

APPENDIX 1c

Council Officers Response

Development Control s106 monitoring

Obtained updated contribution figures in order to finalise the Medway Guide to Developer Contributions which is due to go out to consultation shortly. The contributions specified in the Chatham Centre and Waterfront SPD should be the same as in the guide, but they are not, e.g. pupil ratios.

There should be a reference to the fact that the level of all contributions will be updated annually - any figures quoted now will not be adequate years down the line when the project is nearing completion.

The services detailed in the Chatham document do not include some major players such as transport and sport and leisure facilities.

Currently updating the Guide to Developer Contributions which sets out exactly what Medway will request so that developers will be aware of our expectations, and can reflect this in the cost of purchasing land. This guide includes a host of different services and should be out to consultation in the near future, once we have all the information required for different services; then after any amendments it will go to cabinet and be formally adopted as a Supplementary Planning Document.

At this stage should not include exact figures but rather make a reference to say that contributions will be sought for a number of services.

For those documents which will be produced after the SPD is adopted can then refer to the Guide and a hyperlink to the latest version on the website.

Adult Services

In the absence of central government guidance, we are developing a formula to substantiate requests to Developers for contributing to the infrastructure for adult social care, registration services and bereavement services. This piece of work will be completed by the end of July and will form part of the impending Developer Contributions Guide.

Tourism and Heritage Service

The Development of Medway as a World Class City Break Tourist Destination

Chatham has a key role in connecting the existing visitor hubs of Rochester and Chatham Maritime and the prospective World Heritage site.

The presence of a waterfront hotel within the scheme is most welcome - this will service the growth in the business tourism market as well as the leisure tourism market as befits a city centre.

The major arts/cultural facility is the most important part of the masterplan from a visitor economy and destination perspective. The waterfront location provides the opportunity for an iconic building, a centrepiece for the destination and a facility that can break the mould.

There can be no compromise with this if we want to reposition Chatham as a city centre. As well as housing the gallery, performance spaces etc, should this building also act as the "gateway" to the World Heritage site beyond - pulling in visitors to a core exhibition and working much as the Lowry Centre does?

It is important to reiterate the importance of visitor spend when considering the economy of Chatham in the future. Visitor spend per annum in Medway is currently £253 million, of which little is currently spent in Chatham centre. A significantly transformed Chatham could attract considerable new visitor spend and sustain businesses, which in turn benefit the local residents, particularly regarding leisure, cultural, retail and catering provision.

Design and public realm needs to reflect the essence of Chatham, which relates heavily to its maritime and military heritage.

Heritage

The Old Brook Pumping Station is one of Chatham's most important (but currently invisible) heritage assets. It is part of the Pentagon re-development, but also needs to be connected and visible via the Brook.

Chatham's role as gateway to the World Heritage site is a real opportunity to attract tourists and to add visitor spending power to the High St and new retail/catering offer - links and ease of visitor access to this site is integral to the transformation of Chatham.

The usage and redevelopment of Sun pier is also key to the revival of riverside activity along with the welcomed river walks and venues planned for the waterfront.

Transport/Visitor Navigation

Regular, subsidised river transport (water taxis, pleasure boats, commuter boats) will be essential if Chatham is to successfully fill its central connecting role within the tourist geography. This has been successfully achieved at other riverside destinations - Portsmouth and Newcastle.

The cable car is an imaginative idea. If this does not work out, can we return to the idea of a two part pedestrian bridge from Chatham waterfront to Rochester Riverside via the tip of the city estate - which could eventually revert back to an "eco-park."

Imaginative thinking is required in terms of routing visitors from the railway station (in particular) and the bus station, along to the waterfront and to the Dockyard and World Heritage Site. Medway can become a great "walking city," but routes and information will need to be planned. Connectivity of the train and bus services and links to walking routes are key.

Children's Services

We have already shown in our school forecasts for the Chatham area that by 2011, we will not have enough school places. This does not include any proposed developments such as Chatham Centre or Gray's Garage. If these are phased before 2011, then we will have a shortage of places earlier.

Brompton Westbrook Primary School in Brompton, Gillingham could take some of the places. This would depend on the access into the school being made easier from central Chatham over the Lines, as at the moment it is very isolated.

Theatre & Arts Service

We offer this submission in response to the Chatham Supplementary Planning Document, May 2007. The proposals contained within the Planning Document, including the provision of a purpose-built theatre space on the Waterfront, are exciting and radical, in particular addressing directly the needs of the growing local population for the widest possible cultural offer (as identified in Needs Analysis for New Cultural Facilities, ACT Consultant Services, July 2005).

The Theatres and Arts Service welcomes those proposals and, in this response, goes on to outline its view of the roles, of the existing theatres provision in the interim and beyond and the capital investment requirements of the existing buildings, if they are to fulfil their required roles throughout the development period and in the future.

Purpose of the report

- To consider in outline, a development strategy for both The Brook Theatre and The Central Theatre for the next 5 to 10 years
- To identify the role of each building in developing audiences, including new audiences, in the intervening period before the new cultural building opens

- To pave the way for a programming strategy for the two existing buildings and highlight how each venue's programme will need to evolve in order to develop audiences for the new cultural build
- To begin to identify necessary works required to each building to ensure it is equipped to fulfil those roles and the capital and revenue funding gaps which currently prevent the effective development of both programming and audiences
- To suggest how the roles of the three eventual buildings can be both individual and complementary in their provision

A Summary of Needs of Local Arts Consumers and Providers

The Needs Analysis for New Cultural Facilities carried out by ACT Consultant Services in June 2005 employed a variety of research inputs, including street and telephone surveys, focus groups, public meetings and interviews, to determine the perceived cultural needs of the community in Medway.

The recommendations reported on the expressed needs of individuals as both cultural consumers and providers, as well as those of local groups and societies for whom the arts were their interest or hobby. These latter include music theatre societies, orchestras, choirs, local bands and dance schools among numerous others.

Indeed the depth and breadth of local talent was recognised as a major factor in planning future cultural provision, as well as the changing nature of cultural consumption, as tastes and technology alter what is and can be offered.

The need was also clearly identified to offer wide-ranging opportunities for participation in the arts, particularly but not exclusively for younger people, 'to stimulate creativity and to engage them with the rest of society'.

In respect of the performing arts, the subsequent list of facilities needing to be offered included:

- A large scale theatre
- A concert hall (audience capacity over 500)
- A small concert hall (audience capacity at least 200)
- A small-scale flexible theatre space for local groups
- A cinema – particularly an art house cinema
- Rehearsal rooms and spaces for performing arts classes and workshops

Developing new and existing audiences for the future

The success of the regeneration strategy will itself provoke changes in tastes and demands, as education levels rise. Led by the new cultural building, demands will progressively increase for a wide variety of arts and entertainment not presently able to sustain a viable audience in Medway.

However, the new cultural building will not, at its launch, merely because of its existence, generate immediate and sustainable audiences for work to which the local population has to date not been exposed. Rather, there is, in the intervening years, a clear need for the progressive growth of audiences in terms of both numbers and tastes, which the new building can then inherit from the date of opening.

There can only be one viable way to grow these audiences in advance of opening and that is via the re-development of the Central Theatre, supported by a refurbished and re-equipped Brook Theatre. To achieve this, the Central Theatre in particular will need to be provided with higher specification staging and equipment that enables it to present large scale musicals,

plays, orchestras, ballet and opera companies, of the kind for which potential attenders currently have to travel to Canterbury, Dartford or London's West End.

The ACT Needs Analysis, makes clear the strength of the amateur performing arts in Medway and the extent to which that community and its needs are a major factor to be considered in planning the future arts provision for Medway. It seems equally clear that the demands of these performers will not be met by the new cultural building which will have staging, audience capacities and potential hire costs beyond the economic reach of amateur groups and individual performers.

The burgeoning student population in Medway will engender its own appetites, some of which can and should be met by Medway Council's own provision. The needs and tastes of this audience are very varied and the new cultural building is unlikely to be the venue for work which will meet all of them.

Indeed a whole body of work of a contemporary and cutting edge nature is currently incapable of being offered effectively in Medway mainly because of the physical and presentational shortcomings of the Brook Theatre, which would otherwise be its natural home. Arts Council England South East (ACESE) have indicated they would welcome applications for programme and audience development funding for this kind of work but until the venue is able to present the work credibly, any development strategy is unlikely to be sustainable.

The need therefore is to set out a strategy for the development of the two existing venues to enable them to be viable and to develop significant audiences and appetites for work which will subsequently be the bedrock of arts provision for Medway and the surrounding region. A major plank in establishing Medway as a City of Culture.

