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Cabinet – Supplementary agenda

A meeting of the Cabinet will be held on:

Date: Tuesday, 19 October 2010

Time: 3.00pm

Venue: Meeting Room 2 - Level 3, Gun Wharf, Dock Road, Chatham ME4 4TR

Items

4. Local Development Framework: Draft Core Strategy (Policy Framework) **(Pages 1 - 376)**

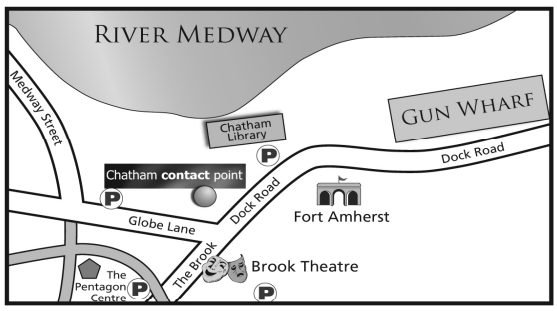
Appendix 1 – The Pre-Publication Draft Core Strategy

Appendix 2 – Sustainability Appraisal of the Medway Core Strategy

Appendix 3 – Schedule of Representations on the Issues and Options Report

For further information please contact Wayne Hemingway/Anthony Law, Cabinet Coordinators on Telephone: 01634 332509/332008 or Email: democratic.services@medway.gov.uk

Date: 11 October 2010



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If you have any questions about this meeting and you want to speak to someone in your own language please ring **01634 335577**

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Medway Council
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Medway Local Development Framework

Pre-Publication Draft Core Strategy

October 2010

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1. Introduction

1.1 This is the first 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 10 years ago. Along with this it sets out how Chatham will develop into a centre of regional significance, how deprivation will be tackled and healthier, more sustainable neighbourhoods created and much else.

1.4 It is being issued as a consultation draft and we welcome views on its contents from all with an interest in Medway's future.

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 a large amount of 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.

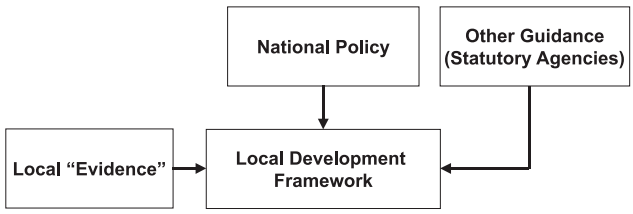


Figure 1 1 The Planning Cascade

The Stage We Have Reached and How We Got There

1.7 In getting to this stage a great deal of work has already been completed. This has included carrying out a number of surveys, gathering information, preparing what is called an '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 has led to this draft Core Strategy on which views are now sought.

1.8 We will again very carefully consider all the responses we receive and then issue what is called the Publication Draft Core Strategy. There will then be a final opportunity for the public to comment on it before it is submitted for an Independent Examination. An Inspector appointed by the Secretary of State for Communities and Local Government will conduct this.

1.9 The various stages that we must go through and where we currently are in the process are illustrated in the following diagram

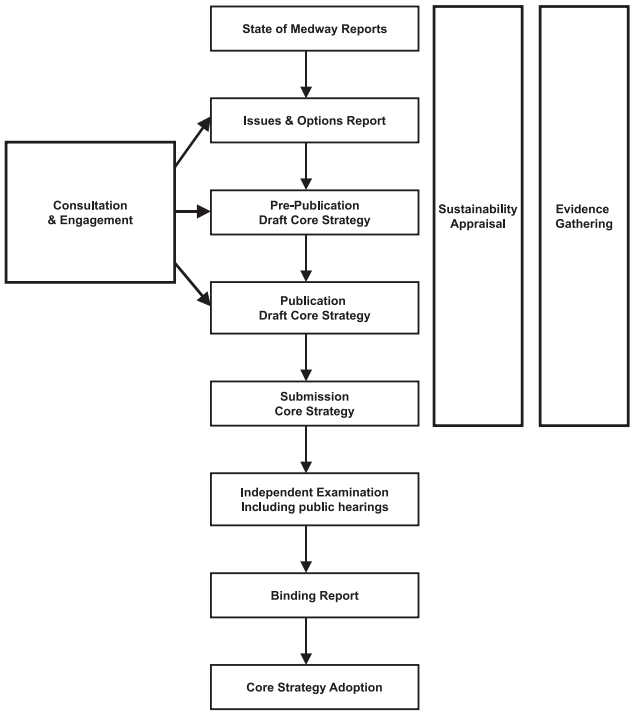


Figure 1 2 Core Strategy Stages

How the Core Strategy Fits Into LDF

1.10 As 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.

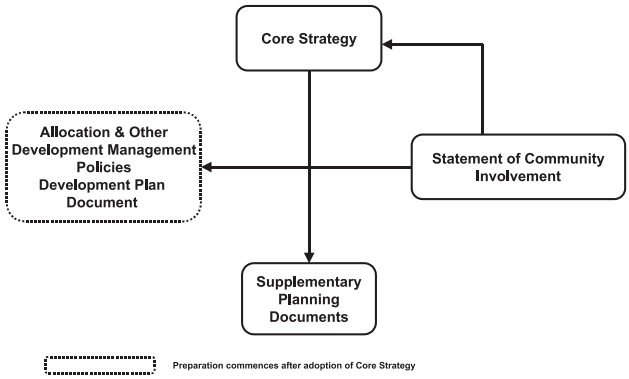


Figure 1 3 Medway Local Development Framework

1.11 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. We hope all who are interested will respond to this document and continue to contribute to the development of the final plan.

1.12 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

1.13 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

1.14 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.

Habitats Regulation Assessment/ Approprate Assessment

1.16 The Core Strategy will also be subject to a Habitats Regulation Assessment (HRA), which will consider the potential effects on European and RAMSAR wildlife sites.

Timetable for the Core Strategy

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

	Stage of Production	Dates
1	Pre-Publication Draft Core Strategy Consultation	November 2010
2	Draft Core Strategy Consultation	June 2011
3	Core Strategy Submission Preparation	December 2011
4	Core Strategy Submission	January 2012
5	Independent Examination	January 2012
6	Public Hearing	April 2012
7	Adoption	August 2012

Table 1 1 Core Strategy Timetable

Statement of Community Involvement

1.17 The Statement of Community Involvement (Dec 2006) 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. This draft Core Strategy has been prepared in accordance with that Statement.

Diversity Impact Assessment

1.18 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.

Consultation Responses

1.19 A statement is being produced setting out those bodies and persons invited to make representations at the various consultation stages, how they were engaged, 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 and the Council's response to them is also available.

Plan Period

1.20 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 2012.

1.21 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.

1.22 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

1.23 The Core Strategy is being prepared at a time when there is some uncertainty over the future of the planning system. The Coalition Government has revoked Regional Spatial Strategies, the South East Plan in Medway's case, in July 2010 and further changes are expected under the 'localism' agenda.

1.24 Core strategies previously had to be in 'conformity' with the relevant Regional Spatial Strategy and their removal has, inevitably, caused some uncertainty. The Council is determined to proceed as quickly as is sensible in taking forward this Core Strategy but subsequent stages may alter if further changes occur in national policy.

Flexibility and Viability

1.25 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.

1.26 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.

Getting Involved

1.27 Representations are invited during a six week period from 1 November 2010 to 10 December 2010. Representations must be received by 5:00 PM on 10 December in order to be considered.

1.28 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: http://www.medway.gov.uk/ldf 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: http://medway-consult.limehouse.co.uk/

What Happens Next

1.29 On completion of the consultation period, the Council will consider all of the representations made and determine whether any are so significant as to warrant further changes to the Core Strategy. A 'Publication Draft' will then be issued, providing a final opportunity to comment before it is submitted for Public Examination.

2. Context and Issues

Introduction

2.1 This chapter briefly lists the many studies that have informed the Core Strategy and describes the current state of Medway and the issues it faces. This 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 253,500 (in 2008) to 278,200 by 2028. However a number of factors, including a move from an historic net out migration trend to a modest net in migration situation, 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 evelopment 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. These set out the baseline from which the Core Strategy was developed. This information provides 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 http://www.medway.gov.uk/ldf

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:

- Strategic Land Availability Assessment (SLAA)
- Strategic Housing Market Assessment (SHMA)

- Infrastructure Plan
- Economic Development Strategy
- Employment Land Study
- SATURN Transport Model
- Strategic Flood Risk Assessment (SFRA)
- Strategic Urban Flood Defence Strategy
- Waste Capacity Study
- Minerals Capacity Study
- Retail Needs Study
- Green Grid Strategy
- Landscape Character Assessment and Eco-Systems Services
- Renewables Capacity Assessment
- Rural Housing Needs Assessment

2.7 The Local Strategic Partnership (LSP) has produced the Sustainable Community Strategy (SCS) 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 (prior to its revocation on 6 July 2010), 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 is 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. The Sustainable Community Strategy document highlights a variety of evidence and issues of particular importance to Medway as summarised below.

Economic Profile

2.9 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, adding to Medway's long standing manufacturing strengths. Important energy and port facilities are located on the Hoo Peninsula. 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, the Mid Kent College and the University for the Creative Arts at Rochester have contributed greatly to this.

2.10 However, Medway remains a relatively low wage area with high numbers of people commuting out to work 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 the evidence for this predates the establishment of the Medway Enterprise Hub and Innovation Centre. External transport links are excel-

lent and improving and the new dynamic bus facility together with investment in a quality public transport network will improve the bus services within Medway. However there are issues around bus services, public transport integration, accessibility, particularly on the Hoo Peninsula, and traffic congestion. 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, its image and its town centre offer, particularly in Chatham as the retail hub of Medway, though these issues are being tackled in the Medway Regeneration Plan and by developing Medway as a city break destination.

Social Profile

2.11 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 150th most deprived local authority out of 354 in England, though at ward level, it has some of the most affluent and some of the most deprived areas in the country.

2.12 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. However 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.

2.13 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.

2.14 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 and Housing Profile

2.15 Medway has a diverse natural environment ranging from the marshlands and wetlands of the Hoo Peninsula to the downland in the south and west of the area, including eight nationally and internationally important designated nature conservation areas and three parks with Green Flag status. It 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.

2.16 Medway has a strong cultural and heritage offer including, state of the art sports facilities now open 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.

2.17 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.

2.18 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

2.19 In addition to this analysis individual neighbourhood area profiles 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
- Chatham (rest of)
- Rochester town centre

- Rochester (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
- Peninsula

Summary Findings

2.20 The headline findings from this work are:

- Chatham is the least populated town centre, Gillingham is the most densely populated town centre area of 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 concentra tion 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

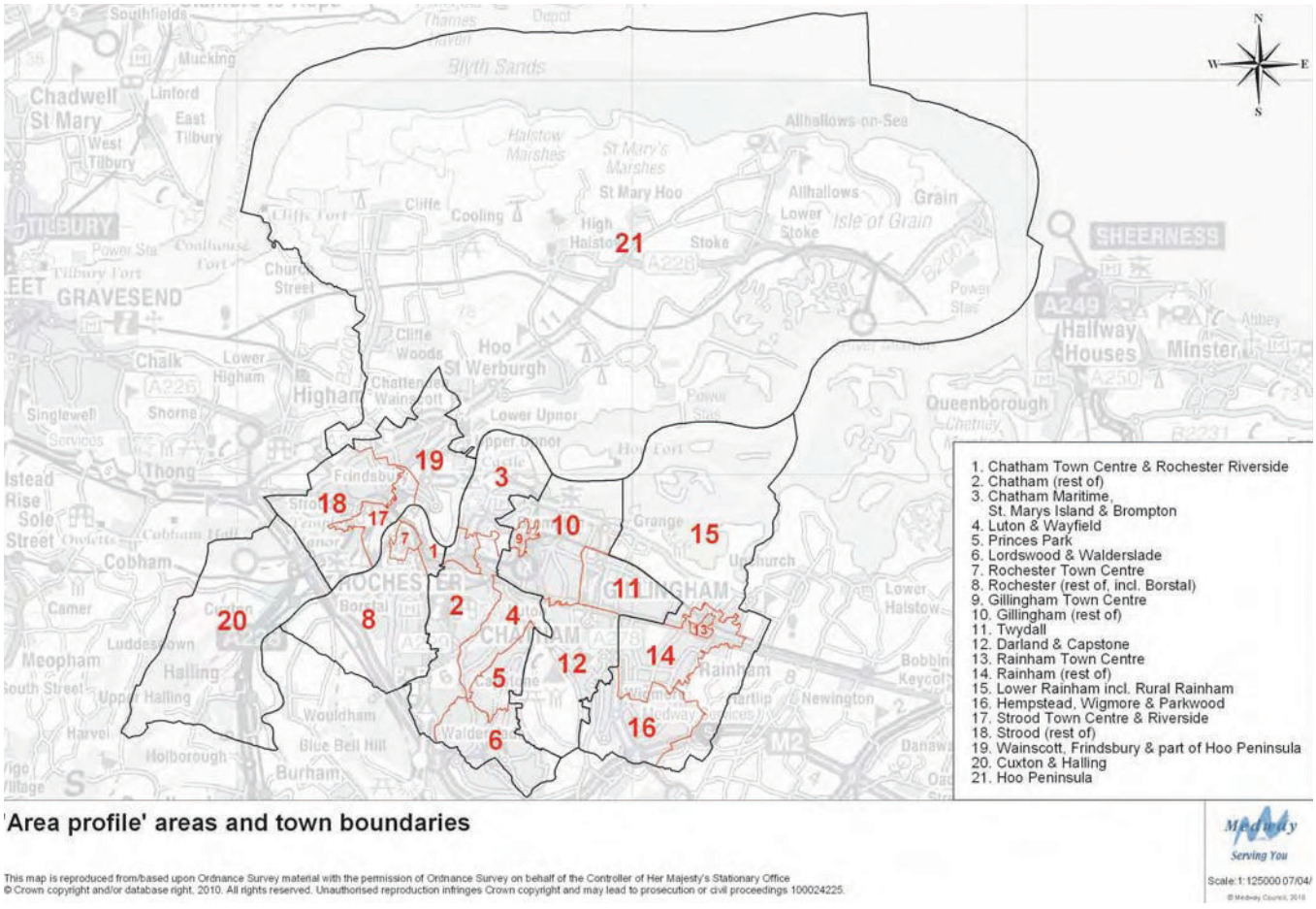


Figure 2 1 Local Areas

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.

2.21 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 – 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

- Tywdall 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 working-age 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

2.22 Taking account of the above there are a variety of important issues affecting Medway and which need to be addressed. Many but not all of these are shared with the Sustainable Community Strategy.

2.23 Economy and Learning

- There is a need to create a Medway city centre and central business district in Chatham that maximises retail, employment, cultural and housing opportunities
- 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
- 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
- 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
- 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
- Develop an Enterprise Strategy covering all forms of enterprise including social enterprise
- Explore the transformational power of communications infrastructure (WiFi, fibre optics etc) in order to make Medway a "Smart" location for business
- Deliver the Primary Strategy for Change bringing in new investment in school buildings and creating 21st century learning environments
- Promote hotel development
- 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
- Address the disparities that exist within Medway, with pockets of considerable affluence and deprivation (often close by one another)
- Promote an environmental technologies cluster
- 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)

- 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
- Maximise business opportunities arising from the presence of around 10,000 students and staff at the universities
- Increase the amount of student and visitor accommodation available in Medway
- Work to retain the University for the Creative Arts with a growing presence in Medway.
- Promote workforce skills development, graduate retention and increases in Gross Value Added levels.

2.24 Transport

- 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
- Ensure good public transport links to new developments and improved links to existing neighbourhoods

- Improve public transport links to the universities and college campuses
- Make highway improvements including the A228 to Grain and highway capacity improvements including at Strood centre
- Provide more opportunities for cycling and walking
- Investigate the potential of the River Medway for work and leisure travel and for further river crossings
- Provide better transport links and wider transport choices in Medway to support regeneration, increasing accessibility and connectivity, and reducing reliance on the car.

2.25 Climate Change

- 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
- Reduce carbon emissions and improve air quality within the Medway area including domestic, business and transport emissions
- Reduce carbon emissions and improve energy efficiency of both new and existing housing by working with the community
- Increase use of sustainable energy and investigate use of decentralised heating schemes
- Raise awareness of and assist in reducing water wastage, encourage reduction in water consumption and encourage water recycling
- Realise opportunities to restore and recreate wildlife habitats in association with sustainable flood-risk management
- Address the impacts of coastal squeeze and loss of inter-tidal habitats
- 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

- 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 appropri ate to prevent all new developments in the areas of flood risk as it may be needed to avoid social and economic stagnation or blight.

2.26 Green Infrastructure

- Develop the Green Grid through the implementation of identified priority strategic routes
- Strengthen the protection and conservation of open spaces
- Conserve and enhance the diversity and abundance of habitats and species
- Encourage community engagement in conserving and developing open space through, for example, the development of "friends" groups
- Apply Green Infrastructure planning in connecting people and places
- Continue to develop and ensure the sustainability of the Great Lines Heritage Park as the metropolitan park for Medway
- Ensure the adequate provision of green space in association with development.

2.27 Neighbourhoods

- Develop place based initiatives to improve health in neighbourhoods iden- tified as having the worst health and lowest life expectancy
- Develop a waterfront arts complex in Chatham as part of a wider cultural area including the Brook and Central theatres
- Implement the Chatham Centre and Waterfront Development Framework
- Implement the Gillingham Town Centre Development Framework
- Implement road improvement and retail improvements in Strood
- Implement and ensure integration of Rochester Riverside with Rochester Centre
- Create and deliver a brand new settlement at Lodge Hill, Chattenden that has strong links to the wider Hoo Peninsula

2.28 Miscellaneous

- Develop a multicultural community centre at the historic dockyard
- Promote high quality design
- Implement the Public Realm Strategy
- Ensure that the nature conservation impacts of riverside development are taken into account
- Reduce pollution affecting the Medway Estuary and local wildlife habitats
- Be aware that as 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 its housing needs
- 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
- 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
- Improve the overall image of Medway
- Deliver good quality housing in mixed use developments to contribute to sustainable regeneration
- Ensure that more executive housing is provided.

2.29 The main evidence used to identify these issues can be found in the following docu- ments:

- 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
- North Kent Economic Development Plan
- North Kent Multi Area Agreement
- Social Regeneration Strategy
- Learning and Skills Plan 2006
- Growing Healthier - NHS Medway's Strategic Commissioning Plan 2008/9 to 2012/13
- Older Peoples Plan
- Children and Young People's Plan 2009-11
- Medway Health and Wellbeing Strategy
- Medway Wildlife, Countryside and Open Space Strategy 2008-16
- Medway's Community Safety Partnership Strategy 2008-11
- Green Grid Strategy
- Greening the Gateway Kent and Medway Green Clusters Studies for Hoo Peninsula and Bredhurst-Capstone
- Medway Housing Strategy 2008-11
- Cultural Strategy 2009-14
- Kent Downs AONB Management Plan.

3. Options and Alternatives

Introduction

3.1 In developing the Core Strategy the Council is required to consider "reasonable alternatives" to the strategy being proposed. This aspect was considered in the Issues and Options report published in 2009 but this chapter considers responses received to that report and discusses certain other matters, which have been considered but discounted for the reasons given.

Overall Level of Growth

3.2 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.

3.3 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.

3.4 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.

3.5 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 option is therefore not required and unlikely to be deliverable. A lower option would not meet the future levels of need and demand in Medway and not be compatible with the objectives for the Thames Gateway. Consequently, no alternative options have been pursued on the overall level of growth.

Employment

3.6 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.

3.7 Given current economic uncertainties a job target range has been 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.

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

Table 3 1 Employment Growth to 2028

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

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

Table 3 2 Job Requirements to 2028

3.9 In settling on a specific jobs target, not only these but a range of other factors also need to be considered including the findings of the Medway Employment Land Review Consolidation Study, 2010. In paragraph 4.2.28, the Study recognised that in Medway, a key objective is to increase employment, reduce out-commuting 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 the strategic objectives, undermine sustainability objectives and ultimately would be self fulfilling by limiting supply and undermining potential economic growth. This is a proposed increase from 2008 basis line figure of 94,500.

3.10 Taking all of these 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 will ensure that all likely future scenarios are covered and that economic activity is not artificially restricted.

3.11 As explained in Chapter 7 sufficient floorspace capacity has been identified to cater for the full range of possibilities. As such further alternatives have not been considered.

Strategic Location of Development

3.12 In the Issues and Options report a range of strategic options for accommodating future housing and employment growth were presented and assessed.

3.13 These were:

Option 1: New settlement at Lodge Hill, Chattenden

Option 2: Expanded Hoo

Option 3: Capstone Urban Extension

Option 4: East of Rainham Urban Extension

Option 5: North of Rainham Urban Extension

3.14 Each option was objectively evaluated using a template containing nine factors and also independently assessed through the Sustainability Appraisal process published at the same time.

3.15 Both the evaluation and the Sustainability Appraisal reached the same conclusion. That was that Option 1 Lodge Hill, Chattenden was assessed as having the least negative impacts. In addition, Option 1 had a much higher degree of conformity with the South East Plan and national policy than any of the other options. Consequently, Lodge Hill was the only option supported by the Council.

3.16 Following public consultation on the Issues and Options Report, a number of variations to these options were submitted to the Council. These were made on behalf of individual development companies, apparently with interests in the alternative locations proposed. These are summarised below, along with the Council's assessment of them.

- A reduction in the scale of development at Chattenden (Lodge Hill), as it is claimed it can only deliver 3000 dwellings during the plan period. The residual 2000 dwellings should be carried over to the next plan period. In addition, a reduced scale of development, equivalent to a mini extended Hoo should be assessed consisting of a further 1500 units in and around Hoo St.Werburgh, High Halstow and Cliffe Woods.

- Expansion of the village of Cliffe, either on its own or as part of a strategy to locate housing at key rural service centres in order to maintain rural services. This could possibly be a variation to option 2, the expanded Hoo village cluster.
- Lodge Hill is claimed as likely to be at the tail end of the plan period, so othe sites should be allocated in order to spread the housing provision and meet the 5 year supply requirement. The BAe Sports and Social Club at Hoo St. Werburgh should be included.
- Woolley's Orchard, to the north of Rainham, should be considered as a location for a small scale urban extension. It is claimed that the Council only considered large scale options and not an option for a disaggregation of development across a number of smaller sites to minimise impact and maximise sustainability. The fact that North Rainham was ruled out as a large scale option should not mean thaT smaller, individual sites should be excluded. Site specific factors should be taken into account through the Strategic Land Availability Assessment (SLAA).

3.17 Even if Lodge Hill, Chattenden were to deliver only 3000 dwellings up to 2028 instead of the 5,000 estimated by the Council in the draft Strategic Land Availability Assessment (SLAA), the SLAA has identified a surplus of over 2,000 dwellings, which would compensate for the shortfall without the need to identify further land for housing development.

3.18 Cliffe is a remote settlement with no available previously developed land for development and with no obvious advantages over Lodge Hill. Sites put forward during the preparation of the SLAA are of insufficient scale for a major option and have been assessed through the SLAA process. The overall conclusion of the evaluation of the Expanded Hoo option was that there were a number of high negative impacts compared to Lodge Hill and with less opportunity to mitigate. Such an assessment would equally apply to an expanded Hoo option that included Cliffe.

3.19 The BAe Sports Club is simply an individual site of insufficient size to be dealt with as part of the options process.

3.20 Woolley's Orchard was assessed in the SLAA and rejected. The SLAA also demonstrates a distribution of hundreds of housing sites throughout the urban area, which negates the need for such an option on greenfield land outside the urban area.

3.21 Accordingly none of these options has been further considered.

Options for Urban Medway

3.22 Just as Medway's overall strategy is long established, strategies for the main urban area are also well defined. Accordingly the Council considers that it would be unproductive to generate artificial options when, in most cases, established policies and supplementary planning documents are already being implemented as described below.

Chatham

Medway Local Plan, 2003, Policy S5, Medway's "City Centre"

Chatham Centre and Waterfront Development Framework, July 2004

Chatham Centre and Waterfront Development Brief, August 2008

Pentagon Development Brief, September 2005.

3.23 These documents are being actively implemented but also have sufficient flexibility to allow some re-balancing of land uses in favour of office style accommodation if market demand indicated this was a viable option.

Rochester

Medway Local Plan, 2003, Policy S12, Rochester Riverside Action Area

Rochester Riverside Development Brief, July 2004

Planning Permission MC2004/2030 for housing (2000 units), retail, business, live work units, hotel, community services, open space, and coach park was granted for development on Rochester Riverside on 8 June, 2006.

Corporation Street Development Framework, November 2008.

3.24 In 1997, following the grant of outline planning permission for mixed use development; the former Rochester upon Medway Council initiated compulsory purchase proceedings to assemble the site known as Rochester Riverside for redevelopment. The Secretary of State confirmed the compulsory purchase order in 1998 and in December 2003, Medway Council and the South East England Development Agency (SEEDA), signed a collaboration and grant agreement to regenerate the site. In 2005, Medway Council successfully secured over £38 million of government funding and subsequently the site has been cleared, the land raised, a new flood defence wall constructed and a riverside walk laid out prior to redevelopment. The development strategy for this strategic location is therefore well established.

Strood

Medway Local Plan, 2003, PolicyS10, Strood Waterfront Action Area, Policy H1, sites ME254 and ME375.

Strood Riverside Development Brief, September 2006

Temple Waterfront Development Brief, October 2006

Strood Town Centre Masterplan, January 2010

3.25 Land in Canal Road, Strood originally comprised a mixture of redundant industrial buildings, scrap yards, railway sidings and small-scale industrial and storage uses. It was first allocated for residential development in the Medway Towns Local Plan in 1992 and the area was extended in the Medway Local Plan in 2003. The site has been partially completed by the development of a housing scheme at the southern end of Canal Road at Kingswear Gardens. This included the removal of the scrap yards adjacent to the river, the construction of a new river flood defence wall and the laying out of a large play area and public open space. The Council was successful in securing the confirmation of a compulsory purchase order for the development of residential, cultural and leisure facilities in 1999. Funding amounting to £13.6 million was secured from the Government for the purchase of the land in 2005, in the expectation that the site would produce 550-600 homes and the land was vested in the Council in the same year. A development brief, which proposed the development of 556 units, was adopted in 2006. Given the progress that has been made in implementing the housing proposals on this site and the commitment enshrined in the CPO, no alternatives or options are considered appropriate.

3.26 Policy S10 of the Medway Local Plan proposed a mixed use development including residential, employment, community and other uses on the area known as Temple Waterfront. It also allowed for an alternative proposal for a new stadium for Gillingham Football Club. At the time that the plan was being prepared, the feasibility of both options was being investigated. Medway Council was one of a number of landowners of the site. Because of the uncertainty of securing agreement with all the landowners, and of the viability and feasibility of the stadium proposals, the Council decided to pursue the mixed use scheme. Subsequently, a planning application was submitted for 620 dwellings, up to 10,300 sq m of employment B1 floorspace, up to 1,800 sq m of retail floorspace, 200sq m of community facilities and open space improvements, which was approved subject to a section 106 agreement. Again no options or alternatives are therefore considered appropriate.

3.27 The masterplan for Central Strood has only recently been endorsed, with broad support for its proposals.

Gillingham

Gillingham Town Centre Development Framework, July 2007.

3.28 Given the tight geography of Gillingham town centre there are few strategic alternatives that would not involve a wholesale reconfiguration of the centre. Some funding has already been obtained on the basis of the proposals in the 2007 framework so, again, it is not considered that there are reasonable alternatives to it.

Hierarchy of Centres

3.29 Some consideration was given to whether the established hierarchy of town centres should be re-evaluated. However, as Chatham is already clearly the dominant centre in Medway and its role as a major sub-regional hub is recognised in the Sustainable Community Strategy, the Waterfront Regeneration Strategy and the Nathaniel Lichfield Medway Retail Needs Study, 2009, little benefit is seen in exploring alternatives.

Employment Land

3.30 Some consideration was given to two alternatives as described below but discounted for the reasons given.

3.31 The Economic Development Strategy adopted by the Council in December 2009 considered the employment land at the Isle of Grain to be remote from centres of population and unattractive to some empl oyers. It considered that the availability of large amounts of employment land at the Isle of Grain and to a lesser extent at Kingsnorth, could serve to distort the market. They were not considered to be locations that may attract employers looking for a high quality operating environment. As such, the strategy recommended that the amount of land at these two sites, or at least the Isle of Grain, ought to be excluded from any calculations of forecast take up of employment land as they are irrelevant to most employment uses.

3.32 However, since the strategy was prepared a planning permission for 464,930 sq m of employment floorspace has been granted at Grain and considerable market interest generated as a result. Advance infrastructure is also being installed at Kingsnorth, which also benefits from a recent planning permission.

3.33 Even if Grain was discounted from the total of 838,487 sq m of existing B1, B2 and B8 employment land identified in the Economic Development chapter of this document, this would still leave 373,557 sq m of available capacity. This still represents a surplus of 24,594 sq m over the maximum forecast requirement of 348,963 sq m identified as being needed.

3.34 If Kingsnorth were to be discounted as well as the Isle of Grain, 202,733 would need to be deducted from the remaining 373,557 sq m to leave 170,824 sq m of available capacity. This would represent a deficit of 178,139 sq m. However, as the Lodge Hill development gets underway, a larger local workforce will emerge to support employment at both Kingsnorth and Grain. Consequently, no case has been found to discount these locations despite this being proposed in the Economic Development Strategy, 2009.

Existing Employment Sites

3.35 The Economic Development Strategy also put forward three options to increase the availability of employment space. These were:

- Rebalancing the existing residential and employment designations on mixed use sites
- More intensive use of existing employment sites; and
- Designation of additional (high quality) employment sites.

