknowledges the main uses for town centres in line with PPS4, and states that these will be maintained and enhanced. However we would have expected specific	Noted but implies a level of detail that is not appropriate to a core strategy.

	guidance for the evening economy to be within this particular policy even though the topic appears in Policies CS17 and CS18 but these only contain general references to support an evening economy.	
Tourism South East	Having read through the tourism relevant sections of the strategy we are generally very supportive of the approach taken. One of the six ambitions arising as part of the vision for Medway is: 'Medway to be recognised as a Destination for Culture, Heritage, Sport and Tourism'. We commend the fact this is included as such an important strand of the strategy. All too often developing an area as a destination for tourism is neglected or, at best, subsumed within the economic development sections of the strategy.	Noted
	The 'Regenerating Medway' section and Policy CS1 demonstrate a clear commitment to redevelop civic space and increase the provision of amenities that will benefit residents and visitors alike. These actions will undoubtedly improve the desirability of Medway as a destination for leisure tourists and business visitors.	Noted
	Quality and sustainability are vital considerations for any destination that wishes to maximise the potential of its tourism sector. We commend the policies in CS2 as an excellent approach toward achieving this aim.	Noted
	Improving the provision of culture and leisure opportunities is a key element to any strategy for an enhanced tourism economy. Similarly it is important to maintain the heritage assets in areas such as Chatham. Therefore we fully support policies CS11 and CS12.	Noted
	We support the aspiration in the economic development chapter to increase the value of local jobs and reduce the reliance on net out commuting. In fact by addressing the first issue you will go a long way toward correcting the second problem. We recognise that there is a desire to grow the micro and small businesses in the area but we would like to point out that these small businesses do bring with them numerous benefits and spread financial risk. Areas with a reliance on large businesses (such as factories) run the risk of large disruptions to the local economy. Therefore we would urge you to recognise the importance of fostering conditions that also assist small and micro-businesses.	Agreed. Policy CS17 to be amended by adding the following to the 4 <sup>th</sup> paragraph:  "This will include the development of incubator and grow on space for new and expanding businesses."
	We fully support the Medway Economic Development Strategy which identifies tourism as one of the most significant opportunities for Medway.	Noted
	The aims in CS17 of developing tourism and of developing Medway as a genuine	Noted

	and connected 'city break' tourism destination receive our support.	
	Policy CS18 is the most important policy for Tourism South East. It amply sets out a	Noted
	vision for the future of the tourism sector and Medway and includes important aims	
	that, if enacted, will benefit the tourism sector. We generally support policies that	
	encouragement retention of existing accommodation businesses; that promote a	
	high level of quality and which support new visitor focused initiatives.	
	References to tourism in Core Strategies all too often give the impression that the	Noted
	sector is separate to all other aspects of the local area. This Core Strategy clearly	
	recognises that this is not true and that the tourism sector plays a vital role in	
	assisting the wider local economy. Three quarters of visitor spending goes to	
	enterprises outside the accommodation sector- to shops, pubs, restaurants,	
	garages, train operators, museums, cinemas and theatres etc. These enterprises in	
	turn support other businesses across a wide range of sectors. Tourism South East is	
	supportive of this excellent strategy. We hope that our comments have been useful.	
Trenport	Strongly Disagree with Paragraph 3.18 (re: Cliffe) - The paragraph suggests that	In identifying Lodge Hill as the
Investments Ltd	Cliffe has no obvious advantages over Lodge Hill and advises that the SLAA	location for a new settlement,
(Vincent &	effectively concludes that the overall conclusion of the evaluation, in so far as it	Medway Council has given the
Gorbing – R	relates to an expanded Hoo option including Cliffe, was that there were a number of	greatest weighting, in its
Lewis, on behalf	Thigh negative impacts compared to Lodge Hill. However, this statement overlooks	assessment of alternative strategic
		_
of Mr C Hall)	a significant advantage of Cliffe over Lodge Hill, in that Cliffe is an existing long	options, to the national policy in
	established settlement with an established range of existing services and facilities,	paragraph 36 of PPS36, of
	including primary school, health centre, village hall, shops and public houses, sports	considering housing provision on
	and recreation facilities, as well as public transport services etc and is therefore	surplus public sector land and
	already a sustainable location for development. Lodge Hill on the other hand would	giving priority to the development of
	be starting from a lower base in terms of services and facilities. Unless new services	previously developed land.
	and facilities are to be provided by the development on day one, which is very	These policies are reflected in the
	unlikely, Lodge Hill would be a much less sustainable location for development, with	South East Plan policy CC9, which
	less sustainable travel patterns being established at the start of the development	requires Government Departments
	which would be difficult to change later on. We have reviewed the evaluation set out	to undertake strategic reviews of
	in Section 5 of the Core Strategy Issues and Options Report (July 2009) and again	their land with a view to disposal,
	query whether the evaluation, particularly for options 1 and 2 was option get very	taking into account the need to
	similar comments but the expanded. Hoo option has existing services whereas the	bring forward land for housing. This
	Lodge Hill option does not, so there should be a clear distinction in favour of the	has already taken place at Lodge
	expanded Hoo option. However, the summary assessment gives the impression that	Hill and the process of land

the opposite is the case. Also, there is no assessment of the impact of the options on existing services. With the same examples, the Hoo Expansion option may help support existing rural services, whereas Lodge Hill may compete with them leading to a decline elsewhere, and making the existing villages less sustainable as custom is drawn away from them. If this evaluation had been more balanced it should have shown that Option 1 would make less efficient use of existing infrastructure and would require more substantial investment in new infrastructure, and significant disruption of existing networks, whereas Option 2 could make more use of existing infrastructure with less need for significant investment in new infrastructure. although some upgrading may be required, which will give rise to some disruption to existing networks. Comparing the two Options would have resulted in Option 1 having a high negative impact and Option 2 having a minimal or moderate impact. Similar conclusions can be drawn for other issues in the evaluation, so in our view the basis of the exercise and therefore the conclusions are flawed and weighted in favour of Lodge Hill and the supposed â€high negative impacts compared to Lodge Hill' is not correct. In support of this we note that paragraph 4.26 of the interim sustainability appraisal refers to the significant benefits that either Extended Hoo or Lodge Hill would have in terms of the social and economic objectives, and that paragraph 4.27 states that in terms of sustainability both the Chattenden and Extended Hoo options are considered to have benefits on social, economic and environmental objectives. Though there may be a greater level of work to be done for construction to occur at Chattenden in comparison to an Extended Hoo, this could potentially, be easier due to it being a blank canvas whereas it would be likely to be more problematic trying to mesh with the existing services around the villages. The differences are not so clear cut with Lodge Hill having a clear advantage as suggested in the draft Core Strategy. We refer to the statements and accompanying plans which were submitted on behalf of Trenport Investments limited in response to the SLAA in January 2009 and April 2010, which provide further information about their proposals for land at Cliffe. A further copy of the statement and plans accompanies these representations. Further comments: Also, in commenting on this paragraph we note that the SLAA (Map 6) incorrectly identifies the land at Cliffe which Trenport has suggested is suitable for development and also query the stated reason for rejecting the sites. The area shown for site 0836 is incorrect. The actual area being suggested as appropriate for development and shown on the submitted plan lies to the west of this area, fronting Church Street. The site area shown is

disposal has been set in train. The Lodge Hill proposal also conforms with policy KTG1 for the Thames Gateway, which requires priority to be given to making full use of previously developed land. Paragraph 19.5 of the South East Plan states that the main locational effects of KTG1 and related policies will be the concentration of new dwellings, employment and services within Medway at riverside sites and to the north on Ministry of Defence land at Chattenden. (i.e. Lodge Hill).

Table 11.22 of the core strategy provides a long list of services and community facilities that will be included in the comprehensive development of the new community at Lodge Hill and provided on a phased basis as development proceeds. Were substantial development to take place at Cliffe, a larger scale of services and facilities would also need to be provided there.

The error in the site boundary at Cliffe has now been corrected in the SLAA.

actually being augmented as playing fields and are a green with an their development	
actually being suggested as playing fields and open space rather than development. The area shown for site 0837 is actually the area being suggested for development (southern part) and playing field / open space (northern part). Table 6 gives the reasons for rejecting the sites as †fails proximity assessment / greenfield' However, the proposals would meet the proximity criteria set out in the Council's methodology / checklist (Stage 7 of the SLAA) i.e.: Within 800m walking distance of a bus stop or railway station providing two or more services per hour. Within 800m walking distance of a convenience store, a primary school and a GP surgery. Within 30 minutes public transport time of a hospital/health centre, secondary school, employment area, town or district centre. Although we accept that much of the land is greenfield, we query whether this has been applied consistently as the land East of Church Street has similar characteristics to much of site 0520 at Hoo St Werburgh which has passed the assessment and is included in Table 1.	
The strategy for accommodating Medway's development needs should be reviewed on a less partial basis and a wider variety of sites provided, including Trenport's proposals for land at Cliffe, with less reliance on the proposals for Lodge Hill.	Medway Council considers that the weighting given to the policies supporting Lodge Hill render the need for a reassessment unnecessary.
Disagree with Policy CS13: Housing Provision and Distribution; Paragraphs 3.3, 3.4 and 6.3 (re: level of growth - housing) - We note that paragraphs 3.3 and 3.4 indicate that it is intended that 815 dwellings per year are to be provided and that this is based on the South East Plan. We have concerns that this level of housing will not be able to be achieved bearing in mind the current economic climate and that levels of housing completions of 815 or more have only been achieved on two occasions in the last 18 years (ie 1991/2 and 2008/9) unless a wide variety of sites is provided in terms of locations, sizes and types (ie greenfield / brownfield etc.). We also consider that there is too much reliance on the Lodge Hill development and that if this proposal does not deliver the required housing it will affect the overall level of housing provided in Medway. A strategy with a more diverse range of sites will be better able to meet the suggested housing requirement. Such a strategy should include Trenport's proposals for land at Cliffe, which is not subject to significant planning and environmental constraints, is in a sustainable location relative to existing services and facilities, and is available for development. The strategy for accommodating Medway's development needs should be reviewed and a wider variety of sites provided, including Trenport's proposals for land at Cliffe, with less	The first review of the SLAA has identified a cumulative surplus of over 2,000 dwellings suitable for development up to 2028. Medway Council considers that this surplus will offset any sites, which do not come forward as a result of the recession. It also considers that the release of additional, constraint-free, greenfield sites would result in their early development at the cost of harder to develop previously developed sites and substantially undermine the whole regeneration strategy of the LDF.

reliance on the proposals for Lodge Hill.

Disagree with Policy CS31: Hoo Peninsula and the Isle of Grain, Paragraphs 11.61, 11.65 and 11.69 - We note that paragraph 11.61 advises that "the villages face the pressure of sustaining services and facilities needed to underpin the quality of life for their residents and surrounding countryside... 'We also note that paragraph 11.65 states in line with wider national trends, there are increasing pressures on village services and facilities, such as shops, post offices, health facilities, pubs and village halls. These services together with good public transport, are essential to the wellbeing of the communities, in order to reduce the need to travel and to sustain a vibrant quality of life...' Paragraph 11.69 advises that "the countryside is a working environment, and villages need local employment to support village life and vibrancy of their communities. Small employment sites are part of the fabric of villages, and these need to be encouraged'. Trenport supports these statements. Policy CS31: Hoo Peninsula and the Isle of Grain advises that "the council will seek to secure the viability of the rural communities on the Hoo Peninsula and Isle of Grain by supporting the retention and development of local services and facilities needed to sustain village life to reduce the need to travel...' The policy and explanatory text stress the importance of services and facilities for the wellbeing of village and rural communities and that the council will seek to secure their viability by supporting their retention. However, there is no indication how the council will help support the viability of the services and facilities and it is unclear how this is intended to be achieved. We suspect that the "support' will be limited to restricting the change of use of premises used for services and facilities to other uses and that there will not actually be any positive and meaningful support for the services and facilities. As the Core Strategy paragraphs hint at, the number of rural shops and services has declined in recent years. This has been brought about by a range of factors including reductions in household sizes; greater mobility; more centralisation of services; greater competition, particularly from larger retail units located in the towns; and more recently internet shopping. These have all contributed towards reducing the number of customers/users and therefore the viability of the services. This trend will inevitably continue unless the decline in the number of potential customers / users is reduced or reversed and more potential customers provided to improve their viability. Simply avoiding this fact and simply introducing policies to protect rural shops and services is unlikely to provide support for the shops and

The issue of support for rural services will be addressed on a village by village or village group basis through the development of neighbourhood plans.

services and help to ensure that they are viable and remain open. A decline in the number of rural shops and services will mean that the rural area will become less sustainable as residents are forced to travel further for services, usually by car. One of the most effective and best ways to protect rural shops and services and help maintain or improve their viability would be to accommodate more housing and employment at appropriate rural settlements as this would give rise to more potential customers and more spending power to support the local businesses and services. One village which we consider would be appropriate for accommodating some residential development to support local services and facilities would be Cliffe (see representations on other policies for further information). Unless this difficult issue is properly addressed there will inevitably be a continuing reduction in the level of services and facilities in rural villages, such as Cliffe, and the "support' offered by the current policy will do little, if anything, to address the decline, which will continue, making the settlements less self-sufficient and sustainable than they are at present. The explanatory text also advises that small employment sites need to be encouraged. This statement is supported, assuming that it refers to new small employment sites as well as existing employment sites. If it only relates to existing employment sites Trenport would object because this interpretation would be too restrictive and in order to maintain local employment to support village life and vibrancy there is a need for a variety of sites suitable for a range of uses which need to be located in rural areas or would serve rural areas and provide local employment opportunities.

In order to address this issue and halt the reduction in rural services and facilities the LDF and this Core Strategy should permit some residential and/or employment development in appropriate rural villages (such as Cliffe), which have a role as rural village service centres. This would require more than just a slight modification to policy CS31 but would require a rethink of the strategy for accommodating the housing and employment needs of Medway and the distribution of housing and employment across Medway, with a proportion of the housing and employment being allocated to suitable rural settlements. However, policy CS31 should be modified to add the following (see underlined text): "The Council will seek to secure the viability of the rural communities on the Hoo Peninsula and Isle of Grain by supporting the retention and development of local services and facilities needed to sustain village life and reduce the need to travel and by allocating land for housing and employment in appropriate locations in suitable settlements, where this would

The issue of support for rural services will be addressed on a village by village or village group basis through the development of neighbourhood plans.

help support local services and facilities. It will work with local communities to	
prepare and implement village plans and other initiatives in order that they can	
become more self-supporting and can respond to local needs and changing	
circumstances, including identifying possible locations for housing and employment	
development and the scale of development which might be appropriateetc	
Strongly Disagree with Policy CS32: Medway Valley & Paragraph 11.76 - We note	Given that the proposed river
that paragraph 11.76 refers to the proposed Medway Crossing that will link Halling	crossing now has planning
and Wouldham. The proposed bridge, which has the benefit of planning permission,	permission there is no need to refer
was allocated in the adopted Medway Local Plan and is shown on the Proposals	to it in the core strategy.
Map (Policy T20). The importance of the new crossing should be recognised in the	
Core Strategy. Trenport Investments is committed to providing the bridge in	
connection with the Peters Village development, which is a strategic development in	
the Medway Valley. Although it is located in Tonbridge and Malling Borough it is	
very close to the boundary with Medway Council. The LDF (including Core Strategy)	
should continue to maintain the Council's commitment to the proposed crossing in	
accordance with the current adopted Local Plan.	
The following should be added to policy CS32: Medway Valley: The council	Given that the proposed river
maintains its support for the proposed Medway river crossing (A228 to East Bank of	crossing now has planning
the River Medway) which will serve the Peters Village development which is of	permission there is no need to refer
strategic importance for the Medway Valley.	to it in the core strategy.
Policy CS33: Lodge Hill – In responding to the Core Strategy Issues and Options	See preceding responses.
Report (July 2009) Trenport stated that it did not support the option for a new	The SLAA review has identified 177
settlement at Lodge Hill. The Expanded Hoo option, modified to include Cliffe, was	sites suitable for residential
supported, for the reasons given in response to questions 52 and 94 of the	development and the Council
submission (see below). Alternatively an option was suggested which involved the	considers that this provides a range
expansion of key rural service centres, including Cliffe. Response to Question 94:	of sites which will meet Medway's
The right options have not all been considered. A further option which should be	housing requirements up to the end
considered is the option of expansion of the village of Cliffe, as propose by Trenport.	of the plan period.
This could be either on its own or as part of a strategy to locate additional housing at	
key rural service centres, such as Cliffe, to maintain the level of shops and other	
rural services in the villages and maintain their relative levels of sustainability (see	
comments on Question 52). This could possibly form part of a variation to Option 2	
Expanded Hoo (village "cluster") to include Cliffe. For the reasons set out in the	
response to Question 52 the option of effectively stopping any further development	
at village such as Cliffe would mean that the level of rural services will decline	

	making them less sustainable. Response to Question 52: One of the most effective	
1	and best ways to protect rural shops and services would be to accommodate more	
	housing and employment at appropriate rural settlements as this would give rise to	
	more people and more spending power to support the local businesses and	
	services. The number of rural shops and services has declined as household sizes	
	have reduced; there has been greater mobility; and greater competition. This trend	
	will inevitably continue unless the decline in the number of potential customers is	
	reduced or reversed. Simply avoiding this fact and introducing policies to protect	
	rural shops and services is unlikely to ensure that they are viable and remain open.	
	A decline in the number of rural shops and services will mean that the rural area will	
	become less sustainable as residents are forced to travel further for services,	
	usually by car. This position is maintained. Notwithstanding Trenport's concerns at	
	the overall strategy we query whether the 4,600 dwellings suggested at Lodge Hill	
	could be completed in the plan period (i.e. by 2028 or an 18 year period). This would	
	mean an average of 255 dwellings per year being completed. Although this number	
	may be achievable during a boom period in the middle stages of development they	
	would be unlikely to be achieved during times of economic downturn, as at present,	
	or during the start-up period of the development, when completions are likely to be	
	significantly less. There is inevitably likely to be another downturn in the 18 year	
	period bearing in mind the cyclical nature of the property market. Overall we	
ļ	consider that the development programme is too optimistic and that this number of	
ļ	dwellings is unlikely to be achieved. The policy of concentrating most development	
ļ	at Lodge Hill is effectively putting all the eggs in one basket, which is a risky	
ļ	strategy. It would also effectively put all of the housing in the control of one	
ļ	landowner / developer which is also risky. The required number of dwellings would	
ļ	be more likely to be achieved if there was a range of sites available, spreading the	
	risk and giving greater choice. One such development which could compliment the	
	proposals for Lodge Hill would be Trenport's proposals for Cliffe. We refer to the	
	statements and accompanying plans which were submitted on behalf of Trenport	
	Investments limited in response to the SLAA in January 2009 and April 2010, which	
	provide further information about their proposals for land at Cliffe. A further copy of	
	the statement and plans accompanies these representations.	
	Reference made to previous <b>SLAA</b> Call for sites submissions:	Noted.
University for the	UCA might want to locate to a site other than the Interface Land. Therefore, the	Neither the University for the
Creative Arts	Strategy should indicate that other specific sites in Medway would be suitable for	Creative Arts nor any other