Current Programming at Medway Council Venues

Looking at the arts and entertainment programme currently available from the two existing theatres owned and operated by Medway Council's Theatres and Arts Service, it is clear that current provision is considerably constrained by the limitations on the presentational capabilities of the buildings themselves. This essentially grows from the fact that neither venue is a purpose-built theatre, meaning that compromises have constantly to be made in the choice of programming and whole strands of work simply cannot be offered because neither venue is able to deliver what the genre requires, either in an artistically credible way, or even at all.

The Central Theatre

This converted Methodist Hall, with up to 965 seats, offers a broad, mixed programme of popular arts and entertainment. Despite having a seating capacity directly comparable with both the Orchard Theatre, Dartford (959 seats) and the Marlowe Theatre, Canterbury (993 seats) the venue has serious limitations on its staging capability, in particular :

- a compact stage with a difficult mid-stage proscenium arch
- a complete lack of wing space
- inadequate flying height
- a contorted and hazardous 'load-in'
- a lack of orchestra pit
- limited auditorium air-conditioning (and none in the Cellar Bar)

These factors alone render it unable to present large scale 'number one' tours of musicals, drama and west-end touring shows and thus it has no historical audience for this type of work.

The same restrictions also prevent the programming of large-scale ballet, opera, children's theatre and major orchestral and choral works. A larger, more high-profile and more lucrative pantomime could be presented in a more appropriate staging environment as could emerging strands of work such as new circus and aerial work.

At present this programming gap, as demonstrated by ACT, leads such audiences as there are to attend elsewhere for all these types of work. To successfully develop the type of programme required, in order to establish a significant audience base which the new cultural building can inherit, the Central Theatre's current staging facilities will need to be brought up to the necessary standard, with the investment of capital that implies.

Currently the venue is primarily suited to the presentation of

- Touring rock and pop music, other than current bands which play larger venues and arenas only
- High-profile, headline stand-up comedy acts
- An annual pantomime, limited in scale and casting potential
- Children's shows of mid-scale
- Small to mid-scale drama
- Chamber orchestral music
- Mid-scale ballet, of good quality but low popular profile, dancing to recorded music
- An eclectic mix of easy-listening, nostalgia, tribute bands and spoken word presentations

The Brook Theatre

The Brook Theatre (formerly Chatham Town Hall) has two performance spaces, a 400-seat main theatre and a 60-seat studio space as well as another nine hireable rooms for workshops and classes, as well as corporate training sessions. The majority of its programme is currently taken up with hires, alongside the venue's own promotions which include folk and jazz and a popular monthly comedy club. The venue's strengths are its relaxed 'community venue' feel, welcoming staff and supportive audiences, particularly for the hired content of the programme.

It has many weaknesses, the most salient of which are summarised below, which impinge on its ability to present work in ways which are credible and attractive to touring producers and which leave it unable to efficiently and effectively support the development of audiences for more cutting-edge work.

- A main theatre with a cramped, high platform stage in an environment which is cluttered by architectural features inappropriate to a performance space. A 'black box' environment would avoid this problem without requiring the removal of the features.
- Inflexible seating, in poor repair, which, although retractable, basically permits only one seating configuration.
- Large art deco 'chandeliers' which prevent the rigging of required lighting in more flexible presentation formats
- Serious problems with sound transference between rooms which, in most cases, prevent more than one programme happening at a time
- Inadequate power intake
- Inadequate sound installation for most larger music shows and events
- A studio theatre artificially limited to 60 seats because of the lack of a second fire exit

- Poor, inflexible studio theatre seating
- No projection facilities
- A small, badly located bar
- Breakout rooms in a poor physical and decorative state
- A building exterior which requires cleaning and new signage

The future of the Brook Theatre as a thriving Arts Centre

A place for local talent to grow

Medway already has a vibrant and burgeoning arts community. As the ACT Needs Analysis demonstrates, there is a wide range of theatre groups, art societies, local bands, choirs and orchestras in Medway, all with specific needs if they are to pursue their work for the benefit of the wider community. There is also considerable frustration regarding the lack of suitable facilities in the area and cutbacks in provision, and a need for recognition of local creativity and a sense of ownership by the local community.

In order for the Brook Theatre to attract funding to allow it to continue to develop as an arts centre and cultural hub for Medway and to meet these needs, the philosophy and programming of the venue must reflect the needs of the community in addition to its aspirations in the area of arts development and building audiences for more progressive art forms.

Building a Bridge – Medway’s Audience Development Strategy

The ethos behind the Brook Theatre’s arts development work, in particular via the Fuse Festival, is to build audiences in Medway for more cutting edge art forms. This is an important journey for Medway in terms of becoming a City of Culture. However:

- Medway is not a highly-educated area and building audiences for this kind of work will call for special resources and funding from external sources (eg ACESE)
- Contemporary and cutting edge art forms, that are part of the Arts Service’s current offering, attract relatively small but growing audiences, and future marketing will involve a targeted approach to both new and existing audience sectors

Medway’s Audience Development Strategy will therefore need to take audiences incrementally on a journey towards discovering and enjoying progressive art forms for themselves, so that viable audiences can be built progressively and these barriers to participation can eventually be broken down.

Context, presentation and marketing will play a vital and combined role in engaging audiences on this journey, by engendering a sense of understanding and familiarity by the community, sometimes referred to as an “it’s for me” approach.

As audiences grow for new work, and the work itself becomes accepted as part of more mainstream offering, it can then form part of the Central Theatre’s programming, making way for further progressive and cutting edge work to find its place at the Brook Theatre, a process which aims to take Medway’s audiences along a journey that enables them to view “the arts” simply as a path to enjoyment and discovery.

A Vision for Three Venues in Medway

Following the opening of the new cultural building, the wide variety of demands identified in the ACT Needs Analysis, demonstrates conclusively the future requirement for three performing arts venues of a complementary nature, each with its unique role and identity and each meeting the needs and tastes of different sectors of the community and the wider region.

The following represents a model for the way in which the three roles fit together. A 'menu' from which future arts consumers in Medway will be able to choose.

(i) The Brook Theatre

Small-to-mid-scale in size, delivering a programme of cutting-edge work capable of attracting programming/audience development subsidy. The work offered would be contemporary and challenging, attracting a range of niche audiences eager to take risks with new ideas.

The Brook will address the task of seeding audiences for many kinds of future development. Music genres with smaller audience potential would begin their growth at The Brook, including folk, jazz and world music, as would audiences for contemporary dance, physical theatre and a number of emerging arts forms.

It will continue to play host to a small number of local, professional creative companies whose presence supports the exciting programme on stage and creates the feeling of a 'creative village' within the building and its external image and ethos. The Brook would continue to have a community role in delivering the aspirations of local performers of smaller scale work.

Consideration might be given to equipping The Brook to enable it to take on the role of arts cinema, a need identified by ACT. In addition to programme subsidy, The Brook would require operational support in the form of revenue funding.

(ii) The Central Theatre

The comfortable, popular mid-scale venue that can house the larger amateur performers while taking over the audience development baton from the Brook as audiences grow, as well as undertaking the development of audiences for work such as new circus and aerial work, which cannot by its nature be performed at the Brook.

The Central will remain essentially a music venue, possibly with removable stalls seating to enable an increased-capacity part-standing audience for some rock and pop concerts. It will also have the potential to host intimate chamber music and small choirs for which the new building would be too large.

In the longer term there remains the potential to partially redevelop the Central Theatre as a truly dedicated music venue, with a smaller, up to 500-seat auditorium for jazz, blues, folk, world music and chamber music, plus rehearsal rooms, a lecture/master-class theatre and recording studio, supporting local music-making.

The Central Theatre would require operational revenue funding and occasional programme subsidy for audience development projects.

(iii) The New Cultural Building

The large, prestigious entertainment venue with No 1 touring capacity and capability. It will be able to present everything from West End touring shows of all kinds, to tribute bands, from opera and ballet to pantomime and headline comedy.

With the potential to attract a resident international symphony orchestra or dance company of its own, this is the flagship venue of major regional importance, that puts Medway firmly and finally on the map in the North Thames Gateway area.

The building would be commercially operated, possibly at no cost to the Authority.

The Programming Capabilities of the Existing Venues

As stated earlier, each venue has shortcomings which need to be rectified if it is to be capable of developing audiences as required for the future of the new cultural building and of arts development in Medway. The following tables summarise the potential performing arts genres in question and identifies the works needing to be carried out to enable the work to be performed in a credible, viable and sustainable way.