3.36 As explained in the section on town centres above, the Council intends to pursue the proposals in its supplementary planning documents and consequently no formal rebalancing of existing designations to reduce residential development and increase employment development, has taken place. However this can be readily achieved if an increased emphasis on employment uses can be proved to be viable and necessary.

3.37 An assessment of the established employment areas indicates some potential to increase the amount of floorspace available. However, at this stage no contribution from this source has been assumed, pending more detailed work and given uncertainties over future market conditions. The new designation options are discussed below.

Potential Designations

Rochester Airfield

3.38 Rochester Airfield comprises an operational general aviation airport, an adjoining large site occupied by BAe Systems and other parcels of adjoining land, including a caravan park. BAe Systems are currently working closely with the Council in preparing a development brief and masterplan that would retain a general aviation facility and promote a technology and knowledge based hub around it.

3.39 Pending the completion of this work preliminary assumptions have been made as to the amount of new employment floorspace that might come forward and this is covered in the Economic Development chapter.

Lodge Hill

3.40 The Economic Development Strategy recommended that consideration be given to the potential employment contribution of Lodge Hill. In 2006 the Kent and Medway Structure Plan stated that in Medway, at least 20 hectares (70,000 sq. m.) should be identified at Lodge Hill for a wide range of employment uses, including the knowledge and technology sectors as part of a mixed use development. It considered that providing new jobs would also help to meet Medway's strategic objective of reducing its dependency on commuting out of the area.

3.41 The Issues and Options Report asked whether the new settlement at Lodge Hill should be identified as an employment location meeting more than purely local needs. In response a number of representations were received which support the provision of employment to meet local needs only. One respondent considered that general employment and B1 uses would attract more local people than more specialist uses, which would attract workers from a wider area. Another one considered that a strategic employment site would compete with sites in the urban area, thus prejudicing long term economic regeneration objectives.

3.42 Continuing investigations have identified a range of opportunities to attract higher value activities to Lodge Hill, including spin off activities from Kingsnorth and Grain and satellite university research opportunities. Accordingly a balance of provision is proposed, broadly matching the floorspace to be provided with the size of the resident workforce.

Capstone Valley

3.43 The Economic Development Strategy states that there is a clear choice between looking to develop Greenfield sites to the south of the borough and exploring the potential for further development at/adjacent to Rochester Airport. The latter was considered to be a much more attractive option, being partly in Council ownership, well located and proven as a business location for high quality scientific, technology and knowledge based businesses.

3.44 In response to the "call for sites" in relation to the SLAA, two sites were put forward within the Capstone Valley to the south of the Hempstead shopping centre for employment. One of them, to the west of Chapel Lane, is safeguarded in the Medway Local Plan for playing field and associated uses. Furthermore, the sites fall within the wider strategic option for Capstone Valley, which has been rejected in favour of Lodge Hill. Consequently, the core strategy is not proposing employment development in the Capstone Valley.

Chatham Maritime Interface Land

3.45 In the Issues and Options Report the Interface Land, situated between the Chatham Historic Dockyard and Chatham Maritime, is identified as a regeneration site with a capacity of 500 dwellings. It goes on to explain that the University for the Creative Arts is looking to develop a major new campus. It states that losing the university to another area would be a major blow and that a potential site has been identified on the Interface Land.

3.46 In response to the SLAA "call for sites", SEEDA and the Chatham Historic Dockyard Trust, considered the site to be suitable for a residential led mixed use scheme with retail, tourism and leisure uses and a capacity of 1,000 dwellings or an education development. The SLAA study also considered offices and workshops to be a suitable part of a mixed use scheme.

3.47 Given Medway's policy of supporting university development, the Core Strategy is proposing to ensure that the Interface Land remains an option for the relocation of the University for the Creative Arts. Should the University campus be located elsewhere, the site can be brought forward for a mixed use development. Because no certainty can be given to the future delivery of housing on this site, no units will be assumed as contributing to the housing requirement up to 2028. The position will be reviewed once any decision has been made on the future location of the University for the Creative Arts.

Minerals

3.48 The Issues and Options report identified a potential regional requirement or target of between 410,000 tons and 1.37 million tons of land won aggregates up to 2026. Two options were identified with reasonable potential for meeting this target. These were river terraces at Grain and Kingsnorth. The main advantages of the Grain deposits were that they were close to historical workings, processing plant could potentially be easily provided and the area was not covered by significant landscape or nature conservation designations. The main disadvantages were that remoteness from markets could make their exploitation unviable and the land take would be on grade 2 agricultural land.

3.49 The main advantages of the Kingsnorth deposits were that the land was not covered by significant landscape or conservation designations, the overall quantity was sufficient to allow a buffer to meet contingencies, and they were relatively close to Medway's regeneration sites, the proposed settlement at Lodge Hill and employment development land at Kingsnorth. The disadvantages were concerns over economic viability, proximity to Hoo St. Werburgh, the undeveloped coast, the Medway Estuary Special Protection Area (SPA)/ RAMSAR site and Site of Special Scientific Interests (SSSI) and impact on Grade 1 agricultural land.

3.50 The permitted remaining reserves at Grain have now been abandoned as uneconomic and the site is being returned to agriculture. The Area of Search deposits

that were thought of as having potential are now also considered as uneconomic. Consequently, the Kingsnorth deposits, despite their disadvantages, remain the main option for the safeguarding of a landbank of land won aggregates to meet Medway's needs up to 2028.

Waste

3.51 The Issues and Options report identified two options relating to waste infill, first that Medway will continue to need landfill capacity of its own or secondly access will be needed to facilities elsewhere that do not involve prohibitive transport costs. Although Medway has signed a contract that transports municipal solid waste out of the borough for processing and disposal, similar options are not available for other forms of waste that arise in the area.

3.52 One of the guiding principles of national policy is the proximity principle that is that waste should be treated and disposed of as close as possible to its place of origin. This means that local authorities should, as far as possible provide for final disposal capacity within their own borders. Medway's permitted waste disposal capacity is currently limited. Adhering to the self-sufficiency principle in the Core Strategy is therefore proposed, particularly as the neighbouring waste authority, Kent County Council, has no non-inert final disposal to land capacity beyond 2013-14.

Strategic Land Availability Assessment

3.53 The Strategic Land Availability Assessment (SLAA), already referred to, identified sites considered suitable for residential, employment, retail, mixed use and other uses. In many cases, sites were found to be suitable for more than one use.

3.54 In order to identify the total land that could contribute to meeting Medway's requirements, the SLAA selected preferred options based on a number of criteria set out in the final document. A table in the report identifies all the alternative options for each site, the preferred use and the reasons for selection. This table is reproduced as an Appendix A in this document.

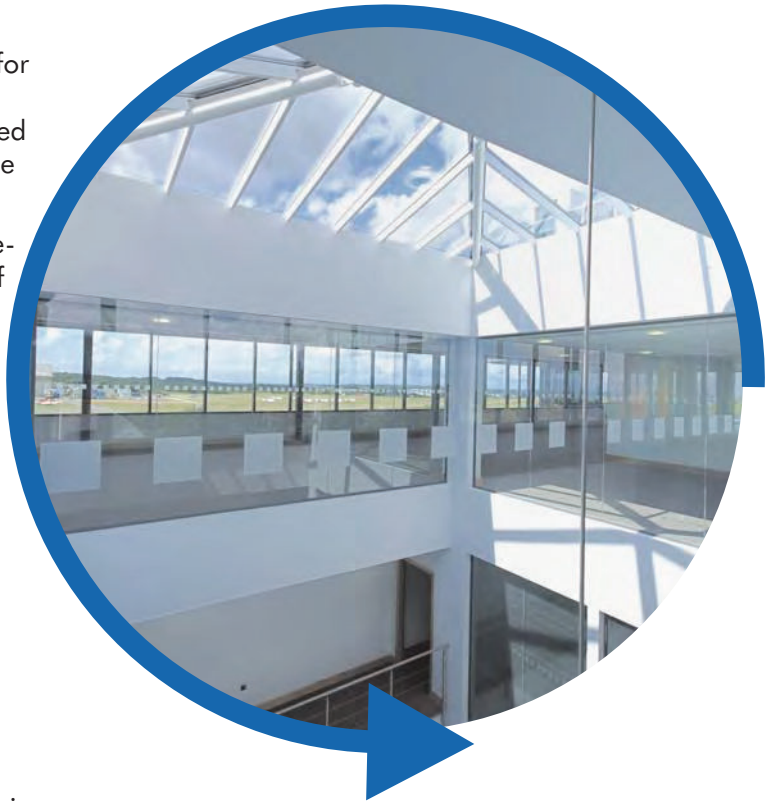
3.55 Given the conclusions, as set out above, the Council is confident that all reasonable alternatives to the proposed strategy have been fully considered and the approach subsequently taken is robust.

4. Vision and Strategic Objectives

Introduction

4.1 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.

4.2 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.



Sustainable Community Strategy

4.3 The Local Strategic Partnership, or LSP, prepared the overarching Medway Sustainable Community Strategy during 2009 and 2010, Medway Sustainable Community Strategy.

4.4 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.

4.5 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.

4.6 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

4.7 In the strategy the vision for Medway to 2026 is summarised in the strap line:

'City of Medway: Rich heritage, great future'.

4.8 It consists of four key principles and six ambitions.

4.9 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?*

4.10 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"*

4.11 A wide range of actions is then identified to realise these ambitions and specific plans are in place to take forward delivery.

The Core Strategy 'Spatial' Vision

Taking full account of this overall vision for Medway and the various issues discussed in chapter 2, the proposed corresponding spatial vision is as follows:

1. By 2028 Medway will have experienced major change.
2. 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.
3. 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.
4. 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.
5. 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.
6. 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.

7. 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.
8. 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 built heritage, including the proposed World Heritage Site, founded on the former Dockyard and its defences, is valued and promoted.

9. Our rural areas will be celebrated for their rich natural assets 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 relating sensitively to nearby villages.

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

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

12 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.

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

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

15. 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

In taking this vision forward the following strategic objectives will guide development and other planning decisions.

1. 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 employment growth in Chatham Centre, within the major mixed use regeneration sites, through re-investment 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 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.
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.
9. 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.
10. To enhance the quality of life of local people through the promotion of healthier lifestyles and the provision of improved cultural, leisure and tourism acilities, including along the river Medway.
11. To nurture Medway's rural areas and economy, including through village improvement projects, enhanced land management and local access strategies.
12. 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.
13. 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.
14. To ensure that there is sufficient minerals and waste management/disposal capacity to meet local requirements and contribute to regional and national needs.

Key Diagram

4.12 The main elements of the strategy are illustrated on the Key Diagram overleaf

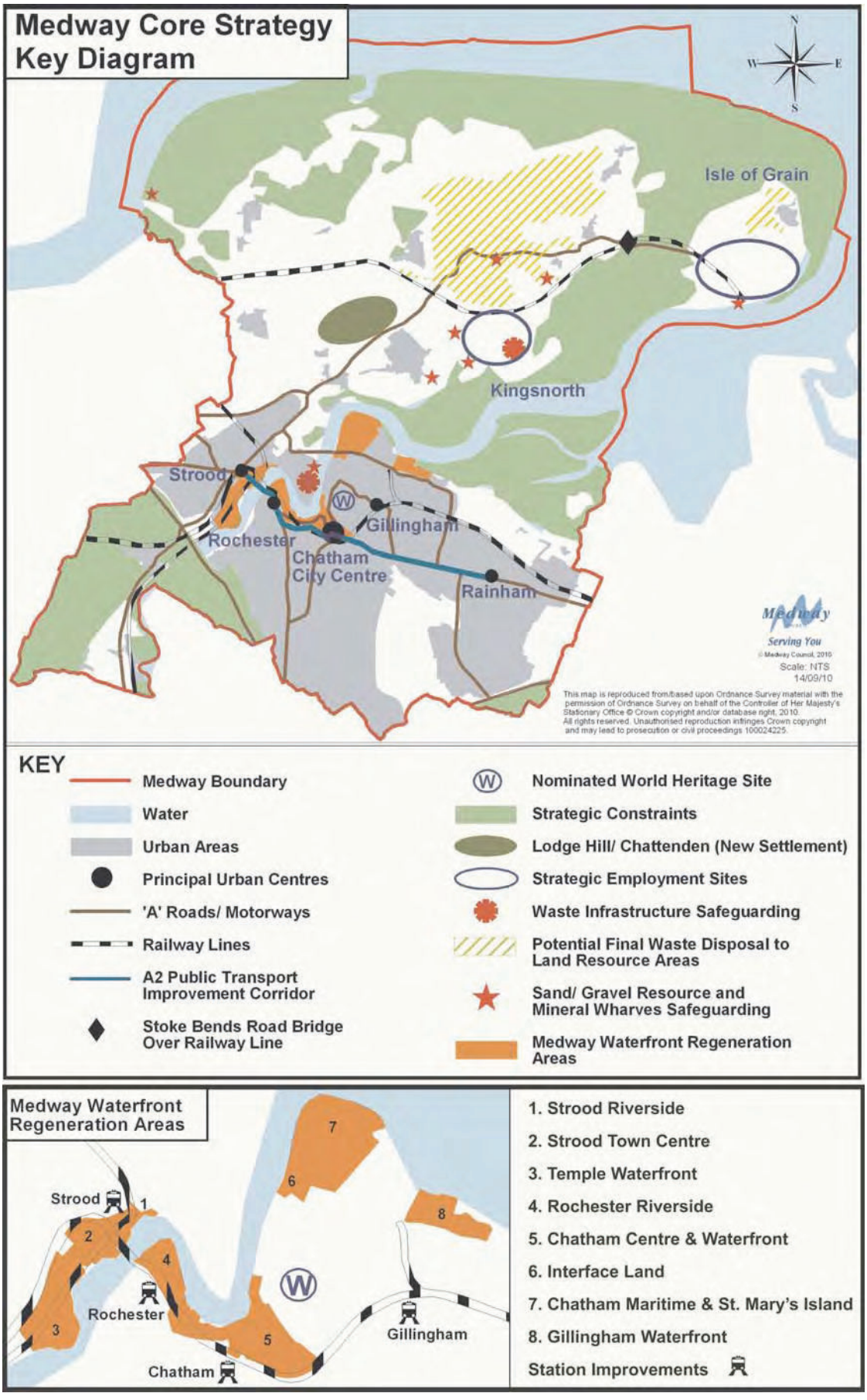


Figure 4 1 Medway Core Strategy Key Diagram

5. Cross Cutting Themes

Introduction

5.1 This chapter covers a range of over-arching topics or themes that must 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.

Regenerating Medway

5.2 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 must therefore be 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.

5.3 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 major infrastructure changes continue to be implemented.

5.4 A stage has now been reached where market perceptions are changing and community confidence is growing but with much still to be done if the enormous potential is to be fully realised and Medway is to be fully recognised as one of the most significant conurbations in the greater South East and a strategic centre within the Thames Gateway area.

5.5 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.

Policy CS1: Regenerating Medway

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*
- *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

5.6 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.

5.7 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 21st Century.

5.8 If the regeneration, described above, is to reach its full potential, good design is an essential tool 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.

5.9 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 whist being integrated with the rest of the built environment.

5.10 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 a role to play in enabling sustainable life styles that are less car dependent than hitherto.

5.11 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. In seeking to ensure that developments meet the criteria laid down in Building for Life, the Council will carry out Building for Life Assessments for all schemes of 25 dwellings or more.

5.12 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 (over 1hectare within Medway Waterfront Regeneration Area),

larger sites elsewhere (100 dwellings or more, or 10,000m2 commercial development) or particularly sensitive sites which will be visible or prominent within the surrounding area or in close proximity to important designated historic assets, good design will best be ensured by agreeing design principles with the Council via a design brief for each site. Consultation on each brief will be expected to conform with the Council's Statement of Community Involvement.

5.13 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 CABE's '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

5.15 Climate change and its potential effects is an issue that has grown in importance over the last 10 years. The government has brought in an increasing number of measures that need 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.

5.16 A detailed explanation of Medway's ecological footprint is contained within the Climate Change, Renewables and Flooding State of Medway Report.

5.17 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.

5.18 A Local Area Agreement target seeks 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.

5.19 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 Code currently proposes that by 2010, all new homes should achieve a grade 3 rating and that by 2016, a grade 6, or zero carbon rating should be achieved. A similar system is operated by the Building Research Establishment for non residential development called the BREEAM standard. This rates buildings either pass, good, very good or excellent.

5.20 Climate change impacts are sometimes seen as intangible and mainly affecting crops, water supply and flooding. However climate change will also affect urban areas and 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.

5.21 Water supply in Medway is largely dependent on ground water abstraction. There are no large reservoirs or any significant abstraction from the River Medway. 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.

5.22 In simple terms Medway is one of the driest parts of the most water 'stressed' region in the country.

5.23 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, 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. All are supported by the Council although many of the required improvements will occur outside the administrative area.

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.

Residential development will be required to achieve at least level 3 of the Code for Sustainable Homes;

Commercial buildings over 1,000 sq m will be required to meet the BREEAM "very good" standard.Other measures that should be considered include:

- *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, includ-*

ing the provision of greenspaces and roofs, planting and intelligent design

- *The application of National Sustainable Urban Drainage Systems Standards*
- *Increasing the efficiency of water usage.*

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.

Energy Efficiency and Renewable Energy

5.24 Medway has a strategic role in supplying power to the region and the country as a whole 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.

5.25 This shows that there is the 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 could be spread across a number of concentrated areas through the main centres.

5.26 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.

5.27 To consider the impact on scheme viability of applying higher sustainable code levels ahead of the national timescale 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.

5.28 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.

5.29 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.

5.30 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 CO2 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 very high proportion is privately owned, making it difficult to implement area wide improvement programmes.

5.31 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.

5.32 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.

Policy CS4: Energy Efficiency and Renewable Energy

All new development will be expected to show reduced energy loads through passive design and the inclusion of energy efficiency measures. 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. Direction for which technologies would be most appropriate should be taken from the Medway Renewable Energy Capacity Study. If it is demonstrated that this target cannot be met economically, compensatory measures will be sought and applied to current buildings in the locality.

Should it prove feasible to do so, the Council will promote large scale district heating schemes that utilise 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 positively promote the installation of all forms of renewable energy systems.

Development and Flood Risk

5.33 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, robust flood defences will be required. 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.

5.34 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.

5.35 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 5.1. 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.

5.36 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.

5.37 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.

5.38 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 or industrial or infrastructure installations.

5.39 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.

5.40 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.

5.41 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.

5.42 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.

5.43 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.

5.44 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.

5.45 Through the Flood and Water Management Act 2010 National Standards will be introduced that will need to be adhered to for a development to be connected to the foul drainage network. These standards are currently being formulated by the Environment Agency.

5.46 A number of the key regeneration sites are located on the riverside and a strategic approach to their defence is appropriate. Accordingly the Council has commissioned a study of the existing defences and the potential defence works and strategies that should be applied to meet the required defence standard.

5.47 This approach will allow optimum solutions to be identified that balance the protection of sites with management of the natural environment but these are likely to require financial support.

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

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.

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

Natural Environment and Biodiversity

Preservation and Enhancement of Natural Assets

5.48 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. These are complemented by highly valued local areas of nature conservation value, many of which are designated nature reserves. 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

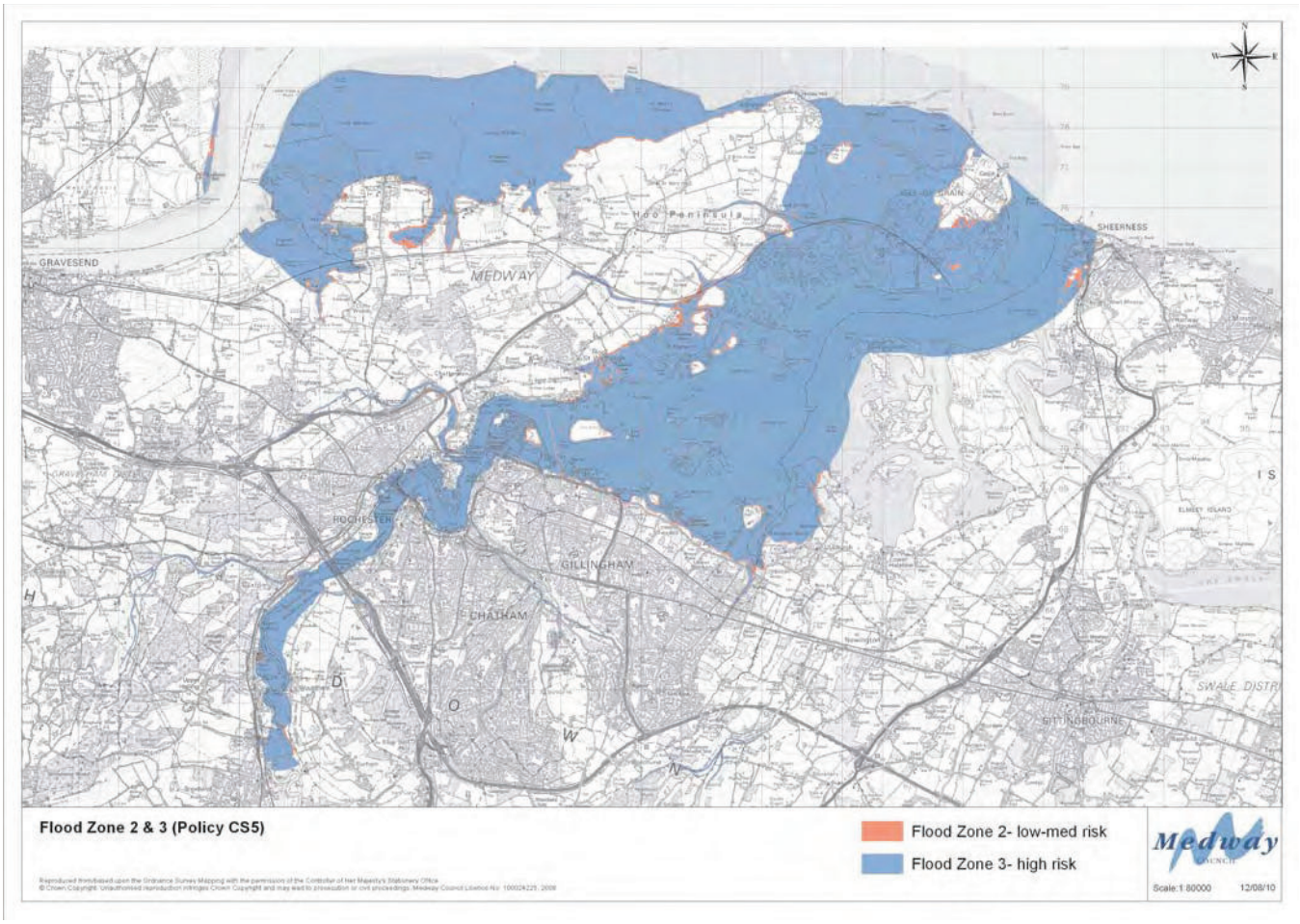


Figure 5 1 Flood Zones in Medway

Valley and Darland Banks, which extend far into the urban neighbourhoods and which provide a physical link to the countryside beyond.

5.49 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.

5.50 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.

5.51 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.

5.52 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.

5.53 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.

5.54 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.

5.55 Regionally Important Geological and Geomorphological Sites (RIGS) were established in 1990 by the Nature Conservancy Council and are selected by local, voluntary RIGS groups.

5.56 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.

5.57 The Kent RIGS Group notified Medway Council of four sites in its area at Halling, Cliffe and Fort Amherst in 2006.

5.58 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.

5.59 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

5.60 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 Northwood Hill.

5.61 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).

5.62 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.

5.63 In Medway there are seventeen local wildlife sites, which are identified as SNCIs in the Medway Local Plan, 2003. These are:

- Grain Pit
- South Hill and Houlder Quarry
- River Medway and Marshes, Wouldham
- Cuxton Wood (Mill Wood)
- Cuxton Pit
- River Medway between Cuxton and Temple Marsh
- Bridge Woods, Burham
- Luton Banks
- Hook Wood, Walderslade
- Great Lines
- Darland Banks
- Ambley and East Hoath Woods
- Grove Wood
- South Wood
- Berengrave Pit
- Yaugher Woods
- Princes Avenue

5.64 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.

5.65 Paragraph 10 of 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.

5.66 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, 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.

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 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.

Countryside and Landscape

5.67 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. In PPS7, the Government no longer accepts the need for 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 may re-introduce local designations. The core strategy consequently includes a policy which could replace the designations and applies it to the whole of the rural area rather than specific parts but this may be amended if the Government confirms further changes.

5.68 Medway prepared a Landscape Character Assessment in 2010, 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.

5.69 There were two special landscape areas. 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.

5.70 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.

5.71 All these functions are recognised in Medway's Landscape Character Assessment document, which in turn is the subject of the new countryside and landscape policy.

5.72 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.

5.73 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 house-building in the open countryside should be strictly controlled.

5.74 PPG 2:'Green Belts', states that the general policies controlling developmen t 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 PPS2 to manage development in the Green Belt.

5.75 A number of "Green Cluster" studies have set out an ambitious vision for landscape enhancement in North Kent. Each one focuses on areas of intensive regeneration and change where there are opportunities to create high quality green infrastructure. A green cluster study has been carried out on the Hoo Peninsula by a partnership of 10 organisations. The study proposes:

- The re-creation of the wooded ridge at the core of the Peninsula
- The restoration of Yantlet Creek to its natural course linked to a major wetland re-creation
- The enhancement of the landscape setting of local villages and the improvement of access to and interpretation of the surrounding countryside
- The creation of a network of off-road cycleways; and
- The enhancement of the southern gateway to the area at Medway City Estate and Manor Farm.

5.76 A second Cluster Study covers the area from Capstone to Bredhurst. The key opportunities identified for this area are:

- An off-road cycleway linking the city centre to the Kent Downs
- Conservation, farming and forestry projects for Capstone Country Park
- Luton streetscape enhancements
- Restoration of the "natural" character of the area
- Enhancement of the principal gateways to the area
- Community engagement through youth partnerships.

5.77 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.

5.78 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 three year project funded by the Heritage Lottery Fund and run by a partnership of 16 organisations. The project:

- Supports ongoing landscape and habitat conservation
- Seeks to improve public access
- Works with and advises farmers and landowners on agri-environment schemes
- Promotes measures to reduce intrusion by nuisance vehicles, fly tipping and anti-social behaviour
- Interprets and conserves the area's historic heritage; and
- Works with schools and volunteers on interactive projects.

5.79 The Kent Wildlife Trust is managing the Medway Smile Living Landscape Scheme to the south of Medway, together with local landowners and the local community, which aims to extend areas for wildlife and create a network of good wildlife habitats.

5.80 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. 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, Medway Council will seek to protect the main tracts from development.

Policy CS7:Countryside and Landscape

Sustainable Development in the countryside will be permitted in accordance with the objectives and principles of 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*
- *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*
- *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*

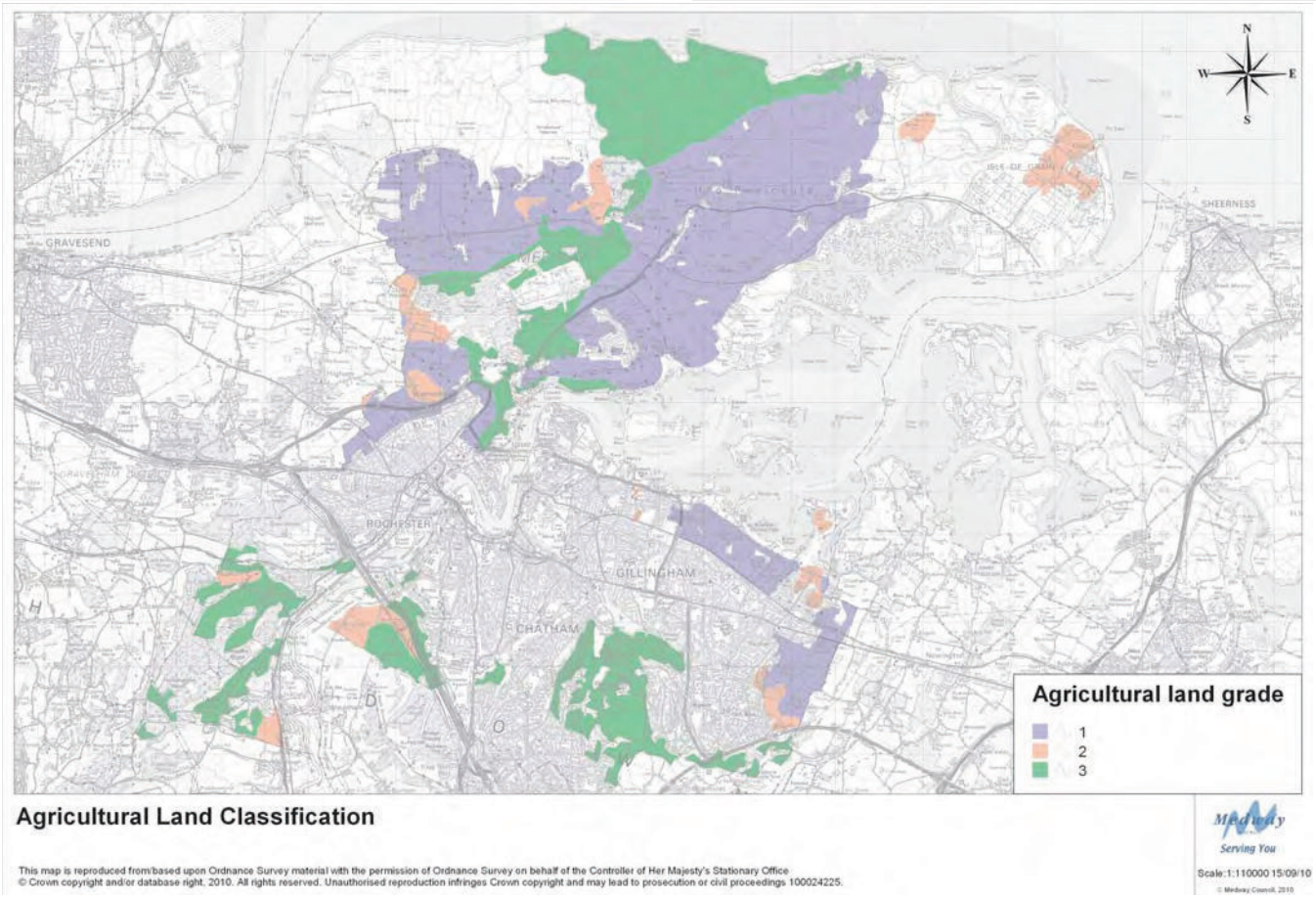


Figure 5 2 Agricultural Land Classification

- *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 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.