(John Sharkey Associates)	higher/further education use. Would like a meeting with the Council to discuss this further.	university have put forward other specific sites for consideration as locations for university or other higher education development. A meeting would be welcomed.
	Infrastructure Delivery Schedule: UCA is disappointed that there is no reference to any development (especially the proposed Lodge Hill settlement) needing to contribute to the higher and further education sector.	Neither the University for the Creative Arts nor any other university have put forward other specific sites for consideration as locations for university or other higher education development.
	Surprised that there is no reference to the creative industries in the Core Strategy vision or policy CS28.	The University for the Creative Arts is specifically included in policy CS20. If a site specific proposal comes forward after the core strategy has been adopted, an allocation could be made, if appropriate, in the Site Allocations and Development Management DPD.
	Further references should be inserted within the text regarding education.	This representation is too broad and does not identify where such amendments should be made.
Viridor (Entec)	Waste management is not always confined to authority boundaries and should be considered as a cross border issue in spatial planning terms.	Agreed and it is considered that the text reflects this.
	Would like a definition of the types of environmental technologies to be encouraged and how this links with waste management uses.	These are evolving rapidly and it would not be appropriate to employ a narrow definition.
	Medway City estate should be regarded as a suitable location for environmental technologies.	Policy CS23: Waste Management does include Medway City Estate as a preferred location.
	Any requirement for 20% on-site renewable energy generation is unlikely to be viable if it is in situ.	View noted.
	Policy CS4 should encourage low carbon energy sources alongside renewable	What is meant by 'low carbon'

energy sources.	energy sources is not defined. Conventional energy generation should become increasingly 'low carbon' through efficiency improvements. While more carbon neutral and carbon free technologies slowly displace fossil fuelled generation.
Policy CS17 should recognise Medway City Estate as also being a preferred location for energy and environmental technologies.	The policy is generally permissive; Grain and Kingsnorth are mentioned given that they have significant opportunities to develop. Other more 'mature' locations like the Medway City Estate are not excluded from being an area that has potential for energy and environmental technologies.
Policy CS23 should give a clear definition for both 'preferred location' and for 'waste infrastructure safeguarding'.	Technology will change with time; it is not appropriate to identify 'preferred' locations or 'safeguard' existing sites. This would pre-judge the situation; also it is not a role the Medway Core Strategy to identify particular sites for waste infrastructure safeguarding. That would come later in a site allocation DPD.
It is not clear how specific site allocations for waste management will be brought forward over the plan period.	There are no specific site allocations for waste management technology. This would be the role of a site allocation DPD.
If the Council decides to include strategic waste management sites in the Core Strategy then Viridor's existing Pelican Reach site should be listed.  Any cross-river link to Medway City Estate needs further investigation to ensure potential conflicts are addressed between pedestrians and cyclists and existing	Noted.  The Local Transport Plan3 has this linkage as a long term aspiration

	users of the Estate, which is industrial in nature.	The factors listed would be fully assessed at the time a scheme is being developed.
Respondent (Individual)		
Geoff Orton	One major concern is that the scope of the proposed Development Strategy for the Lodge Hill /Chattenden site gives insufficient protection to the important SSSI sites in this area and rather than being the "exemplar" of Sustainable Development that is intended by Medway Council, damage will be caused to the wildlife of this exceptional site, in particular to breeding Nightingales, which will reduce the "Exemplar" value of the development. Once ancient woodland is destroyed, it cannot be simply replanted to achieve the original biodiversity and is therefore not "sustainable" and not available to future generations.	The buffer zone imposed between the SSSI and the development should provide sufficient protection to the species listed. Also the Medway Core Strategy will have policies to preserve and enhance natural assets (Policy CS6) and specifically for the development at Lodge Hill (Policy CS33) that will have to coincide rather than conflict. Indeed Policy CS33 seeks to enhance biodiversity within the site and in its close proximity. The area that is planned to be lost to development has recognised habitat value but would be replaced with an area of equal value. The masterplan for the development will detail this more comprehensively.
	Suggests that much greater emphasis is given researching and incorporating proven buffer zones between the developed and Natural areas even if this means a reduction in the area allocated to housing and other development.	The site masterplan will detail how the natural assets of the site and its immediate surroundings will be protected.
	I feel that Medway Council is missing an opportunity for maintaining protection of green space in Medway (in planning terms) by retaining the concept of ALLIs (Areas of Local Landscape Importance). From recent government announcements, it seems that there is no real case for disbanding the concept of ALLIs in Medway.	own sake. See also responses to other parties on this issue.
	Re Chapter 12, I'm sure you picked up the error in "Implementation" in the heading.  Glossary of Terms could benefit from the inclusion of LNRs, ALLIs and differentiation of "Country Park" and "Countryside Park" which appears in the "Lodge"	Noted.  Paragraph 5.58 explains the meaning of LNRs or Local Nature

	Hill Key Development Principles" diagram between Wybornes Wood and Lodge Hill Wood. Not everyone might understand these terms.	Reserves and there is no need to repeat the explanation in the Glossary of Terms. The core strategy is not proposing to include Areas of Local Landscape Importance and there is therefore no need to explain their meaning. It is not intended that the land at Lodge Hill will be a country park as defined by statute but it will be designed to meet the specific requirements of the new settlement and its surroundings. Hence, the term countryside park has been used.
	Policy CS8 – Open Spaces, in view of this good policy presumably no part of Temple Marsh Open Space will be taken for the planned housing development.	Temple Marsh is the subject of an outstanding planning permission for housing and other development and development is therefore expected to proceed.
John Hill	Policy CS24 – Transport Movement, assumes that given the policy both Strood Pier and Sun Pier, Chatham will fairly soon be re-opened.	The council manage Sun Pier but it is owned by the port authority and managed by the Council. The council have no immediate plans to replace the pontoons that were required due to failure some time ago. Strood Pier is owned by the port authority and effectively removed as a functioning pier some time ago. There is no intention on bringing this structure back into use. River taxi operation does not appear to be viable in the short term. Redevelopment of Chatham centre may well increase the

	Policy CS27 – Rochester, in view of this good policy presumably work will be carried out in the city centre conservation area to bring it up to a satisfactory standard.	demand for this type of transport service over the life of the Core Strategy.  The Council has done assessment work on the area and has adopted a Historic Rochester Conservation Area Management Plan 2010. This plan will be the instrument by which identified problems within the conservation area can be addressed.
Owen Sweeney	These comments are from a local Medway resident and a member of Medway Countryside Forum(MCF). As such, I should like them to be treated as complementary to the separate submission on this draft Core Strategy by our Chairman, David Murr, on behalf of the Forum as a whole.	Noted.
	For an ordinary resident, it is very difficult to comment adequately on a lengthy and important document - which will greatly affect our lives and those who follow us - in such a short timescale and in a season when we are all so busy (a few extra days' grace is virtually meaningless).	Noted. There was a normal six week consultation period for a core strategy DPD. Further time to respond due to personal circumstances was granted to enable a response to be made as an extra dispensation due to personal circumstances.
	So these comments will be confined to three topics viz. Areas of Local Landscape Importance (together with Protected Open Space), the proposed Lodge Hill/Chattenden development and Motney.	Noted.
	ALLIs Policy CS7. Over recent years our Forum has stoutly defended the existence of ALLIs, particularly for Medway, and for very good reasons. Attached is a copy of comments contributed on-line to the Issues and Options consultation Qu. 67 which still stand as a convincing justification for the continuance of ALLIs in Medway. Please note the decision of the Inspector at the last Kent&Medway Structure Plan Examination in Public who, against opposition, agreed with our case and accepted	Paragraph 25 of PPS7, states that local landscape designations should only be maintained where it can clearly be shown that criteria based policies cannot provide the necessary protection. No evidence

our amendment for their retention in that plan. And we draw your attention to our Cabinet's support for them in a late amendment to the introduction of the more recent Wildlife, Countryside and Open Space Strategy.

We respectfully ask our Council to retain Medway ALLIs (and Protected Open Spaces) in Policies CS7 and CS8 as valid and delineated protection designations in the Core Strategy and hence strongly object to their removal in this Pre-Publication Draft.

The reason we are so disappointed with this draft's position (on ALLIs) is that it recognises early on at para.1.24 that there are likely to be changes in planning policy and particularly under the "localism" agenda. And at para. 5.67 that "the Coalition Government has indicated that it may re-introduce local designations". Given that there are no longer any top-down housing target figures, and given the greater freedom which this gives to an area like Medway to make decisions about its own future, we do not follow that this draft should pre-empt the removal of ALLIs when - as the attached submission argues - Medway, of all areas in Kent, desperately needs to protect its remaining green lungs, buffer zones, urban green fringes, "separations". (In passing, we are also troubled by a paper, we understand, to the Cabinet at this time on Landscape Character Assessment; we hope that its acceptance, during this consultation period, would not in any way preclude the continuance of ALLIs.)

The previous para. gets to the heart of the matter for those who wish to retain ALLIs. We have heard for some time from Council representatives that protection of these existing green areas will be as good, if not better, under the new arrangements and policies. We beg to differ. All we can see is a weakening of the delineations leading to inevitable encroachment, "trimming" and "enabling" developments precisely because of the removal of that clear act of designation which was the strength of ALLIs - as experienced at the Public Inquiries which debated the Medway Local Plan and also quoted as recently as this year by an Inspector ruling on a case at Cliffe. The only outcome of this change in policy is that our remaining green lungs will be increasingly vulnerable and under greater pressure than hitherto since developers will recognise an increased and easier opportunity to encroach onto these currently protected areas. We therefore ask our Council to think again, please,

has been provided of this and therefore the local landscape designations will not be retained. The Kent and Medway Structure Plan has been abolished.

To remain in accordance with national planning policy the retention of local landscape designations is not possible; unless a combination of landscape character assessments and criteria based protection policies do not afford the necessary protection. No evidence has been presented that this will not occur.

The intention to protect is still as strong as hitherto, the mechanism has changed, as required by national planning policy.

The Landscape Character Assessment as adopted in March 2011 is a strong tool. Criteria policies should ensure the same level of protection to Medway's rural areas. and retain them.

Lodge Hill/Chattenden Policy CS31 and Table11.16 and Policy CS33 and Figure 11.4. MCF have written two important letters dated 4 October 2010 and 18 November 2010 to Land Securities on this proposed development and copied them to the MOD, local MPs, local party Leaders and various parts of Medway Council, including planning. They summarise our position and show how consistent we have been in our advice to our Council over recent years. There is, of course, a connection between the case for ALLIs generally and our views on this particular development.

In truth, there should not be any development at Lodge Hill/Chattenden because of all the sites discussed in the Issues and Options process, this ALLI is undoubtedly the richest in biodiversity terms, rather ironic in this UN International Year of Biodiversity. The pressure on the people of Medway to accept this development was unreasonable, not least because all of our remaining green lungs considered in that paper should have continued to enjoy protection in line with the Local Plan. Sadly, it was in effect verging on a form of "blackmail" on the people of Medway and now that there is no longer a specific housing target laid down by Government, it is up to our Council to reconsider its support for this excessive development.

Noted.

The ALLI in the Lodge Hill area is, like others across the area, is not an ecological designation. The landscape importance is understood and the adopted Medway Landscape Character Assessment identifies the whole area as Chattenden Ridge, which includes the SSSI and the area covered by the redevelopment masterplanning work. The ALLI designation does not preclude development, given that the central 'white' undesignated area is PDL. and surplus to MOD requirements. it should be seen as a developable area. In order to ensure a sustainable pattern of development a certain 'critical mass' has to be achieved. A dwelling number of some 500 with a population of approximately 12,000 plus are anticipated to give this magnitude that will ensure the services and

infrastructure (such as potentially district heating, waste recycling and medical and retail services etc) are justified. Therefore there would be take up of some of the land currently designated as ALLI and protected open space. However, to ensure biodiversity is largely unaffected none of the SSSI areas will be directly affected and a buffer zone between these areas and the new development will be imposed. Also, those areas that are potential habitat but not SSSI and will be lost due to development are to be replaced with new habitat with equal value if not area. The masterplanning of the site will have to accord with national planning policy advice contained in PPS9: Biodiversity and Geological Conservation in that habitat should be conserved enhanced and restored.

If against this renewed "localism" freedom from Government, our Council is intent on some development at Lodge Hill, it is vital that such development is less extensive and confined to the area E/NE of Lodge Hill/Chattenden Lane ie within that element of the MOD-fenced and hitherto private area, inaccessible to the general public both by entry and in terms of a visual amenity. It is not right to build on the biodiversity-rich areas to the W/SW of that road which is currently protected by the ALLI and POSs designations - and should remain so protected (see above).

We should like to explore this proposal against deeper values. Given the popularity of programmes like Springwatch, Autumnwatch (which recently featured the UK

Noted.

The buffer zone imposed between

decline of the nightingale), any David Attenborough, Andrew Motion on the delights of the nightingale in Birds Britannia etc, why is it that our Council is so immune to responsibility for these treasures? In that this is a nationally important site for nightingales, one of the top five in Kent itself the top county in UK, it is barely an exaggeration to wonder if this is not Governmental (MOD) and/or municipal (Medway Council) vandalism in terms of the destruction of and damage to such a beautiful, iconic and fast declining UK species. But we all know, don't we, that it is not only the nightingales that will be sent packing for such scarcities as the turtle dove, bee orchid and yellowhammers etc will also suffer from this intrusive and excessive development.

the SSSI and the development should provide sufficient protection to the species listed. The Medway Core Strategy will have policies to preserve and enhance natural assets (Policy CS6) and specifically for the development at Lodge Hill (Policy CS33) that will have to coincide rather than conflict. Indeed Policy CS33 seeks to enhance biodiversity within the site and its close proximity.

We are sorry to say this but we are beginning to wonder if Medway Council's recent mind-set is such that to destroy an SNCI/LWS level habitat for reptiles like slowworms and lizards (Copperfields Wildlife Site) for housing; the infilling of the last remaining freshwater lake and reedbed in urban Medway with its stunning biodiversity (on Medway City Estate) for un-needed warehousing when "To Let" signs abound; the plundering of designated Protected Open Space at Temple Marsh against the Local Plan, again for housing; the riding rough-shod over an ALLI for the Wainscott Training Ground; all have become so common-place that such dreadful losses seem no longer to have the capacity to concern our Councillors and Planners. All attempts by MCF members and many other residents, whether in groups or individuals, to influence their thinking are routinely disregarded.

View noted.