VENUE PROGRAMMING CAPABILITIES

THE BROOK THEATRE

Genre	Requirements to achieve effective programme development
New Circus/Aerial performance	Remove chandeliers Increase roof loading to permit lighting truss Install more flexible seating 'Black box' the main auditorium Install demountable forestage
Physical Theatre	Remove chandeliers Increase roof loading to permit lighting truss Install demountable forestage
Contemporary dance	Remove chandeliers Increase roof loading to permit lighting truss Install more flexible seating 'Black box' the main auditorium Install demountable forestage
Signed' bands	'Black box' the main auditorium Install demountable forestage Cure issues of sound bleed Install new sound system Improve stage lighting Improve bar facilities Provide trained security staff to handle crowd behaviour
Develop Christmas Show	'Black box' the main auditorium Install demountable forestage New power installation to building 'Black box' the main auditorium Install demountable forestage

Cutting-edge Jazz & Blues	Install new sound system 'Black box' the main auditorium Increase roof loading to permit lighting truss
New Folk Music	Install new sound system 'Black box' the main auditorium Increase roof loading to permit lighting truss
New Country Music	Cure issues of sound bleed 'Black box' the main auditorium
Drama/New Writing	'Black box' the main auditorium Install demountable forestage
Alternative Cabaret	'Black box' the main auditorium Purchase new cabaret-style tables and chairs
Variety	'Black box' the main auditorium Purchase new cabaret-style tables and chairs
Burlesque	'Black box' the main auditorium Purchase new cabaret-style tables and chairs
Develop Children's Theatre	Second Studio Theatre fire exit New flexible studio theatre seating
Art & Culturally Diverse Cinema	New (digital) projection equipment 'Black box' the main auditorium
Education & other workshops	Cure issues of sound bleed Upgrade rooms/fitness for purpose Address issues of 'nesters'
Live Literature	Second Studio Theatre fire exit New flexible studio theatre seating
Spoken Word	'Black box' the main auditorium
Drag	'Black box' the main auditorium Improve bar facilities

CENTRAL THEATRE

Genre	Requirements to achieve effective programme development
No1 touring drama	Complete backstage redevelopment including new fly tower, wider stage with wing space, enlarged load-in, conventional proscenium arch, orchestra, pit, full air conditioning, "intelligent" lighting.

Large-scale pantomime	As above
Music theatre	As above
Opera & Ballet	As above
Large-scale children/family shows	As above
Large orchestral and choral work	As above
New Circus/Aerial work	Curtaining to reduce auditorium for smaller audiences Demountable forstage New suspension points above the stage
Audience development programme	Curtaining to reduce auditorium for smaller audiences

Physical developments required at each of the two existing venues

Brook Theatre

'Black box' the main auditorium
 Increase roof loading to permit lighting trusses
 Install more flexible seating
 Remove chandeliers
 Install demountable forestage
 Cure major issues of sound bleed
 Second Studio Theatre fire exit
 New (digital) projection equipment
 Upgrade rooms/fitness for purpose
 Address issues of 'nesting' hirers preventing programme development
 Improve bar facilities
 Clean exterior and improve signage

Central Theatre

Complete backstage redevelopment including:

- New full-height fly tower
- Wider stage with wing space
- Enlarged, safer load-in
- Conventional proscenium arc
- Orchestra pit
- Full air conditioning
- 'Intelligent' lighting

Curtaining to reduce size of auditorium for smaller audiences
 Demountable forestage for new circus and similar programming
 New suspension points above the stage
 Review potential of an enhanced retail offer

SUMMARY

Our recommendation is that the planning of the Waterfront Development should, as soon as possible, take into account the vital need to develop audiences for a new cultural building well before its opening and utilise the existing theatre venues to accomplish this.

In order to do so there will be a requirement for capital investment in both the Central Theatre and The Brook Theatre to bring their specifications up to the required standard. This will be linked to a bid for programme and audience development funding to, among others, Arts Council England, South East.

The requirement for revenue funding for both buildings will need to encompass closures for redevelopment, running costs and the loss of some existing revenue streams, whilst new audiences are developed. The opportunity to develop significant income through improved retail and catering provision at the Central Theatre, as recommended by ACT Consultant Services, should also be re-examined as a means of off-setting some of this requirement.

Realistic cost estimates are not in existence at this stage but the Theatres & Arts Service would wish to be closely involved in their preparation and has considerable expertise to bring to the development potential of its venues now and in the future.

Finally, it is recommended that further consultancy work should be commissioned to ensure the smooth transition of the existing venues from their interim roles to their future roles, once the new cultural building is open.

Design & Conservation

Concerns about the waterfront elements in particular remain – not just in heritage terms, but in practical concerns too. These concerns will not come as a surprise to Medway Renaissance.

There are other concerns over the use of the masterplans – are they setting an overall policy tone, or is the intention to fix actual footprints of the buildings and the lines of the streets? Finally it is disappointing that the sustainability section fails to measure certain key impacts of the scheme.

If option 1 is to be progressed it must be with a joint corporate understanding of the effect of it on other council strategic regeneration projects such as the World Heritage Site and on key existing policies such as the Building Heights Policy.

It is accepted that there will always be disagreement over aspects of the masterplan and that there is an imperative to drive the process forward. However, the issues here are substantial. In terms of the Chatham's status as the centre of the largest city in the Thames Gateway and the area's undoubted historic importance, the significance of the development of Chatham is national. There is therefore an extremely strong case for debating the areas of concern at a national level- via the CABE Design Review Panel or at the very least the Regional Design Panel. We suggest that the adoption of the masterplan documents should be delayed until this can be arranged.

STYLE, USABILITY, and DELIVERY

We commend LDY on their specific document on the Waterfront- whist obviously not as comprehensive as the main document it is full of diagrams and pictures and forms a very usable summary of the proposals. The Brook document is also good- although rather more wordy. It demonstrates a good understanding of the existing environment and the bibliography is useful. The Station Gateway summary is a useful summary of the all-important transport proposals although it avoids discussion of controversial issues. There is

scope to compare all these documents to the main document with a view to shortening the main document.

In all the documents there is a tendency towards 'description' of the masterplans rather than laying down specific guidelines and instructions. In order to maximise the usability of these documents we would like to see clearer distinctions between 'aspiration', 'principle' and 'prescription'. More use of bullet points might be useful here.

The potential confusion with regard to principle and prescription is illustrated by 18 –20 Medway Street. This site is the subject of a planning application for a very substantial perimeter block yet it straddles the street form indicated on the Waterfront masterplan. Is the masterplan illustrative of principle only? If so the present application could be approved now, without delay. If on the other hand, the intention of the masterplan is to 'fix' building footprints and streets, the application should clearly be refused. The 'delivery' section of the main document could usefully say something on this.

The delivery section of in the main document could usefully be illustrated. We would also like to see it expanded to make explicit links between the delivery of phases of development and improvement to the public realm.

Information on 'next steps' would also be useful. We think that there is a very strong case for future work which could include the following:

- Detailed section 106 strategy related to a detailed implementation strategy
- Design Codes- especially for the Brook
- Design competitions for key areas of the public realm
- Streetworks manual for other parts of the public realm.

Areas of risk

The project team is well aware that the present waterfront proposals are highly controversial both for their impact on the historic environment and their effect on river ecology. Pursuance of the present options could damage the chances of a successful application for World Heritage Site status for Chatham and with it re-imaging, marketing and regeneration opportunities.

The Environment Agency controls development within 15m of the waterfront via a licensing system. If agreement cannot be reached a licence will not be granted. Crucial elements of Options 1 and 2 will not be implementable.

The potential for buried archaeology of national importance in the Old Gun Wharf area could add an extremely significant additional expense to development in this vicinity. Similarly Town Hall Gardens and the Whiffens Avenue car park are built on old military cemeteries. Dealing with the bodies that may be found could be a significant expense.

PLANNING POLICY CONTEXT

There does not seem to be any reference to the national (PPG15 and PPG16) and local policies in respect of the historic environment.

PPS3 and LDF housing and mixed use policies – both PPS 3 and the draft LDF encourage a genuine mix of housing types, sizes, and tenures across sites of all sizes. This requirement should be spelt out in the masterplans and the spatial implications of this should be worked out. In the absence of a market analysis, we suggest that at between 10% and 20% of all new residential development is provided as housing as opposed to flats.

Building heights policy. It is important that the proposals can be seen to comply with the council's adopted building heights SPD. We understand that an appendix has been produced on this but it has not been made available. Accurate Visual Representation (AVR's), shadowing diagrams and a host of other information is required in order to comply with the policy. Some of this required information- particularly AVR's of the development from strategic viewpoints- would benefit from public presentation and consultation.