Open Space, Green Grid and Public Realm

5.81 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.

5.82 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.

5.83 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 the 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.

5.84 The Government is encouraging the emergence of a continuous linked network of various landscapes both within and between built up areas known as the green grid.

5.85 Work in Medway to develop green infrastructure is focused into the Green Grid project, promoted through the Medway Wildlife, Countryside and Open Spaces Strategy (2007). This aims to improve links between people, wildlife and green spaces, countryside and towns.

5.86 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.

5.87 Medway's Green Grid consists of a network of broad strategic corridors linking the natural environment, heritage features and local communities. It 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 reserve at Cliffe Pools 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 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.

5.88 Green Grid is supported by a broad based partnership of statutory, voluntary and community organisations, including Greening the Gateway Kent and Medway, RSPB, Natural England, Environment Agency, Kent Downs AONB Unit, Kent Wildlife Trust and Ramblers Association. It brings together different services within Medway Council, including Greenspaces, Transport, Health, Landscape and Planning to coordinate planning work, funding and delivery of projects.

5.89 Medway Green Grid is being delivered through a coordinated series of actions, including the Valley of Visions Landscape Area Partnership in the Medway Valley, development of the Great Lines Heritage Park and public realm improvements around Medway waterfront, and access improvements planned on the Hoo Peninsula.

5.90 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 and affordable open space. It will ensure that:

- *A multifunctional network of open space will, as far as possible, connect to 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 Waterfront, the Hoo Peninsula, Medway Valley, the Estuary and Orchards and Great Lines to the Downs*
- *Opportunities will be sought for new development to provide open space that contributes to the formation of the green grid:*
- *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.*

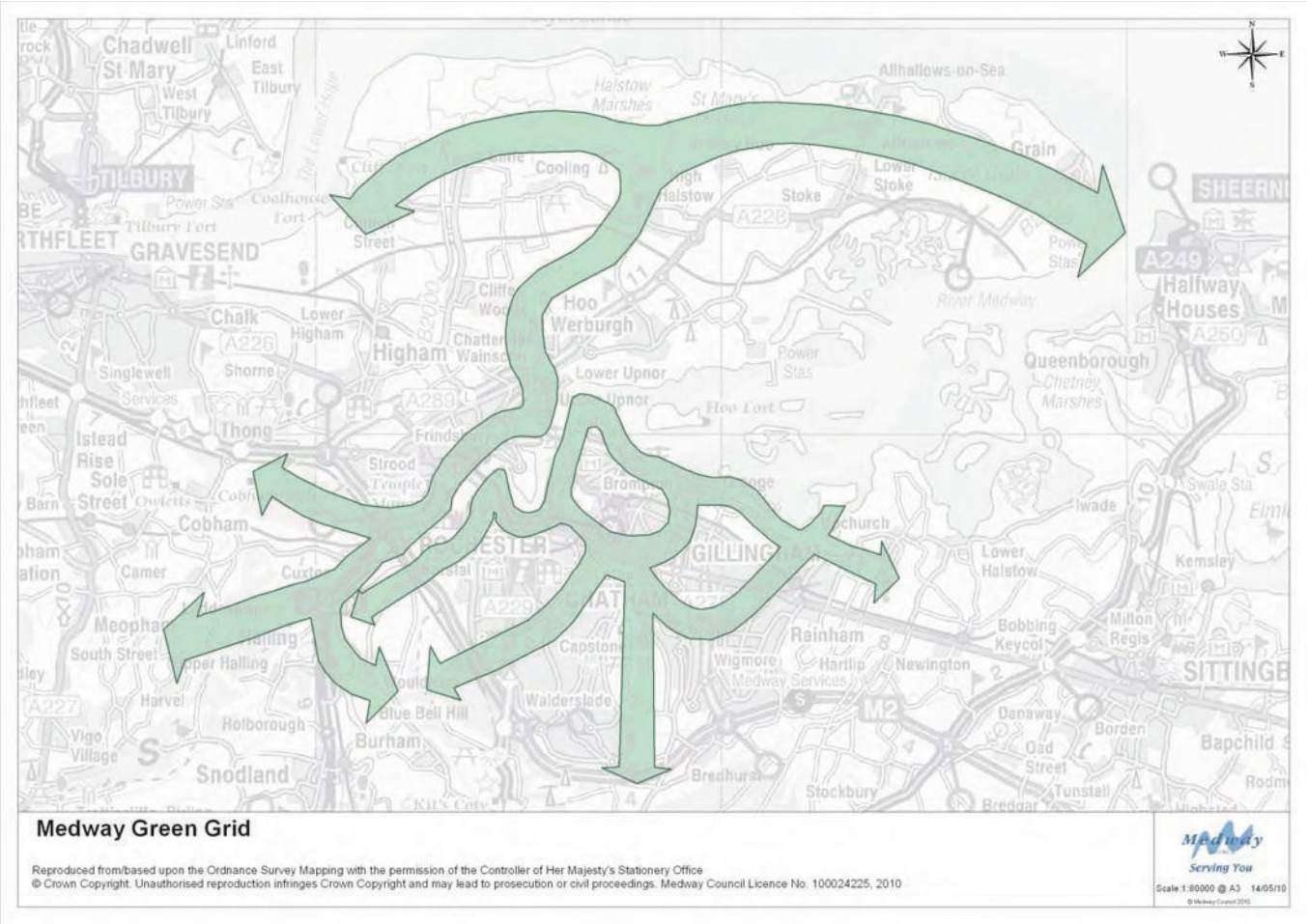


Figure 5 3 Green Grid Corridors

Sustainable Communities

Health and Social Infrastructure

5.91 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).

5.92 The Medway Sustainable Communities Strategy Plan 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.

5.93 Consequently, the Core Strategy is about providing equal opportunities and access to good quality Community Infrastructure, access to 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

5.94 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.

5.95 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
- To improve access to employment opportunities for all
- To 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
- To undertake a renovation programme of the poorest quality housing stock.

5.96 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

5.97 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.

5.98 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.

5.99 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 Medway NHS and their delivery partner Medway Community Estates to enable them to develop and adapt their business.

5.100 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. The following facilities are considered likely to 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, Wisdom Hospice, Darland House, Elm House Clinic, New Road, Kings Road Clinic, Luton, Nelson Road, and Balmoral Road.

5.101 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.

5.102 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.

5.103 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 construction work to add 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.

5.104 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.

5.105 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

5.106 The adult social care services in Medway are currently undergoing transformation and modernisation. Adults fall into a number of categories for whom services are provided. 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

5.107 There are places of worship for Buddhists; Christian denominations; Hindus, Jews, Muslims and Sikhs as well as some for smaller independent faiths, but it is not clear whether current provision is adequate. Faith groups, like the public and voluntary sectors, are highly reliant on financial resources to provide for their congregations.

Voluntary Sector

5.108 Medway has in excess of 530 voluntary and community organisations. 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

5.109 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

5.110 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.

5.111 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.

5.112 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*
- *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

5.113 Details of the typology, quantity and quality of Medway's outdoor sports facilities can be found in the open space strategy 2008-2016. Sport and leisure is a means of tackling local issues of poor health, community development and deprivation.

5.114 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 through out 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.

5.115 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. However to fully meet Sports England advice, a further four '4 court' halls are required across the area.

5.116 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.

5.117 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.

5.118 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. Throughout the period leading up to the Games themselves it is expected that, nationally and locally, a range of strategies will be put in place to increase participation rates in sport and to improve the standard and distribution of facilities.

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 develop a strategy to maximise the potential local benefits of the London Olympics in 2012. This will consider opportunities for enhanced training facilities, increased participation in sport, the provision a major pre-Games training camp and meeting hotel and other accommodation needs for visitors to the games. It will also consider the long-term legacy from the Games and how this can be best used to meet local needs.*

Culture and Leisure

5.119 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.

5.120 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.

5.121 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.

5.122 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.

5.123 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

5.124 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.

5.125 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.

5.126 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.

5.127 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 in Medway is much more widespread than this. 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 an 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 which 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 bronze age though to the C20 (1st and 2nd World Wars).

5.128 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.

5.129 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 valuable 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).*

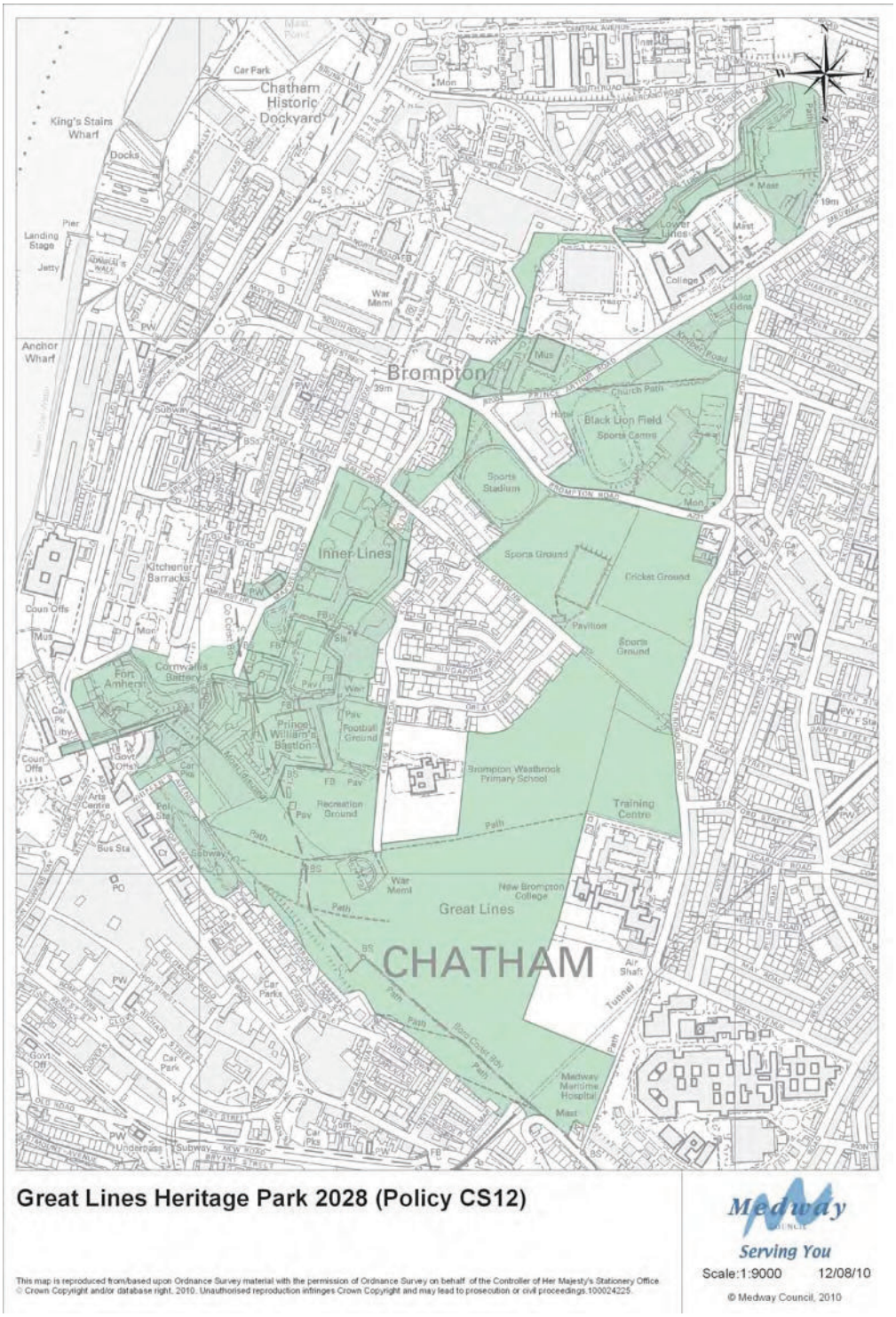


Figure 5 4 Great Lines Heritage Park

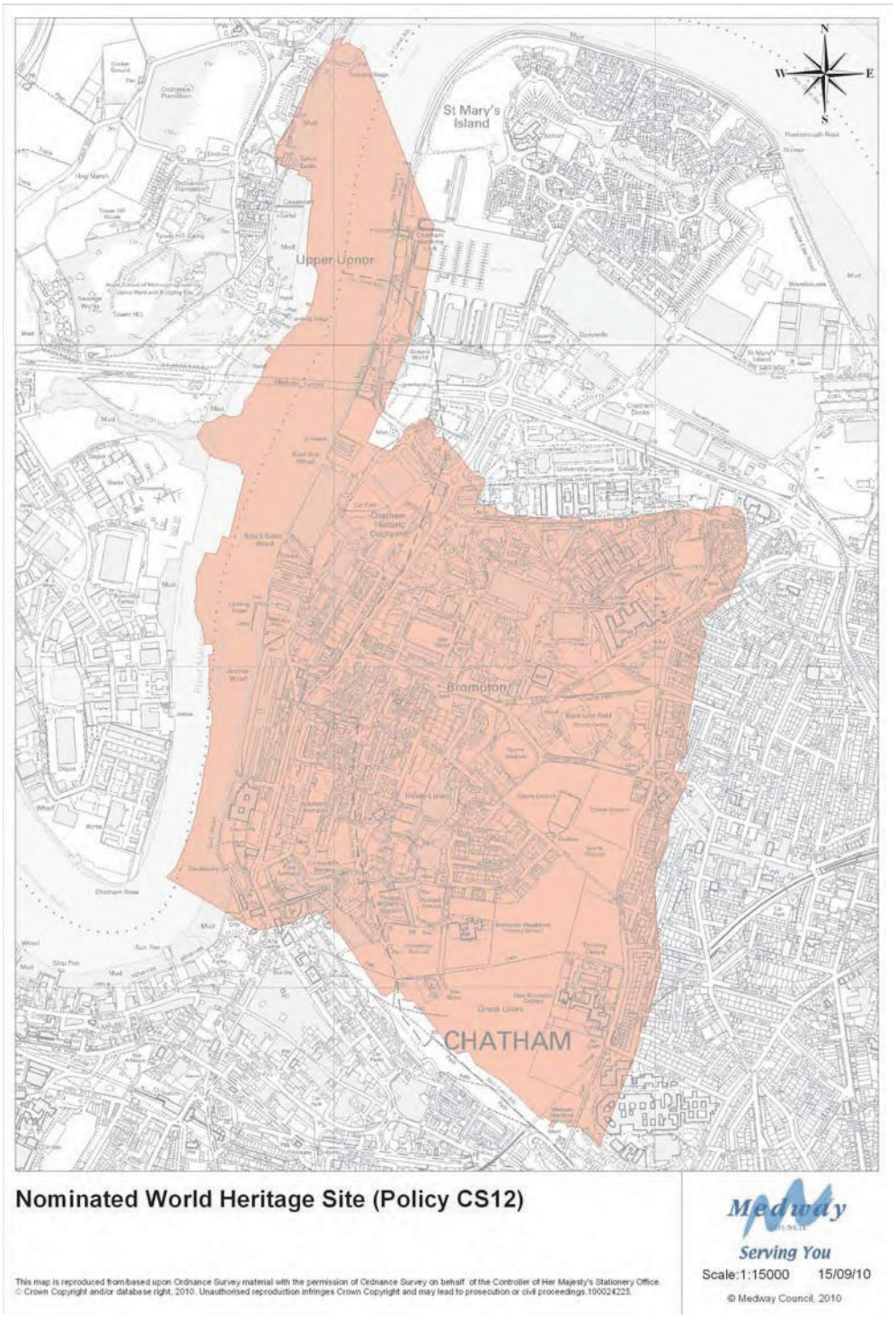


Figure 5 5 Nominated World Heritage Site

6. Housing

Introduction

6.1 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 long- standing 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 being 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, particularly 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.

6.2 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

6.3 As explained earlier the Council intends to proceed with an average of 815 per year over the period to 2028 as its housing target. 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.

6.4 The great majority of this will occur in the main part of the Borough that is located in the Thames Gateway. Only around 596 units in total are expected to be built in the 'rest of' area, which essentially corresponds to the parishes of Cuxton and Halling. Here the former Cemex cement plant at Halling is to be redeveloped and this will account for virtually all of this number

6.5 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 house completion rates in Medway have reached an historic high. 761 dwellings were delivered in 2007-2008 and 914 in 2008-2009. Preliminary monitoring of completions for 2009-2010 suggests that an even higher figure has been achieved but that this will reduce if there is no early recovery in the national economic picture.

6.6 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, which will be the only new freestanding settlement in the Thames Gateway. It is expected to deliver approximately 5,000 dwellings in total (4,600 within the plan period).

Housing Delivery

6.7 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 Social Landlord's and other key stakeholders in order to maintain delivery.

6.8 The housing trajectory for Medway anticipates that the peak of housing delivery will come forward between 2013 and 2018. It also suggests that delivery is expected to tail off significantly over the last five years of the plan period. This is based on the availability of sites and the market may, in practice, even-out this trajectory.

6.9 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.

Supply Component	Number of Dwellings (Thames Gateway)	Number of Dwellings (Rest of Kent)	Total
Units completed 2006-2009	2235	31	2,266
Small sites with planning permission at April 1, 2009	364	17	381
Projected Strategic Land Availability Sites	16424	548	16972
Total Supply	**19023**	**596**	**19619**

Table 6 1 Medway Housing Supply Components

6.10 The Strategic Land Availability Assessment (SLAA) identifies a potential housing supply for Medway of 16,972 dwellings. When this figure is added to the housing completions already achieved and the outstanding small site planning permissions as at April 1, 2009, a very healthy supply position is indicated for the period up to 2028. The following table and map shows where the majority of new housing is planned to come forward (see also Chapter 11 for further details).

Sub-areas	Number of Units
1. Chatham	3,843
2. Rochester	3,117
3. Gillingham	1,488
4. Strood	2,331
5. Rainham	123
6. Cuxton and Halling	548
7. Hoo Peninsula	5,522
Total	**16,972**

Table 6 2 Distribution of New Housing by Sub Areas up to 2028

6.11 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 4,600 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. Furthermore, no provision has been made anywhere within the supply components for future housing windfalls (other sites that come forward unexpectedly).

6.12 A number of Adopted Local Plan Allocations are being carried over.

SLAA Ref	Local Plan Ref.	Site Name
13	GL181	Medway House, 277 Gillingham Road
90	ME 254 & ME375	Strood Riverside, Canal Road
100	ME 386	320 - 344 High Street inc. 42 New Road, Rochester
102	ME 407	1-35 High Street, Chatham (Grays Garage)
525	ME 409	Former Laundry Hilda Road Chatham
598	ME 510	R/O 329 - 377 (Featherstones) High St Rochester
757	ME 383	Between Cross Street & The Brook, Chatham
844	GL150	Amherst Hill, Brompton

Table 6 3 Local Plan Allocations

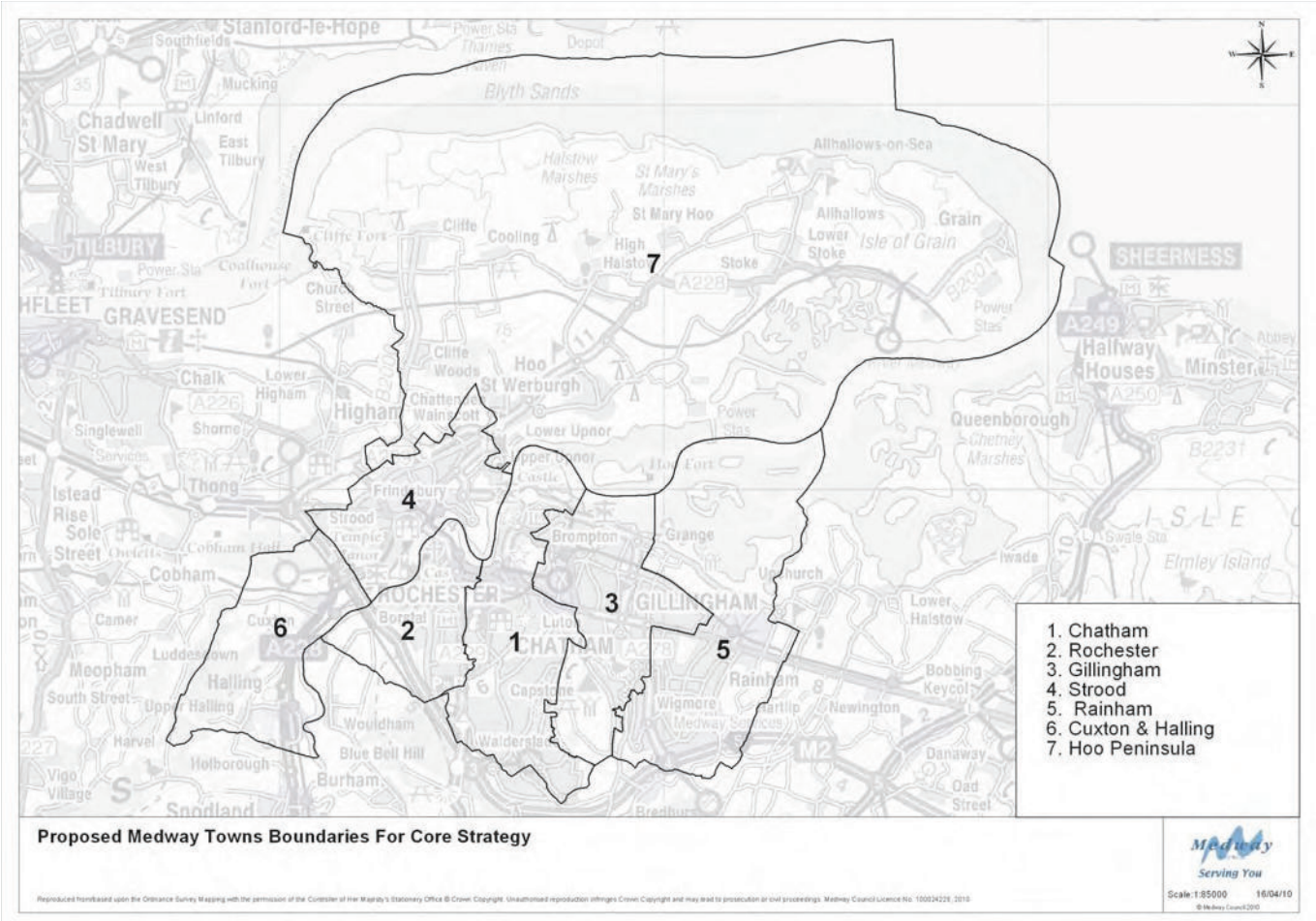


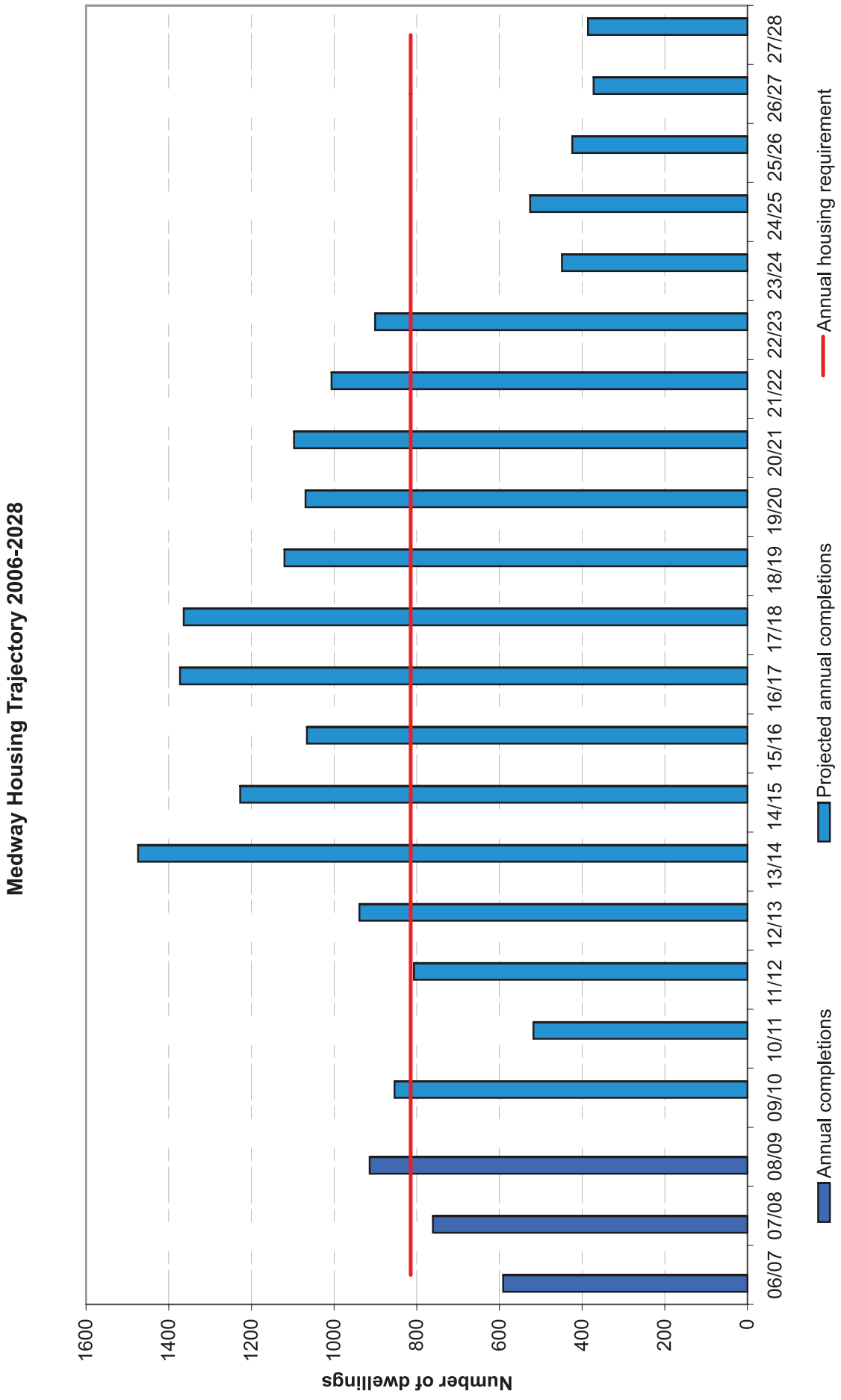
Figure 6 1 Medway Housing Sub Areas

Policy CS13: Housing Provision and Distribution

In accordance with Table 6-1 and the schedule set out in Appendix B, 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:

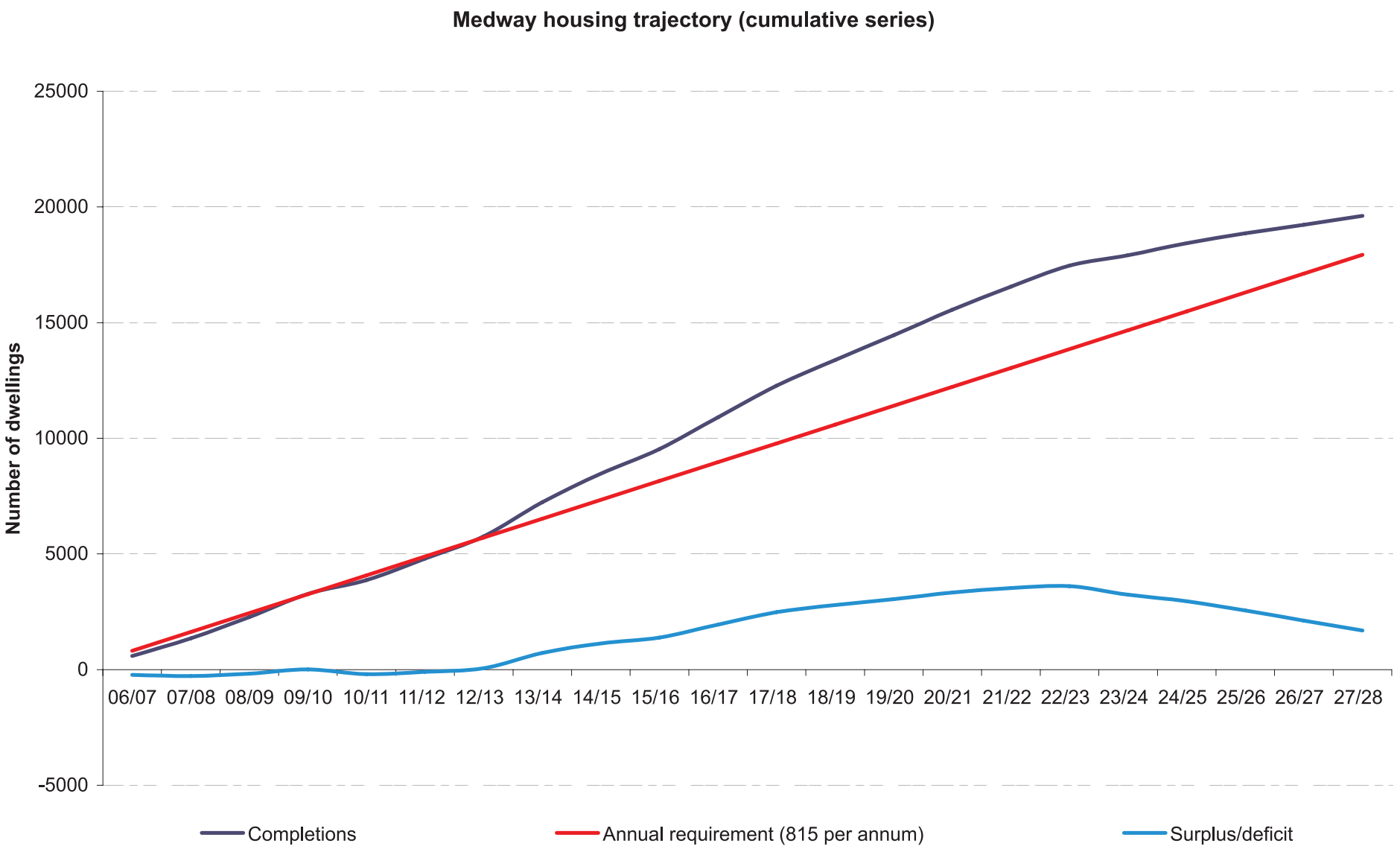
- *All sites which are the subject of adopted development briefs or masterplans, including Strood, Chatham and Gillingham town centres*
- *Sites allocated in the Medway Local Plan 2003 not already having the benefit of a planning permission*
- *A contribution of 5,000 dwellings (of which approximately 4,600 dwellings will be delivered during the plan period) arising from the Strategic Allocation of land at Lodge Hill (see Policy CS 33);*
- *Other sites identified in the Medway Strategic Land Availability Assessment, 2010.*

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.