We ask then in this case to reconsider the current intentions for Lodge Hill/Chattenden as contained in this draft Core Strategy and as detailed from paras.11.56 to 11.72 and paras.11.88 to 11.110 and particularly Figure 11.4. It fails to meet the third principle for the development at para.11.94 and, as MCF argued with the Wainscott Training Ground, is against PPS9 re. the SSSI. We have pleaded above that any development is confined to the E/NE of Lodge Hill/Chattenden Lane for only then can the jewels of the SSSI woodlands and nightingale-enriched etc scrub areas to the W/SW of that road be properly protected and sustained by a significant and meaningful separation. Mitigation and/or compensation will not produce a solution for destruction of and detriment to breeding sites; cat fences

Continuing work on the Lodge Hill masterplan is being done collaboratively with Natural England and others to ensure that full account is taken of the SSSI and all other areas of nature conservation within the site and in areas adjoining.

	would also prevent free movement of other important mammal species and moats would be ineffective as the nightingale breeding sites are fragmented. And it is arrogant of humans to claim that we can always cajole species to breed where we want them to breed. Because nightingales in UK are contracting into the SE corner, all present and potential sites will be needed. Open our eyes and ears, please; we have a biodiversity gem at Lodge Hill/Chattenden and we are honoured by the nightingales' presence. Let's preserve it, not destroy it. It is very rare for the Kent Ornithological Society to involve itself in planning matters, the only recent precedent being the Cliffe Airport proposal. Yet this reputable organisation with hundreds of members has come out against the intended damage to the nightingale sites in a letter to Land Securities.	
	14. Motney Policy CS6. We ask for the inclusion of Motney Reedbed and Motney Marshes at para.5.59. These were in our Local Plan 2003 and given their biodiversity richness even as compared to other proposed LNRs we ask that they are included here too, please.	The successful designation of a LNR greatly depends on ownership. Medway Council do not own the land and the owners apparently are fully engaged with managing the area as part of their wildfowling activity.
Vivienne Parker	There is no land use provision for extra allotment sites anywhere in Medway, and especially at Lodge Hill	The authority is looking at allotment standards across the area in terms of protecting the existing stock and setting standards for new development. With regard to Lodge Hill the development brief for the site will set standards for the development.
	The River Medway has been given its own chapter, but not the Thames. What about Cliff, All Hallows and Grain?	The area based policies address the Hoo Peninsula, particularly CS31: Hoo Peninsula and the Isle of Grain. Figure 10 1 River Medway will show the peninsula's relationship with the R.Thames.
	Preference should be given to Chattenden rather than Hoo for new health facilities, especially given development at Lodge Hill.	The masterplanning of the new settlement at Lodge Hill will include

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	Strongly disagree that Chatham should be the regional hub in the centre of Medway. University students are closer to Gillingham. Chatham should be more tourist and employment orientated.	health care to ensure the area has adequate provision. The existing residents of Chattenden will be able to access these facilities. The population of Hoo St Werburgh will continue to enjoy their level of existing of health care provision.  View noted.  That is what is sought in the
	Chamam should be more tourist and employment offentated.	strategy for Chatham.
	Another risk with Chatham is that it is at increased risk of flooding.	Noted and this is dealt with in the core strategy.
Yelena Sherwood- Jenkins	Suggested measures for attracting more visitors to Rainham Shopping Centre.	Noted.
Faye Murison	Strongly Agree with Policy CS31: Hoo Peninsula and the Isle of Grain.	Noted.
	We have a piece of Land at the Isle of Grain Suitable for 5 + Dwellings would like to be Considered for Building in Your Plan. 2028. (We do not Understand what your Policy is all about we would like a representative to explain to us in more detail as everything seems confusing to us)	Officers would be pleased to have a meeting to explain the core strategy and discuss the proposal at the Isle of Grain.
Brendan Weaver	Disagree with Policy CS17: Economic Development & Appendix D.	Noted.
	The projection of employment floor space included in Appendix D seems somewhat hopeful for the next couple of years. I'd suggest that this projection is revised to present something more realistic. 220,000sqm for floor space in one year, for context, is equivalent to something like 20 Tesco Extras opening in Medway in one year - unrealistic in any economic climate.	CS17: The job target is explained in paragraphs 4.2.28 of the Medway Employment Land Review Consolidation Study, 2010. This states that in Medway, a key objective is to increase employment, especially higher value employment, reduce out commuting and improve economic activity rates to levels closer to the South East average. Baker Associates analysis has lead to the conclusion that planning for lower economic growth would not deliver

Unknown  Dr M C Barbara	Disagree with Policy CS21: Conventional Energy Generation.  E. On announcement on Kingsnorth has thrown this one up in the air  Policy CS30: Rainham: Residents of Mierscourt Road, we have been trying to have our little parcel of land changed from rural to urban since 2002. Although we have made many representations in various forms, we never seem to get to the core of the matter and the problem solved. We find that the programmes are often couched in language that we are unfamiliar with as it is technical and relevant to your area of work only.	the strategic objectives for the wider area and undermine sustainability objectives in Medway and ultimately be self fulfilling by limiting supply and undermining potential economic growth.  Consequently, a high growth scenario was adopted by the study, consisting of natural change, (5,600 jobs), increased economic activity (8,600 jobs) and reduced outcommuting (7,300 jobs). (see paras. 4.2.48 and 4.2.49).  Noted.  Noted.  The opportunity to change the status of the land is limited given that it is outside the defined boundary of the extant urban area. It is a rural location, and as such is protected from development for its own sake. Green field releases for development are not required given the substantial amount of previously developed land being available for development elsewhere in the area.
Sean Delay	No Opinion with <b>Policy CS24</b> : Transport and Movement; Economic	Noted.
	Development/Transport/Sustainable Communities.	The Councille Legal Transport Disc
	Medway City Estate: This site is practically inaccessible, if one does not have ones	The Council's Local Transport Plan
	own transport' (usually defined as a car). The bus services are very patchy, and, in	3(LTP3) 2011-2026 sets out a 15-
	any case, will get trapped in the traffic jams at the limited exit points from the	year program to deliver a rage of
	peninsula; This geography, having a limiting effect, on the traffic flow, at this	transport infrastructure
	location. Since the Medway City estate is in the centre of the towns, geographically,	improvements totalling £52.8
	the poor pedestrian links are perverse. The site is unsustainable, by virtue of this,	million in secured funding terms.

		T
	with the associated car generated pollution, congestion, and associated risk, to other Road-Users. The provision of a pedestrian bridge, from the Gun Wharf, New Bus station site, in Chatham Town Centre would have the following effects: the easing of pedestrian access to the MCE; the reduction of vehicle generated pollution, and the associated health problems, for both car-users, and those outside the vehicles. In addition, some of the companies on the MCE might well then be able to recruit some of the long-term unemployed, in the Chatham Area, thus having a beneficial effect on employment chances, and with that, life chances, in Medway. In order to permit ship navigation, of the Medway, beyond Rats Bay, the bridge would have to be either: a. High enough for ocean-going vessels to pass beneath it b. Have a raise able centre section, in order to permit ship navigation.	This does not include a pedestrian linkage with Medway City Estate and Gun Wharf. It remains a long term aspiration.
	Pedestrian Access, in general: an effort needs to be made to ease pedestrian use of the urban environment. For example, the configuration, of fencing, at traffic islands, in Chatham Town centre, which obstructs pedestrians, which makes their journeys less convenient. The stopping up of links between adjoining areas, making pedestrians walk a circuitous journey; these all need to be tackled. A practical example: ASDA, at the Bridgewood Roundabout; there is an unofficial short cut, into Taddington Valley, from the corner of the car park. There should be an official path, so that those wishing to walk to the store, from adjoining areas can do so.	The ongoing reconfiguration of Chatham has greatly reduced pedestrian confinement
Liz McVeigh	Agree with <b>Policy CS25</b> : The River Medway and 10.11 Marine Leisure.	Noted.
	Whilst supporting the general thrust of the policy, I would like to remind the Council that some of the river users are afloat in rowing boats. There is no mention of this form of leisure use but it provides a real opportunity for those who cannot afford motor or sailing boats to access this wonderful resource in the area. In particular we would wish to preserve our access point to the river, on the slipway at the southern end of Rochester Esplanade and trust that the assurance that such facilities will be "generally" preserved will include those of Medway Towns Rowing Club. Please add rowing to the list of leisure.	Slipways and launching points are given protection in the core strategy and 'saved' local plan policies.
David Murr	CS24 & Paras 9.20-9.21 – There should be a specific reference supporting the continued long-term operation of Rochester Airport as a flying facility, and recognising its potential value for tourism, light business aviation and promoting interest in Medway's aviation heritage.	The core strategy supports general aviation at Rochester Airport.



# Medway Local Development Framework:

**Core Strategy** 

**Interim Diversity Impact Assessment** 

August 2011



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- 1. Medway Council's approach to the LDF and Diversity Impact assessment
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- 6. Publication Draft Core Strategy
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- 1. Medway Council's approach to the LDF and Diversity Impact assessment.
- 1.1 The Race Relations (Amendment) Act 2000 introduced a requirement to conduct race impact assessments. By law all policies and major service changes that could have an impact on black and minority ethnic (BME) groups need to be assessed.
- 1.2 Since then, similar statutory duties have been introduced in relation to disability and gender and the potential barriers to people having fair access to council services or employment.
- 1.3 The legal duties on local authorities<sup>1</sup> currently cover race, disability and gender only. However, the Diversity Impact Assessment (DIA) process at Medway Council has been designed so that it can consider other groups in the same way. Medway will identify impacts for customers due not only to their racial/ethnic group but, also, to their gender, or disability and asks about possible discrimination due to sexual orientation, age, religious belief and other factors.
- 1.4 The Core Strategy is the key document in the Local Development Framework (LDF) as it sets out the overall vision and strategy for place making and will provide the context for all subsequent Development Plan Documents and their policies. It sets out what Medway wants to achieve in different parts of the area to 2028 and how it will get there.
- 1.5 The information used to inform the Core Strategy is formed from two key elements, participation and studies. These are collectively referred to as the evidence base. This has included a number of background studies, community consultations, working with the Local Strategic Partnership, community groups and developers and agents.
- 1.6 The views of the local community and others who have a stake in the future of the area have helped influence the spatial strategy and vision set out in the Core Strategy, particularly through the Sustainable Communities Strategy. To ensure that participation has been constructive, the principles of effective community engagement in planning have been followed. This has meant that at each stage during the progress of the Core Strategy engagement has been continuous, proportional and appropriate<sup>2</sup>.
- 1.7 To help produce an Equalities Impact Assessment an additional Code of Practice has been produced by the Equality and Human Rights Commission<sup>3</sup> that details the procedure to enable a Local Authorities to

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<sup>&</sup>lt;sup>1</sup>http://connections.medway.gov.uk/index/yourcouncil/businesssupport/8315.html/13053/10960/38 <u>810/38811.htm#downloadable\_guidance\_forms</u>

Worthing Borough Council EIA April 2010.

carry out an Equalities Impact Assessment that addresses the needs of all diverse communities.

1.8 There are two main sections to the procedure, the first being the Screening of relevant policies and once assessed if they do have an impact on BME groups, a full assessment.

Screening

1.9 A screening process is used to: identify the main aims of the policy; collect information and decide if the policy is relevant. Authorities should work on the assumption that all proposed policies are relevant to the race equality duty, until it has had a chance to screen them. Any changes a local authority makes to a policy should also be screened, to see if they have implications for meeting the duty. If a policy is relevant then a full assessment should be carried out on its impact on BME groups.

#### 2. Medway Council's approach to the LDF and Initial Screening of Policy

- 2.1 Before any policies were formed or even considered an initial screening of issues took place in the spring of 2009. This included the following matters:
  - Housing
  - Retail
  - Neighborhoods and Town Centres
  - Sustainability and Climate change

#### 2.2 Any race equalities relevance

At this early stage owing to the very general areas of possible policy under consideration, none of the topics could be assessed to have any direct race/equalities relevance. Nevertheless, key priorities and sustainability issues were put together using the documents contained in table 2 of the SAR<sup>4</sup>. This document was taken to the Advisory group of the Local Strategic Partnership who confirmed that subject to a few minor amendments, the Scoping report could go out to consultation to the bodies listed in Annex E1 of PPS12<sup>5</sup>. In the Scoping report a number of key documents were considered that relate to equalities and diversity matters. These included:

**PPG3** (Housing): Meeting the housing needs of the entire community; and creating mixed communities

**PPG17 (Planning for Open Space Sport and Recreation)**: Promote Social inclusion and community cohesion.

**PPS1 (Delivering Sustainable communities)**: Ensuring development supports existing communities.

**Sustainable Communities: Building for the Future**: To ensure all social tenants have a decent home by 2010. To improve conditions for vulnerable people in private accommodation.

http://www.medway.gov.uk/pdf/sustainability%20appraisal%20scoping%20report.pdf

<sup>&</sup>lt;sup>5</sup> Office of the Deputy Prime Minister 2004 Planning Policy Statement 12: Local Development Frameworks http://www.odpm.gov.uk/index.asp?id=1143847

Securing the Future: UK Sustainable Development Strategy: Social progress that recognises the needs of everyone. Reducing the level of social exclusion.

Bringing Britain together: A national strategy for neighbourhood renewal: investing in people, not just buildings; involving communities, not parachuting in solutions; developing integrated approaches with clear leadership; ensuring mainstream policies really work for the poorest neighbourhoods.

A new commitment to neighbourhood renewal — national strategy action plan: In all the poorest neighbourhoods, to have common goals of lower worklessness and crime and better health, skills, housing and physical environment. To narrow the gap on these measures between the most deprived neighbourhoods and the rest of the country.

For a full list of these documents and objectives see figure 4 of the SAR<sup>6</sup>.

#### 3. Collection of Data and the Issues and Options Report

- 3.1 Through the collection of baseline data and examination of sustainability issues, a series of key issues were highlighted. In addition, discussions were held with external organisations and Medway Council officers to help to identify potential issues and options. These formed the basis of the Issues and Options Report<sup>7</sup>, which was published in July 2009 for consultation with those organisations listed within the Statement of Community Involvement (SCI)<sup>8</sup>. The Issues and Options Report outlined the main issues for Medway in relation to the Core Strategy and provided details of options for dealing with them. The Document contained a set of comprehensive questions addressing the main matters for consideration. In relation to community diversity and equalities matters questions were asked about Neighbourhoods, Cultural facilities, Social Care, Affordable Housing and Regeneration.
- 3.2 The above document was also accompanied by the Initial Sustainability Appraisal Report (ISAR) that sought to appraise these potential options. Each Strategic option was then assessed against the Sustainability Appraisal objectives.
- 3.3 A range of bodies concerned with race, gender, disability, age and religion were consulted such as:

Ahmadiyya Muslim Association	Age Concern Medway Ltd	
Alzheimer's Society (Rainham (Kent)	Apnar Ghar	
Support Group)		
Hindu Sabha	Ethnic Minority Forum	
Kent Bangladesh Welfare Association	Frindsbury Hall Nursing Home	
Kent Multicultural Community Association	Kent Association For Spina Bifida &	
	Hydrocephalus	
Kent Ramgarhia Darbar - Gurdwara	Kent Association For The Disabled	
Kent Turkish Welfare Association	Kent Ethnic Minorities Disabilities Forum	

<sup>6</sup> http://www.medway.gov.uk/pdf/sustainability%20appraisal%20scoping%20report.pdf

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http://medway-consult.limehouse.co.uk/portal/issues\_and\_options\_report?pointId=794820

<sup>8</sup> http://www.medway.gov.uk/sci march 2006 statement wl.pdf.

Medway Access Group	Kent Malayalee Association	
Medway Afro Caribbean Association	Kent Muslim Welfare Association	
(Gillingham)		
Medway Arthritis Self Help	Kent Refugee Action Network	
Medway Hindu Centre	Kent Youth	
Medway Mencap Society	Medway Inter Faith Action	
Medway Racial Equality Council	Medway Towns Gurdwara Sabha	
Punjabi International Cultural Society	Multiple Sclerosis Society (Medway	
	Towns Branch)	
Royal Association For Deaf People	Medway Ethnic Minority Forum	
Showman's Guild of Great Britain	Sikh Sangat Gurdwara Association	
Siri Guru Nanak Gurdwara	Sri Guru Ravidass Sabha	
Strood Youth & Community Centre	Women's National Commission	
Women's Aid		
Women's Support Service		

3.4 A copy of all the responses to the Issues and Options Report can be found at the Councils web page<sup>9</sup> together with Officers responses.

#### 4.0 Policy Formulation

- 4.1 As a result of the Issues and Options consultation<sup>10</sup> and together with the Sustainable Assessment of the main strategic options the most sustainable option was chosen and draft policies written for the Pre-Publication Draft Core Strategy.
- 4.2 The general nature of Core Strategy policies means that their impact is wide-ranging and difficult to quantify. This is particularly so with regard to equalities matters. The significance of impacts is dependent on the location of development, as well as the magnitude and duration of those effects. Therefore, uncertainty exists in determining the precise nature and significance of some of the impacts identified for the generic policies.

#### 5.0 Pre-Publication Draft Core Strategy (PPDCS)

- 5.1 In November through to December 2010 the PPDCS underwent its public consultation. For a full list of bodies see Appendix A. A Pre-Publication Draft Core Strategy consultation was carried out between Monday, 1<sup>st</sup> November 2010 and Friday, 10<sup>th</sup> December 2010. The results of this consultation can be seen in the Councils PPDCS Consultation document.
- 5.2 This included a range of bodies concerned with race, gender, disability, age and religion. A full list of consultees can be found in the PPDCS Consultation document. In addition to this some libraries and shopping centres had a one-day manned exhibition showing the documents and areas affected.

#### 6. Draft Core Strategy

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<sup>&</sup>lt;sup>9</sup>http://www.medway.gov.uk/environmentandplanning/developmentplan/localdevelopmentframework/issuesandoptionsreport.aspx

<sup>&</sup>lt;sup>10</sup>http://www.medway.gov.uk/environmentandplanning/developmentplan/localdevelopmentframework/issuesandoptionsreport.aspx

6.1 All the responses from the PPDCS consultation were examined and responses made. Any equality issues were then highlighted and amendments made where necessary. However, as with previous rounds of consultation the policies and issues that were raised in the documents were exceptionally general and related to the population in Medway as a whole. Therefore, no equalities issues were identified.