A key part of the policy is the designation of strategic views- this should be mentioned in the planning policy section. It would also be useful to look at paragraph 5.2.1 which states the information expected of a masterplan, and to work through *Section 7- the checklist* at the rear of Part 1.

The Council's Brompton Lines Conservation Area Appraisal (adopted 2006) has implications for all development –particularly the key views and the Management Section. It should be referred to in the Planning Context Section.

WATERFRONT MASTERPLAN

Tall buildings/ landmark blocks:

The concept of high buildings in order to provide a new and exciting image for Chatham is strongly supported. Indeed this very concept is outlined in the adopted Building Heights policy. The policy also advocates in Chatham. However it also charts key sensitivities and particularly draws attention to the sensitivity of the Gun Wharf area via the section on strategic views and elsewhere in specific area guidance. For this reason **we cannot support Option 1** for two towers on the waterfront. Whilst we do not wish to overplay this point it is worth outlining our concerns so that there can be full debate on this subject. In detail, therefore, our objections are as follows:

- Negative impact on strategic views, towards Chatham centre and Fort Amherst and the backdrop of the Great Lines and from Fort Amherst and the New Gun Wharf towards Rochester Cathedral and Castle. This is a serious point which could have ramifications for the whole World Heritage Site project.
- The Gun Wharf Tower would dominate its immediate surroundings and therefore have a negative impact on the character of this delicate part of conservation area and the World Heritage Site and on the specific setting of the listed buildings on Gun Wharf and St Mary's Church and also the setting of Fort Amherst.
- The placement of towers will block views out from the key green space of New Gun Wharf. Views will be focused on the unattractive Medway City Estate whilst the attractive views upstream to Rochester downstream to Upnor Castle will be blocked. At the very least this is regrettable in urban design terms.
- The towers will overshadow the key green space of Gun Wharf. It is likely that overshadowing will be extensive. However there is no assessment of this as required by the Council's adopted Building Height policy.
- Difficulty of vehicle access at Gun Wharf The existing access to Gun Wharf is not adequate – even at present. Improving access or forming a new access from Dock Road in front of the proposed tower would not be a viable option- the difference in levels between the road and the quay level is substantial and would require large-scale engineering work which would be severely detrimental to the wider area. Other options – bring a road across the key green space of New Gun Wharf would be equally unsympathetic to both the area and the aspirations of the Masterplan for attractive waterside spaces of world-class quality.
- Difficulty of providing car parking. Substantial 20 storey buildings would generate a substantial demand for parking. Although we assume that the very wide base of the

towers in option 2 is to accommodate car parking, it is not evident in general how or where this parking will be provided without spilling out onto the key green spaces.

- Lack of integration with rest of Chatham: The Gun Wharf tower is remote from the rest of Chatham and other than a restaurant use at ground level it is a private building. This isolation and privacy will not lead to it becoming an integrated and well-liked building – no matter how good the design.
- Extending Chatham centre. There is a need for development in the vicinity in order to attract people to use this part of Chatham. However a private tower is unlikely to do this. The Council's move to the Lloyds Building and the associated shops and restaurants will be a much more effective draw. There is therefore no over-riding need for a large quantum of development this location.
- Non compliance with building heights policy: Whilst an established policy should not get in the way of bold imaginative and well thought through proposals, the building heights policy specifically outlined the importance and sensitivity of key views and specifically steered tall development away from the Gun Wharf area. The effect of development on these is not explored and compliance with the building heights policy is not demonstrated. It should be noted that:
 - a) the policy was specifically written so as to allow tall buildings whilst protecting key views and areas of historic sensitivity;
 - b) the policy was written so as to demonstrate that it is possible protect the setting of the prospective World Heritage Site whilst allowing for dramatic new development and;
 - c) members only accepted a policy that encourages tall buildings for reasons (a) and (b) above;

Given the above, the decision to depart from the guidance is very serious. It should also be noted that the Chatham SPD does not comply with the information requirements laid down by the Building Height policy. In particular all proposals, whether at an early stage or not, require an assessment of their impact on key strategic views. This assessment should include both accurate visual representations from agreed grid references and a visual impact assessment.

Whilst these points apply in the main the Gun Wharf tower most are also relevant to the Sun Pier Tower- in particular practical concerns such as access and parking could make it well nigh impossible to design a well integrated tower with attractive surroundings in this location. In addition Sun Pier itself is a structure of some historic importance, is within the Star Hill to Sun Pier conservation area and contributes to its character. With modest development, it could become a viable, useful and much loved part of Chatham Centre.

Despite the above, it should be noted again that the concept of tall landmark towers as means of signalling a new image and providing a new focus of Chatham is supported. We therefore prefer **option 2** over **option 3**. However, it is a great pity that the controversy over option 1 seems to distracted attention way from the full development of other options and we are not convinced that option 2 has been fully refined and thought through. In particular:

- The precise placement of landmarks buildings at key points within the street and open space hierarchy is of crucial importance to their impact on the built and historic environment.
- It is important that there is a full exploration of the effect of specific tall buildings proposals on strategic views as required by the Building Heights Policy.
- Mixed, public uses are the base of such buildings is important if they are not to be perceived as isolated and fortified towers
- As indicated on P58 of waterfront supplementary planning document a first 10 storeys of each tower occupy a very substantial footprint – this lack of slimness will have its own visual impact.

- Details on servicing and access need to be investigated to some degree in order to determine the feasibility of any tall building proposal.

It would be useful to discuss these points with specific regard to option 2. It is unfortunate that as the document stands at the moment we are unable to provide full endorsement to Option 2. Put quite simply- more work is required.

Perimeter / townscape blocks

The basic block form which is a key component of the riverside development supported. However designing such blocks so that they can accommodate active frontages, residential and other uses, and car parking, is not easy. We have concerns that the individual LDY blocks are too small to accommodate satisfactorily accommodate parking, commercial and residential uses. Underground car-parks which link the blocks may be one way of providing the required degree of servicing- however these are not shown or indicated in the masterplan.

It is noted that the master-plan commits to retaining attractive Victorian buildings within the Lower High Street area. This is welcome. However- options 1 and 2 seem to advocate the retention of facades only; whilst option 3 advocates the entire retention of the buildings.

We strongly support this last option. In order to retain a sense of place, culture and history it is important to retain existing historic character where it remains substantially intact and viable. It's not easy to integrate narrow frontage and relatively small scale historic facades with large modern blocks. In addition it does not seem sensible to displace viable retail businesses from this part of town - even if these uses are low key at present.

The same also applies to the buildings in Military Road adjacent to the Pentagon Centre. Once again, these are attractive buildings which contribute to the character of the area. We note that the buildings' strategic position right at the heart of Chatham - next to Pentagon Square and adjacent to Mountbatten house- this might allow a case to be made for their replacement with special building with a special function in this location. However we do not feel that the master-plan is sufficiently refined to justify this.

It may well be appropriate for buildings to be higher towards the waterfront –however 5/6 and 7/8 storeys as indicated in option 2 and 3 is really very substantial. This together with the 'open backs' of the blocks facing Medway Street could create quite an odd utilitarian character to Medway Street- not the elegant boulevard which might seem to be appropriate. This is not helped by the lack of a hierarchy of streets of varying significance and width.

Green spaces

The retention of the Green Space around new Gun Wharf and the Barrier Ditch is strongly supported. This is a major improvement on the 2004 Framework. The location of the Theatre adjacent to this space offers real opportunities to use the space in a variety of interesting ways.

The proposed introduction of inter-tidal terraces along the water-front is extremely welcome. This will considerably improve the appearance of the area by bringing vegetation to the present most unattractive area of mud.

It is also good to see the retention of the Paddock. This is a space of some historical importance. In addition its mature trees add considerably to the character of the area.

All of the options indicate a number of new footpaths and tracks on and through the New Gun Wharf area, including round the Barrier Ditch and the surviving revetment (which currently forms one wall of the Riverside 1 building). Again - this is extremely welcome.

The Barrier Ditch and revetments are a major historic feature to be celebrated and which could be the key to improving access up to the rest of ditches and the Great Lines. This is an opportunity not to be missed. There is scope for these aspects to be given far greater prominence in both waterfront document and the public realm strategy- if nothing else in order to link the masterplans more effectively into the important WHS and Great Lines City Park projects.

As a small point it should be noted that the archaeological sensitivity of the Barrier Ditch and Old Gun Wharf areas is such that the precise routes should be determined following an archaeological investigation and the preparation of a conservation statement.

Historic environment

The statement that the historic character is a strong driving factor for design (P77 of the main document) is welcome- as is the commitment on the same page to the preservation of existing green areas. However – our position on a number of elements of the historic environment have been noted elsewhere in this memo- and reveal, at least to an extent, a gap between rhetoric and a full understanding of the historic environment and how best it should be integrated with new development. It would be useful to debate this point.