Source: Strategic Land Availability Assessment 2010

Figure 6 2 Medway Housing Trajectory 2006 - 2028



Source: Strategic Land Availability Assessment 2010

Figure 6 3 Cumulative Housing Trajectory

Affordable Housing

6.13 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' and various types of 'intermediate' accommodation and is usually provided through a Registered Social Landlord (RSL) or Housing Association. Government funding is allocated by the Homes and Communities Agency to RSLs 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.

6.14 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.

6.15 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.

6.16 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.

6.17 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.

6.18 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.

6.19 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. Where this is the case, applicants will be expected to use and adhere to the Medway Affordable Housing Toolkit developed by the consultancy Three Dragons. The model has been produced to allow users to test the economic implications of different types and amounts of planning obligations.

Developers will need to demonstrate and justify, via appropriate evidence, why they are seeking to deviate from specific developer contribution requirements.

6.20 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 SPD. This document will be regularly updated.

6.21 The term 'affordable housing' is defined as in PPS3 'Housing' 2010 and this definition applies to Policy CS14 below.

6.22 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.

6.23 Affordable housing should be provided on-site and secured through a S106 agreement (or equivalent device introduced by the 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 Registered Social Landlords (RSLs). 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.

6.24 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. Affordable housing to meet local needs on qualifying sites 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 over-concentration 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

6.25 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 ever 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.

6.26 Accordingly the sections below consider these and related issues.

Existing Housing Stock

6.27 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.

6.28 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

6.29 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.

6.30 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.

6.31 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 future demands and lifestyles; and
- Combines efficiency in land use with the environmental benefits of well-designed, well-managed housing, particularly when built to higher densities.

6.32 For these reasons the Council has produced Housing Design Standards alongside this Core Strategy..

Special Care Accommodation

6.33 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." (Housing Learning and Improvement Partnership 2006, Extra Care Housing Toolkit).

6.34 The Core Strategy seeks to address 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 which can help elderly people to live active and independent lives for longer (lifetime homes).

Institutional and Student Housing

6.35 Given the rapid expansion of the Universities at Medway and the associated rise in student numbers to 10,000 (with around 16,000 envisaged by 2016) 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.

6.36 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.

6.37 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 [Understanding the housing needs of students in Medway, ORS – June 2010] 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.

Health and Education Implications for Housing

6.38 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 the use of Health Impact Assessments (HIA's) and these will be sought in relation to larger housing proposals.

6.39 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*
- *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 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*
- *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 at Medway and local facilities

- *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

6.40 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 Showmans 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.

6.41 A North Kent Gypsy and Traveller Accommodation Assessment (GTAA) undertaken in 2006 by David Couttie Associates 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.

6.42 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.

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 (DPD). 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.

7. Economic Development

Introduction

7.1 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.

7.2 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.

7.3 The challenges for the future are therefore to increase the value of local jobs, to reduce 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

7.4 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.

7.5 The latter include:

- BAe Systems at Rochester Airfield. This is by some way the area's largest private sector employer and the site 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] Future commercial development should be concentrated on the advanced manufacturng sector and software engineering to foster growth in these sectors
- The Universities at Medway Campus at 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 satellite operations from the Universities at Medway at Chatham Maritime and higher value activities associated with the developments at Kingsnorth and Grain
- Isle of Grain: Potential focus for 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 from logistics and distribution, off-site manufacture for the construction sector, environmental technologies to waste management and processing
- Central Chatham associated with the development of a centre of regional significance and with a specific focus on fostering development within the creative industries sector.

7.6 In 2009, Medway Council adopted the latest Medway Economic Development Strategy. This contained five strategic priorities, which form the basis for the economic strategy set out in this document. Those priorities are:

- Sector development
- Skills development
- Higher education
- Employment space; and
- Image building.

7.7 It considered 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.

7.8 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.

7.9 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.

7.10 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.

7.11 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.

7.12 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 create Medway as the destination of choice for businesses.

7.13 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.

7.14 In 2008, there were 94,500 people in employment in Medway. As explained in Chapter 2, 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

7.15 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 of 21,500 jobs.

7.16 In 2010, Medway 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 but the overall job employment requirement is still considered to be appropriate for this slightly longer period.

7.17 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. (See Figure 7-1).

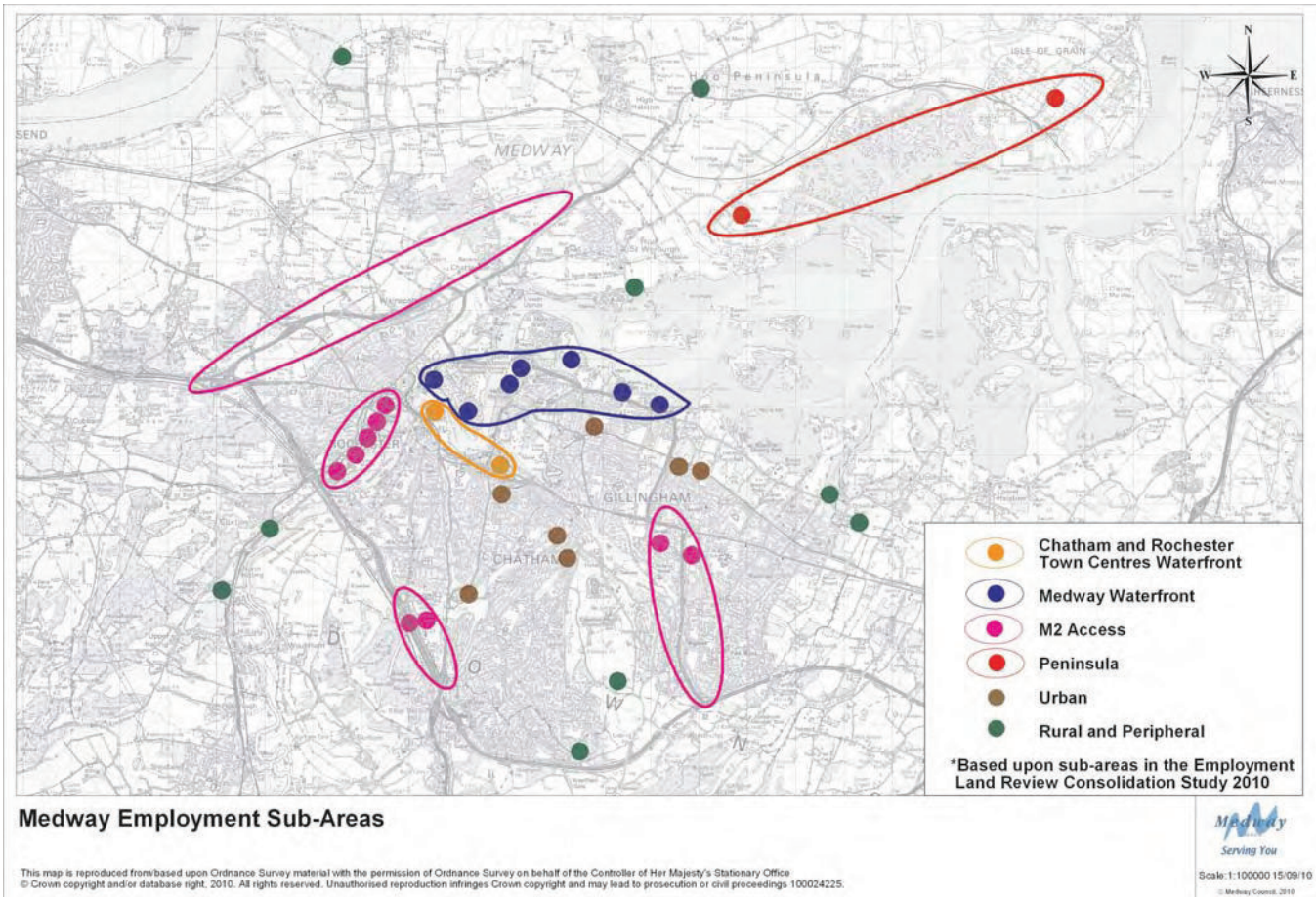


Figure 7 1 Medway Employment Sub Areas

7.18 The overall requirement amounted to 348,963 sq m on 49.9 hectares of land in the following locations.

Location	Floorspace	Land
	Sq m	Ha
Town Centre/Waterfront	93,493	6.68
M2 Access	193,570	32.32
Peninsula	36,604	4.58
Other Urban Areas	25,296	6.32
Total Requirement	348,963	49.9

Table 7 1 Floorspace Requirements by Sub Areas

7.19 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.

Location	Floorspace Required	Floorspace Supply	Surplus/Deficit
	Sq m	Sq m	Sq m
Town Centre/Waterfront	93,493	73,836	-19,657
M2 Access	193,570	88,605	-104,965
Peninsula	36,604	666,290	+629,686
Other Urban Areas	25,296	4,827	-20,469
Total	**348,963**	**838,487**	**+484,595**

Table 7 2 Employment Floorspace Supply by Sub Areas

7.20 Details of the anticipated rate of development of B1, B2 and B* uses are set out in the Employment Land Trajectory in Appendix D.

7.21 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.

7.22 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.

7.23 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. The Employment Land Study emphasises that development on new sites with access to the M2 would undermine reinvestment in more central locations.

7.24 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 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.

7.25 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 C18. 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 SLAA has identified a potential supply of 148,113 sq m up to 2028.

7.26 Not only is there sufficient floorspace overall to meet the employment requirements but that 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 both 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.

7.27 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 out-commuting 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, the development of the large Isle of Grain and Kingsnorth employment locations 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.

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 the 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 996,053 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 Rochester Airfield to develop a technology and knowledge based cluster.The Council will protect established employment areas from other development 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

7.28 In 2006, tourism employed over 5,250 people and was worth about £265 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.

7.29 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. Tourism provides a boost to other sectors of the local economy such as retail, arts and culture, leisure, heritage and transport.

7.30 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.

7.31 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 catapult the Dockyard into the top league of attractions in the South East after its opening in July 2010.

7.32 Dickens World, which opened in May 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.

7.33 The prospect of World Heritage Site status for Chatham Dockyard and its defences by 2013 will greatly enhance Medway's reputation as a visitor destination of international status.

7.34 The 2012 Olympics present Medway with various opportunities and will be a further catalyst to develop Medway as a genuine city break destination.

7.35 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:*
  - *In towns and villages and*
  - *In the countryside through the re-use of existing buildings or as part of farm diversification schemes.*

Retail and Town Centres

7.36 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.

7.37 The current hierarchy of town centres in Medway consists of:

- Regional Hub and primary centre: Chatham
- District Centres: Strood, Gillingham, Rainham, Hempstead Valley Shopping Centre, Rochester
- Local Centres, Villages and Neighbourhood Centres

7.38 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.

7.39 In 2009, Nathaniel Lichfield and Partners prepared a town centre, retail and leisure study for Medway Council, 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.

7.40 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.

7.41 The Study found some potential for new convenience floorspace, as detailed in the following tables.

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

Table 7 3 Convenience Floorspace Capacities 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**

Table 7 4 Convenience Floorspace Options 2008 – 2026

7.42 To put this in context a large food superstore is usually around 6,000 sq m.

7.43 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.

7.44 On the other hand, in relation to comparison spending, the Study identifies scope for a large increase in floorspace as detailed below.

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

Table 7 5 Comparison Floorspace Options 2008 - 2026

7.45 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.

7.46 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.

7.47 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 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 of the market.

7.48 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. These figures exclude the unimplemented planning permission for 14,400 sq m gross of retail warehousing at Anthony's Way in Frindsbury.

7.49 The Study provides a firm basis for the future retail strategy and how this should be applied in each centre.

7.50 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.

7.51 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 for small scale development to provide additional 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.

7.52 Local 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 small catchment areas focused on their respective local communities.

7.53 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 11.

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*
- *15,000 sq m for bulky comparison goods in association with a park and ride facility at Whitewall Creek*
- *Smaller scale comparison goods floorspace at the district centres of Strood, (9,400sq m) Rochester, (Riverside 7,800sq m) Gillingham (6,200 sq m), Lodge Hill (5,200 sq m) and Rainham and at Hempstead Valley (2,800 sq m)*
- *Two convenience stores of about 3,500 sq m at Corporation Street, Rochester and 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

7.54 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.

7.55 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.

7.56 Medway Council's Draft 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.

7.57 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 2008 just under 23% of working-age residents in Medway had qualifications at degree level or higher.

7.58 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.

7.59 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.

7.59 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 via the Department for Education's FES "Schools for the Future" programme or other relevant initiatives such as Academies*
- *Management arrangements for schools which fully exploit their potential as community hubs*
- *A distributed adult learning service with a new focus on re-skilling 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.*

8. Energy, Waste and Minerals

Introduction

8.1 As an all purpose unitary council Medway is also a minerals and waste planning authority and, in discharging this role, needs to ensure effective policies are in place to meet both local and regional requirements. These are set out in this chapter.

8.2 Medway is also nationally significant in terms of power generation, electricity distribution and liquefied natural gas storage.

Conventional Energy Generation

8.3 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 are awaiting a Government decision, as is a plan to replace the Kingsnorth coal plant with a modern alternative. If this proceeds it is likely to be coupled with full Carbon Capture and Storage (CCS) technology and this could also be a requirement for the Damhead Creek facility.

8.4 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.

8.5 A two way electrical inter-connector (BritNed) is currently being installed between Grain and the Netherlands and aviation fuel is also imported, stored and distributed from Grain.

8.6 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.

8.7 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.

8.8 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, as is anticipated, new plants are required to install full scale CCS. Potentially this could be of global significance if Britain is the first country to make this a pre-condition of new installed capacity
- The potential for large scale district heating utilising waste heat from new power plants. Initial feasibility studies in relation to Kingsnorth indicate a scale of opportunity unique in the UK
- 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*
- *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 of Secondary and Primary Aggregate Minerals

8.9 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.

8.10 Details of the available local reserves, past production rates and other information are set out in the Minerals State of Medway report.

8.11 The materials covered by this section are:

- Land won sands and gravels (aggregates)
- Secondary aggregates – effectively the reuse of materials such as demolition waste in place of virgin aggregates
- Chalk
- Clay
- The importation of aggregates – both marine dredged and land won from outside the region.

8.12 Where relevant the Medway apportionment in terms of supply, capacity and safeguarding from the appropriate regional working parties are applied.

8.13 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 (terestrial and marine).

8.14 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
3. 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 now revoked South East Plan
4. Make provision at existing cement manufacturing facilities for at least 15 years of production, and 25 years at new sites.

8.15 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.

8.16 The revocation of the South East Plan means 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.

8.17 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.

8.18 Medway has established facilities at:

Marine Wharves:

- Euro Wharf, Frindsbury, Medway City Estate - Aggregates/Cement and Coated Stone Products

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) Halling – Aggregates.

8.19 In terms of native land won aggregates the Government has indicated its support regional apportionments envisaged in the South East Plan. In Medway's case that is 0.18 mtpa. This equates to 2.7 million tonnes of primary land won aggregates for the period 2010-25 and a land bank of planning permissions at any one time of 1.23 million tonnes (equal to 7 years of production) throughout the life of the plan.

8.20 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 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 40 years.

8.21 Given this situation there is no need to identify any additional chalk resources for the cement industry at this stage.

8.22 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.

8.23 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.

8.24 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 the need to s afeguard reserves for the future.

8.25 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.

8.26 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 1.23 million tonnes throughout the life of the plan.

8.27 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) 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.

8.28 The available reserves are therefore more than sufficient to provide the 1.5 million tonnes proposed between 2010-2025.

8.29 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. If it is assumed that further reserves are permitted from the unconstrained identified 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.

8.30 The identified reserves are shown on Figure 8.1

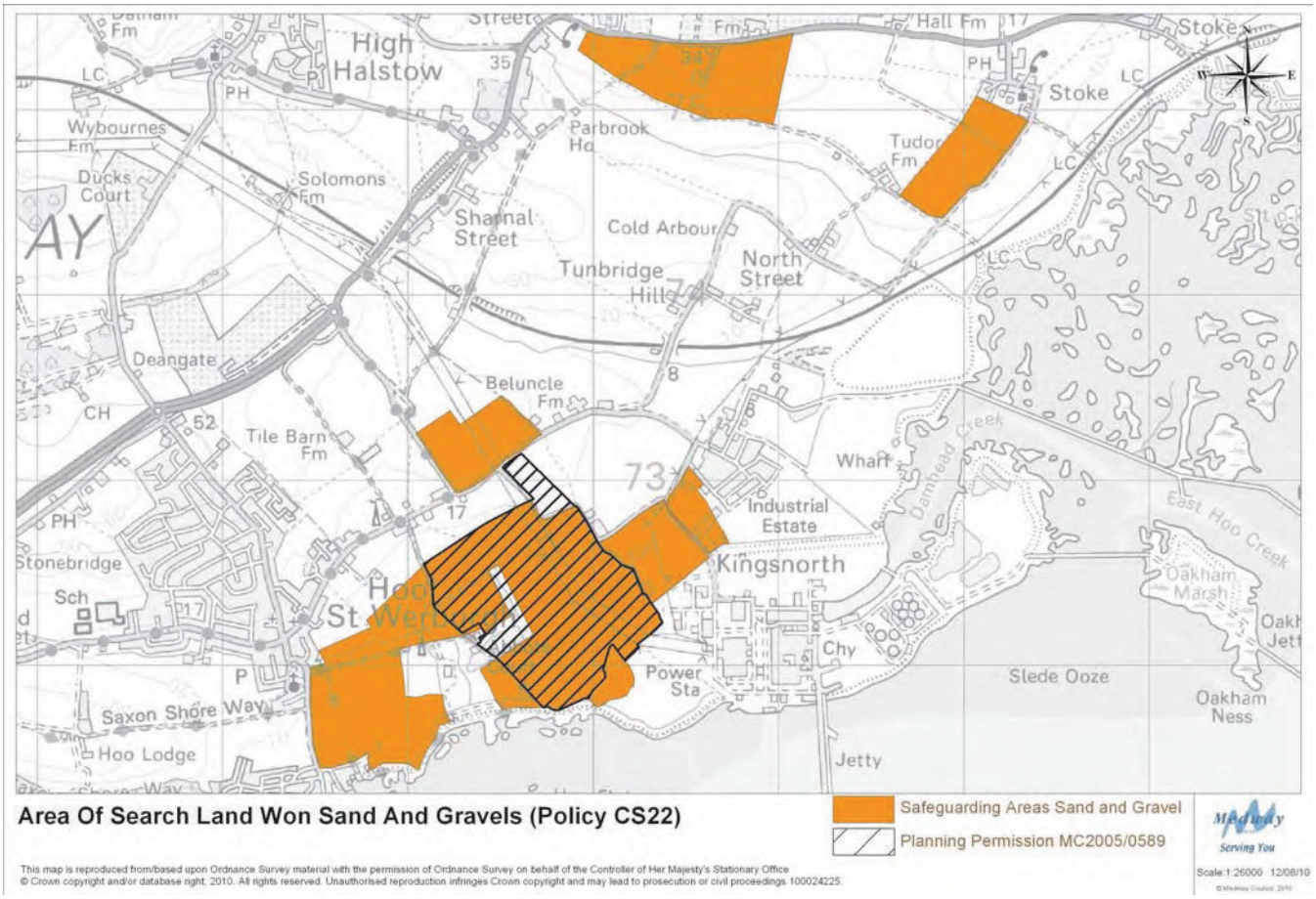


Figure 8 1 Land Won Sand and Gravels

8.31 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 forthcoming Land Allocation and Development Management Development Plan Document.*

The Council will make provision for the extraction of at least 0.18 million tonnes per annum 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 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.

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 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.

Waste Management

8.32 More background information on this complex topic can be found in the Waste State of Medway report.

8.33 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; and
- Hazardous waste.

8.34 The emphasis is on waste reduction and reuse and recycling at source to meet national and regional guidance and targets. Those wastes that cannot be then recovered and the residues from higher parts of the waste hierarchy have to be safely disposed of to land (landfill) but this is increasingly a last resort solution. Councils in the South East have also been required to make provision for the disposal of a certain amount of London's waste to landfill but the demand for this is also reducing.

8.35 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 will still need to be made for the other waste streams.

Commercial and Industrial Wastes

8.36 The quantities of commercial and industrial wastes arising in Medway have been calculated as follows:

- 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

• 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

Table 8 1Average Tonnage per Sector per Annum

8.37 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 8-2.

- 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

• 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	

Table 8 2Disposal of Commercial and Industrial Waste 2008

8.38 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:75,000 tpa
- Abattoir waste in vessel composting at Matts Hill: 40,000 tpa

8.39 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 will continue to be the only option for certain types of waste but this can also be expected to continue to decline as costs for this disposal method increase and new methods of recovery are introduced.

Construction, Demolition and Excavation Waste

8.40 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, hardcore. However quantities recorded by the Environment Agency in 2008 were dealt with Table 8-3 shows how.

- 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

• 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	

Table 8 3 Disposal of Construction, Demolition and Excavation Waste, 2008

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

8.41 It can be assumed that all reprocessed material was reused in one way or another. The proportion needing final disposal was very small.

8.42 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.

8.43 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. However there is a current proposal to develop an alternative facility at Medway City Estate. If permitted this would have a capacity of in excess of 125,000 tonnes per annum, which would be more than sufficient to meet Medway's needs.

Hazardous Wastes

8.44 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.

8.48 The Medway site operator waste return interrogator 2008 detailed company activity is set out in Table 8-4.

- 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

- 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

Table 8 4 Disposal of Hazardous Waste, 2008

8.46 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.

8.47 There are no significant arisings of low level nuclear wastes in Medway and so local provision is not necessary for such material.

8.48 Regional analysis has 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
- Treatment facilities for air pollution control residues
- Treatment facilities for waste electronic and electrical equipment (WEEE); and
- Sub-regional networks of contaminated Construction Demolition and Excavation waste treatment facilities.

8.49 It suggests 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

8.50 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. Also, there has been no activity in Medway for some time and no interest has been expressed in new capacity, either by the London authorities or commercial operators.

8.51 It is expected that the Government will clarify its position on this and other waste matters 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

8.52 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 down to the operators and their commercial contract arrangements.

8.53 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, although this is provided for within the new contract
- 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 inert, non-inert or hazardous wastes, or a combination of these.

8.54 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.

8.55 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.

8.56 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.

8.57 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 used for 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 digging out cover material or re-profiling land by raising its natural contours.

8.58 Many of the area's chalk pits have already been infilled but a pit at Frindsbury would provide sufficient capacity to meet Medway's inert waste needs over the plan period.

8.59 Medway's arisings from all sectors, including hazardous wastes, are not sufficiently large to justify the investment required to create new void space. If this option was pursued it would therefore inevitably involve the large scale importation of material, contrary to a local proximity principle. The Hoo Peninsula is also remote from major markets adding to transport costs and the environmental impact of transporting materials.

8.60 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 8-2 below.

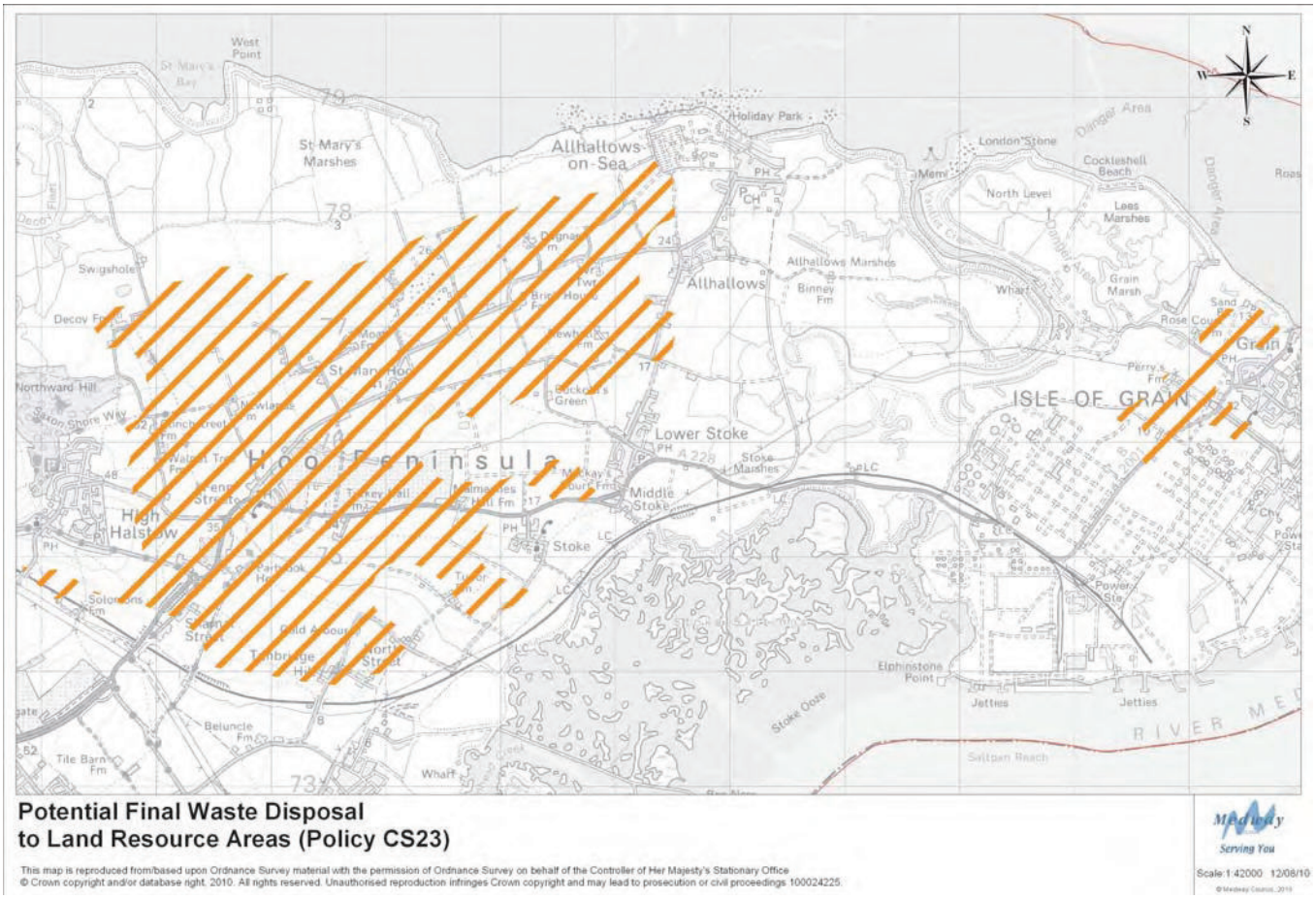


Figure 8 2 Potential Final Waste Disposal to Land Resource Area

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 an inert waste landfill site, 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 refered 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:*
  - *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 after-use of the site.*

9. Transport and Movement

Introduction

9.1 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.

9.2 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.

9.2 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 published as a consultation draft 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.

9.3 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

9.4 Due to its strategic location within the Thames Gateway, Medway has received approval for 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 include funding to remove the flyover in Chatham, return the town to two way working, 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 will also go live. Major improvements to the A228 to Grain are also underway.

9.5 This funding is doing much to address long-standing problems and introduce new capacity to the highway network. Significantly it is also creating capacity to accommodate development on the major regeneration sites in the short term.

9.6 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

9.6 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.

9.7 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.

9.8 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 diagram below.

9.9 Further details are contained in a technical report prepared by the Council's modelling consultants, Transport Issue & Preliminary Options Report Phase 1 – 2nd Issue, April 2009.