#### 7. Diversity Impact Assessment: Screening Form

Directorate	Name of Strategy				
RCC	Medway Core Strategy (LDF)				
Officer responsible for	assessment	Date of assessme	ent New or existing?		
Paul Cronk		July 2011	Existing		
Defining what is be					
1. Briefly describe th		de a spatial plannir	ng framework for Medway up		
purpose and objective	Medway Local De  Esta 17 ye Prov  Tack peop quali Set o Prov econ A Comm people in	edway's Core Strategy will be the main part of the ical Development Framework. It will:  Establish the pattern of development over the next 17 years  Provide the basis for all key planning decisions  Tackle a range of issues that are relevant to local people and with the overall aim of improving our quality of life  Set out what needs to be done, by whom and how Allocate land for 'strategic' developments  Set out a local environmental agenda  Provide the basis for significant improvements in our economic performance.  Communication Plan will provide regular information to tople in Medway about progress on LDF (in njunction with SCS and LTP3).			
2. Who is intended to benefit, and in what	All residence  way?  Providing  visit, and	ents, businesses, e g an improved envi	employees & visitors.  Fronment to work, live and eliver a range of different		
3. What outcomes are wanted?  An attractive Medway that meets the needs of Med residents.  Delivery of high quality homes, jobs, shops leisure.  A safe environment for all.			ŕ		
4. What factors/force could contribute/det from the outcomes?	• Active and difference Med	ribute  /e participation buy in from the rent parts of way Council. hership working outside bodies.	<ul> <li>Detract</li> <li>Economic downturn</li> <li>Medway's existing image</li> </ul>		
5. Who are the main	Residen	ts, Workers, Visitor	rs, Developers, Businesses,		

stakeholders?	Community groups, Charities, Council (departments), LSP, National Organisations, Other Kent L.A.'s
6. Who implements this and who is responsible?	Development partners / infrastructure providers Medway Council - RCC

Assessing impact			
7. Are there concerns that		Brief statement of main issue	
there <u>could</u> be a differential impact due to <i>racial groups</i> ?	YES Prior statement of main issue		
impact and to racial groups:	<u>NO</u>		
What evidence exists for this?	Medway Racial Equality Council was consulted. No adverse comments have been received.  The views of relevant groups have and will be sought at appropriate stages of the strategy as it progresses. So far no adverse comments have been received.		
8. Are there concerns that there <u>could</u> be a differential impact due to <i>disability</i> ?	YES	Brief statement of main issue	
	<u>NO</u>		
What evidence exists for this?		ousing Strategy has elements within it that will he needs of disabled people.	
	The views of relevant groups have and will be sought at appropriate stages of the strategy as it progresses. So far no adverse comments have been received.		
9. Are there concerns that there <u>could</u> be a differential impact due to <i>gender</i> ?	YES Brief statement of main issue		
	<u>NO</u>		
What evidence exists for this?	We have projected demographics for Medway covering the lifespan of the Core Strategy. The priorities as identified so far enable both males and females to benefit.		
	The views of relevant groups will continue to be sought at appropriate stages of the strategy as it progresses. So far no adverse comments have been received.		
10. Are there concerns there could be a differential impact	YES	Brief statement of main issue	
due to sexual orientation?	<u>NO</u>		
What evidence exists for this?	The views of relevant groups have been and will be sought at appropriate stages of the strategy as it progresses. So far no adverse comments have been received.		
11. Are there concerns there could be a have a differential impact due to religion or belief?	YES	Brief statement of main issue	
mpset and to rong on a solion.	<u>NO</u>		

What evidence exists for this?  12. Are there concerns there could be a differential impact	The views of relevant groups have been and will be sought at appropriate stages of the strategy as it progresses. So far no adverse comments have been received.  YES Brief statement of main issue			
due to people's age?	NO			
What evidence exists for this?		outh Parliament was consulted. No adverse ents have been received.		
	The views of relevant groups have been and will be sought at appropriate stages of the strategy as it progresses. So far no adverse comments have been received.			
13. Are there concerns that there could be a differential	YES	Brief statement of main issue		
impact due to being trans- gendered or transsexual?	NO			
What evidence exists for this?	The views of relevant groups have been and will be sought at appropriate stages of the strategy as it progresses. So far no adverse comments have been received.			
14. Are there any other groups that would find it difficult to access/make use of the function (e.g. young parents, commuters, people with caring responsibilities or dependants, young carers, or people living in	YES	If yes, which group(s)?  A key feature of the Core Strategy is to improve the living and work conditions of more deprived areas of Medway. Although a wide range of consultation methods are used we do not always get as much feedback as we would like.  We let people know about the Core Strategy		
rural areas)?	NO	via a variety of means including the Council website, press releases, newspaper adverts/articles, exhibitions and workshops. We also use these means to keep people informed about what is happening. We also use LDF database and online consultation software to keep in touch with stakeholders. Medway Ambassadors have been used to help get the message passed on, as have a range of different community forums and groups.		
What evidence exists for this?	There are hard-to-reach groups that are more difficult to actively involve in the production of the Core Strategy.			
15. Are there concerns there could have a differential impact due to multiple discriminations (e.g. disability and age)?	YES NO	Brief statement of main issue		
What evidence exists for this?	The views of relevant groups have been sought at appropriate stages as the strategy progresses. So far no adverse comments have been received.			

Co	nclusions & reco	mme	ndation			
Conclusions & recommend  16. Could the differential			liualiuli	Brief staten	nant of mai	n issue
			bilei stateii	nent of mai	nissue	
impacts identified in			Th		and the second of the second of	
	ons 7-15 amount		YES			se impacts if there is a
	eing the potentia	al for				and take on board the
advers	e impact?			needs and	requiremer	nts of particular groups.
			<u>NO</u>			
17. Cai	n the adverse im	oact		Please exp	lain	
	ified on the grou		YES			will seek to reduce
	noting equality o			deprivation		
	unity for one gro			aopiivation	, raioc onin	0 10 10 10
	ther reason?	up:	NO			
			d to o full	impost see	000000010	
Recon	nmendation to pr	ocee	d to a full	impact ass	essment	
					ements of	the legislation and there
NO	is evidence to sh	ow th	is is the c	ase.		
_						
	ction plan to mak					
Outco				date of compl		Officer responsible
	consultation to			e.g. Women i		Paul Cronk
	tter information			l Medway Old		
upon v	which to plan	Peop	ole's partn	ership group	s	
Datter		<b>T</b>				Time Of and a sec
	quality			lysis breaks		Tim Stephens
	nation upon to plan			v equality stra ibility, gende		
WILL	to pian	etc)	licity, disa	ibility, gende	i, aye	
		elc)				
Planr	ning ahead: Ren	ninde	ers for th	e next revi	ew	
	of next review	Ī		next stage.		
Areas	to check at next	:		egislation		
reviev	พ (e.g. new censเ	ıs	0	Changing demographics		
	nation, new		3 **.	9		
legislation due)						
Signed (completing officer/se		service m	nanager)	Date	21 <sup>st</sup> July 2011	
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Signed (service manager/Ass		ssistant [	Director)	Date	27 July 2011	
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	d Documents:					

### **ATTACHMENT 6**



# Medway Local Development Scheme

August 2011



## Medway Local Development Scheme August 2011

#### 1. Introduction

- 1.1 This, the latest revision of Medway's Local Development Scheme, came into effect on 2 August 2011. In effect, it sets out a summary project plan that guides the preparation and review of the Local Development Framework the long-term spatial plan for Medway.
- 1.2 The Medway Local Development Scheme first came into effect in April 2005. It was subsequently updated in March 2007, then in September 2008 and again in December 2009.
- 1.3 The detailed reasons for this update of the Scheme are set out below.

#### 2. Background

- 2.1 The Planning and Compulsory Purchase Act, 2004 and associated Regulations<sup>1</sup>, requires the council to prepare and maintain a local development scheme (LDS). It must identify the local development documents that will be prepared over the next three years as part of the local development framework (LDF). It must also set out the timetable for the preparation and review of these documents.
- 2.2 Local development documents, with one exception, will contain the Council's policies and proposals relating to the development and use of land in Medway. The exception deals with public participation in the plan making process and this is called the Statement of Community Involvement (SCI). Medway's SCI was adopted in December 2006 and was revised in August 2011.
- 2.3 Local development schemes have three main purposes:
  - To inform the public of the documents that will make up the local development framework and the timescales they can expect for the preparation of these documents.
  - To establish and reflect council priorities and to enable work programmes to be set for preparation of the documents.

<sup>&</sup>lt;sup>1</sup> The 2004 Act was partially amended by the Planning Act 2008. The 2004 Town & Country Planning (Local Development) (England) Regulations were partially amended by the Town & Country Planning (Local Development) (England) (Amendment) Regulations 2008.

• To set a timetable for the review of the documents once they have been prepared.

#### 2.4 They must specify:

The documents that are to have the status of what are called local development documents (LDDs).

- The subject matter and geographical area to which each document relates.
- Which LDDs are to be development plan documents.
- Which LDDs, if any, are to be prepared jointly with one or more other local planning authorities.
- Any matter or area in respect of which the authority has agreed (or proposes to agree) to the setting up of a joint committee with other local planning authorities, and
- The timetable for the preparation and revision of the LDDs.

#### 3. Reasons for this Revision of the LDS

- 3.1 Since the Local Development Scheme was last revised, a number of changes have occurred:
  - Following the publication of the Issues and Options Report in July 2009, the Council decided to introduce an additional period of public consultation on a pre-publication draft core strategy, which set out a vision, objectives, strategy and policies for the future planning of Medway. This took place in October 2010
  - The Government revoked the South East Plan, which required references to that plan to be removed or reworded from the prepublication draft core strategy and a reassessment of the evidence base to ensure that the core strategy could stand on its own in the absence of the South East Plan policies. This plan was subsequently reinstated as a result of a legal challenge
  - The delays caused by these issues took the plan programme into the "purdah" period of the May 2011 local elections and reprogramming had to take place to ensure that public consultation on the publication draft core strategy took place after that period
  - The Government has introduced a system for the introduction of a Community Infrastructure Levy or CIL by each council responsible for a local development framework. This will be an important means of funding local infrastructure in the future and so the charging schedule needs to be reflected in the LDS.
- 3.2 Taking these and a number of other factors into account it was therefore considered beneficial to revise the Local Development Scheme.

#### 4. Resources & Management

- 4.1 The overall responsibility for the preparation of Local Development Documents lies with the Planning Policy & Design Manager on behalf of the Assistant Director. The team responsible for the production of the LDF is the Development Plans & Engagement team under the supervision of the Development Plans and Engagement Manager. The team currently comprises five senior planners, two planning officers and a technical assistant. This staffing structure is subject to review. A temporary Project Manager has also been appointed.
- 4.2 The Council has installed the Limehouse data processing and report generating system in order to streamline the processing and production of the LDF. This is widely used in other local authorities and by Government departments and agencies.
- 4.3 Also contributing regularly to the work are the Design and Conservation team, the Integrated Transport team, Greenspaces, the Housing Strategy team and the Development Management team.
- 4.4 Other teams from across the Council also contribute and specialist consultants are used when there is insufficient expertise or capacity within the Council to carry out a particular piece of work. Where opportunities occur work is undertaken jointly with adjoining authorities.
- 4.5 Close working with the Medway Local Strategic Partnership is also of critical importance and close links are maintained with both the Partnership and a range of statutory agencies and service providers.
- 4.6 Necessary decisions, which need to be made during the LDF preparation process, are the responsibility of the Cabinet, which meets every four weeks. Submission of documents to the Secretary of State and their adoption require approval of the full Council. Medway has an eight-week cycle of Council meetings.
- 4.7 Day to day activity is managed using the following mechanisms:
  - Fortnightly team meetings
  - Monthly Project Board meetings
  - Bi-monthly LDF Extended Officer Group meetings
  - Monthly LDF Advisory Group meetings (a formally constituted Cabinet Advisory Group with membership drawn from the two main political groupings on the Council).

#### 5. Documents Covered in This Revision

- 5.1 There are two development plan documents covered in this revision:
  - The Core Strategy, on which work is well underway
  - A Site Allocations and Development Management document. Work on this will commence following examination in public of the Core Strategy.
- 5.2 The Core Strategy will:
  - Cover the period to 2028 as it must cover a period of at least 15 years from the date of adoption
  - Propose a Strategic Allocation at Lodge Hill, Chattenden
  - Identify broad locations for a range of strategic developments, including within the town centres and along the urban waterfront
  - Include an Infrastructure Delivery Schedule for Medway. A full Infrastructure Plan will be prepared in parallel with the Core Strategy and will inform the content of the Delivery Schedule
  - Include proposals from an indicative masterplan for Central Strood to illustrate how a town centre strategy can be taken forward
  - Replace a number of 'saved' Medway Local Plan policies.
- 5.3 The Land Allocations and Development Management Development Management document will:
  - Deal with all relevant issues to carry forward the overarching policies for the area set out in the Core Strategy
  - Allocate land for a variety of land uses
  - Set out a limited range of policies to govern the effective use of land and guide detailed development management decisions
  - Replace all currently 'saved' Medway Local Plan policies not already superseded by the Core Strategy
  - Be accompanied by a comprehensive Proposals Map to replace that originally produced for the Medway Local Plan.
- 5.4 It should also be noted that the Council publishes a further document each December. This is known as the Annual Monitoring Report. It reports on key changes in the area and charts progress in preparing the LDF against the milestones set out in the Local Development Scheme.
- 5.5 Local Authorities are now required to prepare a Community Infrastructure Levy that sets out a schedule of charges to be applied to all new development to cover the provision of infrastructure. This has to be embedded within the LDF and has therefore been included in the Local Development Scheme.

## 6. Medway LDS: Summary Schedule

Document Number and Title		Status	Resources	Brief Description	Conformity	Key dates
1.	Medway Core Strategy	Development Plan Document	Development Plans & Research Team assisted by other teams across the Council	The document will provide a spatial vision for Medway and include strategic policies and proposals, including those for waste and minerals. It will include overarching policies for specific areas within Medway	Consistent with national planning policy statements, and in general conformity with the Regional Spatial Strategy (South East Plan) [pending its abolition]	Submission March 2012 Hearings July 2012 Adoption October 2012
2.	Land Allocations & Development Management DPD	Development Plan Document	Development Plans & Research Team assisted by other teams across the Council	The document will replace detailed policies 'saved' from the Medway Local Plan and allocate land for a variety of uses	Consistent with national planning policy statements, and in general conformity with the Medway Core Strategy	SEA/SA scoping June 2013 Submission May 2014 Hearings Sep 2014 Adoption Jan 2015
3.	Annual Monitoring Report	Non Development Plan Document	Development Plans and Research Team	Monitors the implementation of the local development scheme and the extent to which policies in local development documents are being achieved.	Not applicable	December annually
4.	Medway Proposals Map	Development Plan Document	Development Plans & Research Team	This document will illustrate the policies and proposals in the other development plan documents	With the relevant development plan documents	When DPDs are adopted

			on an ordnance survey base		
5. Community Infrastructure Levy	Non Development Plan Document	Development Plans & Research Team assisted by others	The document will provide a schedule of charges to be applied to all new qualifying development for the provision of infrastructure	Not applicable	Preparation July 2012 Public Consultation on draft CIL Jan 2013 Examination June 2013 Adoption Sep 2013

#### 7 Details of Local Development Documents and Timetable for Preparation

#### 7.1 Document 1

Name of Document: Medway Core Strategy

Subject of Document: The document will provide a spatial vision for

Medway and include strategic policies and proposals, including those for waste and minerals. It will include overarching policies for

specific areas within Medway.

Geographical Area: Medway administrative area.

Development Plan

Document: Yes

Joint Preparation: No

Timetable/Milestones: Pre-Production Survey Jan-Aug 2008

Formal start of Dec. 2008

continuous engagement

SEA/SA scoping Nov/Dec. 2008

Consultation
Publication of the
Pre-Publication Draft

Core Strategy Nov 2010
Publication of the Draft Aug 2011

Core Strategy

Submission to Secretary March 2012

of State

Hearing sessions
Inspector's report
Adoption

July 2012
October 2012
October 2012

Note: Timetable after submission subject to range of issues selected for

examination

Review: Ongoing from adoption

#### 7.2 Document 2

Name of Document: Site Allocations and Development

**Management DPD** 

Subject of Document: To allocate land for a variety of uses,

including waste and minerals. To set out policies to inform detailed development management decisions. To replace 'saved' policies from the Medway Local Plan

Geographical Area: Medway administrative area

Development Plan

Document:

Yes

Joint Preparation: No

Timetable: Pre-Production Survey From July 2012

Formal start of Sept 2012

continuous engagement

SEA/SA scoping June 2013

consultation

Publication of Draft DPD October 2013 Submission to Secretary May 2014

of State

Hearing sessions
Inspector's report
Adoption

September 2014
December 2014
January 2015

Note: The indicated programme extends beyond the three year

programme covered in this revision of the LDS. Dates are therefore

indicative and provided for information only

Review: Ongoing from adoption

Chain of Conformity: With the Core Strategy

7.3 Document 3

Name of Document: Annual Monitoring Report

Subject of Document: The document monitors the implementation of

the local development scheme and the extent to

which policies and proposals in local

development documents are being achieved.

Geographical Area: Medway Administrative Area

Development Plan

Document: No

Joint Preparation: No

Timetable: Preparation and adoption of report

Apr-Dec annually

Review: Ongoing annual report

Chain of Conformity: Not applicable.

7.4 Document 4

Name of Document: Medway Proposals Map

Subject of Document: The document will illustrate the adopted policies

and proposals in the other development plan documents on an ordnance survey base map.

Geographical Area: Medway administrative area

Development Plan

Document: No

Joint Preparation: No

Timetable: Following adoption of Core Strategy and

Land Allocations and Development

Management DPD

Review: Ongoing

Chain of Conformity: Development Plan Documents.

7.4 Document 5

Name of Document: Community Infrastructure Levy

Subject of Document A charging schedule to be applied to all new

qualifying

development to be used for the provision of

infrastructure

Geographical Area: Medway administrative area

Development Plan

Document: No

Joint Preparation: No

Timetable: Start Preparation July 2012

Public consultation on

Preliminary Draft CIL Dec 2012
Consultation on Draft CIL Mar 2013
Consultation on Modifications
Examination June 2013
Adoption Sept 2013

Review: Ongoing

Chain of Conformity: Not Applicable.

#### 8. Risks and Contingencies

- 8.1 A number of factors could affect the programme for delivering the documents described above. The most significant of these are considered to be:
  - Staffing Changes: The Development Plans and Research team is currently undergoing a fundamental review. It is not yet known what the effect of this will be on the programme for the local development framework.
  - Work Load: Reduced staffing levels, both within the team and beyond, are likely to impact on the work programme. Further demands may also arise once the Localism Bill becomes law and a new tier of neighbourhood plan making is introduced into the planning system.
  - Resources: The cost of producing local development frameworks has proved to be higher than expected. In particular the wide range of studies and surveys required to create a robust evidence base has caused difficulty for many authorities.