As a smaller matter we note the existing built form diagram (P21 of waterfront document). We think it is rather conservative in its rating of the quality of buildings. The majority of buildings within the High Street are of high quality in themselves and they contribute to the character of one of the few attractive areas of Chatham centre. Some are within the Star –Hill Sun Pier Conservation Area and in our view the rest of this area has a townscape of high enough quality to be worthy of consideration for conservation area status.

Similarly the Military Road buildings are reasonably high quality early Victorian buildings that contribute to the character of the area.

Movement

In the Waterfront supplementary planning document we note the intention to sever the link between the Lower High Street area (Star Hill to Sun Pier) by closing Medway Street as a through route. It is understood that this has been a key part of the Chatham proposals since 2004. However, we remain extremely concerned about the effect of these traffic changes on the viability of the Star Hill-Sun Pier area.

This is an issue which must be fully debated. We also think that the matter should be specifically raised with the Star Hill–Sun Pier businesses and residents before any final decision is made on this aspect of the masterplans.

Gateways Landmarks and Views

The place of landmarks and gateways is understood and supported. There is the strongest case for bold buildings that make a mark on the surrounding area. However – it is extremely disappointing that this section only maps out views out from the area as opposed to analysing the effect of the proposals on the specific strategic views mapped out by the building heights policy. - Similarly, no AVR's of the landmark proposals are provided. Quite simply not enough information is provided to comply with the requirements of the Building

Heights policy, and more to the point- to assess the effect of the proposals on the statutory strategic views.

This is a major omission.

Errors.

On the Key Constraints map on page 32 the listed carpenters shop is not shown as listed is not shown as being listed.

On the Key Constraints map, the part of the Brompton Lines Conservation Area around Gun Wharf is not shown. This needs amendment to avoid confusion.

THE BROOK

General

In general this piece of work is to be commended. It is clear, readable and has excellent ideas thoroughly thought through. The concept of a Boulevard along the Brook is sounds as is the development of round Town Hall Gardens. The concept of a square defined by tall buildings at the High Street/ Brook junction is an exciting and powerful one. Its good to see connections and landscaping well worked out. However there are a few issues which are worthy of consideration as follows:

Existing Built Form and Character

- The pub adjacent to the Brook Theatre is an attractive building of some architectural significance and may even be a candidate for listing. We would like to see a commitment to retain this building.

Brook

- This could be a very elegant street. However, the narrow width of the footway (5m) means that it is highly unlikely that street trees will be established here. It is unlikely that Medway Council, in its capacity as highway authority will accept trees that overhang the carriageway. All of this is a great pity. We suggest that consideration is given to setting buildings back where possible.

Town Hall Gardens

- The importance of Fort Amherst in many views across Chatham is noted in both the Building Heights Policy and in the Brompton Lines Conservation area appraisal. Fort Amherst is potentially a very powerful feature in the landscape, dominating the top of the hill and is just as important visually to Chatham as is Rochester Castle to Rochester. The proposed housing on the upper part of the site at four stories could have an impact on the key view to Fort Amherst from Chatham Centre in the vicinity of the Paddock and the Theatre. In addition they will impact on strategic view 5 of the Building Heights Policy. The proposals should be amended to indicate this key sensitivity and to show two and three stories at the most.
- What will happen to the old wall and tombstones along the boundary of the gardens? The diagram 47 seems to indicate that it will be retained. Is this the case?
- Pedestrian connections to Fort Amherst from the Whiffens Avenue (Passage 1 of the Landscape Strategy and P 66, 67) will be extremely steep whist the traverses below the ramparts will be vertiginous. Whist we absolutely share McCreanor Lavington's aspirations we doubt the practicality of these.

Upper Slopes

- The upper slopes are already the location of some tall buildings including the unattractive multi-storey car park and the Carpaux Road Flats. In term of long distance views the area absorbs building of this scale with surprising ease although there is no doubt that the car park in particular is a blot on the landscape. Nevertheless, a degree of caution is needed here. The valley form of Chatham and the escarpment of the Great Lines are very strong features. We note the and support the degree of caution expressed on p66, along with the stated need to analysis the effect of development of this scale on long distance views.
- The new road down from Hardstone to Carpeaux Close could be very steep.

Landscape Strategy

- It is good that the connection of the Great Lines with its surroundings and treating the slope of the Great Lines as a local landmark is identified within the document. Proposals for new paths and improvement of existing paths will all make a positive contribution to the historic environment.

Old Pumping Station

- Whilst we support the improvement of the setting of the Brook Pumping Station, the operating needs and security of station need to be considered. We suggest that specific consultation with the operators before proposals are finalised.

THE STATION GATEWAY

Study Area 7 Overview

It is good to see that one of the objectives is to respond to the remnants of the historic fabric of Chatham especially in the High Street, Railway Street and New Road areas in a way that will both enhance the best of the old and that an analysis of the study area has been carried out to assess its present character.

Structuring Options.

The proposal to create a square in front of St John's Church is welcomed. However, it should be pointed out that this will be at the end opposite the entrance so there will be no connectivity between the church and the square. Level changes pose a significant challenge here.

The diagrams and text of the structuring options need expansion in order to assist a fuller understanding of the advantages and disadvantages of the proposed changes to pedestrian and traffic movement.

Despite this, the downgrading of Railway Street in order to improve its function as an important pedestrian link is understood. Whilst there is no doubt that traffic engineers can devise a junction that works for vehicles, it poses a real challenge in connecting the busy Maidstone Road to New Road without causing undue harm to New Road Conservation Area or the attractive and historic viaduct. Similarly the effect of vehicle changes in this area could militate against pedestrian improvements. This whole area needs to be explored in greater detail and the results debated before a final decision is made about how to proceed.

Best Street would also be down graded. Whilst this is not a pleasant road at the moment it is likely that several large sites will come up for redevelopment. It is a pity that the masterplans do not address this area.

Massing and Building Heights

The general principle and layout of blocks is supported. There is a proposal for a very tall building near the viaduct. There is some confusion over the height proposed- Section C-C on p118 shows 12 storeys but on the plan it shows a building of 20 storeys. However, the building height policy identifies this location as suitable for tall buildings and the masterplan text contains caveats and references to the policy such that the specific proposals can be considered properly at the appropriate time.

At the same time the tower could be very large. It will need full testing in terms of servicing and impact on the local area.

The proposed new buildings at facing onto Railway Street are on extremely tight sites. We doubt the feasibility of these proposals.

At the southern end it is proposed to construct a series of blocks facing Ordnance Terrace, a fine row of Georgian houses. On the section A-A these are shown as being three stories over two stories of car-parking which is likely to be acceptable. However, on the plan, they are shown as being 4-6 stories which may not be. It is important that they do not exceed the height of Ordnance Terrace. It would be helpful if Ordnance Terrace were to be identified in the text as being sensitive.

The plan which shows buildings of architectural interest within this area does not include the listed Bank Chambers building adjacent to the Theatre Royal (although it is shown on the Heritage plan 6.3).

PUBLIC REAL STRATEGY:

Overall

The crucial importance of the public realm to the regeneration of Chatham has been pointed out in previous memo's- it is not something that can be left to chance or dealt with in an uncoordinated piecemeal way. To this extent the previous draft was inadequate. It is good to see that this section has improved a lot since the initial draft. It is good to see comments being noted, considered and acted upon. It is now a reasonably useful document, although it is still really a collection of outline ideas (albeit very good ones) rather than a detailed strategy.

The document is still at its weakest when it comes to implementation. More detail would have allowed the development of an implementation strategy. However, in the absence of this it is essential that the document charts 'next steps' so that we can all start commissioning and negotiating improvements in a structured way.

More detailed comments are as follows:

Overarching strategy:

Figure 7 gives an interpretative Cultural Trail. The trail needs revising- it does not show access to the defences including Fort Amherst, and the Black Lion Leisure centre is misinterpreted as the Royal Engineers Museum! We note that the trail passes through the private estate of the dockyard- controversial!

Detailed proposals – Great Lines

Café on escarpment- bold!

SUSTAINABILITY APPRAISAL

In general the sustainability appraisal follows the Directive guidelines and covers most of the aspects relating to social, economic and environmental impacts. However, the information is not consistent throughout the whole document and there are differences between some of the areas of the masterplan that need to be addressed, such as carbon targets, housing numbers and Code for Sustainable Homes requirements.