9.10 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

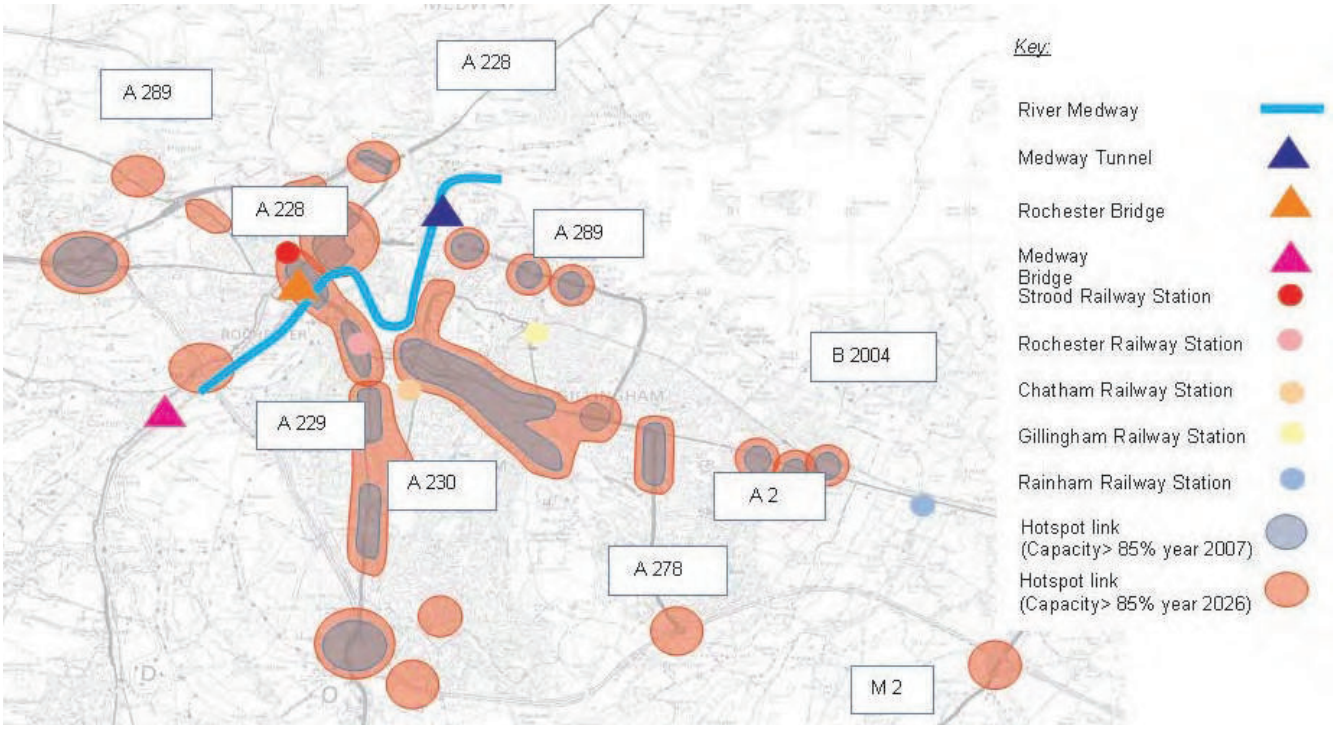


Figure 9 1 Main Congestion Hotspots

- 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 rail 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.

9.11 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.

9.12 A full list of schemes and actions is included at Appendix C.

9.13 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

Other Transport Related Issues

9.14 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.

9.15 However it is important that the Core Strategy takes full account of the planning implications of these matters.

9.16 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.

9.17 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.

9.18 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.

9.19 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

9.20 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.

9.21 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 due course.

9.22 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

9.23 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.

9.24 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.

9.25 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.

9.26 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.

9.27 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.

Transport and Movement

9.28 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*
  - *Improved interchange facilities associated with the rail stations and in the town centres*
  - *Improved main line rail 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*
- *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.*

10. The River Medway

Introduction

10.1 The River Medway was made navigable as far as Maidstone in the 17th 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.

10.2 The River Medway forms one of the most dramatic and consistent features of Medway; 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 towards providing a coherent sense of identity for 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.

10.3 The River comprises three reaches – outer (Sheerness to Chetney Marshes), middle (Chetney Marshes to Gillingham) and inner (Gillingham to Allington Lock). 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 intertidal 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.

10.4 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 provide a diverse and varied character with strong local distinctiveness.

10.5 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.

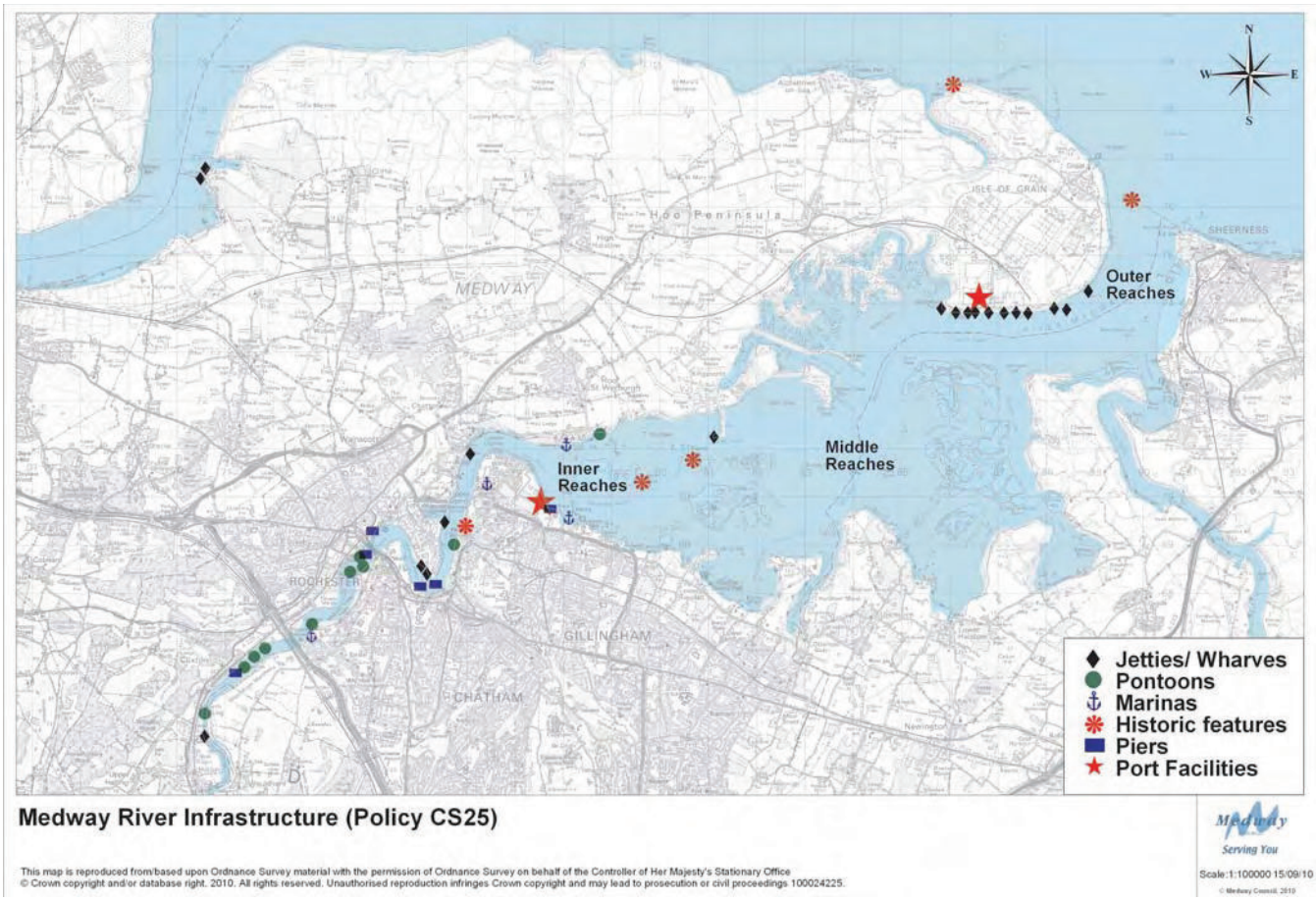


Figure 10 1 River Medway

Management of the Natural Eco-system

10.6 Navigation and dredging is an issue. Siltation has increased in the river as dredging activities have reduced and commercial activities have moved downriver to the outer reaches. Over the longer term this has implications for navigation, particularly in the upper stretches.

10.7 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 re-treating and re-establishing in the face of sea level rise due to flood defence structures.

10.7 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.

10.8 Currently consultants are completing an update of the Strategic Flood Risk Assessment for the river and preparing an associated Strategic Urban Flood Defence Strategy. This will ensure that all flood defences along the waterfront meet a universal standard. 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.

Regeneration

10.9 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 pre-eminent 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.

10.10 Proposals that maximise the potential of the River Medway, as a valuable natural resource, will therefore be supported.

Marine Leisure

10.11 Marine leisure activities primarily consist of yachting and motor boating facilities along the middle and upper reaches of the river, largely away from conflict with the bulk of commercial activities elsewhere on the river. 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, river access to shore facilities, attractions, shopping areas, restaurants and public houses requires improving.

10.11 There are also a significant number of marine engineering and boat repair businesses that have an important role within the local economy.

Chatham Docks

10.12 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

10.13 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. Accordingly the retention and protection of existing and disused wharves, and public piers, and access land to them will be promoted.

10.14 The river is also strategically important for the importation of construction aggregates and it is important that adequate capacity is retained.

10.15 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.

10.16 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.

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 generally be protected and new facilities, including piers for river taxis, encouraged*
- *Leisure activities on and along the river will be supported as long as they will not harm the environment or natural ecosystems*
- *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 inter-tidal habitat and reduce flood risk*
- *Measures to protect and enhance the river as a valuable resource for wildlife and biodiversity, including wildlife corridors and habitat enhancement, will be supported.*

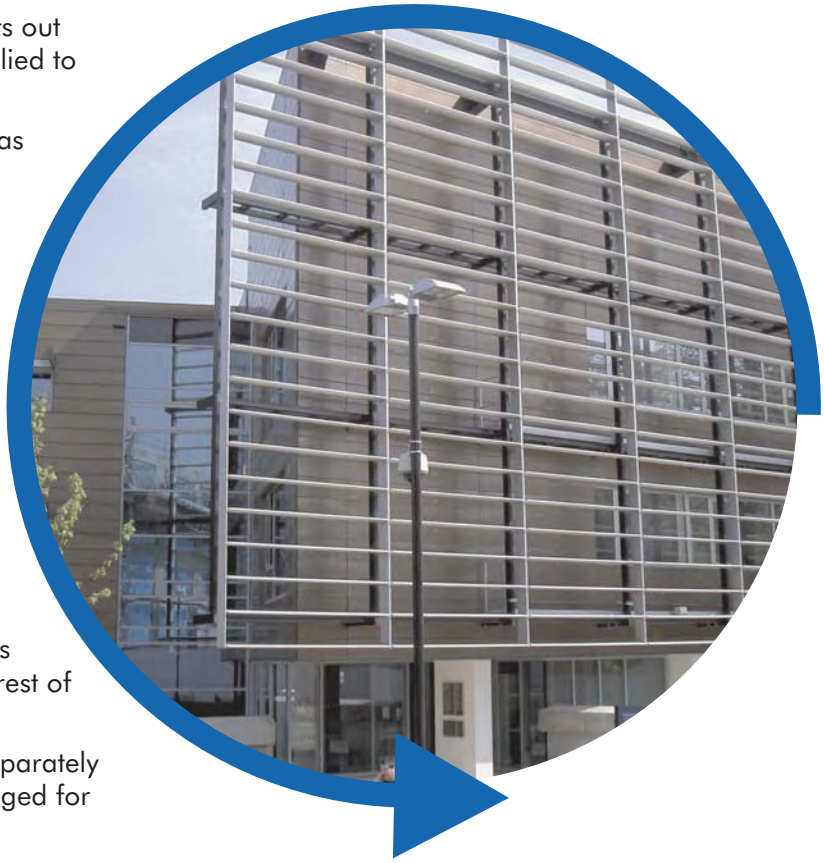
11. Area Policies

Introduction

11.1 This section of the Core Strategy sets out how the overall strategy will be applied to specific areas within Medway.

11.2 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
- The Hoo Peninsula and the Isle of Grain – excluding Lodge Hill
- Medway Valley – this are 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



11.3 A map showing the 7 spatial areas of Medway can be found in Chapter 6 Housing.

11.4 In the following sections the more significant issues facing each area are described and overall policies for each area 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.

Strood

11.5 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.

11.6 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.

11.7 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.

11.8 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.

11.9 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.

11.10 The outlying residential areas also have pockets of deprivation related to education, crime and the local living environment.

11.11 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'.

11.12 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 recently endorsed masterplan for central Strood. 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.

11.13 The Strood Town Centre Masterplan has 8 key objectives to guide the future development in the centre of Strood.

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 11 1 Strood Town Centre

11.14 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 witt 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 al ready underway at Hoo Road, Wainscott.

11.15 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.

11.16 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.

11.17 Over the plan period the broad scale and location of new housing and employment related development is expected to be as indicated in the following table.

Strood Housing Sites		
SLAA Ref	**Site Name**	**Capacity**
90	Strood Riverside, Canal Road	576
137	Civic Centre Strood	398
463	Cuxton Pit No. 3 Cuxton Road Strood	258
522	East of Higham Road Wainscott	173
685	Temple Waterfront, Roman Way, Strood	620
	Main developments	2025
	Other sites	306
	Housing total	**2331**

Table 11 1 Potential Housing Development in Strood

Strood Employment Sites		
SLAA Ref	**Site Name**	**Capacity**
463	Cuxton Pit No. 3 Cuxton Road Strood	1352
653	Land fronting Sir Thomas Longley Road, Frindsbury	3525
654	Land adjoining Southern House, Anthonys Way	2062
678	Land at Commissioners Road, Strood	999
685	Temple Waterfront, Roman Way, Strood	7000
727	Brompton Farm, adj. 66 Brompton Farm Road	1190
752	North side of Commissioners Road, Strood	6000
839	Former Alloy Wheels, Priory Road, Strood	8494
	Main developments	30622
	Other sites	7813
	Employment floorspace total (sq. m)	38435

Table 11 2 Potential Employment Development in Strood

Strood Retail Sites		
SLAA Ref	**Site Name**	**Capacity**
137	Civic Centre Strood	2000
641	Friary Place, Rear of 46-98 High Street, Strood	1800
648	Land between Vanguard Way and George Summers Close	14430
685	Temple Waterfront, Roman Way, Strood	1620
843	Tesco, Strood	5596
	Main developments	25446
	Other sites	2074
	Retail floorspace total (sq. m)	27520

Table 11 3 Potential Retail Development in Strood

Housing: showing sites over 100 units
Employment & retail: showing sites over 1000 sq. m

11.18 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 improving links between the retail areas and accessibility to the rail 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)*

Rochester

11.19 Rochester Town Centre is a nationally renowned historic settlement distinguished by its Norman Castle and Cathedral which are located on high ground, dominating 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.

11.20 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. However it has few convenience shops. It has retained its historic character and avoided damaging, unsympathetic development.

11.21 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.

11.22 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.

11.23 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.

11.24 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, the riverside walk has been laid out and a development partner has been appointed to undertake the first phase of the development.

11.25 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 comprises an uninspiring, poor quality environment dominated by traffic.

11.26 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 enhancement, 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 a high quality of development which would complements the historic character of Rochester City centre and the new community at Rochester Riverside.

11.27 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.

11.28 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.

11.29 Borstal also lacks a natural centre and further services and facilities are justified given its distance from Rochester centre.

11.30 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 table.

Rochester Housing Sites		
SLAA Ref	**Site Name**	**Capacity**
144	St Bartholomews Hospital, New Road, Rochester	108
460	Mid Kent College City Way Rochester	214
515	Rochester Riverside	2,000
598	R/O 329 - 377 (Featherstones) High St Rochester	102
	Main development	2,424
	Other sites	613
	Housing total units	3,117

Table 11 4 Potential Housing Development in Rochester

Rochester Employment Sites		
SLAA Ref	**Site Name**	**Capacity**
515	Rochester Riverside	12,000
598	R/O 329 - 377 (Featherstones) High St Rochester	3,600
724	BAE Systems, Rochester	11,147
	Main developments	26,747
	Other sites	-409
	Employment floorspace total (sq.m)	26,338

Table 11 5 Potential Employment Development in Rochester

Rochester Retail Sites		
SLAA Ref	**Site Name**	**Capacity**
515	Rochester Riverside	7,800
822	Land at Robins and Day (Peugeot),High St ,Rochester	2,275
	Main developments	10075
	Other Sites	0
	Retail floorspace total (sq m)	10,075

Table 11 6 Potential Retail Development in Rochester

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)*

Chatham

11.31 The Chatham Centre and Waterfront Development Framework, which was adopted in 2004, addressed a number of long standing problem 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).

11.32 The Framework set out the measures necessary to transform the centre of Chatham as follows:

11.33 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.

11.34 A world class cultural waterfront with:

- A major new contemporary performing arts facility close to Sun Pier
- 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, close to Sun Pier.

11.35 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 militar 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.

11.36 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.

11.37 Accessibility improvements to, and within, the Centre comprising:

- Returning The Brook and Best Street to two-way streets, with associated environmental improvements (to be completed in 2011)
- 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 (completed in 2011)
- 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.

11.38 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.

11.39 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.

11.40 Beyond the centre of Chatham are numerous but distinct residential neighbourhoods stretching down to the M2. Most have well established local centres, although of varying quality and there are a number of employment areas. These areas contain some of the most prosperous and the most deprived communities in Medway, including St. Mary's Island and Brompton on the one hand and Luton and Wayfield on the other. A wide range of initiatives are underway to reduce deprivation, with an emphasis on improving skills and access to employment.

11.41 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.

Chatham Housing Sites		
SLAA Ref	**Site Name**	**Capacity**
33	RSME Kitchener Barracks, Brompton	248
470	Mid Kent College, Horsted Maidstone Road Chatham	414
472	Land at St Mary's Island Maritime Way Chatham Maritime	503
513	South of Basin 1 and St Mary's Island Maritime Way	284
757	Between Cross Street & The Brook, Chatham	110
758	Sir John Hawkins Car Park, Chatham	120
761	Chatham Waterfront	494
865	2-8 King Street and 1-11 Queen Street, Chatham	108
869	Wickes, New Cut, Chatham (post 2026)	126
	Main developments	2407
	Other sites	1436
	Housing total units	3843

Table 11 7 Potential Housing Development in Chatham

Chatham Employment Sites		
SLAA Ref	**Site Name**	**Capacity**
243	Chatham-Clover/Richard/Rhode/High Streets	5,950
470	Mid Kent College, Horsted Maidstone Road Chatham	2,480
570	Fort Horsted, Primrose Close, Chatham	1,139
761	Chatham Waterfront	5,456
804	Former Officers Mess, Maidstone Road, Chatham	4,300
845	Woolmans Wood Caravan Site	6,160
862	296-310 High Street, Chatham	2,040
869	Wickes, New Cut, Chatham (post 2026)	30,865
	Main developments	58,390
	Other sites	-1,800
	Employment floorspace total (sq.m)	56,590

Table 11 8 Potential Employment Development in Chatham

Chatham Retail Sites		
SLAA Ref	**Site Name**	**Capacity**
243	Chatham-Clover/Richard/Rhode/High Streets	28,000
513	South of Basin 1 and St Mary's Island Maritime Way	2,845
755	Former Police Station, Chatham	1,898
756	Pentagon, Chatham	15,000
757	Between Cross Street & The Brook, Chatham	3,680
758	Sir John Hawkins Car Park, Chatham	3,059
760	Tesco, The Brook, Chatham	1,940
761	Chatham Waterfront	7,772
818	J7, Chatham Maritime	5,220
819	Pump House 7, Leviathan Way, Chatham Maritime	1,200
821	Machine Shop 8, Chatham Maritime	1,200
834	1 Batchelor Street, off the Brook, Chatham	1,600
857	The Brook (r/o High St and Batchelor St) (2028)	1,107
860	Land at High St, Union St and New Road (2028)	9,852
865	2-8 King Street and 1-11 Queen Street, Chatham	2,531
867	2-14 Railway Street & 142-146 High Street, Chatham	1,228
	Main developments	88,132
	Other sites	2,658
	Retail floorspace total (sq m)	90,790

Table 11 9 Potential Retail Development in Chatham

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*

Gillingham

11.42 Gillingham town centre once rivalled Chatham but in recent years has consolidated into a district level centre serving a compact but dense catchment area. The surrounding residential areas vary from Edwardian suburbs in Upper Gillingham, to tight streets of Victorian terraces and areas of council housing. Deprivation is an issue in the areas to the north and south of the town centre.

11.43 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.

11.44 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 down 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.

11.45 Significant improvements to the Station are in hand but other measures will take longer to realise.

11.46 Beyond the centre a range of local centres provide a range 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.

11.47 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.

Gillingham Housing Sites		
SLAA Ref	**Site Name**	**Capacity**
511	Victory Pier, Pier Road (former Akzo), Gillingham	776
875	Retail Core(High St,Jeffrey St,King St) Gillingham	100
	Main developments	876
	Other sites	612
	Housing total	1488

Table 11 10 Potential Housing Development in Gillingham

Gillingham Employment Sites		
SLAA Ref	**Site Name**	**Capacity**
564	South Thames Regional Health Authority Land	12169
875	Retail Core(High St, Jeffrey St, King St) Gillingham	4750
	Main developments	16919
	Other sites	2302
	Employment floorspace total (sq m)	19221

Table 11 11 Potential Employment Development in Gillingham

Gillingham Retail Sites		
SLAA Ref	**Site Name**	**Capacity**
511	Victory Pier, Pier Road (former Akzo), Gillingham	2069
576	A1-A5 and F1-F3, Elm Court Estate, Capstone Road	2105
875	Retail Core(High St,Jeffrey St,King St) Gillingham	3750
	Main developments	7924
	Other sites	460
	Retail floorspace total (sq m)	8384

Table 11 12 Potential Retail Development in Gillingham

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 of the centre 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 and 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*

Rainham

11.48 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.

11.49 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 respass putting pressure on farming activity.

11.50 There are pockets of deprivation close to the town centre, contrasting strongly with the very prosperous southern neighbourhoods.

11.51 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.

11.52 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.

11.53 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.

11.54 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.

11.55 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

Rainham Housing Sites		
SLAA Ref	**Site Name**	**Capacity**
	Main Development	0
	Other Sites	123
	Housing Total	123

Table 11 13 Potential Housing Development in Rainham

Rainham Employment Sites		
SLAA Ref	**Site Name**	**Capacity**
562	Astra Site, Courteney Road, Gillingham	2032
665	Land South of Kent Terrace, Canterbury Lane, Rainham	2350
690	Crest Packaging Site, Courteney Road, Gillingham	9750
	Employment floorspace total (Sq. m)	14132

Table 11 14 Potential Employment Development in Rainham

Rainham Retail Sites		
SLAA Ref	**Site Name**	**Capacity**
691	Hempstead Valley Shopping Centre	2774
842	Tesco, Gillingham	2475
	Main Developments	5249
	Other sites	234
	Retail floorspace total (sq. m)	5483

Table 11 15 Potential Retail Development in Rainham

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 compariso 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.

Hoo Peninsula and Isle of Grain

11.56 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.

11.57 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.

11.58 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.

11.59 The area offers potential for managing adaptations to climate change, such as flood water storage or increases in woodland. There are a number of barriers in accessing the countryside but recognition that the area could offer a great open space resource for local people and visitors through appropriate management.

11.60 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 still has a relatively limited range of facilities.

11.61 The villages face the pressures of sustaining services and facilities needed to underpin the quality of life for their residents and surrounding countryside. Rural transport services are critical in preventing isolation. Many 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.

11.62 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. Together with 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.

11.63 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.

11.64 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.

11.65 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 services, are essential to the well-being of the communities, in order to reduce the need to travel and to sustain a vibrant quality of life. The provision of broadband is recognised as critical infrastructure to support businesses and communities.

11.66 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 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.

11.67 The Hoo Peninsula has an important environment that 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 the area's special environment, 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 and Grain Foreshore, together with improvements to the footpath and cycling networks.

11.68 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.

11.69 The countryside is a working environment, and 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.

11.70 There are extensive residential home parks at Allhallows and Hoo Marina that provide for an important niche within the wider housing market.

11.71 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 in terms of increased access but also be an opportunity to improve the wider leisure experience for other than park visitors.

11.72 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.

Hoo Peninsula and Isle of Grain Housing Sites		
SLAA Ref	**Site Name**	**Capacity**
50	Lodge Hill (Chattenden) Ministry of Defence Estate	5000
520	Hoo –North East Bells Lane Hoo	389
	Main Sites	5389
	Other Sites	133
	Housing Total	5522

Table 11 16 Potential Housing Development on Hoo Peninsula

Hoo Peninsula and Isle of Grain Employment Sites		
SLAA Ref	**Site Name**	**Capacity**
50	Lodge Hill (Chattenden) Ministry of Defence Estate	43353
730	Land North East of Kingsnorth Industrial Estate	200835
694	Mockbeggar Farm, Town Road, Cliffe Woods	1981
699	National Grid Property Holdings, Grain Road	464930
	Main Stites	711099
	Other Sites	1195
	Employment floorspace total (sq. m)	712294

Table 11 17 Potential Employment Development on Hoo Peninsula

Hoo Peninsula and Isle of Grain Retail Sites		
SLAA Ref	**Site Name**	**Capacity**
50	Lodge Hill (Chattenden) Ministry of Defence Estate	5161
	Main Development	5161
	Other Sites	0
	Retail floorspace total (sq. m)	5161

Table 11 18 Potential Retail Development on Hoo Peninsula

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 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. There will be a presumption against development that would lead to the loss of the highest quality agricultural land.

Medway Valley

11.73 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 largely 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 cutting through the area.

11.74 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 from the rest of Medway.

11.75 The area is largely shaped by the Kent Downs, with protected landscapes in close proximity to transport and development corridors running along the Medway Valley. It is a highly visual area, marked by both infrastructure and the natural landscape, but 'sandwiched' between the M2 and M20

the former breaks the connections to communities to the north in Medway. Much of the area lies within the Kent Downs Area of Outstanding Natural Beauty, a landscape of national importance.

11.76 Transport infrastructure within and adjacent to the area has a significant impact on the landscape and setting of the villages and countryside, and will be further extended through a planned bridge over the Medway linking Halling and Wouldham.

11.77 The valley villages in the parishes of Halling and Cuxton grew up through their links to the river and saw expansion with the development of the cement industry in the 19th Century. Most of the cement industry has now moved from the area, but it has defined much of the local landscape, with chalk cuttings and pits, and the 'blue lake' at Halling.

11.78 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 land uses.

11.79 The area lies outside of the Thames Gateway regeneration area and much of the land is covered by the Metropolitan Green Belt. The Medway Valley forms part of a strategic gap that is intended to prevent coalescence between Medway and the Maidstone/Malling area.

11.80 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.

11.81 The closure of the Cemex plant at Halling offers a site for a significant new development in the village. The amount of land available is such that it will significantly extend the settlement and redefine how services are provided and located. It is more than sufficient to meet local requirements and so can also contribute to meeting needs in the surrounding area, which is heavily constrained by the green belt, the AONB and other designations.

11.82 A principal issue is the protection and enhancement of the distinctive character of this rural area, and managing access to strengthen connections to the wider countryside and surrounding urban areas.

11.83 The Kent Downs AONB designation gives a particular significance to management of the local landscape and wider environment. The Valley of Visions programme has developed a strong focus on improving access, enhancing the quality of the environment and engaging with local communities in sharing the area's heritage. This has created an interest amongst partners in continuing to develop this work, managing the countryside and improving access to the river.

11.84 The aims of protecting and enhancing the natural environment and distinctive landscape is being further promoted through the countryside reserves at Ranscombe Farm and Nashenden Valley.

11.85 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 sustained a good range of services in local settlements, particularly Halling.

11.86 Agriculture and woodland are significant land uses in the area and valuable resources for economic and environmental purposes. Agriculture is facing a number of changes and there is recognition that businesses may need to diversify or develop. There is a need to improve the quality of woodland management in some areas and opportunities taken to work with landowners to achieve economic and environmental outcomes.

11.87 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.

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

Table 11 19 Potential Housing Development in Medway Valley

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

Table 11 20 Potential Employment Development in Medway Valley

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

Table 11 21 Potential Retail Development in Medway Valley

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 to make provision for access and management of the high quality environment. Cycling and pedestrian routes connecting to adjacent areas will be promoted.

The council will support the retention and development of local services and facilities in Cuxton, Lower Halling and Upper Halling.

The council will support a strong economy in the Medway Valley to sustain local communities and retain the distinctive character of the countryside.

Lodge Hill

11.88 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.

11.89 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. However, it excludes further

Figure 11 2 Lodge Hill Connections

land in the Ministry's ownership, including the Wainscott Training Area and Camp (which will remain in military use) and areas of mature woodland. The development site extends to some 256 hectares in total, the great majority of which is defined as "previously developed" due to its military use, including ordnance manufacture.

11.90 Much of the site is set between the Chattenden and Deangate ridges and so is largely hidden within the wider 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 proposed development area.

11.91 Due to its location close to the A228 and proximity to existing villages on the Peninsula, the development of Lodge Hill provides an opportunity to enhance the range of services available locally while respecting the character of nearby settlements and the wider Peninsula. Its position between the main urban area and the industrial hubs on the Peninsula is also a major asset in establishing Lodge Hill as a new centre for employment growth.