For example, the costs of transport modelling alone can easily reach several hundreds of thousands of pounds.

The core team producing the LDF also has to rely on significant contributions from services across the Council and from a wide range of external organisations. If staff resources are not available at the appropriate time this can impact on the planned programme.

However, with substantial progress being made with the Core Strategy adequate resources have been assembled to complete the evidence base by the end of 2011. A high level of co-operation has also been forthcoming from services across the Council and beyond.

Other strong pressures on public finances forecast over the next few years could impact negatively on the programme as set out.

 Alignment with other plans and strategies: Revised Government guidance and policy announcements can have significant implications for the local development framework. The Government is currently preparing a National Planning Policy Framework, which will replace planning policy guidance and planning policy statements in a more streamlined, comprehensive format. This could have a significant impact on the underlying foundations of the LDF.

As a unitary authority, the Council is responsible for preparing a wide range of plans and strategies. These have varied time horizons and review periods, so that it can be difficult to reflect all considerations into each stage of the Core Strategy's production.

- New requirements: Since the introduction of the LDF system in 2004 many new requirements have emerged, not all of which arise from changes in Government policy and guidance. A range of bodies, including statutory agencies, have issued their own guidance and associated requirements in relation to LDFs. This can cause considerable difficulties depending on their timing in relation to the LDF programme. In extreme case they can cause significant delays or even a repeat of key stages as well as having resource implications.
- 8.2 To manage these factors careful monitoring is undertaken of progress with LDFs across the country and of emerging material and best practice. The process being followed also closely reflects the Plan Making Manual issued by the Planning Advisory Service.

#### 9. Saved Documents

- 9.1 The development plan documents proposed in this Scheme will eventually completely replace the previous local development plan.
- 9.2 Under the Planning and Compulsory Purchase Act 2004

(www.opsi.gov.uk/ACTS/acts2004/ukpga\_20040005\_en\_1.htm), all Structure and Local Plan policies were saved for three years from the date of the commencement of the Act or from the date the plan was adopted, if later. As all of Medway's Local Plan policies were in force when the Act commenced, they were due to expire after three years, on 27 September 2007.

- 9.3 If there were no appropriate Local Development Documents adopted which could replace Local Plan policies, local planning authorities could apply to the Secretary of State to issue a direction to save policies until such time as they were replaced. Medway Council consequently applied to the Secretary of State to save those policies that remained in conformity with national and regional planning policies and the Secretary of State issued a direction on 21 September 2007. Copies of the direction letters are available at
  - http://www.medway.gov.uk/index/environment/9995.html/70194.htm
- 9.4 The Core Strategy will identify all the policies in the Medway Local Plan, which will be superseded once the core strategy is adopted and those which will be "saved" and carried forward to be replaced by the Land Allocations and Development Management DPD.

#### 10. **Further Information**

10.1 Further information about Medway's local development framework can be obtained from: www.medway.gov.uk/ldf or by contacting the Development Plans & Research Team:

#### Address:

Development Plans & Engagement Team, Regeneration, Community & Culture, Medway Council, Gun Wharf, Dock Road. Chatham, Kent ME4 4TR

Telephone: 01634 331629

Email: ldf@medway.gov.uk or

localdevelopmentframework@medway.gov.uk

More general information about local development frameworks and the planning system can be found at:

http://www.planningportal.gov.uk/england/genpub/en/1115311947782.

Html

http://www.planninginspectorate.gov.uk/pins/appeals/local\_dev/index.htm



## **Medway Local Development Framework**

## Draft Revised Statement of Community Involvement

(Cabinet Version)

August 2011



#### Summary

This document is a new draft version of the Statement of Community Involvement or SCI for Medway. It sets out how the Council will involve local people in planning and development issues affecting Medway.

The Council first adopted its SCI in 2006. Since then there have been further changes to the development planning system and consultation bodies have come and gone. For these reasons it is appropriate to update and refresh it now.

It includes a short description of the development planning system and Medway Council's role. However most of the document describes the methods the Council will use to engage with the public and other stakeholders and it lists the main organisations that have expressed an interest in being involved.

We welcome views on it before it is adopted and ways to do this are set out below.

#### **Ways to Give Your Views on the Document**

Representations on the document are invited during a six-week period from 30<sup>th</sup> August 2011 to 10<sup>th</sup> October 2011. Representations must be received by 5 p.m. on 10<sup>th</sup> October 2011 in order to be considered.

There are a number of ways in which you can give us your views, check progress on the preparation of this and other LDF Documents and view many background documents.

- **Telephone**: 01634 331629 (Office hours are 9 a.m. 5 p.m. Monday to Thursday and 9 a.m. 4.30 p.m. Friday)
- Email: <a href="mailto:ldf@medway.gov.uk">ldf@medway.gov.uk</a>
- Post: Development Plans and Research Team, Regeneration, Community and Culture, Medway Council, Gun Wharf, Dock Road, Chatham, Kent ME4 4TR
- **Website:** http://www.medway.gov.uk/ldf. This is our front page and you will find numerous links to published documents, our Limehouse system etc.
- Limehouse: This is an online consultation system and we would strongly encourage
  you to "register" as a user. If you do you will receive email alerts when new
  consultations are underway, you can submit your views in a structured way and see
  our responses to all representations we receive. To register please go to:
  <a href="http://medway-consult.limehouse.co.uk/">http://medway-consult.limehouse.co.uk/</a>

#### **Further Advice**

If you would like any further advice on this document or the planning system in Medway the Development Plans & Research Team will always be pleased to help. The contact details are as above.

If you would like more general and independent advice the Planning Aid service is available.

Planning Aid South East

#### Planning advice

The planning system is often seen as complex and difficult to navigate. Planning Aid are able to explain the complexities of it and help you get involved, whether it is by explaining how to comment on a planning application or a national policy statement. If you would like advice or information on any aspect of the planning system call their Planning Advisor.

#### Planning Advisor Tel: 0870 850 9806

email: <a href="mailto:secw@planningaid.rtpi.org.uk">secw@planningaid.rtpi.org.uk</a>

#### Community Planning

Planning Aid also provides training, workshops and seminars for community groups, schools and voluntary groups who would like to learn more about the planning system. If you would like to get more involved in the planning of your area then Planning Aid, through its programme of community involvement in planning and regeneration, can help. Please contact their Community Planners for more information.

#### **Community Planners**

Tel: 01634 831167email: <a href="mailto:secp@planningaid.rtpi.org.uk">secp@planningaid.rtpi.org.uk</a>

email: secp1@planningaid.rtpi.org.uk

Specific people in the Development Plans and Research Section that you might find it useful to talk to are listed below. Please phone 01634 33\*\*\*\* followed by the relevant extension number:

Paul Cronk Development Plans and Research Manager ext 8146

Morgan Slade Senior Planning Officer ext 1028 Bryan Geake Senior Planning Officer ext 1025



Email

ldf@medway.gov.uk

or visit our website at

www.medway.gov.uk/ldf



Minicom

(01634) 333111

# This information is available in other formats from (01634) 331629

If you have any questions about this leaflet and you want to speak to someone in your own language please ring (01634) 331629

এই লিফলেট সম্পর্কে আপনার যদি কোন প্রশ্ন থাকে এবং এ ব্যাপারে আপনার নিজের 331780 ভাষায় কারো সাথে আলাপ করতে চান, তাহলে দয়া করে এই নম্বরে টেলিফোন করুন: (Bengali)

如果你對這本小冊的內容有任何疑問,且想與會說你的語言的某人談 331781 (Chinese)

જો તમને આ પત્રિકા વિશે કોઈ પ્રશ્નો હોય અને તમે તમારી માતૃભાષામાં કોઈની 331782 સાથે વાત કરવા માગતા હો તો કૃપા કરીને આ નંબર ઉપર ફોન કરો (Gujarati)

यदि आपने इस लीफलैट के बारे में कुछ पूछना है और उस व्यक्ति के साथ आप अपनी भाषा में बात करना चाहते है, तो कृप्या निम्नलिखित नंबर पर टैलीफोन करने करे.: (Hindi)

ਜੇ ਤੁਸੀਂ ਇਸ ਲੀਫਲੈੱਟ ਦੇ ਬਾਰੇ ਕੁੱਝ ਪੁੱਛਣਾ ਚਾਹੁੰਦੇ ਹੋਵੇ ਅਤੇ ਤੁਸੀਂ ਉਸ ਵਿਅਕਤੀ ਦੇ ਨਾਲ 331784 ਆਪਣੀ ਬੋਲੀ ਵਿੱਚ ਗੱਲ ਕਰਨੀ ਚਾਹੁੰਦੇ ਤੋ, ਤਾਂ ਕ੍ਰਿਪਾ ਕਰਕੇ ਅੱਗੇ ਲਿਖੇ ਨੰਬਰ ਤੇ ਟੈਲੀਫੋਨ ਕਰੋ: (Punjabi)

331785 اگرآپ اس کتا بچے کے بارے میں کوئی سوال پوچھنا چاہتے ہیں اور آپ کی فردے اپنی زبان میں بات کرنے (Urdu) کے خواہشند ہیں تو براہ میربانی اس نمبر برفون کیجئے۔

Elinizdeki bu yazılı duyuru ile ilgili herhangi bir sorunuz varsa ve dilinizi 331786 bilen birisi ile konuşmak istiyorsanız, lütfen 331786 numaraya telefon edin. (Turkish)

#### 1. Introduction

#### The new planning system

- 1.1 The Planning and Compulsory Purchase Act 2004 replaced a system of Structure and Local Plans with Regional Spatial Strategies (RSS) and Local Development Frameworks (LDF). Some further changes were made in the Planning Act 2008.
- 1.2 Further changes were also announced when the Coalition Government was elected in 2010. These are focussed on the Localism Bill that is currently going through Parliament. Perhaps the most significant change being proposed is the abolition of regional spatial strategies. In the case of Medway this is known as the South East Plan. Pending its abolition Medway's local development framework or LDF has to be in 'conformity' with that plan.
- 1.3 The Government is also moving to rename local development frameworks 'local plans'. This is potentially confusing as some old style local plans dating from before 2004 are still in place. Such changes make preparing Medway's local development frameworks difficult but the Council considers it important to make progress and as quickly as is prudent.
- 1.4 The current system is described in a Government publication Planning Policy Statement 12: 'Local Spatial Planning' (PPS12):

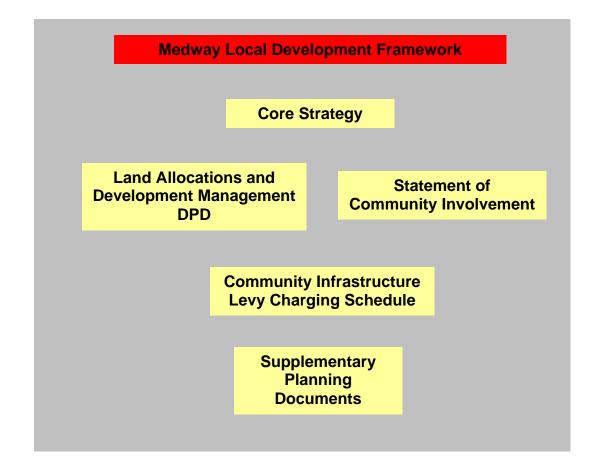
  (http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningpolicystatements/pps12/).

  The following website also contains useful information about the current system and emergingchanges:
  http://www.planningportal.gov.uk/planning/planningsystem/localplans
- 1.5 PPS12 contains the following:

"The Local Development Framework is the collection of local development documents produced by the local planning authority which collectively delivers the spatial planning strategy for its area. The Core Strategy is the key plan within the Local Development Framework."

"The planning system has been substantially reformed to embed community responsive policy-making at its heart and to make contributing to the achievement of sustainable development a statutory objective. The new spatial planning system exists to deliver positive social, economic and environmental outcomes, and requires planners to collaborate actively with the wide range of stakeholders and agencies that help to shape local areas and deliver local services." (paras 1.4 and 1.5)

- 1.6 This stresses the importance of community involvement in the plan-making process and hence the role of this document the Statement of Community Involvement.
- 1.7 It forms part of Medway's LDF as illustrated on the diagram below.



#### 2. Aims and objectives of the SCI

- 2.1 The aim of the process of community involvement is to produce consensus, as far as possible, on the form and content of the local development documents which Medway Council is preparing. Where this is successful, it will help to achieve broad support from local communities and minimise the need for lengthy public examinations.
- 2.2 Sometimes the Council has to make difficult choices as to what policies or proposals should be in the LDF. For example these must conform with national policies. In these cases it may not always be possible to achieve consensus but it is important that local people understand the reasons for decisions reached and have every opportunity to express their views. To achieve this there should be meaningful involvement by all of those with an interest in the future of the area throughout the preparation of all local development documents.
- 2.3 The process by which we aim to achieve this is set out below.
- 2.4 The SCI covers Medway Council's policy for involving the community not only in the preparation, alteration and revision of local development documents but also key planning applications. It aims to be a clear public statement that enables the community to know when and how it will be involved. The Government has set minimum requirements for public involvement, with which local planning authorities must comply. The SCI shows how these requirements will be met and exceeded.
- 2.5 Medway Council's standard is to seek participation from as wide a section of the community as possible that work, live and use the Medway area. It also aims to

- use the results of that participation in a positive way to shape the future for Medway.
- 2.6 The Council considers this to be a 'living' document and it will further amend it when required. Importantly it will always look to devise new methods to positively engage with the public and to learn from them. As such the standards and approaches set out below are intended to set a minimum standard that will be frequently exceeded.
- 2.7 The Council consults the public on many issues, not just planning ones. As a result there is sometimes a danger of consultation 'fatigue' or 'overload'. To overcome this consultation exercises will be co-ordinated where this is practicable and results shared so that work across the Councils is informed.
- 2.8 Medway has a wide range of community and voluntary groups operating in the area. It has been estimated that including all the small community groups, there are well over 500 organisations. These range from very large, professionally staffed organisations to small community based groups. Very often these groups are established to address particular needs such as those of disabled children, older people and so on.
- 2.9 A particular challenge is to engage effectively with what are termed 'hard to reach' groups and sections of the community with specific needs but no organised groups to represent them. The approaches detailed below reflect this.
- 2.10 Transparency is crucial to community engagement and an important element of this is ensuring that the public can access relevant information, reports and research. The ability to do this has been transformed by the growth of the worldwide web and for this reason the Council will continue to invest in its website and ensure that all planning documents, including all those relating to the LDF, are accessible.

#### 3. Medway's Approach to community Involvement

Bodies to be consulted

- 3.1 The Council is required to meet a minimum level of public involvement under the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended). The Regulations specify that the following bodies must be consulted if the Council considers that body will be affected by what is to be covered in a development plan document.
  - Adjoining local planning authorities
  - Environment Agency
  - Natural England
  - English Heritage
  - Secretary of State for Transport
  - Relevant telecommunications companies
  - Primary Care Trust
  - Highways Agency
  - Relevant electricity and gas companies
  - Relevant sewerage and water undertakers
- 3.2 At appendix A is a list of bodies, some of which the Council is required to consult, plus other bodies which it may consult should it be thought necessary to do so.

This list is not exhaustive. The Council may also consult with the following bodies in relation to the LDF and SCI:

- Voluntary bodies, some or all of whose activities benefit the whole or part of the authority's area;
- Bodies representing the interests of:
  - Different racial, ethnic or national bodies in the area;
  - Different religious groups in the area;
  - People with disabilities in the area;
  - Persons carrying on business in the area.
- 3.3 The Council has identified that there are a number of key issues for the community and voluntary sector in gaining effective community involvement.

  Many of these issues relate to groups who may find it difficult making their views known, such as:
  - People on low incomes
  - The unemployed
  - Lone parents
  - Homeless people
  - Older people
  - People with disabilities
  - People wanting to improve their basic skills
  - People with English as a second language
  - People with illnesses or addictions.
- 3.4 One of the aims of the SCI is to ensure that all sections of the public, including local groups and organisations, are actively involved throughout the plan making process. The Council considers that a framework of different methods should be used to contact different sections of the community in Medway. In this way the the LDF in general can be developed in an inclusive way.
  - Dissemination, Participation and Response
- 3.5 There are three key elements, which are considered fundamental to involving the public in the plan making process.
- 3.6 *Dissemination* of Information. The following methods may be used:
  - Statutory notices in the local press
  - Making all documents available on the web site
  - Deposit of documents in Council Offices
  - Staffed exhibitions in locations throughout the Medway Area. These will
    usually be in village or community halls, church halls, schools or other
    public buildings according to availability
  - Press releases containing sufficient information for an article to appear in the local press. The actual appearance of an article will depend upon the editor
  - Articles in Medway Matters the Councils newspaper and in the Council's monthly e-mailed newsletter.
  - Send notification and documentation to individuals and bodies as necessary.
  - Making available large print versions of documents, Braille and different languages if requested. A system is in place that can cope with requests from people who don't have English as a first Language (EFL)

- Specifically identify and communicate with ethnic minorities and disability groups
- Use of site notices for site-specific issues
- Using social network sites in order to publicise events and consultation documents.
- 3.7 *Participation* or continuous Community Involvement. This will be achieved through the use of the following methods:
  - Discussions with the Local Strategic Partnership
  - Programme of public meetings, round tables or forums on large or controversial sites or issues
  - Discussions and correspondence with developers and other interested parties seeking to promote or object to specific development or specific policies
  - Workshops to provide an early input into the formulation of proposals for a specific site or area. The Council has already used these workshops as methods of public participation
  - The Local Development Framework Advisory Group that has been established by the Council. This consists of officers and Councillors. It has responsibility for overseeing the progress of the LDF. Necessary decisions, which need to be made throughout the LDF process, will be the subject of resolutions by the Cabinet and Council after consideration by the Advisory Group.
- 3.8 Responses. The main methods of considering responses will be:
  - All representations will be considered by the council and reasons given for accepting or rejecting them
  - When considering representations, they will be measured against national and locally adopted guidance and other local circumstances
  - A report on council responses to objections and representations and recommended amendments to documents will be published
  - Revised documents will be published and further opportunities for consultation and participation will be made available in accordance with the regulations.
- 3.9 Different documents may require a combination of these consultation methods.