There is also lack of information regarding the options of the SPD and how those are scored against the sustainability objectives identified in the appraisal. The SA does not have a 'do nothing' scenario- this is quite a serious omission. Also, there should be a comparison of the environmental, social and economic effects for the different options. It is important to provide that information in the main document to justify the selection of the favoured option.

Relationship to the SEA Directive

Social inclusiveness and regeneration and economic development are integrated subjects in the SA for the Core Strategy, however this SPD has not clearly distinguished or assessed them.

Historic Environment

English Heritage, Design and Conservation and others have expressed very clear concerns through the masterplan process. Very clear guidance has been given on key sensitivities, key views etc. and documents in the form of the Building Heights Policy, Brompton Lines Conservation Area Appraisal and Chatham Town Centre Character Assessment have been provided. The omission of the Conservation Area Appraisal as a part of the baseline information is not impressive. The key findings, key issues, and other sections show little evidence of this advice and overall, the Sustainability Statement's assessment of the impact of development on the historic environment is blithe at best.

Key sustainability Issues (page 20)

Housing: there is mention of 35% current affordable housing target. This is not in accordance with the LDF's policies where the target still being 25%. Clarification is welcome to justify the difference and avoid confusion.

Mix of housing is not mentioned, despite the fact that this is emerging across the Thames gateway and in Government Guidance as a key sustainability issue. Careful consideration of housing markets assessments and housing needs is required.

In general this section needs strengthening. Housing is major issue - more guidance and certainty will be required by many stakeholders involved in the process.

Access and Movement Assessment.

This section needs expansion and some extra diagrams. Also, it is necessary to assess the collective impacts at all levels (environmental, economic and social) of the full implementation of the three masterplans. The proposals would not be implemented in isolation, therefore effects would be assessed for each plan as well as for the combination of all of them.

Other

The number of dwellings identified in the SPD is substantially higher than the emerging Housing and Mixed use DPD has allocated (+745 units). This should be tested and justified in the SA and highlighted in every specific plan.

Finally, the introduction of the report states that the SPD has been influenced by the SA in order to request level 3 of the Code for Sustainable Homes by 2010. However no evidence of that has been produced in the main document and what impacts of those requirements will be.

General:

Sadly, the Sustainability Appraisal has every appearance of being a document written after key decisions had been taken, rather than a tool to select the most sustainable option.

Development Control

These documents are very impressive and attractive papers but not very user friendly.

- They give good guidance with regard to the possible land uses in the three Master Plan areas which is very helpful to look at the full picture and at the same time see the situation at micro level.
- Are the documents setting an overall policy direction, vision and principles, or the intention is to fix actual footprints of the buildings and the lines of the streets and public realm spaces?

If the latter is the case then this could potentially slow down development and could demand greater use of CPO by the Council to ensure some landowners do not prejudice implementation of some development by holding schemes at ransom.

- It is important that these document are not at odds with other adopted SPD documents, otherwise it will result in inconsistency and confusion for developers and impossible to explain the justification for the inconsistency to the applicants/ developers and on appeal to the planning inspectors or in court.

Specially, I refer to the Council's building height document and other already existing SPD documents adopted by the Council.

If there are inconsistencies which and these Master Plans are adopted with one takes priority over the other? This should be clarified.

- These documents although attractive and detailed – but they are long and it's difficult to grasp all the information quickly! I do not think that potential developers would have the interests to spend long time to ready and try to find parts that are relevant to his/her site and proposal.

I think the final version should be make more user friendly otherwise it will not be embraced by everyone because of their cumbersomeness.

These documents should be edited in order to turn them into a clear set of guidelines for development controllers and developers.

- The implementations of the three Master Plan areas have been divided into a number of phases. A programme of promoting the areas for regeneration should also be considered.
- The Public Real Strategy Document gives detail suggestions about treatment of public realm areas. It however fails to assess and analysis the consequences and implication of the new public realm created in particular along the river frontage and great lines.

There are ideas/suggestion about the extension of public realm into the river or up along the slopes of the Great Lines, but the ecological/environmental implication and harmful impact of these have not been fully assessed and options/ alternatives have not been considered. Creation of wide foot/cycle path, café/restaurant on the slopes of the Great Lines could potentially add to a number of ecological harm and light pollutions, etc.

- The document also refers to public realm courtyard areas that surrounds privately owned and managed buildings. However, no reference has been made to the way these areas are managed. From DC point of view it is important to know if right of public access and long term management issues to be agreed as part of a section 106 agreement.
- The Paddock area in front of the Pentagon is shown as public realm area. This might not be the case if bus station is located here. The implication of this has not been assessed.
- It is also not clear how the integrated public transport and private/ public car parking would work. Clearly every building block would not be able to satisfy their own parking needs if the idea is to provide 1 parking space per dwelling (with regard to the residential aspect of the master plans) and would need to rely on available public car parking spaces. No alternative type of car parking management has been considered.
- Management of the Town centre car parking spaces public and private has not be addressed. There would be significant shortfall between the level of demand for parking spaces based on the car ownership and trips to the town centre and the availability of parking spaces. To make best use of the parking space available management of the parking spaces is crucial.
- The documents do not provide clear answer to the issue arising from car ownership, car parking, and movements of vehicles in the town centre. Clearly the consequences of the Master Plans are that there will be many more retail, office, leisure, residential, entertainment and other civic uses within the master plan area. These would generate significant volume of traffic and demand for incoming and out going service vehicles. The big question is, are the existing road or the proposed one capable of coping with this additional volume of vehicles movement? What are the implication for the regeneration and what is plan B if road are not capable of coping with impact of plan A.
- If the regeneration is successful In addition to the increase in the volume of vehicular movement there would be significant increase in the volume of pedestrian and cycle movement in the town centre. The conflict between these three groups has not been fully analysed. Potential accidents.
- What would be the quality of the air in the Town Centre and the surrounding areas? If the air quality is poor or the area is too noisy then it will not be attractive and inviting. This could have negative effect on the area and the regeneration. No reference has been made with regard to the use of electric buses, taxis, use of out of town lorry depot and use of electric vans/trucks to deliver goods from out of town lorry depot(s) to the centre of the town in order to reduce the level of air and noise pollution and reduce traffic congestion.

- The master plan fails to deal with the issues arising from impact of the development on the carbon footprint and makes no suggestion for a way forward.
- There has been more recent development with regard to the future of Tesco at the southern end of the Brook and the possibly the Paddock at the northern edge of the Brook. The Master Plans should be up dated in order to reduce any uncertainty.
- More clear and robust explanation and justification for heads of terms for section 106 should be provided. This would help negotiation with the developers and provide clarity and transparency. The list provided has missed Primary Care Trust and has failed to consider the circumstances where the developer is unable to provide any on site car parking and seeking commuted sum for providing public car parking is an alternative.
- With regard to education the 106 has stated that that the present facilities are adequate until 2011 and contribution will be sought thereafter. The level of contribution sought after 2011 for primary school has been identified as £1000 per pupil and £6850 for secondary school. These detail prescriptions are in my view wrong and lack flexibility and limit the LEA and DC officers' ability to negotiate.

Conclusion

These documents are very helpful and a good guide for DC officers dealing with planning application for the three Master Plan areas; however, they do require refinement, correction, clarification and simplification in order to make them more use a friendly. It would also be very useful to have executive summary of Master Plan for the three areas. In light of the period of the regeneration a five yearly review of the plans would be beneficial.

Integrated Transport

The published draft has generally accepted the suggested text changes in the Access & Movement Strategy. However, disappointingly other comments have been ignored.

Comments and concerns on the **Access & Movement Strategy** previously made and still outstanding are:

1. Not enough emphasis and specific information on delivering the objective of improving the operation of bus services by improving their reliability on the local road network in Chatham. Without this priority, it is unlikely that significant increases in patronage envisaged will be achieved.
2. No reference to parking standards used for the various types of development – specific reference to parking provision for individual sites is made, but an overall approach is needed.
3. Taking into account the improvements to public transport, walking and cycling, there is no analysis of the impact on the local and strategic road network for the overall traffic generated by the new development. To rely on individual site TAs runs the risk of not dealing with the overall cumulative impact of movement demands.
4. Section 8.2 – Vehicular movement. There is nothing in this section about the likely levels of traffic generated by the proposals. This should be added to enable a robust assessment to be undertaken.
5. Whilst section 8.2 recognised that the *successful management of movements as a whole throughout the central area is fundamental to the delivery of the Development Framework*

proposals, where maintaining and improving accessibility to the central area, while minimising the impact of through traffic is a major aim of the movement strategy it does not explain how this will happen.