11.92 The landowner has put in place robust arrangements to ensure that development is brought forward effectively and in a timely manner. The site has few physical constraints and detailed investigations have demonstrated how it can be largely built out over the period covered by the Core Strategy. There has been extensive engagement with local communities and this will continue throughout the planning phase of the new settlement, leading up to the submission of the planning application, and with the new community as it grows.

11.93 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 of the highest quality, which meets high standards of design and sustainability while relating sensitively to its exceptional surroundings. The proposed 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, over time, 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.

11.94 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 that provide choices for people to live and work in a semi-rural setting, emerging from the characteristics of the site and its locality
- 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 – integrating measures into the masterplan, its infrastructure and delivery and management processes that respect and enhance the natural environment, conserve natural resources and allow people to lead a sustainable lifestyle
- Well connected – bringing people together and to jobs, schools, health and other 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. Establishing an economically and socially sustainable model for management of the Lodge Hill estate and effective leadership, governance and participation of the community in the long-term stewardship of Lodge Hill.

11.95 In the context of this Core Strategy Lodge Hill is categorised as a 'strategic allocation' defined on the Proposals Map. It is intended that 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 master-plan will be subject to regular reviews (at least every three years) to ensure that the proposals for the site remain robust in the face of changing circumstances; the exact mechanism for this will be determined through the planning application process.

Policy CSA33 Lodge Hill

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

- *Approximately 5,000 new homes, of which around 4,600 will be completed within the plan period. Provision of 30% affordable housing within this total will be sought*
- *Employment opportunities generally in balance with the resident working age population (c. 5,000), reflecting not only the needs of the settlement (local services etc.) but also creating a new focus for higher value economic activity in a Medway context*
- *Retail provision of around 5,000 square metres GEA floorspace.*

Planning permissions will be granted subject to:

- *Being consistent with an agreed site-wide masterplan and development brief, which should fully reflect the Vision and Objectives for the site as set out above, include consideration of the physical interfaces and linkages with surrounding communities, and be in accordance with the design principles and parameters illustrated on the Lodge Hill Concept Plan. Applications for preparatory works, such as infrastructure provision, may be acceptable in advance of the adoption of the development brief, provided they can demonstrate that they accord with the principles set out above*
- *The provision of associated supporting infrastructure, including transport links, green infrastructure and community facilities, secured through appropriate Section 106 agreements or equivalent mechanisms, with triggers relating to the detailed phasing of the development*
- *Design solutions having due regard to:*
  - *The military history and heritage of the site, including the recording of any buildings or structures to be demolished*
  - *The proximity of the Chattenden Wood, Lodge Hill Wood and Rough Shaw Sites of Special Scientific Interest, including the need for appropriate buffers and site management arrangements*
  - *The provision of open space and other community facilities and features*
  - *The benefits of retaining existing trees (particularly Category A trees), hedgerows and other landscape features within the site*
  - *Measures to enhance biodiversity either within or in close proximity to the site*
  - *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*
  - *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*

and layout of development enables future residents to achieve a good quality of life

- *The requirements of a comprehensive Access Strategy and associated Transport Assessments, to be phased in accordance with the demands generated by the development, including:*
  - *An all movement junction onto the A228 at Four Elms Hill*
  - *An access to the A228 at the eastern end of the site*
  - *Associated contributions to offsite highway and junction improvements directly related to the scale and phasing of the development*
  - *Early provision of high quality and high frequency bus services including bus 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 for both internal and external trips*
  - *Traffic management measures to minimise rat running on the surrounding rural road network while promoting connectivity for pedestrians and cyclists*
  - *Appropriate long term management and maintenance arrangements for the existing military road network, including potential replacement of the existing bridge over the A228 at Upchat Road*

Implementation

11.96 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. For the purposes of the Core Strategy and based on the current assessment of needs the following broad land use mix is anticipated.

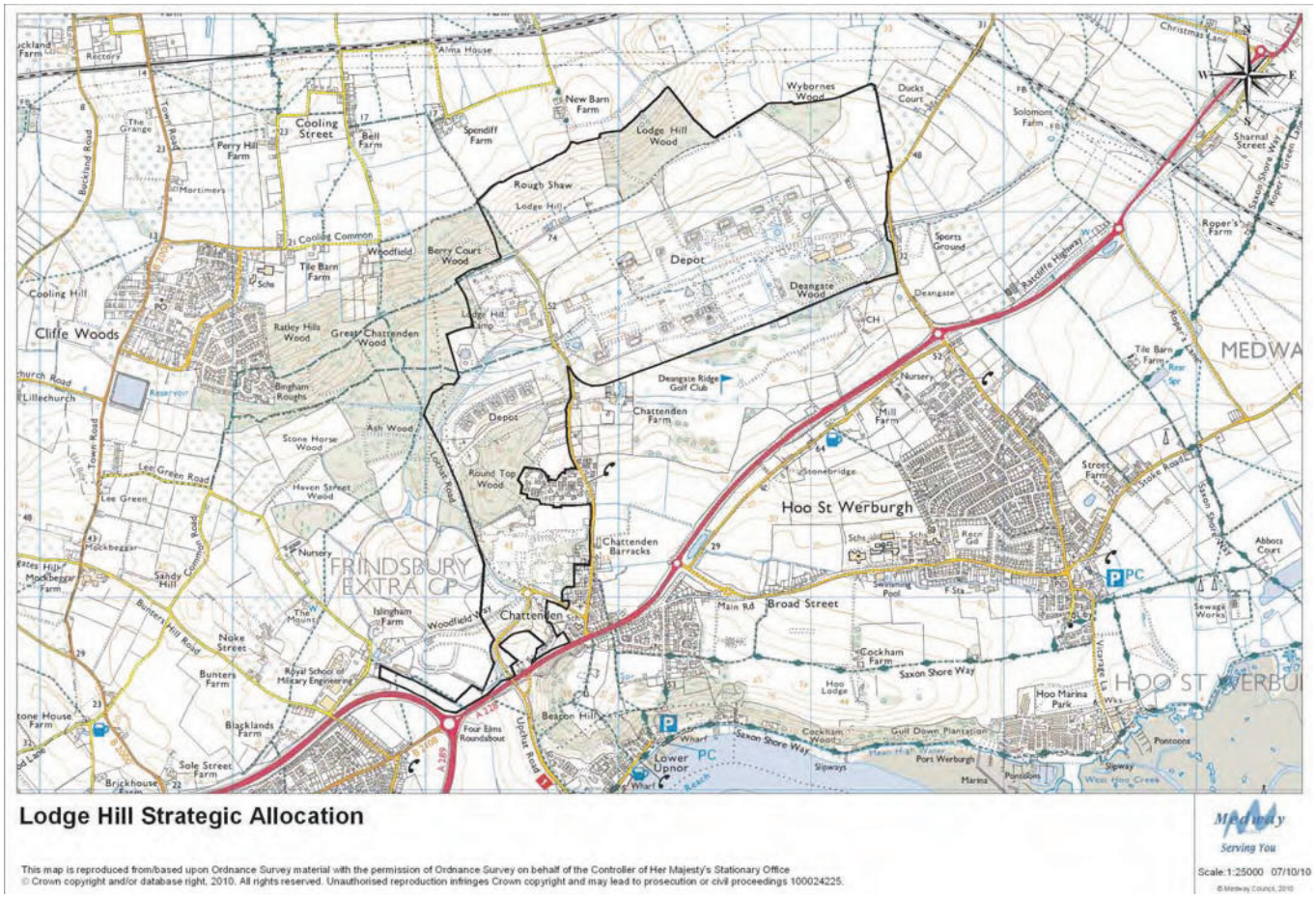


Figure 11 3 Lodge Hill Strategic Allocation

Housing	Capacity for approximately 5,000 residential dwellings (of which approximately 4,600 to be delivered within this plan period), and with 30% of the residential dwellings to be provided as affordable housing.
Economic development - **Retail** - **Employment** - **Hotel**	 Approximately 5,000 square metres Gross External Area, to include a superstore At least 43,000 square metres sq m Gross External Area for business uses Two hotels (approximately 120-room limited service to mid-market offer and approximately 75-room leisure offer)
Community	Three primary schools (including dual community use) Secondary school (including dual community use) Community centre Emergency services Primary healthcare *The land take for social infrastructure is expected to be approximately 9 hectares*
Residential institutions	Assisted living accommodation (approximately 60 units) Nursing home accommodation (approximately 55 units) Retirement village (approximately 0.6 hectare land take)
Leisure	A range of facilities to be provided throughout the site *The land take for leisure is expected to be approximately 10 hectares*
Landscape and open space	Throughout the site *The land take for green infrastructure is expected to be approximately 80 hectares*

Table 11 22 Proposed Land Uses at Lodge Hill

11.97 The quantum of development expected within the period of the Core Strategy has been calculated on the basis of anticipated absorption rates for the market for residential dwellings on an annual basis, and an allowance for the provision of affordable residential dwellings in accordance with the policy requirement. Although the exact level of affordable housing provision within each phase will be dependent on the need to create a balanced community and there being sufficient site viability to support it, the Viability Study suggests that the 30% requirement should be achievable. The market absorption rates are based on an analysis of the following:

- The mix and tenure of the residential accommodation anticipated and the marketing of different development opportunities to different specialists in tandem
- The response of the housebuilder market to the predicted change 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.

11.98 It is expected that the first residential dwellings would be delivered in 2013. The annual delivery rate of dwellings will step up from the start on site and will fluctuate across the period. It is expected that delivery will reach an average annual delivery rate of around 300 dwellings (all tenures). This is reflected within the housing trajectory. In terms of the first five years of the Plan being adopted, Lodge Hill is expected to contribute approximately 1,000 dwellings. The role of Lodge Hill in the wider housing land supply strategy is set out in the Housing chapter and in the Housing Trajectory.

11.99 In terms of the delivery of economic growth and employment opportunities, there will be a range of employment opportunities across the uses described in table 11-22 above, including a significant business offer, 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. The policy is based on the delivery of an absolute minimum of 43,000 square metres of dedicated space for business uses, which reflects current market uncertainties and the need to establish Lodge Hill as a high quality business location over time. However, there is physical capacity to accommodate significantly more employment floorspace if prospects improve, and the policy incorporates an ambition for a higher level of provision.

11.100 The development is likely to be delivered in five main phases, each of which will accommodate the appropriate infrastructure provision required to deliver the scale and nature of development proposed. It is expected that the required infrastructure will be in place prior to the development of the relevant phase. The first phase of development is currently envisaged to be at the Chattenden Barracks area of the site, although this will be determined through the development brief and/or planning application process and will retain sufficient flexibility to respond positively to opportunities and changes in market conditions as they arise. The scale of change and

investment at Lodge Hill has the potential to act as a catalyst for development or improvement opportunities related to existing uses neighbouring the site, but as these would fall outside of the Strategic Allocation they would need to be addressed separately through the appropriate planning process.

11.101 The development of some phases may overlap and there may be strategic infrastructure – particularly within the early stages of development – that will be delivered ahead of the phased sequence. This will be to assist the delivery of future phases. Land remediation may also be undertaken intensively at the beginning of the development process.

11.102 Whilst the precise timing and nature of delivery will be determined through the planning application process, the table below sets out the indicative scale and nature of development comprised within each phase, infrastructure requirements (physical, social and green) and provision, remediation, and timetable for delivery. The masterplan for the redevelopment of the Lodge Hill site is continuing to evolve in response to Borough-wide and site-specific evidence, and ongoing engagement with the Council and relevant stakeholders. The masterplan, and associated phasing of the development, is therefore subject to change and may be revised prior to the next version of the draft Core Strategy.

** The approach to remediation is indicative as the principles and detail are subject to agreement between the landowner, Medway Council and the Environment Agency*

Phase	Nature and Scale of Development	Infrastructure Requirements/Provision	Remediation*	Anticipated Timetable
1	- Approx. 750 residential dwellings - Approx. 16,950 sq m of employment floorspace (offices and knowledge park) - Village centre including approx. 500 sq m of retail floorspace - Hotel	- Access arrangements - Open space provision - Community provision - Primary school provision - Utilities infrastructure etc.	On-site soil treatment and reinstatement, to be undertaken on a phased basis	2012-2017
2	- Approx. 750 residential dwellings - Approx. 3,630 sq m of employment floorspace (offices) - Village centre including approx. 500 sq m of retail floorspace - Hotel - Leisure uses	- Access arrangements - Open space provision - Green and blue (water) infrastructure (part) - Community provision - Primary school - Utilities infrastructure etc.	On-site soil treatment and reinstatement, to be undertaken on a phased basis	2017-2019
3	- Approx. 1420 residential dwellings - Approx. 20,350 sqm of employment floorspace (offices) - Lodge Hill centre including approx. 3660 sq m of retail floorspace - Retirement village - Nursing home - Assisted	- Open space provision - Green and blue (water) infrastructure (part) - Community provision - Utilities infrastructure etc.	On-site soil treatment and reinstatement, to be undertaken on a phased basis	2018-2023
4	- Approx. 920 residential dwellings - Leisure uses	- Open space provision - Community provision - Secondary school - Utilities infrastructure etc.	On-site soil treatment and reinstatement, to be undertaken on a phased basis	2022-2025
5	- Approx. 960 residential dwellings - Approx. 2,400 sq m of employment floorspace (offices) - Village centre including approx. 500 sq m of retail floorspace - Garden centre - Leisure uses	- Open space provision - Green and blue (water) infrastructure (part) - Community provision - Primary school - Utilities infrastructure etc.	On-site soil treatment and reinstatement, to be undertaken on a phased basis	2024-2028

Table 11 23 Infrastructure Requirements for Lodge Hill

** The approach to remediation is indicative as the principles and detail are subject to agreement between the landowner, Medway Council and the Environment*

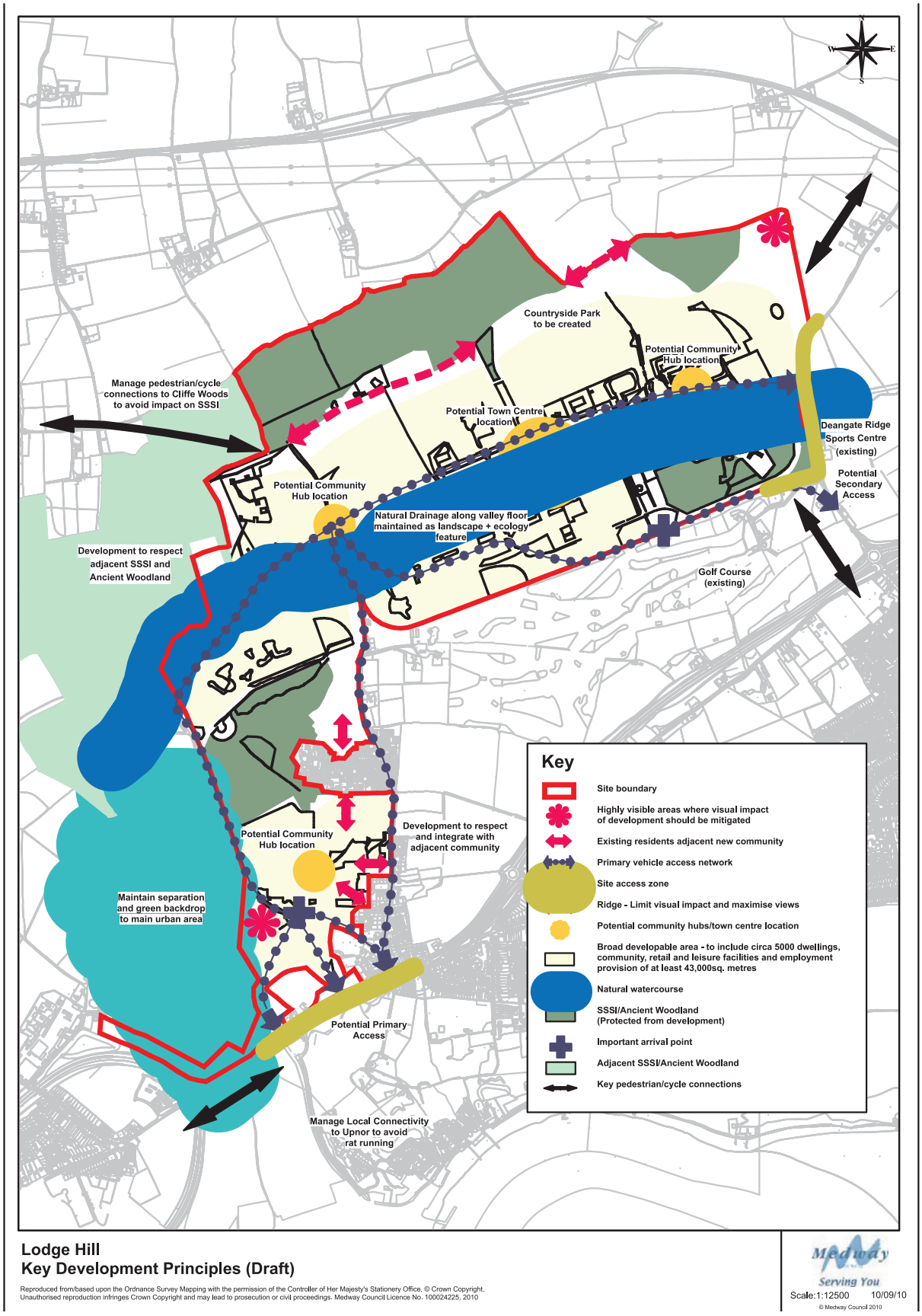


Figure 11 4 Lodge Hill Concept Diagram

11.103 The evidence base demonstrates that there are no significant barriers to the delivery of the site and that, consistent with the requirement set out in PPS12, there are good prospects of provision of the necessary infrastructure to enable the scale of development expected within the Plan period to be delivered.

11.104 The site-specific evidence base assesses the infrastructure requirements/provision referred to in the table above, and sets out who has responsibility for delivery of each element, the funding source and consultation bodies who have a bearing on the delivery of each element.

11.105 Further detail on the proposals for the new settlement at Lodge Hill will be set out in the development brief that will expand upon Policy CS33, and an associated masterplan. It is expected that an outline planning application based upon this masterplan will be submitted for the whole site to facilitate a commencement of the first phase in 2013, but early planning applications may be submitted to allow initial land remediation and strategic infrastructure works ahead of construction.

11.106 The delivery of the new settlement is predicated on the following key principles:

- The necessary infrastructure (physical, social and green) for each phase of development will generally be provided prior to the commencement of the relevant phase and provision will also correlate with the sale of development plots (see below). This will ensure that infrastructure is provided on a proportionate basis having regard to the scale and nature of development within each phase
- As an exception, there may be strategic infrastructure which will be delivered ahead of the phased sequence of development (for example, for the first two phases of development), to set the framework for the delivery of future phases of development
- The landowner/lead developer will be responsible for delivering fully serviced land, public realm and community infrastructure, with infrastructure designed, constructed and funded, to the edge of each development plot, prior to their sale. Alternatively, the landowner will be required to provide funds to the relevant agency to deliver the required infrastructure
- The outline planning application will be the process to agree the precise timing and nature of planning obligations and the most appropriate mechanism for securing these. A traditional S106 Agreement is one mechanism for this. However, it is recognised that there may be alternative mechanisms (e.g. Community Trust, roof tariff, Grampian conditions etc.), which might be more appropriate and these will be explored through and in advance of the planning application process.

11.107 The landowner's consultant team has been working closely with the Council and other relevant agencies since their appointment. This early engagement has informed the indicative masterplan and is reflected in the site-specific evidence base. This engagement will continue through the Core Strategy and Development Brief process, the initial planning application process and over the longer term to ensure that the strategic allocation is delivered in accordance with the policy.

Monitoring

11.108 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.

11.109 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.

11.110 The following indicators and targets will be used to monitor the progress of Lodge Hill:

*Targets for these indicators will be set through the development brief and planning application process and will be monitored once in place

Indicator	Target
Progress through planning process, delivery of related documents	• Adoption of development brief by mid-2012 • Outline planning permission granted by mid/late 2012 • Design Codes agreed by Spring 2013 • Masterplan reviews every 3 years (or more frequently if required)
Dwelling completions at Lodge Hill	• First dwelling completion 2013 • Average annual completions of 300 dwellings (after 2014) • Total of 4,600 dwellings completed during plan period
Amount of floorspace developed for employment uses at Lodge Hill	• Minimum of 43,000m² delivered during plan period • *Amount of floorspace delivered within use classes B1, B2 and B8, annually and cumulatively**
Achievement of sustainability goals	• *District power & heating system (or equivalent) operational** • *Number of dwellings delivered at each Code level** • *Overall energy, carbon & water savings against Building Regulation compliant development** • *% energy needs met through on site generation** • *Number of households/businesses registered members of car club**
Delivery of green infrastructure and open space at Lodge Hill	• *Delivery of country park** • *Delivery of valley nature reserve and water landscaping** • *Area of open space provided within development area** • *Length of cycle/footpath connections delivered**
Provision of transport and social infrastructure at Lodge Hill	• Public transport service & interim priority measures in place by end 2013 • *Final public transport priority measures in place** • Delivery of footbridges at Four Elms Roundabout & over A228 to Hoo by end 2013 • *Opening of supermarket** • *Floorspace of retail & town centre uses delivered** • *Delivery of primary & secondary schools, health centre and community centre**

Table 11 24 Maintaining Targets for Lodge Hill

12. Implentation, Monitoring and Review

Introduction

12.1 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.

12.2 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

12.3 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.

12.4 As new developments are built, developers are expected to contribute towards a range of facilities through Developer Contributions.

12.5 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

12.6 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 appropriate 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

12.7 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 Infrastructure

12.8 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.

12.9 Planning Policy Statement 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.

12.10 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 and who is responsible and the means to implement and deliver the development. Further detail regarding key requirements can be found in the Infrastructure Delivery Schedule at the end of this chapter.

Monitoring and Implementation Framework

12.11 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.

12.12 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

12.13 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

12.14 Medway Council's Guide to Developer Contributions, a Supplementary Planning Document sets out what obligations and contributions will be required for future developments in accordance with circular 05/2005. 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.

12.15 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 signalled its intention to replace the CIL with a system of local tariffs but details of this and the timetable for its introduction have not yet been announced.

12.16 The Council has a comprehensive Developer Contributions document, which it intends to continue to use and review. Given the current uncertainties about the future of the CIL regulations, the Council intends to wait for any changes to the regulations before proceeding towards adopting the CIL/ local tariff and replacing the Development Contributions Document. The following policy is consistent with this.

Policy CS34: Developer Contribution

Where the need arises directly from development, the Council will seek to enter into a legal agreement with the developer(s), 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 12.1 Monitoring and Implementation Framework

Policy	Objective	Indicator(s)	Target	Delivery Partners
CS1	Regenerating Medway	Major physical change in Chatham centre; Creation of dynamic mixed use waterfronts to north and south of the Medway River; Sensitive change within Gillingham town centre to reinforce its role as an important 'District' centre; Creation of enhanced railway station environments and interchange facilities; Creation of a high quality public realm connecting waterfront, town centres & major urban open spaces.	Throughout lifetime of LDF	National and Regional bodies, Medway Council and Developers
CS2	Quality and Sustainable Design	Use of design panels, design champions and other mechanisms to assist in high quality design solutions; SPDs and other guidance to provide details of how the LDF policies will be applied and monitored; Use of criteria and advice laid out in 'By Design' and requirement to submit design statements; Significant proposals to be accompanied by accessibility assessments and sustainability statements.	Throughout lifetime of LDF Throughout lifetime of LDF Throughout lifetime of LDF 100%	Medway Council with Developers
CS3	Mitigation and Adaption to Climate Change	Residential development achieving minimum level 3 of the Code for Sustainable Homes; Commercial buildings over 1,000m^2 meeting the BREEAM "very good" standard.	100% 100%	Medway Council with Developers
CS4	Energy Efficiency and Renewable Energy	New developments showing reduced energy loads through passive design and inclusion of energy efficiency measures; In developments for 10+ dwellings or over 1,000 sq m^2, 20% of the remaining on-site energy loading delivered from renewables.	100% 100%	Medway Council with Developers
CS5	Development and Flood Risk	Permissions granted contrary to EA advice on flood defence or water quality grounds.	TBC	Medway Council & Env. Agency
CS6	Preservation and Enhancement of Natural Assets	Change in priority habitats and species (by type); Change in areas designated for their intrinsic environmental value; Biodiversity surveys of sites prior to development; Extent of impact on habitats and species brought about by development; Amount of habitat enhanced or new habitat created; Success of establishment of new habitat creation.	LDF Core Output Indicators Jan 05 LDF Core Output Indicators Jan 05 TBC TBC TBC TBC	National and Regional bodies, Medway Council and charitable trusts.
CS7	Countryside and Landscape	Increased total area designated as Local Nature Reserves; Formation of a new urban, heritage park on surplus MoD land at The Great Lines and Fort Amherst; Protection of strategic open space.	(min) 250Ha Throughout lifetime of LDF Throughout lifetime of LDF	National and Regional bodies, Medway Council and charitable trusts.

CS8	Open Space, Green Grid and Public Realm	Creation of a multifunctional Green Grid of open space linking the urban areas with 5 strategic corridors; Preservation and enhancement of existing open space; Application of consistent set of open space standards to new development; Provision of new or enhanced urban spaces as a part of major regeneration proposals.
CS9	Health and Social Infrastructure	Protection and enhancement of existing facilities, services and amenities that contribute to quality of life; Continued redevelopment of Medway Maritime Hospital; Preserving and improving access to facilities and services; Implementation of Action Plans at All Saints, Brook Lines, Strood South, Twydall and White Road Estate; Development of Luton and Gillingham North Neighbourhood Action Plans.
CS10	Sport and Recreation	Increasing awareness of value of physical activity / sport and the availability of opportunities to participate; Addressing key barriers preventing people from participating in physical activity and sport; Increase / improve quality of accessible facilities & opportunities to participate in physical activity / sport; Improve quality & quantity of capacity / volunteering to develop physical activity /sporting opportunities; Promote the value and benefits of physical activity and sport through partnership working.
CS11	Culture and Leisure	Development of a sustainable cultural use for Eastgate House and Temple Manor; Conservation of and improved visitor facilities for Rochester Castle and Upnor Castle; Restoration of Gillingham Park and refurbishment of 22 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 and funding of festivals; Ongoing development of museum offer at the Historic Dockyard, Guildhall and Royal Engineers Museum;

Policy	Objective	Indicator(s)	Target	Delivery Partners
CS11	Culture and Leisure cont…	Addressing barriers to experiencing cultural offer and raising awareness / promotion; Changed public's perception of library facilities and offer; Contribution of culture and creative industries to tourism; Creation of work space and retail space for creative practitioners; Encouragement of graduates to live, study and work in Medway; Establishment of Medway Park as a regional centre of excellence & capitalising on the 2012 Olympics; Increased participation in sport and active lifestyles across all ages and abilities.	TBC / Throughout lifetime of LDF	National and Regional bodies, Medway Council, local voluntary organisations, charitable trusts and the wider business community
CS12	Heritage Assets	Number of archaeological interventions under aegis of PPS5; Grants (THI area); Compliance with the Guidance on Building Heights; Adherence to programme of Conservation Area appraisals and management plans.	Throughout lifetime of LDF	Medway Council with Developers
CS13	Housing Provision and Distribution	Net additional dwellings; Percentage of new and converted dwellings; Annual Statements of 5-year land supply (SLAA updates).	(AMR) (AMR) Throughout lifetime of LDF	RSLs, Medway Council, Developers & charitable trusts.
CS14	Affordable Housing	Number affordable homes completed; Number & percentage of affordable homes completed within built-up and rural areas; Number of affordable homes completed as a percentage of all completed dwellings; Number & percentage of affordable homes provided as social rented and other forms of subsidised; Number and percentage of affordable homes completed by tenure, type and size; Affordable housing contributions amount and number of improvements / provisions made as a result; Number of planning applications & units provided meeting the threshold but minus a contribution.	TBC	RSLs, Medway Council, Developers & charitable trusts.