## Other Methods

- 3.10 At each stage where community involvement is required stakeholders should be asked whether or not they felt that they had been fully involved and how they think the process could be improved. Where appropriate, new approaches will be implemented at the end of each consultation stage. In this way the community will have a significant input into developing a community consultation process that suits them and which adapts to changing needs.
- 3.11 This SCI will be widely distributed and other methods that the Council may use to involve the community are:
  - Opinion poll carried out annually consisting of 1100 people in a face-to-face survey to see how people in general feel about certain issues. This is run by an agency that has experience of this method. It is run with a particular key issue in mind. The poll is usually run around September/October time

- Citizen Panel involving a panel of 1500 who are representative in age gender and area etc. and every year a third is replaced by new individuals. They are held 4-5 times a year and consider key issues such as the Community plan. The survey is usually in the form of a questionnaire that goes out to individuals
- Corporate Focus groups where hard to reach groups such as Ethnic Minorities, Age groups, Disability groups, Young peoples groups, Lesbian, Gay and Transsexual groups and the Youth Parliament can participate. Agents are used to find individuals to participate and the venues are held in local halls. A discussion paper is produced and a 1-2 hour discussion takes place. The whole of the meeting is transcribed and the discussions analysed. Feedback is given via Medway Matters or some other forum
- Online Consultation using our Limehouse electronic consultation system. Registered users receive e-mail alerts when new consultations are about to commence. Views can be submitted in a structured way and all responses viewed.

## Specific Groups

3.12 The needs of the working population can be catered for by creating involvement opportunities outside normal working hours but there are a number of other groups within Medway, highlighted below, which the Council would like to be more involved in the planning process.

## Young People

3.13 Young people represent both the present and the future of Medway, although it has sometimes been difficult to involve them in a way that is meaningful to them. Working with youth groups has strengthened there relationships in recent years and enabled many young people to contribute their views - for instance to the preparation of the Sustainable Community Strategy - on issues such as leisure, transport and nightlife. The Youth Parliament meets on a regular basis and is made up of 13-18 year olds. In partnership with a number of local organisations, the Council hosts an annual youth Parliament conference. 'MiX it Online' is a web page dedicated to the youth of Medway and is planned by a group of young people. It is a site where young people are encouraged to raise their views.

## Older People

3.14 Senior organisations working with the Council and others have enabled many older people to contribute their views, for instance on issues such as practical assistance, fear of crime, and transport.

## **Equalities Working Group**

3.15 The Council established a Race Equality Review Working Group in July 2008 to review the actions taken in response to the Race Equality Review and comment on further actions needed. The terms of references of the Working Group were extended to involve the Black Workers Forum, the Disabled Workers Forum and other equalities groups as appropriate on a regular basis. The name of the Working Group be changed to the Equalities Working Group to reflect its

- inclusive remit. This is the group where wider equalities matters are raised and co-ordinated.
- 3.16 The Council has established a consultation database where all the consultation carried out by the council goes onto one database. Results of consultation are available to all Council departments and duplication of survey work is avoided where possible. In this sense a corporate approach to public participation on the LDF can be achieved.
- 3.17 The advantages are that additional resources can be accessed at a corporate level and used where appropriate timetables can be met, and resources will not to be wasted by duplication of survey work.
- 3.18 In addition, all relevant LDF documents are published on the Council's web-site, and people have the opportunity to make representations both in writing and by e-mail. The Council will also use the Local Strategic Partnership (LSP) as a forum to consult the wider community, for raising issues and making representations, where appropriate.

## 4. Resources & Management

4,1 The overall responsibility for the preparation of the Local Development Framework lies with the Planning Policy and Design Manager on behalf of the Assistant Director. The team responsible for the production of the LDF is the Development Plans and Research team under the supervision of the Development Plans and Research Manager. Also contributing to the work, at key stages, are the Design and Conservation team, the Integrated Transport team, and the Development Management team. Some elements of work will be resourced by the use of external consultants. The use of consultants on specific projects is required where there is a lack of expertise or capacity in house. Based on the division's current service planning, sufficient staff and budgetary resources are in place to ensure delivery of the LDF and these resources can be managed in such a way as to deal with most unforeseen circumstances and peaks in workload required to meet the timetable.

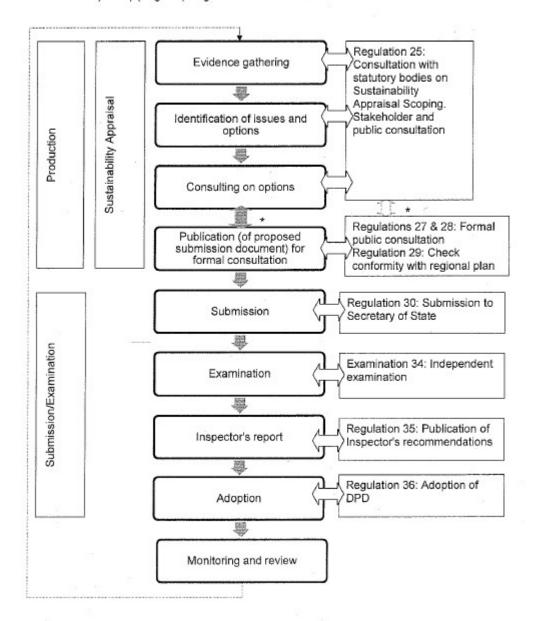
# 5. Public Participation During the Main Stages of Preparing the LDF

5.1 The process for the preparation and adoption of development plan documents is illustrated below and essentially involves four stages.

## **The Development Plan Document Process**

### **Development Plan Document Preparation Process**

Note: The regulations referred to are the Town and Country Planning (Local Development) (England) Regulations 2004 as amended 2008 & 2009.



- The Pre-production and survey stage includes the preparation of the LDS, which describes the various documents to be produced, the timetable for their preparation and adoption and the resources needed to prepare them. In each case the Council has to collect the necessary data to develop a robust evidence base for the plan and provide the baseline for the Sustainability Appraisal process. This is usually referred to as the SA/SEA.
- 5.3 There are benefits in involving the community at this stage to begin informal discussions around key issues. These are carried out with the Local Strategic Partnership and others as necessary asndappropriate. The Partnership is made

- up of almost 200 partner organisations, representing a wide cross section of the community. The participation of the Partnership at both a formal and informal level will be carried through all stages of the LDF process.
- 5.4 **The Production stage** involves developing with stakeholders and the community, the vision, objectives and spatial options for the plan. These need to be developed through public consultation and participation. There are three categories of documents involved at this stage, the SCI, Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs).
- 5.5 Methods of engagement to be used for each of these categories are described below.
  - Statement of Community Involvement
- 5.6 This is the first draft of the revised SCI and is subject to full public participation. It will be publicised by a notice in the press, published on the council's web site and placed on deposit in the Council's offices (See fig 2) Notification of the public consultation, together with a weblink to all relevant documentation, will be sent to the bodies identified in Appendix A.
- 5.7 All views on the draft of the SCI will be considered and the document amended where necessary. The Council will publish its reasons for accepting or rejecting the points raised. The final draft of the SCI does not need to be examined nor submitted to the Secretary of State. The final draft of the SCI will be adopted by the Council and placed on the Councils web site and in Council Offices and Libraries.

SCI Consultation Methods		
	Consultation	Adoption
	stage	
Dissemination of information.		
Statutory notice in Press		
All documents available on the	<b>√</b>	V
web site.	V	V
Deposit of documents in Council	\ \	
offices and Libraries	V	V
Staffed exhibitions in locations		
throughout the Medway Area.	· ·	
Press releases		
Articles in Medway Matters		
Send notification and web link to		
documents to individuals and	$\sqrt{}$	$\sqrt{}$
bodies as necessary		
Making available on request for		
large print version of documents,		
Braille and in different	'	'
languages.		
Specifically identify and	1	
communicate with BME and		
disabled groups.		
Participation - Continuous		
Community Involvement		
Discussions with LSP		
Programme of public meetings,		
round table or forums on large or		
controversial sites or issues.	-	
Discussions and correspondence		
with developers and other interested parties seeking to	1	
promote or object to specific	V	
development or specific policies.		
Workshops with interested		
groups and stakeholders.		
Discussion with LDF Advisory	,	
Group		

## Development Plan Documents (DPD)

- 5.8 Written notification of draft documents will be sent directly to the bodies identified in Appendix A and published on the Councils web-site. The methods for Public participation are contained in the table below. All views received will be considered and if appropriate, subsequent drafts will reflect upon and take on board the comments and issues raised. The Council will publish its reasons for accepting or rejecting points made.
- 5.9 All will be subject to full public participation. They will be publicised by a notice in the press, published on the Council's website and placed on deposit in Council offices.

- 5.10 Medway Council will make representations about site allocations available for inspections at public libraries and at council offices. It will publish such representations on its website and advertise them in a local newspaper stating that the representations are available for inspection and the places and times at which they can be inspected. Copies of all representations will be sent to the Secretary of State before the independent examination takes place.
- 5.11 Following each stage of public consultation, all views will be taken into account in the preparation of subsequent versions of the Development Plan Document being prepared. The Council will publish a summary of responses and the reasons for accepting or rejecting the points raised at the end of each public consultation.

Development Plan Documents (DPDs)					
·	Options Stage	Preferred Strategy	Proposed Submission	Exam	Adopt
Dissemination of	3	J			
information.					
Statutory notice in Press			V	V	$\sqrt{}$
All documents available on	V	V		V	V
web.	V	V	$\sqrt{}$		
Deposit of documents in	V		$\sqrt{}$		
Council offices and Libraries	V	V	V		
Staffed exhibitions in					
locations throughout the	$\sqrt{}$				
Medway Area.					
Press releases					
Articles in Medway Matters					
Send notification and					
documents to individuals and	$\sqrt{}$				$\sqrt{}$
bodies as necessary					
Making available on request					
for large print version of					
documents, Braille and in	√	V	V		$\sqrt{}$
different languages.					
Specifically identify and					
communicate with BME and					
disabled groups.					
Participation - Continuous					
Community Involvement					
Discussions with LSP					
Programme of public					
meetings, round table or	اما				
forums on large or	V	V			
controversial sites or issues.					
Discussions and					
correspondence with					
developers and other					
interested parties seeking to		$\sqrt{}$			
promote or object to specific					
development or specific					
policies.				<u> </u>	
Workshops with interested	V	V			
groups and stakeholders.	V	V			
Discussion with LDF					
Advisory Ggroup including					
officers and members.	15				

- Supplementary Planning Documents (SPD)
- 5.12 SPDs are not a statutory requirement and it is a matter for each local planning authority to decide whether to prepare them. Consequently, they do not need to follow the full procedure set out for other parts of the LDF. Only one period of public participation is required and they are not subject to an independent examination before being adopted.
- 5.13 Forthcoming SPDs may justify the targeting of specific groups depending on what topic and location the SPD is intended to cover. It is difficult to set out the key organisations that may be contacted in advance. However, in a recent consultation event for Lodge Hill a number of key stakeholders and organisations were contacted. A list of these groups can be found in Appendix B.

Supplementary Plan Documents (SPDs)		
A) Dissemination of Information		
A1. Statutory notices in the local press.	<b>✓</b>	
A2. Making all documents available on	<b>✓</b>	
the website.		
A3. Deposit all documents in Council	<b>✓</b>	
Offices		
A4. Staffed exhibitions in locations		
throughout the Medway Area. These will		
usually be in village or community halls,		
church halls, schools or other public		
buildings according to availability.		
<b>A5.</b> Press releases containing sufficient	<b>✓</b>	
information for an article to appear in the		
local press. The actual or other public		
buildings according to availability.		
<b>A6.</b> Articles in Medway Matters the		
Councils newspaper, which is circulated		
free to all local households every 6		
weeks.		
A7. Send notification and documentation	<b>✓</b>	
to individuals and bodies as necessary.		
A8. Making available large print version		
of documents, Braille and different		
languages if requested: a system is in		
place that can cope with requests from		
people who don't have English as a first		
language (EFL)		
A9. Specifically identify and		
communicate with ethnic minorities and		
disability groups.		
<b>A10.</b> Use of site notices for site-specific	<b>✓</b>	
issues.		
B) Participation- Continuous Community Involvement.		
B1. Discussions with Local Strategic	<b>✓</b>	
Partnership.		
<b>B2.</b> Programme of public meetings,	<b>✓</b>	
roundtables or forums on large or		
controversial sites or issues.		
<b>B3.</b> Discussions and correspondence	<b>✓</b>	
with developers and other interested		
г		

parties seeking to promote or object to specific development or specific policies.	
B4. Workshops involving schools and other interested parties to provide an early input into the formulation of proposals for a specific site or action area. The Council has already used these workshops as methods of public participation.	•
B5. The LDF Advisory Group has been established which consists of Councillors and officers. It has responsibility for overseeing the progress of the LDF. Necessary decisions which need to be made throughout the LDF process will be the subject of resolutions by the Cabinet and Council after consideration by the LDF Advisory Group.	•

- 5.14 **The Examination** is an assessment of the soundness of the DPD in terms of its content and whether the correct processes and procedures have been followed.
- 5.15 If representations were made at the publication stage, a statement setting out the number of representations received and a summary of them will be submitted with the document to the Secretary of State.
- 5.16 An independent planning Inspector holds a Public Examination into the "soundness" of the document. The Inspector will determine the procedure for the examination and those who have made representations may be invited, by the Inspector, to participate in the Examination. Afterwards the Inspector will prepare a report setting out recommended changes the Council should make to the Development Plan Document before adopting it.
- 5.17 The examination and Inspector's Report will be the subject of publicity and notification.
- 5.18 **Adoption** and entry of a DPD into the LDF will follow receipt of the Inspector's report. The adoption of these documents and of a SPD will be the subject of publicity and notification.
- 5.19 Monitoring will be carried out annually of the progress against the timetable in the LDS, the effectiveness of LDF policies, the rate of housing provision, and the need for changes to the SCI. This is done through the Annual monitoring report which is published and formally reported to the Council.
- 5.20 A copy of the most up to date Local Development Scheme that shows the programme and timetable for the preparation of Medway's Local Development Framework can be found at:

  <a href="http://www.medway.gov.uk/pdf/Medway%20local%20development%20scheme.p">http://www.medway.gov.uk/pdf/Medway%20local%20development%20scheme.p</a>

## 6. Consultations on key planning applications

- Pre-applications discussions are particularly important for key planning applications. Some applications will be of such importance that the Secretary of State (SoS) will designate them as a major infrastructure project. They will be subject to an inquiry process. However they are very few in number.
- 6.2 The Government also intends to make pre-application consultation with local communities a statutory requirement. When this is brought in it may supersede this part of the SCI. Notwithstanding this, the Council advocates this approach utilising a tiered approach originally advocated in guidance issued some years ago.

## **Tiered Approach**

- 6.3 The tiered approach relates to the setting and use of indicative thresholds for determining which applications are to be subject to different types of community involvement and the level of community involvement required at each stage of the planning process. The level of consultation that will be undertaken for the various types of planning application will vary accordingly. The tiered approach sets out an indicative framework for those planning applications, which should be subject to wider community involvement.
- 6.4 In summary, these 'tiers' are as described below.

Tier Level 1

- 6.5 Major planning applications classified as tier 1 may be expected to allow the widest level of community involvement. The following types of applications are likely to be considered tier 1:
  - Major Development Plan Departures those that are seen to depart from the Development Plan
  - Schedule 1 developments those schemes where an Environmental Impact Assessment is always required as they are likely to have significant effects on the environment
  - Applications that include the provision of gross shopping floor areas of 20,000 square metres or greater; or gross shopping floor space of not less than 2,500 square metres, which will exceed 20,000 square metres.

Tier Level 2

- 6.6 Those major applications referred to as tier 2 are likely to be subject to wider community involvement except where the council can reasonably justify why, for a particular application, the approach to wider community involvement can be waived. These may include the following:
  - Schedule 2 developments those applications where an Environmental Impact Assessment may be required as they are likely to have an effect on the environment by virtue of factors such as their nature, size or location
  - Development proposals that relate to a site of 5 hectares or more of Greenfield land, or comprise 150 dwellings or more regardless of the size of the site
  - Development proposed on playing fields as set out in the Town and Country Planning (Consultation) (England) Direction 2009 – any proposal for development of any playing field owned by the Council or used by an educational institution

### **Tier Level 3**

- 6.7 Tier 3 major applications are likely to be determined on a 'site-by-site' basis at a local level:
  - Applications of a local significance such as those which: fall marginally below the thresholds identified under Tiers 1 and 2
  - Applications that fall within sites that are 'sensitive' to development pressures – development adjoining a listed building; substantial demolition in a Conservation Area; loss of allotment land; loss of employment land for housing; and development on windfall sites
  - Other applications to encompass lower thresholds for nonconforming uses and other types of specific development. For example, small employment/business development within residential areas, change of use of A1 retail uses to other 'non-retail' uses in neighbourhood centres and telecommunication development in 'sensitive' areas
  - Applications that will have transport implications and will require a Transport Assessment to accompany the submitted planning application.