6. Section 8.3 – Pedestrian and cycle movement, discusses changes to provide new gateways and entrance points for pedestrians and cyclists, but does not explain how this will be achieved.
7. Section 8.3 makes reference to a *possible pedestrian and cycle crossing over the River Medway*. This project is unlikely to be pursued, it is not being pursued in our prioritisation bids with SEERA and has been replaced by the Cable Car proposal.
8. Page 142 – text lost before bullets, so they make no sense. Previous text was *Opportunities for improving the reliability of bus services by delivering bus priority will be available through provision of bus lanes along:*
9. Section 8.5 – Specific reference should be made to the Urban Management Control system being installed in Medway. The objectives of this system are to improve the capacity of the road network and improve information to travellers by all modes
10. Section 8.6 – Parking strategy. This section should give an indication of the parking standards used for the various types of development (residential, commercial, etc) – specific references are made to individual masterplans/sites (parking details shown at pages 69 (area rather than number of spaces) & 128), but overall approach/summary is needed, with a table setting out the proposed local parking standards in Chatham and indication of whether spaces are provided on plot, in a private parking court or rely on town centre parking. This links to the justification of the 700 additional parking spaces – it is unclear whether the 700 spaces is a shortfall on the overall demand, sufficient or over-provision – no background calculation is provided.

Additional comment on Chapter 8:

1. Section 8.7 – phasing. The phasing of each of the masterplan areas need to make reference to bus priority measures.
2. An overall access and movement map would be helpful, rather than relying on maps in masterplan areas. Network maps showing existing and potential new bus routes, existing and proposed cycle routes, pedestrian routes and areas of private parking are essential to feed into the individual masterplans.
3. Chapter 8 and other chapters in the document should explain how taxis are to be accommodated.

Comments on other Chapters of the document

Chapter 2

Section 2.4 – Local Planning Context, page 19. Only part of LDF policy CS10 (Transport & Movement) is included. There are elements missing that are very relevant to Chatham, for example *provision will be made for bus corridor improvements, interchange improvements...* To be relevant the full policy needs to be included (point previously made)

Chapter 4 – The Brook

Page 53 – Environmental issues. Bearing in mind Medway Council has signed the Nottingham Declaration, reference should be made to carbon footprint and possibly global warming.

Page 63 – Access & movement. The start of this section deals more with the use of spaces, rather than movement demands associated with the development. This text would fit better in a public realm section.

Page 64, Figure 4.14 – Movement. The key point of this plan is to show movement corridors by various modes. Line widths on the plan are far too narrow (much narrower than the key) making the plan unreadable. The map shows the current routes, bus stops, existing crossing points for peds on The Brook – it should also show how routes are being improved, new road crossings for pedestrians and cyclists, lengths of bus priority, etc.

Page 65 – Pedestrians. First column, last para – new pedestrian crossing point identified, but this should be shown on figure 4.14, and ped. desire lines added. Second column, first para – 5m wide footway proposed. Recommend these surfaces are shared with cyclists to enable provision for cyclists on a safe, reasonably level, desire line. Cross section of The Brook would be helpful, to demonstrate how the wide footways/tree planting will be accommodated.

Page 65 – Cycling. Whilst it is accepted that the minor roads will be designed to be cyclist friendly, it is unacceptable for the masterplan not to focus on designated cycle routes on strategic routes (last par). It is important to identify where new routes are needed, so they can be effectively incorporated. This section of the plan fails to deliver the key objective of providing for cyclists as detailed in Chapter 8.

Page 66, first para. The plan identifies that *the most direct connection [for cyclists] would be along The Brook, but due to the amount of traffic, it is likely to be suitable for experienced cyclists only*. This approach is unacceptable and contrary to the Local Transport Plan, which seeks to provide routes for less confident cyclists on desire lines. No consideration is given to cyclists sharing the proposed 5m wide footway either side of the Brook, which could be a good facility for less confident cyclists.

Page 66 – Bus services. No reference is made to bus priority measures on The Brook, which is contrary to Chapter 8, where The Brook is specifically listed. I would expect more detail here not less, and the bus priority measures identified on figure 4.14. This section should also mention improvements to bus stops to improve the waiting environment together with the provision of real-time information, together with accessibility improvements to and from the stops to end destinations.

Page 66 – Streets. This section assumes the reader has a good knowledge of the geography of Chatham. I recommend a plan be added explaining the text. No reference is made to the new *Manual for Streets*, which is appropriate for this type of development.

Page 67 – Parking. Second par states *The parking standards for the masterplan [for The Brook] should be set in a wider parking strategy for Chatham town centre as a whole (as illustrated in Figure 4.15)*. Firstly, the document does not include a wider parking strategy and secondly figure 4.15 only shows types of car parking not a wider parking strategy.

Page 68 – Figure 4.15 – Multi-storey car park identified in key not shown on plan. Figure 4.16 – unable to read the points of access, particularly the vehicular access points are not clear. Drawing too small to assess the impact of proposals on this drawing.

Page 69 – table. Parking numbers on this table need an explanation – I assume it refers to gross area of parking, rather than the conventional number of spaces. Surface car parking column empty. No indication of the number of parking spaces proposed.

Chapter 5 – The Waterfront

Page 94 – Access and movement. There is insufficient detail in this section, with very little commentary on public transport or private car. Vehicular access arrangements into and through the site to parking areas are unclear. It is unclear whether there is sufficient highway and junction capacity to accommodate the traffic generated from the development.

Third para states *buses enter the site primarily via Sir John Hawkins Way but also via Medway Street*. Buses will enter the site by other routes, for example Dock Road and The Brook (as indicatively shown on figures on page 95). Bearing in mind the promotion of travel by bus is a key objective of the scheme, very little detail is provided, for example there is no reference to bus priority measures (identified in Chapter 8) or bus services for the future residents or improvements to the quality of services and infrastructure. No reference is made to bus routes shown on the figures on page 95

Page 95, figures 5.29-31: I expect these figures to provide additional detail on bus priority identified in Chapter 8, for example details of where priority will be provided and locations of stops. Additional cycle route required, providing a link to Chatham railway station connecting to the Station Gateway ped/cycle link.

Page 96 – Parking strategy. Levels of parking for residential uses defined, but the level of parking for commercial uses is unclear, stating *parking for other uses are provided in a similar way to residential uses where possible* – not clear what this means. Table on page 98 only identifies the number of parking spaces for residential use, no information provided on the number of spaces for commercial uses. It is essential to understand the level of commercial parking as this links to the demand for highway capacity and the level of public transport/park & ride/cycling interventions necessary – with the level of detail provided it is not possible to assess these issues.

Figures 5.32-34 should show vehicle routes for cars to access parking. Adequacy of highway connections to parking is not tested. On-street car park is misleading terminology, as this is not a 'street', it is a surface level car park. No underground car parks identified, but listed in key.

Page 98 – table. Unclear how average parking space per residential unit is calculated, i.e.

- option 1: 419 units, 431 spaces = 1.02 space/unit not 0.87 stated, or 0.87 space/res unit x 419 units = 364 res spaces, leaving 67 spaces for commercial use?
- option 2: 368 units, 493 spaces = 1.34 space/unit not 0.93 stated, or 0.93 space/res unit x 368 units = 342 res spaces, leaving 151 spaces for commercial use?
- option 3: 291 units, 388 spaces = 1.33 space/unit not 0.79 stated, or 0.79 space/res unit x 291 units = 230 res spaces, leaving 158 spaces for commercial use?

Number of commercial spaces for each option is not defined.

Chapter 6 Station Gateway

Page 108, figure 6.1 – bus route listed in key, but not shown on map. Cycle route shown different colour on map and key.

Page 122 - Access & movement. Column 1, para 2 places emphasis on walking and cycling as preferred modes to move around the area, but then only provides minimal mention of improvements for pedestrians with better links to the station and no mention of improving conditions for cyclists. Provisional schemes to encourage walking and cycling need to be identified. No reference to bus priority measures as detailed in Chapter 8, I would expect

more detail here. In addition, the map on page 123 should identify lengths of the bus route where priority measures are proposed.

Level of car parking unclear, table at page 129 requires explanation and linked to the text. Unclear how parking will be accessed and whether there is sufficient highway capacity to cope with movement demands.

Page 123 – inconsistent use of colour for bus and cycle routes – bus route red in key, orange on map, and cycle route green on key, blue on map. No key for proposed bus station. Unclear whether cycle routes are proposed to have improved provision or whether cyclists share carriageway, which may be unsuitable for inexperienced cyclists. Map should identify where improved, dedicated cycle routes are proposed.

Chapter 9

Section 9.5 – This is not a comprehensive list of S106 obligations and should be removed.

Suggested amendments to the main document need to be transferred to the supplementary documents.