CS15	Housing Design and Other Housing Requirements	Number of existing dwellings lost through demolition; Number of existing dwellings brought up to modern environmental standards; Number and percentage of new dwellings completed by tenure, type and size; Number of residential care homes, retirement and extra care homes (and total bedspaces?); Number of completions built to Lifetime Homes Standard / Building for Life Gold or Silver Standard; Number of completions built to Wheelchair Access Standard; Number of student accommodation units completed; Average annual dwelling density.	TBC	RSLs, Medway Council, Developers & charitable trusts.
CS16	Gypsies, Travellers and Travelling Showpeople	Net additional pitches for Gypsies, Travellers & Travelling Showpeople per annum; The number of authorised and illegal encampments or developments, and enforcement actions carried out by either the Council or the police per annum; The number of pitches identified within the latest GTAA Needs Assessment, Housing Needs Study or Strategic Housing Market Assessment (SHMA); The number of planning applications submitted for new sites or extensions / alterations to existing sites, and their outcome.	TBC	Medway Council & charitable trusts
CS17	Economic Strategy	GVA per capita; Supply (completions & commitments) of employment land by type; Proportion of people of working age in employment; Number of business start-ups / Number of businesses lost to Medway; Numbers of people commuting out of Medway to work.	TBC	Medway Council and the wider Business Community
CS18	Tourism	D2 losses and gains in town centres; Open space managed to green flag award standard Percentage of residents satisfied with Medway's parks and open spaces.	TBC	Medway Council and the wider Community

Policy	Objective	Indicator(s)	Target	Delivery Partners
CS19	Retail and Town Centres	Gross comparison retail floorspace in Chatham (mainly Best Street/High Street, Pentagon, Brook and Waterfront redevelopment area); Bulky comparison goods in association with a park & ride facility at Whitewall Creek; Smaller scale comparison floorspace at district centres of Strood, Rochester, Gillingham, Rainham and Hempstead Valley; Corporation Street, Rochester and Lodge Hill; Centres promotion, improvement of range / choice of shops & services, intensification of floorspace use & reoccupation of vacant space.	50,000m^2 15,000m^2 2 no. stores of approx 3,500m^2 TBC TBC	Medway Council & retail operators.
CS20	Education and Personal Development	Percentage of young people going into higher education; Percentage of population of working age qualified with NVQ level 3+	TBC TBC	Medway Council and educational bodies.
CS21	Conventional Energy Generation & Energy Security	Support for additional power generation and energy storage capacity on Hoo Peninsula & Isle of Grain; Promotion of local supply chain developments and a support & maintenance cluster.	Throughout lifetime of LDF Throughout lifetime of LDF	Medway Council & Business Community
CS22	Provision of Minerals	Provision of a continuous supply of Secondary Aggregates; Provision for the extraction of land won aggregates within DPD's identified area; Provision of 7-year permitted reserves land bank in the DPD's identified areas of search; Safeguarding of all existing mineral wharves against prejudicial proposals to their continued use.	(min) 0.2 million tonnes per annum (min) 0.18 million tonnes per annum Throughout lifetime of LDF Throughout lifetime of LDF	Medway Council and the wider Business Community
CS23	Waste Strategy	Appropriate provision for the separation, storage and collection of waste materials in all new build; Permission for appropriate facilities for the reuse, recycling, treatment and transfer of waste materials; Assessment of potential inert waste landfill site.	Throughout lifetime of LDF Throughout lifetime of LDF Throughout lifetime of LDF	Medway Council and the wider Business Community
CS24	Transport and Movement	Supporting regeneration, economic competitiveness and growth; Supporting a healthier natural environment; Ensuring good quality connections to key markets and major conurbations; Supporting equality of opportunity to employment, education, goods and services; Supporting safer, healthier and more secure community.	Throughout lifetime of LDF Throughout lifetime of LDF Throughout lifetime of LDF Throughout lifetime of LDF Throughout lifetime of LDF	Medway Council, National and Regional bodies, commercial operators.

CS25	The River Medway	Retention of existing wharves & protection of disused wharves and access land; Promoting tourism potential (currently underutilised, e.g. river based defence fortifications); Promoting visiting cruise ships; Promoting public piers / houseboat moorings & encouraging transportation/movement (i.e. water taxi); Riverside facilities & walks; Promote further marina(s) and encourage leisure activities; Special protection for Chatham Docks (Arcelor Mittal)?; Potential World Heritage Site designation and promotion of naval / military / war heritage for tourism.	TBC / Throughout lifetime of LDF	Medway Council, National and Regional bodies, commercial operators and the wider business community
CS26	Strood	Increasing housing development; Improving the quality of retail provision and accessibility; Safeguarding open spaces and enhancing the public realm; Promoting employment opportunities; Reducing the impact of traffic.	Throughout lifetime of LDF	Medway Council and the wider Business Community
CS27	Rochester	Conservation and enhancement of the historic and architectural character of Rochester City centre; Maintaining the vitality, viability, function and character of the district centre; Concentration of new development in Corporation Street and at Rochester Riverside.	Throughout lifetime of LDF	Medway Council and the wider Business Community
CS28	Chatham	Greatly improved shopping facilities; A world class cultural waterfront; Major environmental improvements; Accessibility improvements to and within the centre; Providing new offices and a wide variety of dwellings.	See targets detailed in Chapter 11	Medway Council and the wider Business Community

Policy	Objective	Indicator(s)	Target	Delivery Partners
CS29	Gillingham	Developing central site for food store, retail, employment & residential (plus major new public car park); Creation of a series of linked spaces along the High Street, improving public realm & pedestrian facilities; Improved connections to Medway Park, University expansion and the Great Lines City Park; Promotion of Gillingham Hub as a landmark cultural/entertainment building; Regeneration of the railway station, improved public space and reduced traffic conflicts; Improved links to adjoining residential areas; Provision of a new town square at High Street / Green Street junction; Introduce more flexible uses at western High Street (upper floor residential & wider range of uses).	Throughout lifetime of LDF	Medway Council and the wider Business Community
CS30	Rainham	TBC	TBC / Throughout lifetime of LDF	Medway Council & Business Community
CS31	Hoo Peninsula and the Isle of Grain	Supporting retention & development of local services / facilities sustaining village life & reduce travel need; Promoting access for walking & cycling, developing visitor sites and improved Green Grid connections; Supporting strong economic development sustaining local communities & retaining distinctive character.	Throughout lifetime of LDF	Medway Council and the wider Business Community
CS32	Medway Valley	Access and management of the high quality environment in Cobham-Shorne-Ranscombe; Promotion of cycling and pedestrian routes connecting to adjacent areas; Retention & development of local services / facilities in Cuxton, Lower Halling and Upper Halling; Strong economy to sustain local communities and retain the distinctive character of the countryside.	Throughout lifetime of LDF	Medway Council with Developers
CS33	Lodge Hill	Progress through planning process, delivery of related documents Dwelling completions Amount of floorspace developed for employment uses Achievement of sustainability goals Delivery of green infrastructure and open space Provision of transport and social infrastructure	See targets detailed in Chapter 11	Medway Council and the wider Business Community
CS34	Developer Contributions	Money received and facilities provided in accordance with the Council's Guidance.	100%	Medway Council with Developers

table 12.2 Infrastructure Delivery Schedule

	Development Site (plus site source)	Scale	Phasing	Infrastructure Requirement	Development dependent?	Funding Source	Contingency Planning Required?
Hoo/Chattenden	Lodge Hill (Strategic Allocation)	750-1000 homes, 16950sq/m employment space (offices & knowledge park), 500-1000sq/m retail plus hotel	2012-2016	~ primary site access improvements inc. minor alterations to Four Elms roundabout; ~ secondary site access at eastern end of site; ~ pedestrian/cyclist facilities at the Four Elms roundabout and across the A228; ~ replacement bridge over Upchat Road and a high quality public transport corridor with bus priority from the site along the A289; ~ open space provision (inc. Green Grid – part 'Figure of 8 Route'); ~ multi-use community facility (inc. provision for approx 1-2 GP's); ~ 1-2FE primary school provision; ~ wastewater treatment solution (TBC); ~ associated utilities.	Yes	Developer	Range of homes, employment/retail figures and mix of uses appropriate for flexibility (resilience) over LDF.
		1420-1800 homes, 20350-25763sq/m employment space (offices), 3161-3660sq/m retail, retirement village, nursing home, assisted living accommodation, leisure uses	2016-2020	~ Four Elms junction redesign & upgrade of A289 Four Elms Hill to Medway Tunnel, inc. optimum bus priority corridor; ~ open space provision; ~ green and blue infrastructure (inc. Green Grid – part 'Figure of 8 Route'); ~ community centre (inc. provision for approx 2-3 GP's) and library; ~ nursery / primary school; ~ part-time police / ambulance staff room/base; ~ associated utilities.			Infrastructure reliant on phasing of housing (particularly schools and health - level TBC by Medway Council / Medway NHS).
		920-980 homes, leisure uses	2021-2023	~ open space provision; ~ green and blue infrastructure (part); ~ community provision (inc. approx 1-2 GP's); ~ secondary school & pitches; ~ associated utilities.			Further schemes dependent on development TBC by Highways Agency (such as ramp metering access to A2 Trunk Road).
		760-820 homes, 2400-17590sq/m employment space (office), 500-1000sq/m retail, garden centre plus leisure uses	2024-2026	~ open space provision; ~ green and blue infrastructure (part); ~ community provision (inc. approx 1 GP); ~ primary school; ~ associated utilities.			
		400 homes (final phase provides max 5000 homes)	2026+	~ provision for up to 1 GP.			
	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.
		185972sq/m employment space	2016-2021				
	Land NE of Kingsnorth Industrial Estate, Hoo (Call for sites)	42735sq/m employment space	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	2011-2016	~ open space and play area; ~ wildlife conservation area within site; ~ traffic calming on Bells Lane; ~ off-site pedestrian facilities;	Yes	Developer	

	Development Site (plus site source)	Scale	Phasing	Infrastructure Requirement	Development dependent?	Funding Source	Contingency Planning Required?
	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 space, 1000sq/m retail area 700 homes	2011-2016 2016-2021 2021-2026 2026+	~ 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). ~ off-site utilities; ~ St Clement's Park & Riverside Walk (part). ~ utilities; ~ 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 off-site utilities.
	Former Mid Kent College City Way (plg permission)	214 homes	2011-2016	~ financial contributions to off-site provision (education/transport).	Yes	Developer	
	Former Rochester Police Station Cazeneuve St (plg permission)	65 homes	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 170 homes, 5800sq/m employment	2011-2016 2016-2021	~ Public realm: Temple Manor & Knight Road; ~ Highway improvements: Cuxton Road/Roman Way junction; ~ off-site Doctors Surgery provision. ~ Flood Defence Strategy measures (Scott Wilson's August 2010 report).	Yes Part	Developers (Outline S106)	Exact cost of flood defence measures unknown at outline stage. s106 yet to be signed (August 2010)
	Former Alloy Wheels, Priory Rd	16100sq/m employment space	2011-2016	~ TBC			

	Development Site (plus site source)	Scale	Phasing	Infrastructure Requirement	Development dependent?	Funding Source	Contingency Planning Required?
	(plg permission)						
	Cuxton Pit No. 3 Cuxton Road (plg permission)	87 homes	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)	67 homes	2011-2016	~ provision/improvement of equipped play and open space at Broomhill Park.	Yes	Developer	
	North side of Commissioners Rd (Call for Sites)	6000sq/m employment space	2011-2016	~ TBC			
	Three Acre site, Roman Way (Call for Sites)	4440sq/m employment space	2011-2016	~ TBC			
	Friary Place, r/o 46-98 High St (plg permission)	1800sq/m retail area	2011-2016	~ town centre improvements	Yes	Developer	
	Tesco, Strood (Call for Sites)	1756sq/m 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 375 homes, 885sq/m employment space 151 homes	2011-2016 2016-2021 2021-2026	~ pedestrian & cycle accessibility improvements to Gillingham railway station & wider area; ~ pier improvement works.	Yes	Developer	
	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.			
	Crest Packaging Site, Courteney Road (plg permission)	9750sq/m employment space	2011-2016	~ town centre public realm improvements; ~ bus stop improvements.	Yes	Developer	
	Howlands Nursery Christmas St (plg permission)	60 homes	2011-2016	~ open space/formal play provision at either Grange Road or Strand, Gillingham; ~ junction improvements, traffic calming & speed signage at Christmas Street & Church St	Yes	Developer	
	Tesco (plg permission)	2475sq/m retail area	2011-2016	~ TBC			
	Astra Site, Courteney Rd (plg permission)	2032sq/m employment space	2011-2016	~ Air Quality Management / Monitoring improvements	Yes	Developer	No – s106 received
	Rainham Mark Grammar School Pump Lane (plg permission)	35 homes	2011-2016	~ Open space improvements / sports facilities	Yes	Developer	

	Development Site (plus site source)	Scale	Phasing	Infrastructure Requirement	Development dependent?	Funding Source	Contingency Planning Required?
	Rear of 9-25 Birling Avenue (Call for Sites)	32 homes	2011-2016	~ TBC			
	Retail Core(High St,Jeffrey St,King St) Gillingham (Development Framework)	100 homes, 4750sq/m employment space, 3750sq/m retail area	2021-2026	~ TBC			
Horsted	Former Mid Kent College, Maidstone Road (plg permission)	150 homes, 2480sq/m employment space, 200sq/m retail area 264 homes	2011-2016 2016-2021	~ improved bus and pedestrian facilities; ~ Horsted Gyratory system (financial contributions towards).	Yes	Developer	
	BAE Systems (Call for Sites)	11147sq/m employment space	2011-2016	~ TBC			
	Woolmans Wood Caravan Site (Withdrawn H&MU DPD)	6160sq/m employment space	2016-2021	~ TBC			
Medway City Estate	Land between Vanguard Way and George Summers Close (plg permission)	14430sq/m retail area	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)	64 homes	2011-2016	~ traffic calming measures.	Yes	Developer	
	Chatham Waterfront (Call for Sites)	400 homes, 5456sq/m employment space, 7772sq/m retail area 94 homes	2016-2021 2021-2026	~ Waterfront Park & (part) Riverside Walk; ~ Flood Defence Strategy measures (Scott Wilson's August 2010 report).	Yes	Developer	Potentially high Flood Defence associated cost
	Pentagon (Call for Sites)	15000sq/m retail area, 29 homes	2016-2021	~ TBC			
	2-8 King Street & 1-11 Queen St (Development brief)	108 homes, 2531sq/m retail area	2016-2021	~ TBC			
	Tesco, The Brook (Call for Sites)	60 homes, 1940sq/m retail area	2016-2021	~ TBC			
	Former Police Station	60 homes, 1898sq/m retail	2016-2021	~ TBC			

	Development Site	Scale	Phasing	Infrastructure Requirement	Development dependent?	Funding Source	Contingency Planning Required?
	(plus site source) (Call for Sites)	area					
	1 Batchelor Street, off	50 homes, 1600sq/m retail	2016-2021	~ TBC			
	the Brook (Call for Sites) Whiffens Avenue Car	area 70 homes	2016-2021	~ TBC			
	Park (Call for Sites) Eldon St, Carpeaux	50 homes	2016-2021	~ TBC			
	Close & Hards Town (Development brief) Former Officers Mess,	4300sq/m employment	2016-2021	~ TBC			
	Maidstone Rd (Call for Sites) 296 - 310 High Street	space 2040sq/m employment	2016-2021	~ TBC			
	(Development brief) 19 New Road Av & 3	space 1328sq/m retail area	2016-2021	~ TBC			
	New Cut (Development brief) Chatham	28000sq/m retail area,	2021-2026	~ TBC			
	Retailing,Clover/Richard/ Rhode/High Sts (MLP 2003 allocation) Chatham Railway	11440sq/m employment space 279 homes	2026+	~ TBC			
	Station (Development brief) West of Maidstone	173 homes	2026+	~ TBC			
	Road, adj Chatham Rail Station (Development brief) Wickes, New Cut	79 homes	2026+	~ TBC			
	(Development brief) 55-105a The Brook & 1,	50 homes, 4113sq/m retail	2026+	~ TBC			
	5, 11 & 13 King St (Development brief) 2-14 Railway Street &	area 51 homes, 1228sq/m retail	2026+	~ TBC			
	142-146 High Street (Development brief) Land at High St, Union	area 9852sq/m retail area,	2026+	~ TBC			
	St and New Road (Development brief)	590sq/m employment space					
Maritime &	Land at St Mary's Island	Phased delivery of 1700		~ landscaping/recreational areas throughout phasing;	Yes	Developer	Dental Surgery under
Brompton	Maritime Way Chatham Maritime (plg permission)	homes, inc: 280 homes (Part)	2011-2016	~ roads and footways throughout phasing; ~ healthcare facility (upon completion of 100th home – see right) ~ primary school (upon completion of 300th home); ~ secondary access (upon completion of 300th homes); ~ community building (upon completion of 500th home).			construction (2010)
	Interface Land, Chatham	117 homes (Part) (approx) 25000sq/m	2016-2021 2011-2026	~ Flood Defence Strategy measures (Scott Wilson's August 2010 report).	Yes	Developer	Approx University
	Maritime (SLAA) **alternative option:**	University development & 500 student bed-spaces 335 homes, 12200sq/m employment space		~ on-site and off-site utilities (unknown at present, depends on mix and quantum).			cost of £75m+. Exact mix of uses yet to be established by landowner/developer.

	Development Site	Scale	Phasing	Infrastructure Requirement	Development dependent?	Funding Source	Contingency Planning Required?
	(plus site source) Amherst Hill, Brompton	34 homes	2011-2016	~ TBC			
	(MLP 2003 allocation) RSME Kitchener	248 homes	2016-2021	~ TBC			
	Barracks, Brompton (Withdrawn H&MU DPD) J7, Chatham Maritime	75 homes, 5220sq/m retail area	2016-2021	~ TBC			
	(Call for Sites)						
Halling/Cuxton	Former Cement Works,	175 homes, 3000sq/m	2011-2016	~ improvement Junction 4 (M20) overbridge;	Yes	Developer	
	Formby Road, Halling (plg permission)	employment space, 700sq/m retail area 250 homes 100 homes	 2016-2021 2021-2026	~ capacity & safety improvement at A228/Bush Road/Station Road junction; ~ bus service improvements (new shelters on A228 etc); ~ new community centre			
	Southern Water,	69 homes	2011-2016	~ improvements to pedestrian / cycle facilities.	Yes	Developer	
Luton	Capstone Rd (plg permission)						
Rainham & Wigmore	Queens Court,	40 homes	2011-2016	~ TBC			
	Chichester Cl, Rainham (Call for Sites) Hempstead Valley	2774sq/m retail area	2011-2016	~ TBC			
	Shopping Centre (Call for Sites)						

Appendix A Alternative Uses and Preferred Options

Map Ref	Site Ref	Site Name	Residential Units	Employment Sq m	Retail Sq m	Mixed	Other	Preferred Option	Reason
9	0013	Medway House 277 Gillingham Rd	12	Offices 1469				**Residential**	Allocated for Residential/within residential area
8	0033	RSME Kitchener Barracks Brompton	248	Offices 57600				**Residential**	Adj. Residential area. Residential in Medway Waterfront Renaissance Strategy
11	0100	320 –344 High St. Inc 42 new Road, Rochester	66	Offices 7200				**Residential**	Allocated Residential in Local Plan
12	0102	1 – 35 High St. Chatham (Grays Garages)	65	Res 54		Retail 800 sq m Offices 800 sq m		**Mixed**	Allocated Residential in Local Plan Offices/retail on street frontage reflects character of area
7	0137	Civic Centre	398	Offices 36120	7800	Res 398 Retail 2600 sq m Offices 560 sq m		**Mixed**	Mixed use proposed in Strood Town centre Master Plan, 2009
11	0144	St Bartholomew Hospital New Rd, Rochester	108	Offices 11748		Res 54 Emp 5874 sq m		**Residential**	Priority given to meeting total residential requirement. Reflects character of area
12	249	Sorting Office The Paddock Chatham	50	Offices 5490		Res 25 Emp 2745 sq m	Leisure 5490 sq m	**Mixed**	To reflect character of area

Map Ref	Site Ref	Site Name	Residential Units	Employment Sq m	Retail Sq m	Mixed	Other	Preferred Option	Reason
11	0598	R/O 329 – 357 (Featherstones) High St. Rochester	135	Res		102 Emp 3600 sq m		**Mixed**	Part Residential Allocation Part use of existing industrial building
12	0662	3 New Rd Chatham	18	Offices 2400				**Residential**	Reflects adjoining use and aspirations of owner
11	0726	1 – 21 St Clements House, Corporation Street, Rochester	30			Res 22 (Net 1) Emp 386		**Mixed**	Reflects Corporation St. Development Brief
7	0727	Brompton Farm, adj 66 Brompton Farm Rd.	13	B1 B2 B8 1750		Res 4 B1 B2 B8 1190 sq m		**Mixed**	Reflects character of the area
11	0728	10 – 40 Corporation St. Rochester	34	Res 35		Emp 386 sq m		**Mixed**	Reflects Corporation St. Development Brief
12	0755	Former Police Station, Chatham	85	Offices 5040		Res 60 Retail 1898 sq m		**Mixed**	Proposed in Chatham Centre and Waterfront Development Brief
12	0759	Whiffens Ave Car Park, Chatham	70	Offices 24160				**Residential**	Proposed in Chatham Centre and Waterfront Development Brief
9	0765	St Lukes Church, Sidney Rd, Gillingham	15	Community Use				**Residential**	In Residential area, reflects aspirations of owner
8	0818	J7, Chatham Maritme	100	Offices 8352		Res 75 Retail 5220 sq m	Tourism/Leisure	**Mixed**	Reflects mix in surrounding area
8	0820	Interface Land,	721		Res	University		**University**	Reflects South East Plan & Medway

Map Ref	Site Ref	Site Name	Residential Units	Employment Sq m	Retail Sq m	Mixed	Other	Preferred Option	Reason
		Chatham Maritime				335 Emp 12200 sq m			Council's support for Higher Education and one of owners options
11	0822	Land at Robins & Day (Peugeot), High St, Rochester	122	Res 84		Emp 856 sq m Retail 2275 sq m		**Mixed**	Reflects Corporation St. Development Brief and Star Hill/Sun Pier Planning Strategy
9	0824	Chatham Docks, Pier Road, Chatham	2065	B1 B2 B8 141750	17500	Res 1300 Emp 31500 Retail, Leis, Tour 6 ha	Tourism/leisure uses	**Employment**	Priority given to retention of existing employment land to avoid release of greenfield sites
9	0831	2 – 4 Balmoral Gardens, Gillingham	12	Care Home				**Residential**	Care Home PP lapsed. Owner now proposing flats
12	0834	1 Batchelor St, off The Brook, Chatham	80	Offices 6000		Res 50 Retail 1600 sq m		**Mixed**	Reflects Chatham Centre & Waterfront Development Brief
12	0861	141 – 151 new rd. & land at union St, Chatham	18	Offices				**Residential**	Priority given to meeting residential requirements
12	0865	2 – 8 King St & 1 – 11 Queen St, Chatham	118	Offices 7380		Res 118 Retail 2531 sq m		**Mixed**	Reflects Chatham Centre & Waterfront Development Brief

Map Ref	Site Ref	Site Name	Residential Units	Employment Sq m	Retail Sq m	Mixed	Other	Preferred Option	Reason
12	0866	55 – 105a the Brook & 1, 5, 11 & 13 King St, Chatham	114	Offices 12240		Res 50 Retail 4113 sq m		**Mixed**	Reflects Chatham Centre & Waterfront Development Brief
12	0869	Wickes, New Cut, Chatham	79	Offices 18000	Retail no net gain			**Residential**	Reflects Chatham Centre & Waterfront Development Brief
12	0871	Chatham Railway Station	279	Offices 30400				**Residential**	Reflects Chatham Centre & Waterfront Development Brief
12	0872	West of Maidstone Rd, adj Chatham Railway Station	173	Offices 8640				**Residential**	Reflects Chatham Centre & Waterfront Development Brief

Appendix B Housing Trajectory and Sources of Supply 2006 - 2028

																				25/26	26/27		
Past Completions	591	761	914																				2266
Projected Completions Identified Sites				854	518	807	939	1474	1227	1066	1373	1364	1120	1069	1097	1006	901	449	526	424	372	386	16972
Projected Completions Small Sites with Planning Permission				145	93	115	22	6															381
Total Projected Completions				999	611	922	`961	1480	1227	1066	1373	1364	1120	1069	1097	1006	901	449	526	424	372	386	17353
Cumulative Completions	591	1352	2266	3265	3876	4798	5759	7239	8466	9532	10905	12269	13389	14458	15555	16561	17462	17911	18437	18861	19233	19619	
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	5	-199	-92	54	719	1131	1382	1940	2489	2794	3048	3330	3521	3607	3241	2952	2561	2118	1689	
Annual Requirement	815	815	815	815	815	815	815	815	815	815	815	815	815	815	815	815	815	815	815	815	815	815	17930

Appendix C 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
  - Improve the operational efficiency of the highway network;
  - 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 Sans Pareil and Anthony's Way roundabouts and exit from Medway City Estate.	Short / medium	Phased intervention to link to the development of Lodge Hill, Chattenden development to improve capacity and junction operation. Currently under investigation
A2 Corporation Street junctions with The Esplanade & Gas House Road	Short / medium	Works to be delivered as part of the current bus priority scheme
A2 junction with Canal Road	Short / medium	Delivery timeframe dependant on the completion of the A2 Corporation street works
A2 junctions and link between Chatham Hill and Canterbury Street junctions	Medium	Significant localised congestion. Major intervention required to tackle problem and increase capacity
A2/A228 links through Strood town centre	Medium	Delivery timeframe dependant on the completion of the Darnley Arch bridge widening. Scheme to be developed
A228 junction at Darnley Arch Bridge, Strood	Medium	Delivery timeframe dependant on the completion of the Darnley Arch bridge widening
A2 Star Hill junction with A229 City Way roundabout	Medium	Delivery timeframe linked to the development of Rochester Riverside and the completion of the A2 Corporation street bus priority and public realm works
A231 Dock Road junction with Wood Street roundabout	Medium	Transport modelling indicates increasing congestion hence this position in programme
A278 junction with Sharsted Way/Wigmore Road	Medium	Transport model results indicate increasing congestion hence this level of priority
A2 junction with Mierscourt Road, Rainham	Medium	Significant localised congestion. Major intervention required
A2 junctions with A278 Hoath Way & A289 Ito Way	Long	Transport modelling indicates this position in programme
B2004 link through Lower Rainham	Long	Transport modelling indicates 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)
  - 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)
  - Directing HGV traffic away from unsuitable roads
  - Ensuring major freight traffic generating developments provide access to the rail network for freight movements
  - 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
  - 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
  - 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:
  - a Reconstruction and possible relocation of Rochester station (identified in Kent RUS, 2010);
  - b Reconstruction of Strood station
  - c Reconstruction and reconfiguration of Chatham station to support re generation 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)
  - 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, cyclist 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 sub-regional 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
  - 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
  - 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
  - Reviewing and publishing a highways adoption manual
  - The use of shared space at selected locations
- Travel Plans, with outcomes focussing on:
  - 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
  - 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)
- Significant employers or areas of employment

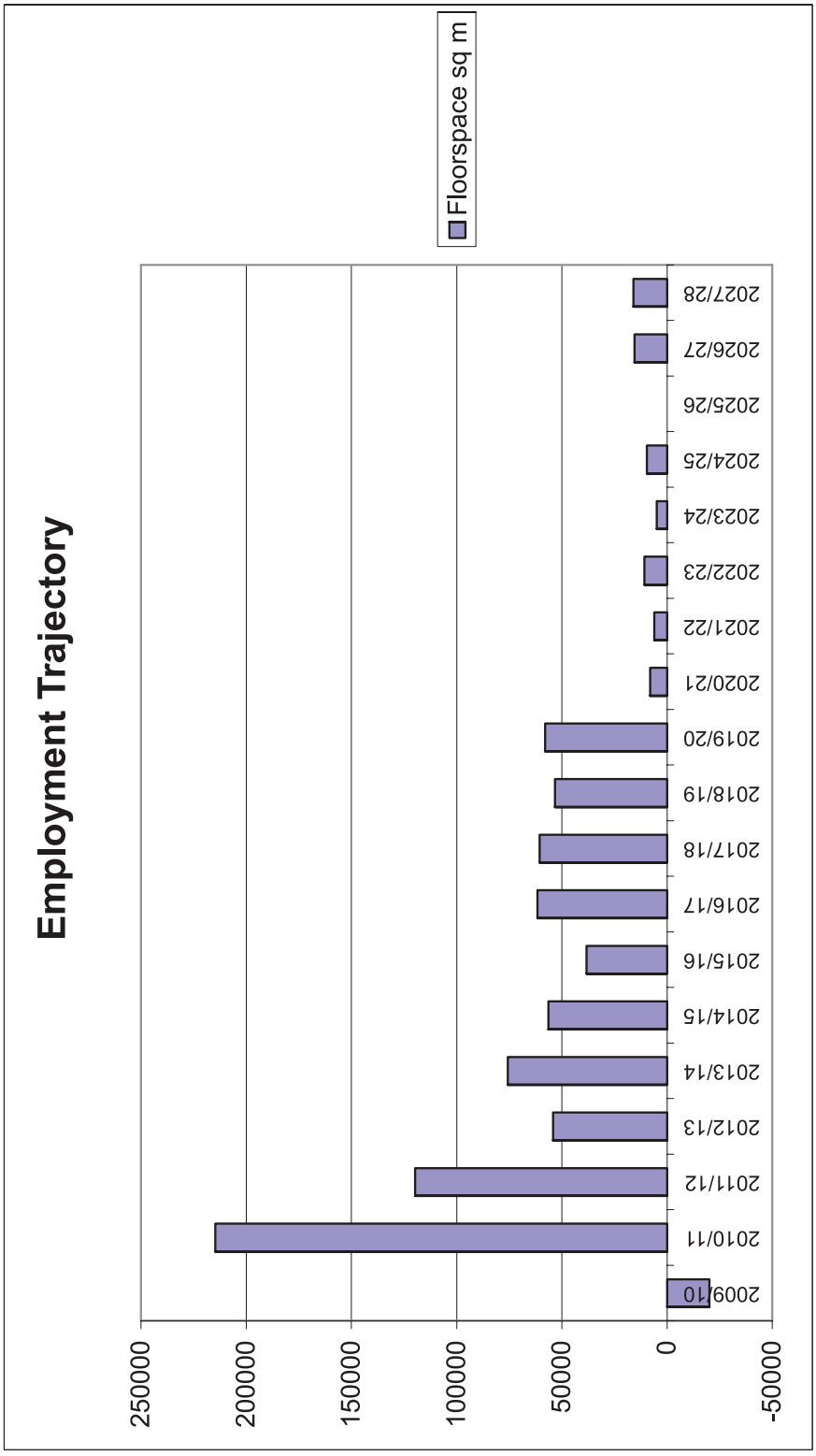
- Major new residential developments
- Further and Higher education establishments

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
  - 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
  - Extend the Junior Road Safety Officer scheme
- Road safety publicity and promotion, with campaigns and promotion focussing on:
  - Drink and drug driving
  - Distractions in collision causation
  - Being visible on the highway net work
  - 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
  - Providing bus safety education
  - Encouraging schools to work with neighbouring schools so that joint initiatives can reflect any wider i ssues within the area
- Community safety initiatives.