## Consultation approach to the three tiers

	Tier 1: Applications where there are considerable issues of scale and controversy or contrary to or out of line with Development Plan (LDF or Area Action Plan) policy (as defined by Regulation 3 (a)-(c) in Annex 1 of circular 07/99∞	Tier 2: Applications broadly in accordance with Development Plan BUT raising controversial issue or detail and 'other' Departures not covered by Regulation 3 (a)-(c) in Annex 1 of circular 07/99 <sup>20</sup>	Tier 3: Applications of a scale or development area for which a LPA requires wider community involvement; applications that fall within sites that are 'sensitive' to development pressures and allocated sites that may not have generated significant objection through the local plan process®
APPROACH			
Public Meetings	✓		
Public Exhibition	✓	✓	
Surgeries	✓	✓	
Development Briefs	✓		
Workshops	✓		
Enquiry by Design and/or Planning for real	✓	✓	
Citizen Panels	✓	✓	✓
Consultation Panel	✓		
Parish Councils	✓	✓	✓
Media	✓		✓
Website	✓	✓	✓
Local architectural or Design Panel	<b>√</b>	<b>√</b>	<b>√</b>
Planning Aid	✓	✓	

6.8 Given the range and types of available consultation approaches, the table above provides an indication of the methods for community engagement that may be appropriate for each 'tier' of application. For example, it is expected that 'Tier 1' applications will, by their very nature and 'significance', call for a higher level of community engagement when compared to an application which may fall in 'Tier

3'. Therefore the 'ticks' in the boxes in figure 5 are merely illustrative as to the means of consultation and should not be interpreted as being prescriptive.

### **Protocol**

- 6.9 Medway Council intends to follow a specific protocol that will enable developers to provide a good level of pre-application community involvement in their major proposals. The protocol involves two main stages:
  - The Pre-application stage; and
  - The formal planning application stage.

Pre-application stage – Meetings with developers to discuss the protocol

- On a site specific basis developers will be asked to produce a method statement which details how they will consult with the local community in advance of a formal planning application being made. This must detail how they are to reach local groups and a wide cross section of the local community who will be affected by the development. The document will detail the methods the developer will use. For example, workshops with community groups, questionnaires, 1 to 1 meetings and wider consultations. It must allow for a wide debate within the community and have realistic aspirations. The Developer can involve a third party to undertake this consultation work on their behalf. Before a formal planning application is submitted the developer will be strongly encouraged to submit a fully detailed report to Medway Council confirming the consultation methods used, the results of the consultation and how the developers intend to take these views into account when submitting a formal planning application. The results of any such consultation will be publicly reported and taken into account in decisions made by the Council.
- 6.11 Some pre-application 'basic' measures for major applications are recommended at appendix C. It is considered that this approach should be adopted and developers are expected to apply all 10 methods of community involvement as set out.
- 6.12 It may be that applications are unlikely to fall into the 'nationally significant infrastructure' category as defined within the Planning Act. However, developer's attention is drawn to the requirements of Part 5 of the Planning Act 2008 (Duty to consult local community) that requires the applicant to produce a consultation report, and for this report to accompany the application. The report must include details of any relevant responses received by the applicant. These requirements are placed upon promoters and are recommended as best practice within this SCI for major applications that fall under the nationally significant threshold.

Formal planning application - check how the pre–application consultations feeds into the application process

6.13 The planning process generates a wide-ranging requirement for consultations in connection with the various types of planning applications that are received. The responsibility for publicising applications normally falls with the Local Planning Authority (LPA). General guidance on publicising planning applications is set out in Circular 15/92 and more recently the Town and Country General Development Procedure Order 1995 (GPDO). These give practical advice on when to use the three types of publicity currently in use i.e. neighbour notification, site and press notice. In most circumstances representations about planning applications are restricted to a period of 21 days from notification. However, such bodies as

- Natural England will be allowed a longer period of time to comment on applications where this is prescribed by legislation.
- 6.14 It is a requirement for all major planning applications to mount a site display on or near the land for at least 21 days before determining the application, publish a local advertisement in The Press and to serve notice on any adjoining owner/occupier.1
- 6.15 Within the Council area there are a number of key Brownfield development sites. Working with our European partners on a project called REVIT<sup>2</sup> and covering cities in Germany, Holland, France and Wales a tool kit<sup>3</sup> has been developed setting out best practice in community participation and involvement. It uses case studies as a basis for the tool kit. The tool kit is endorsed by this SCI and the methods it describes should be used where appropriate.
- 6.16 The Council recognises that all new development will need access to essential service provision and therefore providers will be consulted on major applications. where appropriate.

#### 7. Other Matters

## **Role of Planning Performance Agreements**

- 7.1 Planning Performance Agreements (PPAs) were formally introduced into the planning system in 2008 and are about improving the quality of planning applications and the decision making process through collaboration. They bring together the Local Planning Authority (LPA), developer and key stakeholders, preferably at an early stage, to work together in partnership throughout the planning process. They are essentially a collaborative project management process tool that provides greater certainty and transparency to the development of scheme proposals, the planning application assessment and decision-making.
- 7.2 ATLAS, the HCA's Advisory Team for Large Applications, provides a free service to Local Planning Authorities, the private sector and other stakeholders who are dealing with large scale and complex development proposals. The team can offer Local Authorities advice on a broad range of issues relating to the delivery of large predominantly residential projects and aims to provide a service that will support partners in tackling obstacles and improve relationships. The services range from helping partners with visioning and masterplanning, to more specific tasks including project management advice, advice on the planning process and addressing technical project issues. Further guidance regarding ATLAS and PPA's can be found on the ATLAS web site: http://www.atlasplanning.com/page/about atlas.cfm

## **Developer Contributions**

7.3 Medway Council's Guide to Developer Contributions, a Supplementary Planning Document<sup>4</sup> sets out what obligations and contributions will be required for future developments. Developers are expected to take account of, and meet the requirements of this document before submitting planning applications to the Council. It is designed to help them know what the Council is likely to require for

<sup>3</sup> Available form the Council

<sup>&</sup>lt;sup>1</sup> Town and Country (General Development Procedure) Order 1995. Article 8

<sup>&</sup>lt;sup>2</sup> www.revit-<u>nweurope.org</u>.

<sup>4</sup> http://www.medway.gov.uk/environmentandplanning/planning/developercontributions.aspx

- new developments in Medway. This document will continue to be regularly reviewed and updated and the consultation process will be similar to that for all Supplementary Planning Documents as outlined earlier in this document.
- 7.4 Where planning obligations have formed part of the consultation on planning applications any necessary comments will be fed back into the process for reviewing the Developer Contributions Guide.
- 7.5 The last government introduced a Community Infrastructure Levy (CIL) whereby local authorities are now empowered, but not required, to impose a levy on most types of new development in their areas. The new Coalition Government has endorsed the CIL. Medway Council anticipates adopting a Charging Schedule and relevant levy by autumn 2013. There will be rounds of public consultation but these will be detailed separately.

## The SCI and the Monitoring and Implementation Framework

- 7.6 The Council has a Monitoring and Implementation Framework (MIF) derived from work undertaken to provide a baseline position for both the Core Strategy and the sustainability appraisal.
- 7.7 The MIF set out in the Core Strategy indicates how policies are to be implemented, by when and by whom. It also sets out indicators to monitor these policies. As indicated above, the Council reports annually on core indicators in the Annual Monitoring Report.
- 7.8 The Sustainability Appraisal also includes a monitoring framework to monitor the performance of the Council's spatial strategy in order to ensure more sustainable development is secured. The MIF therefore builds on these existing processes, rather than establishing an additional framework and this will be reported in the AMR.
- 7.9 In this way the public can be informed of progress with implementing the LDF and whether any review of policies or proposals within it are justified.

## Wider community involvement

- 7.10 The Sustainable Community Strategy has been subject to extensive consultation with the community, community groups and stakeholder organisations. The Partnership Plenary, the wider Local Strategic Partnership representing about 450 organisations and individuals has met twice to consider the developing Core Strategy. This was at the strategy development and draft strategy stages. Over 100 organisations and individuals attended on each occasion. Consultation also took place with Medway Voice, an extended Local Strategic Partnership Board, the Youth Parliament, Medway Older People's Partnership, community representatives, Councillors, the Council's Disability Forum, the Ethnic Minorities Forum, three of the most deprived neighbourhoods in Medway and the Local Strategic Partnership Thematic Partnerships.
- 7.11 Some of these consultations have been carried out jointly with the Local Transport Plan in order to ensure that these long-term strategies work together.
- 7.12 We have also drawn on other recent consultations covering local people's priorities, the results of the recent Medway resident's opinion poll and the Ofsted Tellus survey of children and young people. The draft strategy was posted onto

- the LSP area of the Council's website which resulted in comments from members of the public.
- 7.13 This first revision of the SCI will be consulted on at the same time as the Publication Draft Core Strategy and using the same consultation methods. In this way, an open invitation will be given to all groups (many of which overlap) who were involved in the SCS and Core Strategy process to comment on the content and delivery of the Statement of Community Involvement.

## The Localism Bill

- 7.14 As indicated above a new Localism Bill is currently before Parliament and is expected to receive the Royal Assent early in 2012. The final details of this Bill are still uncertain and changes are inevitable as it proceeds through Parliament. However, what is known is that the Government intention to introduce a new layer of Neighbourhood Planning documents below the Local Plan. This could result in greater involvement for local communities.
- 7.15 Given the current level of uncertainty and anticipated further changes to the Bill, it is felt that an addendum to this SCI should be produced giving the details of community involvement envisaged with neighbourhood plans. This will be produced after the Localism Bill has been enacted.

# Glossary

DM - Development Management

DPD - Development Plan Document

EFL - English as a First Language

EIP - Examination In Public

LDD - Local Development Document

LDF - Local Development Framework

LSP - Local Strategic Partnership

LDS - Local Development Scheme

LPA - Local Planning Authority

RSS - Regional Spatial Strategy

SCS - Sustainable Communities Strategy

SoS - Secretary of State

SCI - Statement of Community Involvement

SEA - Strategic Environmental Assessment

SPD - Supplementary Planning Document

SA - Sustainability Appraisal

## Appendix A

This is a list of bodies, some of which the Council is required to consult, plus other bodies that it may consult should it be thought necessary to do so. This list is not exhaustive and can be added to as a result of this consultation process.

- 02 Airwaye
- 118 Twydall Lane
- 20 Slade Close
- ABC Project
- Accent28 Limited
- Action with Communities in Rural Kent
- Adams Homes Associates
- ADE Residents Association
- Aerotation
- Age Concern Medway Ltd
- Ahmadiyya Muslim Association
- Aircraft Owners & Pilots association
- Airport Operators Association
- Airworks Services
- Alan Dawney Coach Hire
- Alec's Express Travel Ltd
- Allhallows Parish Council
- Alliance Environment & Planning Ltd
- Alltask Limited
- Alzheimer's Society (Rainham (Kent) Support Group)
- Amadeus Night Club
- AMEC Group Ltd
- Anchor Trust
- Annington Property Ltd
- Apnar Ghar
- Aramark Plc
- Arethusa Venture Centre
- Arriva Southern Counties
- Arts Council SE England
- ASD Coaches Ltd
- Aylesford Parish Council
- Barton Willmore Planning Partnership
- Batcheller Thacker
- BEBCAR (uk) Ltd
- Bellway Homes
- Berkeley Homes
- Berkeley Leisure Group
- Biffa

- Big Lottery Fund
- Birling Parish Council
- Blackbushe School of Flying
- Bloomfields Ltd
- Bond Pearce
- Boxley Parish Council
- Bredhurst Parish Council
- Brett Aggregates Western
- Bride Hall Developments Ltd
- Bridge Wardens College
- Brimble Lea
- British Archaeological Society
- British Horse Society N& W Kent.
- British Sign and Grapics Association
- British Waterways SE
- British Wind Energy Association
- Brown Group
- Bryant Homes South East
- BSK
- BT
- Burham Parish Council
- Burnett Planning & Development Ltd
- CTC
- Cabair Flying Schools Ltd
- CABE
- Cable & Wireless
- Calverton Flying Group Ltd
- Capstone Park Volunteers
- Carter Jonas
- Castle Point Borough Council
- CRI
- CBRE
- CEMEX
- Cemex (UK) Limited
- Centre for Kentish Studies
- Chalkwell Garage & Coach Hire
- Chatham & Aylesford Liberal Democrats
- Chatham Historic Dockyard Trust
- Chatham Historic Dockyard

- Volunteer Service
- Chatham Maritime Trust
- Chatham Telephony Centre
- Chattenden Community Project
- Christ Church Luton
- Church Commissioners for England
- Church in Society
- CI Holdings
- · City of Rochester Society
- Civil Aviation Authority
- Cleanaway
- Cliffe and Cliffe Woods Parish Council
- Cluttons
- Cobham Parish Council
- Connexions Chatham Access Point
- Connexions Kent and Medway (HQ)
- Constantine Construction Co (Medway) Ltd
- Construction Engineering School
- Cooling Parish Council
- Costain Limited
- Country Land & Business Association (CLA)
- Countryside Maritime Limited
- Countryside Property
- Court Lodge, Lower Road
- Courtley Consultants Ltd
- CPRE Hoo Peninsula
- CPRE Kent
- CPRE Medway
- Creative Environmental Networks (CEN)
- Croudace Ltd
- Crystal's Coaches
- Culture South East c/o Agenda UK Ltd
- Cuxton Countryside Group
- Cuxton Parish Council
- CVS Medway
- CWS South East Co-op
- Cycling England
- Darland Residents Association
- David Hicken Associates Ltd
- David Jarvis Associates Limited
- David Lock Associates
- David R Stacey

- Davis Brown
- Deanland Airfield
- Defence Estates
- DEFRA (C/O GOSE)
- Delce Manor Housing Cooperative Limited
- Delphi Diesel Systems
- Denham Aerodrome
- Department for Education and Skills
- Department for Transport Rail Sub-Group
- Department of Health
- Derwent Housing Association Limited
- Development & Residential Consulting
- Development Land Services Itd
- DHA Planning
- Dialogue
- Dickens Country Protection Society
- Diggerland Ltd
- Diocese of Rochester T&CP Policy
- Disability Information
- Disability Rights Commission
- Dockside Outlet Centre
- Donaldsons
- DPDS Consulting Group
- DTI
- DTZ
- DTZ Pieda Consulting
- Dunedin Property
- EDF Energy
- EDF Energy
- Elliott-Medway Fineline
- English Churches Housing Group
- English Heritage
- English Partnerships (London)
- English Partnerships HQ
- Entec UK Ltd
- Entergy Power Group
- Environment Agency
- Essex County Council
- Ethnic Minority Forum
- Ethnic Minority Senior Citizen's Association
- Eurobell West Kent Ltd
- Faithdean PLC

- Farleigh Coaches
- Federation of Small Businesses
- Findsbury & Wainscott Community Assn
- First European Airways Ltd
- Firstgroup PLC
- Forestry Commission SE England Consevancy
- Fort Amherst Heritage Trust
- Frances Iles Gallery
- Frankie and Benny's
- Freight Transport Association London and SE Region
- Friends of the Earth (Medway)
- Frindsbury and Wainscott Community Association
- Frindsbury Extra Parish Council
- Frindsbury, Upnor & Chattenden PCC
- Fuel Oils (Holdings) Ltd
- Fuji Copain UK Ltd
- Fuji Seal
- Fusion Ltd
- FWCA Frindsbury and Wainscott Community Association
- Gala Clubs
- Gateway Knowledge Alliance
- General Aviation Awareness Council
- George Webb Finn
- Gerald Eve
- GHG Consultancy Ltd
- Gillingham Business Park
- Gillingham Football Club
- GL Hearn
- GNER Holdings Ltd
- Go-Ahead Group
- Graham Warren Partnership
- Gravesham Borough Council
- Green Issues
- Gregory Gray Associates
- Groundwork Kent & Medway
- GVA Grimley
- Habinteg Housing Association Ltd
- Hallam Land Management Limited
- Halling Parish Council
- Hands Rochester Volunteer

### Bureau

- Hanover Housing Association
- Hanson Aggregates
- Hanson-Tower Ltd
- Harlequin Ltd
- Harrisons Chartered Surveyors
- Hartlip Parish Council
- HE Services
- Health and Safety Executive -Hazardous Installations Directorate (West Sussex)
- Heli-charter Ltd
- Hempstead Residents Association
- Hempstead Valley Shopping Centre
- Henry Schein (UK) Holdings
- High Halstow Parish Council
- Higham Parish Council
- Highways Agency
- Hillreed Homes
- Hindu Sabha
- Historic Dockyard & South East Museums Hub
- HM Prison Cockham Wood
- HM Prison Services
- HND Ltd
- Holiday Inn (Rochester)
- Home Builders Federation
- Home Builders Federation
- Home from Home
- Home Office
- Homebase Ltd
- Hoo St Werburgh Parish Council
- Hope in the Community
- Housing 21
- Homes and Communities Agency
- Howard Hutton and Associates
- HSBC
- Hunting Consortium of Companies
- Hyde Housing Association Limited
- Iceni Projects Limited
- ICM Plastic Moulding Ltd
- ING
- Inland Revenue
- IPS International LTD
- Isle of Grain Parish Council
- Iwade Parish Council
- J Sainsbury plc
- Jaycrest Ltd
- JobcentrePlus
- John Divine