Conclusion

In summary, there are a significant number of movement and access issues that need addressing. In particular, there needs to be a much greater consistency between the three masterplan areas, the Access & Movement chapter, and the aspirations & objectives of the plan. In addition, the masterplan chapters need to provide additional detailed transport information rather than ignore key issues.

World Heritage and Great Lines City Park

This is a bold and inspirational document for which I commend the Medway Renaissance team. It evidences the time and consideration required for a sensitive and appropriate regeneration of Chatham. I wish you every success with its implementation, and look forward to collaborating on delivery.

There are several areas I commend in particular:

- (a) the objectives for the Brook as established on p21 of The Brook SPD
- (b) the commitment to enhance, maintain and create lines of sight to and from the Great Lines City Park
- (c) the commitment to open the Great Lines City Park to the town centre, to the waterfront and beyond by improving, creating and signposting access routes.
- (d) the inclusion of cultural trails in the Public Realm Strategy
- (e) plans to explore the potential of the Barrier Ditch as a key access to the Great Lines City Park
- (f) your incorporation of previous World Heritage comments on the Public Realm Strategy.
- (g) a commitment throughout to Chatham as a world-class asset
- (h) a permeating focus on wayfinding as integral to a sense of place.

I have in addition some comments aiming to improve the quality, applicability and durability of the documents:

(1) The World Heritage Site application is a major accolade for Chatham's unique legacy and historical fabric. It will shape the way Chatham is perceived and presented and should be referenced much more prominently throughout the document. This will serve a twofold purpose:

- World Heritage Site status can be a tremendous draw and source of inspiration for developers (as seen by Hamptons International's recent sponsorship of the World Heritage Launch, for example).
- As part of its World Heritage Site application, Medway Council must clearly show that the Site will be well cared for in the short, medium and long term. Clear references to this in the SPD will support this.

In many instances, the heritage assets are referenced, but somewhat inadequately, and in Appendix A, I propose textual enhancements to improve this.

There are other opportunities which should be taken to reinforce Chatham's World Heritage significance:

The SPD.

- (a) Page 5: The Introduction should reference World Heritage. E.g. "The River Medway is one of Medway's greatest assets. It stood at the heart of the rise to worldwide prominence of Chatham Dockyard and its defences (a proposed World Heritage Site) and now provides the backdrop to many of the most exciting development opportunities....".
- (b) Page 27. 3.1 "Location and Description" should mention that the site overlaps the proposed World Heritage Site boundary.
- (c) Page 27. 3.2. "Site Context", paragraph 1 (i) Chatham's role as a naval dockyard should undoubtedly take precedence over its role as a strategic centre for trade. (ii) Chatham's World Heritage assets merit their own bullet point, e.g. "Universally significant heritage assets, on the government's shortlist for submission to UNESCO as a World Heritage Site".
- (d) Page 71. 5.3. I'm uncomfortable with 'Chatham has always thought of itself as...' This is overly self-deprecating. Perhaps: "Chatham is recognised by government as a potential World Heritage Site, thanks to the unique nature of its naval and military legacy, which began in 1570". NB. The Dockyard (singular) closed in 1984.
- (e) The same concerns for page 13, paragraph 1 of The Waterfront.
- (f) Page 73. Figure 5.1 should include the WHS tentative boundary, or this should be detailed in a separate figure.
- (g) Page 76. Objective 7. 'Development will be based around a high quality ...public realm that will create local identity'. This is too dismissive of our heritage. Perhaps 're-create', or 'enhance' – or rephrase entirely.

Summary Document

- (h) Station Gateway, page 6 should be referenced as a gateway to our World Heritage assets. E.g. 'There will be direct and continuous transport and pedestrian links from the station area to the High Street, the Waterfront and Chatham's World Heritage assets.'
- (i) Next sentence 'the masterplan aims to make the best of the old' – this is negative and derogatory. 'Aims to provide a seamless transition between Chatham's world-class heritage and its world-class future' would be much better.

- (j) Chatham Waterfront. Page 8. Reference should be made to the fact that this area overlaps the identified boundary for Chatham's World Heritage, and is thus an important interface.

Public Realm Strategy

- (k) Page 7. The first line is disparaging and undermines World Heritage work. 'Chatham has a long and complex heritage that is lost in much of the town centre realm', would be preferable.
- (l) Page 14, bullet 1, should be stronger. Perhaps 'maximise the opportunity of Chatham's magnificent World Heritage assets'.
- (m) Page 14, bullet 5. 'Connect Chatham's heritage with the river'. 'Re-connect' would be much better. The connection was fundamental to Chatham's significance.
- (n) Although beyond the document's geographical scope, the potential could be noted for links through the Great Lines City Park to the broader World Heritage Site assets of the dockyard, Medway Park, and to Gillingham Town Centre. This could be referenced on page 45 "Objectives...", and bullet point 5 on page 49. These connections contribute to visitor management and sustainability of the proposed World Heritage Site, and will help achieve the full potential of the Great Lines City Park.
- (o) The Chatham World Heritage logo could also be used to support references, where appropriate.
- (2) All references to 'the Great Lines' (map and textual) - which relate to the geographic area, rather than the historic role – should read 'Great Lines City Park'. This would clearly demonstrate the agreed direction of a key Medway project, and provide consistency with future references to the area.
- (3) Option 1 for the Waterfront would permit major new development within the identified boundary of the proposed World Heritage Site (see also my e-mail on 28th March 2007).

English Heritage advise that Option 1 would result in "no prospect" of World Heritage Site status for Chatham. Option 1 would therefore run contrary to a high priority project for Medway, and an agreed objective of senior stakeholders at English Heritage, the Chatham Historic Dockyard Trust, the Ministry of Defence and SEEDA. This priority project also receives national government support from the Department for Culture, Media and Sport, via Chatham's inclusion on the UK's World Heritage Tentative list. It is also endorsed by CLG (in particular by strong support in Judith Armit's speech at the recent Chatham World Heritage launch event).

English Heritage have also expressed grave concerns about Option 2, and reservations about Option 3, which I support.

As a consequence, page 74 of the Sustainability Appraisal (Predicted Impact of the waterfront options) does not correlate to English Heritage advice, and should be revisited.

The sensitivity of the view to and from the potential World Heritage Site boundary is established in the Building Heights Policy, adopted by Medway Council as a Supplementary Planning Document in May 2006. Option 1 – and likely Option 2 - would result in a Supplementary Planning Document which contradicts this existing policy document¹ and

¹ See Strategic Views 4, 5, 6, 15 and pp55, 59 and 64 in 'A building height policy for Medway – part 2'.

would thereby damage the credibility of the Chatham SPD, with significant impact on developer confidence.

This being said, Chatham's World Heritage Tentative listing correlates with a world-class legacy, which should be reflected in world-class design. The Tentative listing for Chatham Dockyard and its defences notes that many of its building and structures were pioneering examples of design and technique. A continuation of this tradition should be strongly encouraged, challenging developers to reinforce Chatham's world-class merit. This must however, take place in appropriate locations, as identified in the Building Heights SPD.

For the eventual option, clear guidance should be issued regarding parking arrangements for residential units with surplus vehicles. At a ratio of between 0.79 and 0.92 parking spaces per unit, unsightly street clutter in and around the heritage assets, and pedestrian routes thereto must be avoided.

(4) Page 78, paragraph 2 (also p96 paragraph 2, and Waterfront page 36, column 2, paragraph 2). 'A new visitors' centre for the Great Lines City Park'. I wholeheartedly support the creation of a Visitors' Centre for this major community and tourist asset. A debate should be held regarding its location, however, and the Chatham Masterplan should not preclude other options. If the Centre is not actually located on the City Park (which may be preferable, given the noted sensitivities), there would be great value in this being a Visitor Centre for Chatham's World Heritage as a whole, given the gateway positioning.

(5) Page 151. The section 106 information should link into, and reference, the Developers' Contribution Guide, currently being produced by Development Control, and destined to become a Supplementary Planning Document. This will contain the current developer contributions required (reviewed annually), and has a broader perspective of the work areas which require section 106 contributions.

(6) Public Realm Strategy, page 60. In principle, I welcome plans to provide the Great Lines City Park with restaurant / café facilities. I note, however, that this proposal will be highly sensitive, given the heritage value of the site. I welcome your efforts to accommodate this in the artist's impression, and look forward to exploring options in more detail.

It must be noted that great care should be given when designing the access routes to the Great Lines City Park to ensure people feel safe and secure using them of an evening.

(7) Public Realm, page 60. This would be enhanced by a map / aerial photo of the Great Lines City Park, which I can provide.

(8) Appendix B lists factual corrections to the documents.