- John Sharkey & Co
- Jones Day
- Judith Ashton Associates
- K Ying Chinese Elderly Association
- Kala Kendra
- Keith Hammond
- Kelsey Housing Association Limited
- Kent & Medway Biological Records Centre
- Kent & Medway Economic Board
- Kent & Medway Fire and Rescue Services
- Kent & Medway Learning & Skills Council
- Kent & Medway Rural Transport Partnership
- Kent & Medway Safety Camera Partnership
- Kent Air Ambulance Trust
- Kent Ambulance NHS Trust
- Kent and Thameside Fastrack
- Kent Archaeological Society
- Kent Architecture Centre
- Kent Association For Spina Bifida & Hydrocephalus
- Kent Association of Parish Councils
- Kent Bangladesh Welfare Association
- Kent Community Housing Trust
- Kent Council for Voluntary Youth Service
- Kent County Council Heritage Conservation Group
- Kent County Council Planning
- Kent Downs AONB Unit
- Kent Energy Centre
- Kent Ethnic Minorities Disabilities Forum
- Kent Express
- Kent Fire and Rescue Service HQ
- Kent Islamic Centre
- Kent Malayalee Association
- Kent Multicultural Community Association
- Kent Muslim Welfare Association
- Kent Ornithological Society
- Kent Police (Estate Department)
- Kent Probation Service (HQ)
- Kent Ramgarhia Darbar Gurdwara
- Kent Refugee Action Network (KRAN)
- Kent Reliance Building Society
- Kent RIGS Group M

- Kent Rural Community Council
- Kent Turkish Welfare Association
- Kent Wildlife Trust
- Kent Youth
- Kevin Wise Town Planning & Development Services
- Keystone Centre
- KGB Cleaning Services (Southern) Ltd
- King George V Memorial Houses
- Kings Ferry
- Kingsley House
- Kingsley Smith
- Kingsley Smith & Co
- Kingsnorth Power Station
- KTI Energy Ltd
- KTNC Medway Group
- Kut-O Chinese Association
- L & Q Beaver Ltd
- L C P Automotive Components
- L Robinson & Co (Gillingham) Ltd
- La Leche League Of Rochester
- LA21 Transport Forum
- Lafarge Cement UK
- Lambe & Evans Building Contractors Ltd
- Lambert Smith Hampton
- Lapthorne industries
- LAW Leasing Ltd
- Lee Evans Planning
- Legal Services Commission SE
- Levvel
- Lilliput Childcare
- Littman Robeson
- Lloyds TSB Bank PLC
- Lloyds TSB Life Assurance Co Ltd
- Locate in Kent
- Lower Halstow Parish Council
- Luddesdown Parish Council
- M Logistics International
- M Y Cartons Ltd
- Mackays of Chatham Plc
- Maidstone Borough Council
- Malcolm Judd and Partners
- Marine and Fisheries Agency
- Marks & Spencer plc
- McCarthy & Stone
- McDonalds Restaurants
- Medway & Swale Estuary Partnership
- Medway Access Group

- Medway Afro Caribbean Association (Gillingham)
- Medway Arthritis Self Help
- Medway Association of Independent Taxi Drivers
- Medway Asthma Self-help
- Medway Bridge Marina Limited
- Medway Chamber of Commerce
- Medway Citizens Advise Bureau (CAB)
- Medway Community College
- Medway Community Living Services Ltd
- Medway Credit Union
- Medway Cycle Forum
- Medway Education Business Partnership
- Medway Ethnic Minority Forum
- Medway Fawcett Society
- Medway Friends of the Earth
- Medway Green Party
- Medway Health Forum
- Medway Hindu Centre
- Medway Homestart
- Medway Inter Faith Action
- Medway Language Achievement Service
- Medway Learning Partnership
- Medway Licensed Taxi Drivers Association
- Medway Maritime Hospital
- Medway Mediation
- Medway Mencap Society
- Medway NHS Trust
- Medway Pensioners Forum
- Medway Ports
- Medway Providers Forum
- Medway Racial Equality Council
- Medway Residents Group
- Medway Scout Association
- Medway Teaching Primary Care Trust (PCT)
- Medway Towns Conservation Volunteers
- Medway Towns Crime Prevention Panel
- Medway Towns Footpath Group
- Medway Towns Gurdwara Sabha
- Medway Urban Parks & Green Spaces Forum
- Medway Valley Countryside

- Partnership
- Medway Waste Forum
- Medway Youth Parliament
- Mercury Personal Communications Ltd
- MeRGe
- MHS Homes
- Michael Dakers Solicitors
- Michael Parkes Chartered Surveyors
- Michael Parkes Surveyors Ltd
- Micro Medical
- Mid Kent College
- Mineral Products Association
- Ministry of Defence
- Minster on Sea Parish Council
- Mittal Steel Kent Wire Ltd
- MM2K
- Moat Homes Limited
- Moat Housing Society
- Mobile Operators Association
- Mono Consultants
- Mowlem
- Multiple Sclerosis Society (Medway Towns Branch)
- N & D Attwood
- Nathaniel Lichfield & Partners
- National Federation of Bus Users
- Natural England
- Natural Resources Institute
- Natwest Bank PLC
- NCH South East
- Nestledown Beds Ltd
- Network Rail
- New Brompton College
- Newington Parish Council
- NFU
- North Kent Chamber of Commerce
- North Kent Justice Area
- North Kent Magistrates' Court
- North Kent Rail Users Group
- Northfleet Cleaning Services Co Ltd
- Nu Venture Coaches Ltd
- Oasis Unit, HMP Rochester
- Open Spaces Society
- Orange
- Orbit Group Ltd
- Orbit Group Ltd
- Parklake Estates Limitied
- Pentagon Shopping Centre

- Persimmon Homes South East
- Planning Perspectives
- Planning Inspectorate
- Planning Potential
- Popular Flying Association
- Powergen Ltd
- PPS Phillips Planning Services Ltd
- Presentation Housing Association
- Presentation Housing Association Limited
- Prime Construction Consortium
- Princess Royal Trust
- Probation Service Medway Local Office
- Protem (Kent) HGV
- Punjabi International Cultural Society
- R Swain & Sons Ltd
- R W Graphics
- Rail Passengers Council Southern England
- Rainbow Arts
- Rainham & Gillingham Privacy Care Group
- Rainham Gillingham and Chatham Amenity Society
- RAISE
- Ramblers Association (Kent)
- Ramblers Association (London)
- Rapleys
- Rebound ECD Ltd (Medway STC)
- Redhill Air Services
- Redroute Buses
- Redrow Homes (Eastern) Ltd
- Reeves & Neylan Accountants
- RHA
- · River Medway Business User Group
- RNID South East and Anglia
- Robert Brett & Sons Ltd
- Rochester Airport Consultative Committee
- Rochester Airport PLC
- Rochester Bridge Trust
- Rochester Cathedral
- Rochester Diocese
- Rochester Diocese Board of Education
- Rochester Independent College
- Roger Tym & Partners
- Rosemound Developments Ltd
- Roueagle Ltd
- Royal Association For Deaf People

- Royal Mail South East
- Royal School of Military Engineering
- RPS Group
- RPS Planning
- RSPB (Medway)
- RSPB South East Regional Office
- S W Attwood & Ptrs
- Safeway Stores Plc
- Salvation Army
- Sanctuary Housing Association
- Savills
- Scout Association
- Secondsite Property Holdings Ltd
- Secondsite Property Holdings Ltd
- SEEBOARD
- SEEDA
- SEERA
- Seneschal
- Shepherd Neame
- Sheppy Industries Ltd
- Shoosmiths
- Shorne Parish Council
- Showman's Guild of Great Britain
- Sikh Sangat Gurdwara Association
- Siri Guru Nanak Gurdwara
- Skanska
- Smith Stuart Reynolds
- Snodland Town Council
- Social Inclusion Project For Medway Young People
- Society Linen Services Ltd
- Somerfield Stores Ltd
- South East Centre for the Built Environment
- South East Coast Strategic Health Authority
- South East England Conservancy
- South East Marine Association
- Southend-on-Sea Borough Council
- Southern Gas Networks
- Southern Housing Group Limited
- Southern Water
- Spiritual Assembly of the Baha'is of Gillingham
- Splashes Leisure Pool
- Sport England SE Region
- Sri Guru Ravidass Sabha
- St Mary's Island Residents Association

- St. James Isle of Grain Parish Council
- Stahl Engineering
- Staples
- Startrite Designs Ltd
- Stewart Ross Associates
- Stockbury Parish Council
- Stoke Parish Council
- Stonham Housing (Kent)
- Strood Heritage Society
- Strood Sports Centre
- Strood Town Centre Forum
- Strood Youth & Community Centre
- Strutt + Parker LLP, Planning & Development
- Sure Start Chatham
- Sustrans
- Swale Borough Council
- Swale Housing Association Limited
- Synergy
- Sywell Aerodrome
- · Taylor Woodrow Developments Ltd
- Telewest Communications SE
- Telspec Plc
- Tesco Stores Ltd
- Tetlow King
- Thames and Medway Canal Association
- Thames Gateway Kent Partnership
- Thames Gateway NHS Trust
- Thames Gateway Strategic Executive (ODPM)
- Thamesport (London Ltd)
- The Abbeyfield Kent Society
- The Barton Willmore Planning Partnership Eastern
- The Bell Cornwell Partnership
- The Benefits Agency
- The Casino Rooms Entertainment Complex
- The Crown Estate
- The Exchange Bar
- The French Hospital
- The Information Shop For Young People
- The Patman Trust
- The Planning Bureau Ltd
- The Post Office Property Holdings
- The Royal Bank of Scotland
- The Theatres Trust
- The Upnor Society
- The word on the street

- Thurrock Council
- Tim's Travel Ltd
- T-Mobile (uk) Ltd
- Tonbridge and Malling Borough Council
- Tourism South East
- Town and Country Housing Group
- Town Planning Team
- Trail Riders Fellowship
- Tram and Light Rail Society
- Transport for London
- Trenport Investment Ltd
- TT Travel
- Turley Associates
- UGC Cinemas
- University College for the Creative Arts
- University College for the Creative Arts at Rochester
- University of Greenwich at Medway
- University of Kent
- University of Kent at Medway
- Unlock
- Upchurch Parish Council
- Veetee Rice Ltd
- Ventmaster Europe Ltd
- Vigo Parish Council
- Vincent & Gorbing Planning Consultants
- Virgin Active
- Vodafone
- W M Morrisons
- Wainscott Residents Association
- Wakeley Brothers
- Walter & Randall
- Ward Homes Group Ltd
- Watson Dav
- Webb Aviation Aerial Photography
- West Kent Badger Group
- West Kent Downs Countryside Forum
- West Kent Health & Social Care Trust
- West Kent Primary Care Dental Service
- Westminster Health Care
- Westminster Pharmaceutical & Paramedics
- White Young Green
- Wilkinsons Hardware
- Women's Aid
- Women's National Commission
- Women's Support Service

- Workers' Educational Association (WEA)
- Wouldham Parish Council
- WYG PLANNING & DESIGN
- Xchanging Ins-Sure Services
- Young Offenders InstituteYouth Justice Board

# Appendix B

# **Lodge Hill: Master-Planning consultation bodies**

Group	Notes
	Community
	Community
	Community
	Community / Business
	Business
	Faith
	Community / Business
	Community
	Community / Business
	Community / Business
	Community (commenced in 2011)
	Community
	Community / Business
	Faith
Cliffe & Cliffe Woods Parish Council	Community
	Community
	Community
Cliffe Woods Primary School	Community
	Community
	Community
CPRE Kent	Community
CPRE Medway	Community
Cuxton Parish Council	Community
Dickens Country Protection Society	Community
Diocese of Rochester	Faith
Elms Medical Centre	Community
	Statutory
Environment Agency	Statutory
	Business
Friends of Hillyfields	Community
	Community
Friends of the Earth South East	Community
Frindsbury & Wainscott Community	Community
Association	•
Frindsbury Extra Parish Council	Community
	Community
	Community
	Business
	Community
	Community
	Community
•	Community
	Community
	Community
•	Community
•	
1 1 2 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2	Community

Hoo St Werburgh Parish Church	Community
Hoo St Werburgh Parish Council	Community
Hoo Village Institute	Community
Hope in the Community	Community
Hundred of Hoo Leisure Centre	,
	Community / Business
Hundred of Hoo School	Community (n.b the school has a
Kont 9 Madusy Fire 9 Decays Comics	community manager)
Kent & Medway Fire & Rescue Service  Kent Council for Voluntary Youth Services	Statutory Community
Kent Economic Board	Business
Kent Ornithological Society	Community
Kent Police Authority	Statutory Community / Business
Kent Wildfowling & Conservation	Community / Business
Association  Kent Wildlife Trust	Ctatutan
	Statutory
Kingsnorth Climate Action Medway	Community Business
Locate in Kent	
London & Quadrant Community	Community
Partnership Maduray Countrysida Forum	Community
Medway Countryside Forum	Community
Medway Enterprise Gateway	Business
Medway Historical Ordnance	Community
Medway Local Access Forum	Community
Medway Older Peoples' Partnership	Community
Medway Pensioners Forum	Community
Medway Primary Care Trust	Statutory
Medway Racial Equality Council	Community
Medway Regeneration Ambassadors	Community
Medway Urban Parks and Greenspaces	Community
Forum Made November Darkinson	0
Medway Youth Parliament	Community
Mid-Kent College	Community / Business
Natural England	Statutory
Nextstep Kent & Medway	Community / Business
North Kent Chamber of Commerce	Business
Open Spaces Society	Community
Parks Medical Practice	Community
Peninsula Rock	Faith
Peninsula Youth for Christ	Faith
Raise	Community
Ramblers Association	Community
Royal Engineers Angling Club	Community
Royal Engineers Museum & Library	Community / Business
Royal School of Mechanical Engineering	Business
RSPB	Statutory
Rural Liaison Committee	Community Forum - Parish Councils on the
	Hoo Peninsula
Soroptomists International – Medway	Community
Towns	
St Margaret Church, High Halstow	Faith
St Mary Hoo Parish Council	Community
St Nick's Day Centre Strood	Community
St Werburgh Medical Practice	Community
Stoke Parish Council	Community
Strood Heritage Society	Community

University of Greenwich	Community / Business
University of Kent at Medway	Community / Business
Upnor Residents Association	Community
Visit Kent	Business
Wainscott Primary School	Community

## Appendix C

## Pre-application 'basic' measures for major applications

- 1. **Inclusive invitation**. Reasonable attempts should be made to ensure that a representative cross-section of the community, the promoter(s) and the Council should be invited to the same event(s), to ensure that all participants are aware of each other's views. Invitations should go to existing local resident associations, community forums, neighbourhood groups and interest groups where they exist or are formed as a result of the proposal. It may be necessary to hold additional events for those groups not traditionally involved in the planning process. Events should be held in accessible locations. In any event, all participants in the involvement process should be asked to put their contact details on record so as to ensure that they receive feedback on the results of involvement.
- 2. **Authorisation**. Those representing community groups, the promoter(s), and the Council should be able to show that they are authorised to speak for their organisations. The scale and remit of those organisations should also be made clear.
- 3. **Continuity.** Involvement should be a continuous process with the timetable for the period of preparing the plan or making the planning application made clear in advance to the participants. Where involvement is intended to include a series of meetings or events then, as far as possible, the same individuals that represent the community, the promoter and the Council should continue to be involved throughout the process to ensure continuity of views. Nevertheless, it may be appropriate for other participants or advisers to be involved intermittently. However the process should not be re-run if or when representatives change.
- 4. **Independent advice.** Where technical or professional advisers or private consultants are employed as independent facilitators to manage the involvement process, they should have a client duty of care to all parties equally and should be instructed to follow these ground rules, irrespective of the party employing them. Where facilitators or advisers are not independent this should be declared.
- 5. **Early Involvement**. Arrangements should be made for the meetings process to begin and for all parties to meet at the early "ideas" stage of the plan or the development preparation process. This is before specific proposals are made, when significant options are still open and can be identified and while there is still the potential to make a difference.
- 6. **Presenting options**. The aim should be to set out options or choices that are possible in the way that specific development is carried out, including those suggested by the community that reflect the community's needs, ambitions and experience. Purely oral or written presentations should be avoided so that, wherever possible, options are illustrated in 3 dimensional terms with models and examples of sustainable development best practice in comparable schemes elsewhere (see for example "Towards Good Practice in Sustainable Urban Land Use" ODPM 2004). In generating options the constraints of already adopted national and local planning policy should be made clear as well as the opportunities still open to choice. It may not be possible to include in options issues that are commercially confidential.
- 7. **Choosing between options.** The planning criteria for choosing between options should be made clear and transparent, identifying where a distinction has been made between choices based upon technical and legal argument and choices based purely on opinion.

- 8. **Consensus.** Best endeavours should be made to reach consensus making it clear and specific how far the involvement has resulted in agreement to adopt or to alter proposals. Where agreement has not been possible, the reasons and the scale of disagreement should be made clear and specific.
- 9. **Transparent records.** Community involvement meetings should be summarised in a Community Involvement Statement, which will be submitted to the Council as a supporting document. Community Involvement Statements will be provided by the applicant to support relevant planning applications submitted for determination. A Community Involvement Statement will also be prepared and submitted with Local Development Documents for examination.

An opportunity will be given to participants of community involvement meetings to verify Community Involvement Statements before they are submitted to the Council. Participants may provide a written statement of omissions and corrections which will be reported and considered by the council along with the Community Involvement Statement.

10. Feedback on the outcome of community involvement. Those who have supplied their details will be notified of the availability of a report to show, with reasons, how far the recommendation or determination of planning applications or the approval of Local Development Documents has reflected the opinions given by the community and the weight given to them. For planning applications this will be either the case officers delegated decision report, or the Development Management Area Committee report and minutes. For Local Development Documents this will be the Community Involvement Statement as required by the Town and Country Planning (Local Development) (England) Regulations 2004. Neighbourhood Planning Groups are expected to share the outcome of community involvement with their membership by, for example, their community newsletters.