Appendix D Employment Trajectory and Sources of Supply



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Sustainability Appraisal
Of
The Medway Core Strategy Pre-Publication Draft
October 2010

Medway Council
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Introduction

This is the second interim Sustainability Appraisal carried out in relation to Medway's emerging Core Strategy. The Core Strategy is the most important of a suite of reports or 'development plan documents' that will form the Local Development Framework for Medway.

The Sustainability Appraisal process is an iterative one, assessing the Core Strategy at key stages as it evolves. In this way it also informs the policies in the Core Strategy. This report is the fourth in a series:

- In December 2008 a draft Scoping Report was published as a consultation draft. Specific input was sought from three statutory agencies – Environment Agency, Natural England and English Heritage – and from the public at large. See: http://www.medway.gov.uk/sustainability_appraisal_scoping_report.pdf

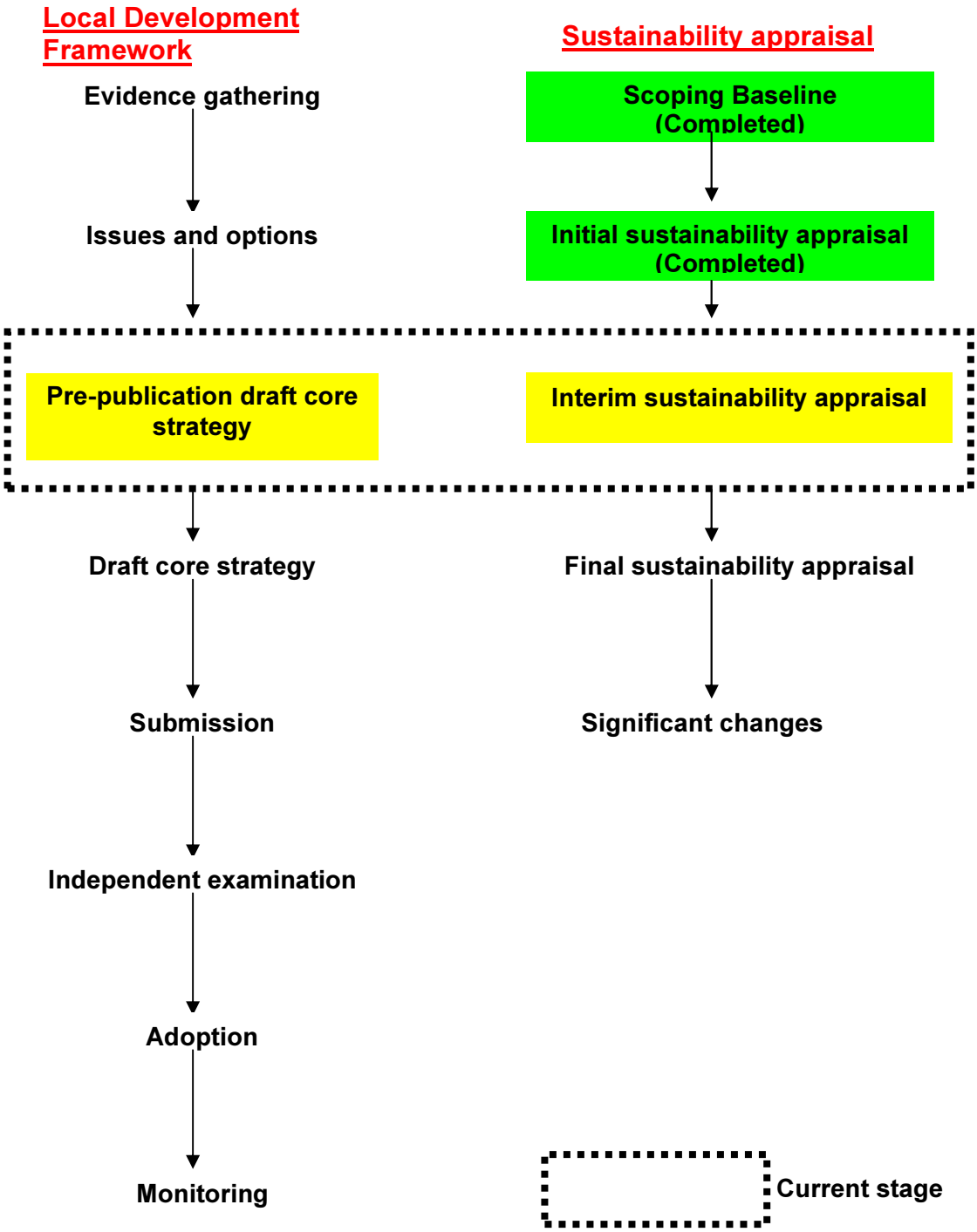
- Taking account of all the responses received, a Final Scoping Report was published in April 2009. See: http://www.medway.gov.uk/final_scoping_report.pdf

- A first interim appraisal was published in July 2009. This assessed the Issues and Options report published at the same time and which considered the matters that should be covered in the Core Strategy. See: http://www.medway.gov.uk/medway_initial_sustainability_appraisal.pdf

- This report appraises the first full draft of the Core Strategy – referred to as the Pre-Publication Draft.

One further interim appraisal will be carried out of the subsequent Publication Draft and then a final appraisal of the document submitted for an independent Examination.

This is illustrated in the diagram overleaf.



This report is structured as follows:

- A short background section summarises the process and is included for ease of reference. Further detail is available in the Final Scoping Report

- The methodology used is then explained and how this has been refined in relation to an updated baseline and revised assumptions
- A section then comments on further possible development alternatives covered in chapter 3 of the Pre-Publication Draft Core Strategy
- The remainder of the Pre-Publication Draft is then appraised. This is done against a standard set of environmental social and economic indicators. This begins, where applicable in terms of updating the situation with information not available at the scoping stage or the inclusion of newer legislation that will affect it. In each case the likely effects without the Core Strategy are assessed. The expected effect of the Core Strategy is then considered against this non-intervention option. Finally, recommendations are made, where appropriate, suggesting how the intended policy approach might be amended to reduce any negative impacts.

Background

Medway is located 30 miles outside London along the North Kent coast, formed of the 5 main town centres of Rainham, Gillingham, Chatham, Rochester and Strood, along with the rural Hoo Peninsula and Isle of Grain. It is located within the growth area of the Thames Gateway and also has a number of sites of nature conservation importance, as well as having sites of strategic importance for aggregate importation and power generation.

The Vision for the area is for Medway to have/be

- *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*
- *Residents to enjoy good health, well being and care*
- *A safe and high quality environment*
- *A place where people value one another, play an active part and have pride in their community and Medway as a whole*
- *To be recognised as a Destination for Culture, Heritage, Sport and Tourism*

The Local Development Framework (LDF) will be a suite of documents that will form the planning framework against which development applications will be assessed and other important decisions made. Medway's Core Strategy will be the spatial expression of these aims by helping to bring together the various strategies to achieve this.

This report accompanies the 'Pre-Publication Draft Core Strategy' (PPDCS) version of the Core Strategy. It goes through the process that has been followed to date, outlines the methodology, the results in summary and then appraises the strategic objectives and policies contained in the document against the objectives of the Sustainability Appraisal Framework. It does this by looking at the indicators and expected impacts on them.

Under the requirements of the Planning and Compulsory Purchase Act 2004 and Planning Policy Statement 12, the Local Planning Authority is required to carry out a Sustainability Appraisal of it's LDF to fulfil the aim of contributing towards the achievement of sustainable development through preparation of its plans.

The work on each appraisal runs simultaneously to the development of the LDD so it becomes integrated into the plan-making process as a way of improving the document as it develops and producing sustainable policies on the ground. By involving stakeholders and experts along the way, a robust and fully integrated appraisal should develop.

This integration will ensure that future development meets the needs of people living and working in an area, whilst at the same time ensuring that it is sited in such a way as to protect the environment.

The SEA Directive and Environmental Assessment of Plans & Programmes Regulations set out the statutory process that must be followed. To show compliance with this, checklists are used.

Draft objectives were refined through consultation with council officers before a scoping document was issued for consultation with both the public and statutory agencies.

This scoping report was sent to the Environment Agency, English Heritage and Natural England, as well as being published on the Council's website and sent separately to the following stakeholders:

- Neighbouring Authorities – Kent County Council, Gravesham, Swale, Maidstone and Tonbridge and Malling Borough Councils
- Regional Assembly – SEERA
- Government Office for the South East (GOSE)

In addition, to the above consultations there was also a presentation to the Local Strategic Partnership in December 2008.

Alongside the Issues and Options Report, which was consulted on last summer, there was an Initial Sustainability Appraisal that went through and discussed the advantages of 5 strategic options in terms of their contribution to accommodating 4 specific elements of the plan where options could still be considered.

This latest document supports the Pre-Publication Draft Core Strategy and contains an appraisal of how much the proposed policies in the document would be expected to contribute or hinder the achievements of the sustainability objectives laid out within the SA Framework.

The Council is consulting on this report alongside the 'Pre-Publication Draft Core Strategy' that it relates to.

Formal consultation periods will also occur on reports produced to accompany the Draft and Submission versions of the Core Strategy, which follow this stage.

Appraisal Methodology, Assumptions and Issues

The Final Scoping Report documents the SA process, as set out within 'A Practical Guide to the Strategic Environmental Assessment Directive' published by the ODPM in 2005. Stage A consists of a number of tasks, which include:

- Task A1: Identifying other relevant plans, programmes and sustainability objectives;
- Task A2: Collecting baseline information;
- Task A3: Identifying sustainability issues;
- Task A4: Developing the SA framework; and
- Task A5: Consulting on the scope of the SA.

The list of "other relevant plans and programmes" that need to be taken into account through the Local Development Framework and considered through the SA process has been updated since the initial scoping report - see Appendix 1.

The Sustainability Appraisal Framework provides a way in which sustainability effects can be described, analysed and compared. The starting point for determining the objectives for the sustainability framework came from those within the Regional Sustainability Framework for the South East, adopted in June 2008.

To make the process more manageable the aim was to limit the number of objectives to no more than 18. These were identified by reviewing relevant policy documents, those in the SEA Guidance and from the baseline information. The draft objectives were refined through subsequent consultation with council officers and others. These included officers responsible for monitoring and those with relevant knowledge of equalities legislation.

The Medway Council objectives were tested for internal compatibility. This highlighted where there may be the potential for conflicts with what they aim to achieve. For example, the objectives associated with providing housing and those aiming to conserve biodiversity and the natural and cultural environment may not be compatible. There is also potential conflict between ensuring high and stable economic growth and the issues associated with traffic, specifically air quality, health and climate change.

The objectives should not be removed because of this potential conflict but highlighting this at an early stage allows the framework to be aware of and therefore balance these issues. Simply because the objectives are compatible or incompatible, does not mean that the outcomes also have to be.

This exercise therefore identified the areas where the objectives needed to be carefully balanced to ensure the outcomes are consistent and where possible achieve a win-win situation.

The SEA Directive requires that *"the relevant aspects of the state of the environment and the likely evolution thereof without implementation of the plan or programme"* and *"the environmental characteristics of the areas likely to be significantly affected*" be included in the Environmental Report.

Government guidance on Sustainability Appraisals of Local Development Documents[1] states *"baseline information provides the basis for predicting and monitoring effects and helps to identify sustainability problems and alternative ways of dealing with them"*.

Collection of baseline information formed an essential part of the SA process. It was important that sufficient baseline information on the current and likely future state of the area was obtained in order to enable the LDF's effects to be adequately predicted and evaluated.

For each indicator, quantified baseline data was collected which was applicable to the issues to be assessed by the Sustainability Appraisal and at a relevant geographical scale. The main sources used were official websites on the Internet, Medway Council reports and data, Kent County Council Reports and the Census.

The baseline situation and identified sustainability issues are covered later in this report but were originally separated into the topic areas below at the scoping stage.

- Community (population, crime, deprivation, health)
- Economy and employment
- Cultural Heritage and Material Assets
- Housing
- Biodiversity and open space
- Air quality
- Water and Soil
- Waste
- Transport and accessibility
- Climate adaptation and mitigation

Section 5 of the Final Scoping Report lays out the baseline information in relation to the identified topic areas and highlights the sustainability issues that arise from these. Additional information collected since then and an explanation of how development in the area would progress without the Core Strategy are laid out in this report.

Officers within the Development Plans & Research team at Medway Council are drawing up the Core Strategy. The Senior Planner (Environmental Policy) completed this SA, incorporating the SEA, independently from the team.

[1] Sustainability Appraisals of Regional Spatial Strategies and Local Development Documents (2005), ODPM

The Initial Sustainability Appraisal assessment corresponds to Stage 2 within the guidance "developing and refining options", particularly Tasks B1 and B2, described as follows:

B1: Testing the DPD objectives against the SA framework; and
B2: Developing the DPD options.

This stage (B) of the appraisal process highlighted the sustainability implications of each option, and where necessary, suggested recommendations for improvement. The results of the appraisal informed the decision making process on the options, but it did not, by itself, determine which should be chosen.

Given the strategic nature of the Core Strategy, the assessment is inevitably broad brush.

As discussed later in this report, the location of certain forms of development was already determined. Therefore the options appraised within the previous document were those aspects where the location had not been fully determined.

As the guidance was written back in 2005 it relates to the system before changes brought in by the Planning Act 2008. As such the current stage would equate to the old Preferred Options stage of the process, where it was expected that there would be a second round of consultation on the SA and the first appraisal of any significant changes.

Assumptions

General assumptions have been applied to both the baseline and to the following assessment of the plan policies. It has been assumed in both instances that there will be some impacts from climate change, both on the area directly and more generally, as follows:

- An increase in annual average temperatures
- A 30-40% reduction in summer precipitation
- A 15-20% increase in winter precipitation
- Sea level rise

The assessment of the suggested plan policies has been done on the basis that all are fully implemented and will have the maximum impact/effect.

The Draft Medway Strategic Land Availability Assessment has been used to gain information as to how much and where new housing is likely to be constructed over the plan period.

The Pre-Publication Draft Core Strategy considers a range of possibilities in terms of future job numbers based on different scenarios or assumptions. The higher end of this range has been used to assess impacts in this appraisal.

Environment Agency flood maps show where flooding would occur in the natural floodplain, but take no account of any flood defences. It is known by the Agency that these are partly out of date and need to be updated to take account of works that have been done around St Mary's Island and Rochester Riverside. A wider range of information sources has therefore been used to assess possible flooding impacts.

It has been assumed that, in the absence of the Core Strategy regeneration will still occur but at a slower pace. It has also been assumed that due to Southern Water's plans for introducing universal metering across the area water use will, on average, reduce to some degree.

Some elements of the evidence base supporting the Core Strategy are still being completed or revised. As a result some of the conclusions reached are not necessarily definitive but this is to be expected at this stage of the process.

Definitions Used in Appraisal Matrices

In terms of the definitions used to categorise the impacts that were expected during the appraisal, the following steps were applied.

1. Is there going to be a substantial impact? Yes Q2 or No Q4
2. Will this be positive or negative?
3. If it falls into either of these categories then the relevant mark is made
4. If the impact is not going to be substantial, then is the expected impact going to be positive or negative?
5. If it falls within either of these second categories then it would be marked with the less substantial mark
6. If it is considered that the impact could not fall into any of these categories then it was considered to be neutral and marked with the relevant symbol.

In addition it was considered whether the potential impacts were likely to occur in the short, medium or long term. Due to the length of the plan period, at 15 years, these correlated to the following 5 year bandings:

Short-term	0-5 years
Medium term	5-10 years
Long term	10-15 years

As a result the marks below have been used in the matrices.

√	Significant benefits
-	Potentially harmful; cannot be balanced
0	No effect; benefits/harm will be balanced
+	Potentially some benefits
×	Not compatible

Discussion Categories

Many of the sustainability issues identified are cross-cutting in nature. To take account of this they have been grouped under the following categories:

- Air quality
- Water and Soil
- Waste
- Biodiversity and open space
- Climate adaptation and mitigation
- Community (population, crime, deprivation, health)
- Cultural Heritage and Material Assets
- Transport and accessibility
- Housing
- Economy and employment

Significant Issues

As a result of the baseline information and new information referred to above, the following issues are considered to be of particular significance in terms of the sustainability of the area as a whole into the future.

Air –changes made to the Air Quality Management Areas (AQMAs) mean that many town centre areas and main urban routes are now covered. Given the focus for development in the town centres in future, potentially there could be a higher proportion of the population resident within areas of poor air quality. As such all development will need to take this fully into account to avoid a worsening situation.

Water and soil –water supply will be a crucial sustainability issue in the future. This will be partially due to impacts of climate change but also the expected level of growth across the area. As Medway is classified as a 'stressed' area in water supply terms and the South East is also the most stressed region in the country it is critical that as many water efficiency measures as possible are implemented and that there is a supportive environment for innovative ways of increasing supplies.

Waste – good progress is being made with recycling but it will be important to continue the momentum into the future and to ensure that there is sufficient waste treatment and disposal capacity to deal with the areas needs.

Housing – in terms of housing affordability is an issue with prices having increased faster than wages, meaning a larger proportion of affordable homes may be required if the price to earnings ratio does not improve. Should future house building not be sufficient to meet local needs, stress on families would increase. Housing will also need to be resilient to climate change and adaptable for different occupants and uses.

Economy and employment – the existing low average income level in Medway and the number of deprived areas means that increasing skills and providing more jobs across the area is important to the future sustainability of the area. Account also needs to be taken of the fact that the workforce is ageing, albeit more slowly than in many other areas.

A proportion of the existing stock of buildings used for employment purposes is not flexible or adaptable enough to meet changing requirements, pointing to the need for reinvestment.

Biodiversity, open space and landscape – between designated sites and other land there is a significant proportion of the area, especially on the riverfront and the Hoo Peninsula, that is important for biodiversity and human health. Ensuring that these areas are preserved and appropriately managed is therefore of obvious importance.

Climate change adaptation and mitigation – climate change is expected to have significant effects across the area. Appropriate strategies for both managing and minimising these impacts will therefore be important. These will need to include more adaptable built environments, resilience to flooding and adaptation strategies for biodiversity.

Transport and accessibility – the use of public transport in Medway is higher than the regional average and further improvements are being made in the short term. However a continued effort to manage car use will be required to offset the effects of high levels of development.

Cultural and material assets – this section of the baseline highlights the range of important cultural assets in the area and also covers the importance of townscape. As the existing physical townscape can seem unwelcoming in some areas in and around the town centres, improving this so that people want to interact more with their surroundings is key to the economic vitality of the town centres.

Community – there will be an increase in population of around 25,000 over the plan period, of which a significant proportion are likely to be in the older age groups. This in turn emphasises the need for services to be accessible.

Compatibility of the Core Strategy and SA Objectives

The following strategic objectives are proposed in the Pre-Publication Draft Core Strategy:

- 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.

- 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.

- To substantially improve the performance of the local economy, in particular by nurturing higher value activities and reducing the current reliance on out commuting.

- To focus employment growth in Chatham Centre, within the major mixed use regeneration sites, through re-investment within the established employment areas and at Rochester Airport, Lodge Hill, Kingsnorth and Grain.

- To maximise the development opportunities associated with the four universities and Further Education College to create a centre of excellence of national significance.

- To radically improve the quality of the townscape and public realm within the central urban area and along the urban waterfront.

- 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.

- To provide for 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.

- To enhance the quality of life of local people through the promotion of healthier lifestyles and the provision of improved cultural, leisure and tourism facilities, including along the river Medway.

- To nurture Medway's rural areas and economy, including through village improvement projects, enhanced land management and local access strategies.

- 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.

- 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.

- To ensure that there is sufficient minerals and waste management/disposal capacity to meet local requirements and contribute to regional and national needs.

The Sustainability Framework was finalised in the Final Scoping Report and the objectives of the SA are described in that and laid out in the following table.

1	Biodiversity, Flora and fauna	Conserve and enhance the diversity and abundance of habitats and species
2	Air	Reduce air pollution and improve air quality, including reduction of greenhouse gas emissions
3	Water and Soil	Maintain and improve quality of ground and surface waters and security of supply
4	Climatic factors	Reduce risk of flooding and ensure flood resilience of buildings and minimise the effect on public services and infrastructure
5	Climatic factors	Reduce ecological footprint through prudent use of natural resources, reduction in waste and use of sustainable waste management practices
6		Provide opportunity for everyone to live in a decent, sustainably constructed, affordable home suitable to their needs
7		Maximise land use efficiency through appropriate use of previously developed land and existing buildings
8	Human Health	Improve the health and well-being of the population and reduce health inequalities
9	Population	Reduce inequalities in poverty and social exclusion
10	Population	Reduce crime and the perception of crime
11	Material assets	Improve accessibility to key services and facilities (inc. countryside, leisure/recreation and historic env)
12	Cultural Heritage & Landscape	Conserve and enhance historic buildings, archeological site and culturally important features and increase engagement by all sections of community
13	Material assets & climatic factors	Increase energy efficiency; the proportion of energy generated from renewable sources and the diversity and security of energy supplies
14		Reduce traffic and congestion by reducing need to travel and improving travel choice
15		Raise educational achievements through developing opportunities to acquire skills, to develop and maintain workforce
16		Support and improve employment and economic competitiveness in town centres and deprived areas

The table below shows the compatibility matrices between the objectives of the Core Strategy and the SA framework. It shows that there are a number of areas where the the Core Strategy objectives and the SA objectives are incompatible. However, these tend to be due to the consequences of growth. At this stage they are simply considered in terms of whether they would be compatible with the aim or not, rather than considering anything specific in terms of how they may be implemented. It is however important to outline where potential conflicts occur and need to be considered.

Compatibility Matrix of the Strategic and Sustainability Objectives

	SA Objectives	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Strategic Objectives		environment	air	water	flooding	Environmental footprint	housing	Previously developed land	health	Poverty/social exclusion	crime	accessibility	Material assets and culture	Renewable Energy	transport	Education and workforce	Employment and competitiveness of deprived areas
1																	
2																	
3																	
4																	
5																	
6																	
7																	
8																	
9																	
10																	
11																	
12																	
13																	
14																	

Key to matrix

	Compatible
	Slightly compatible, expected more benefits
	No effect; benefits may balance harm
	Slightly compatible, but expected more harm
	Not compatible

As can be seen from the matrix there are few immediate clashes between the Core Strategy's strategic objectives and the objectives of the SA framework. It can also been seen that none of the strategic objectives are currently entirely complimentary in terms of the SA objectives. However, a lot of this is due to the fact that no consideration has been given, as yet, to the exact implementation possibilities. Nevertheless it usefully highlights where greater consideration needs to be given to the exact policy wording to ensure the most effective implementation, to ensure the maximum linkage occurs.

Appraisal of the Alternatives

This short section of the report provides some further commentary on how development alternatives have been considered. It expands on certain elements of the initial appraisal of the Issues & Options report.

The main bulk of the appraisal of alternatives was done within the Initial Appraisal of the Issues & Options document in July 2009. This focused on the potential for 5 broad locations to accommodate growth outside the existing urban boundaries. This incorporated considerations of how much additional infrastructure may be needed to serve each option and the impact of each on the natural environment.

Consideration of options beyond this was limited due to the number of decisions on the location of development that have already been made. This reflects the area's location within the Thames Gateway and its associated regeneration strategy.

There were a number of areas where the way forward has also been established through other plans and strategies.

One example relates to the hierarchy of retail centres coming from the conclusions of the Retail Needs Study carried out by Nathaniel Litchfield & Partners. This emphasised the potential of Chatham over the other town centres for accommodating new retail development. It concluded that there was substantial headroom within Chatham town centre and that a minimum of 30,000 sq m of new comparison floorspace was necessary to have the 'critical mass' to effect change. This reinforced the expectation that Chatham would in future be the focus for growth in town centre uses, although change at a lesser scale was still expected in the other centres. Accordingly other options were not appraised.

Another example is in relation to potential relocation options for a new football stadium. Over a number of years Gillingham Football Club have sought a new ground but all the options identified have not proved to be viable. No new proposal has been put forward in connection with the draft Core Strategy.

Similarly, a significant upgrading of facilities at Medway Maritime Hospital is justified and there was some speculation as to whether this could be better achieved by relocating to a new site. However the Foundation Trust have now determined that the current site will be progressively redeveloped, removing the need to evaluate alternatives.

A new long-term contract for the disposal of Medway's municipal waste has been let and, as a result, material will continue to be taken out of the area. However, it is recognised that treatment and processing is needed for other waste streams in the area. At present the majority of treatment is centred in two hubs situated on the Medway City Estate and at Kingsnorth. There are no active landfill operations (inert and non-inert) in Medway. As such the

appraisal in relation to waste development in the Initial Sustainability Appraisal was done in terms of adding provision to the treatment and processing of the other waste streams in the area.

The options appraised for tackling the issue were a continuing and supportive focus on reuse and recycling/processing facilities in and around Kingsnorth; an extension to the existing Viridor site at Medway City Estate; use of unused land at Chatham Port; providing a facility at Halling Coal Yard and Wharf; the creation of a void within the London Clay on the Hoo Peninsula or land raising on the Peninsula.

In forming the options to be appraised for any waste treatment/processing there were two approaches, the first being to reduce the overall level being produced and increasing capacity of the waste hierarchy and the second being in terms of the need and potential ways of addressing the issue of final disposal. Overall 6 options were considered, 4 of which followed the first approach and 2 the second approach.

In terms of the four options to increase treatment/processing through the area two of these would result in locations to the north east of the urban area, one centrally located and one to the south west of the urban area. The two remaining options in terms of final disposal would both be located on the Peninsula and again to the north of the urban area.

As a result of the type of development this scores highest in terms of sustainability against reducing the ecological footprint of the area and increasing sustainable waste management practices. However, the introduction of a technological hub at Kingsnorth and extending the Viridor site at Medway City, due to their location and resultant proximity to an available workforce is believed to give the greatest benefit against the economic objectives of the framework. Linked to these it was considered that as a result there could also be some benefit to addressing inequalities in poverty and social exclusion.

Overall, it was not considered that any of the proposed options would have either a positive or negative effect on the social objectives of the framework. It was considered the two proposals related to final disposal capacity on the Peninsula could potentially introduce an element of antisocial behaviour during construction, due to anecdotal evidence in relation to similar types of development.

No assessment could accurately be made of the potential impacts of the developments, especially those at Kingsnorth and Medway City Estate, on public health as many of the technologies are still evolving.

The conclusion of the appraisal was that an extension to Viridor's existing site on Medway City Estate would be the most sustainable for a number of reasons. Little additional work would be needed to ensure its operation as there is good access to the existing road network, there are existing permits and permissions, as well as there being benefits to both the local economy

and community. In addition it was considered to have the least impact on the environment. However, it was recognised that, on a locational basis, this was only slightly better than the increased focus on a treatment/processing hub at Kingsnorth.

In the Initial Sustainability Appraisal there was a section covering aggregates but this only looked at how the area would be able to provide the amounts that were being suggested under the Partial Review of Policy M3 of the South East Plan. This did not consider any other elements related to mineral production, such as importation as there are no known plans for this to change beyond the existing sites. The potential impacts of any intensification of the existing sites would need to be assessed through the appropriate assessment stage of the Habitats Regulation Assessment.

The 3 options considered for providing the required amount of land-won aggregates were the exploitation of deep channel deposits at Cliffe; continued exploitation of the terraces at Hoo or those located at Grain.

As expected due to the nature of the development type all of the proposed options for addressing this have low sustainability ratings. The most significant sustainability benefits of the land won aggregate provision is to the objective of providing the opportunity for everyone to live in a decent, sustainably constructed, affordable home.

The appraisal explained that the air quality in the area and water quality could be affected through these processes due to being water intensive and currently the air being relatively pristine. It would also be expected that all of the options would increase pressure on the transport network, although alternatives would lessen this over the plan period and again due to its existing proximity to the network this would be neutral in the case of extending the permissions around Hoo.

The option of extensions to the existing permission around Hoo were considered to have the least detrimental impacts, with the potential of contributing to economic opportunities and also in the long term being able to provide a new natural feature that could integrate with the existing Special Protection Areas and after operations have finished give greater access to the countryside.

The conclusion of the appraisal was that of the 3, continued exploitation of the terraces located near to Hoo was the most sustainable. It was expected that this would have a neutral impact on the environment considering the conditions that have been applied to permissions granted. It was also considered that this could result in an improvement in the environment over the longer term. Furthermore the proximity of this location to the existing road network would mean that there would be less impact both to make any site accessible and in terms of its operation.

In terms of the location of housing there is an established focus on the main urban area. Taking account of the large number of smaller sites that

contribute to supply in the area and for overall sustainability reasons, this approach has wide support. As such the main emphasis in terms of any potential alternative locations is their ability to meet additional requirements, not to replace urban sites.

A 'Call for sites' was carried out from December 2008 till January 2009, as part of the Medway Strategic Land Availability Assessment (SLAA) and as a result of this a number of sites were put forward. These tended to fall within a number of broad locations and were considered accordingly. This also allowed an objective assessment to be made by comparison with the proposed settlement at Lodge Hill, Chattenden. This was both to see whether another location may be more suitable than Lodge Hill and also to test whether the same scale of development could be achieved elsewhere.

All of the options apart from Capstone were considered to make a reasonable contribution towards achieving the sustainability objectives at least in the short term. However over the longer term Lodge Hill would make the greatest contribution overall. The harmful impacts that could be anticipated from the Lodge Hill development would be to air quality through elements, such as biomass boilers and the increased demand on water supplies.

Though all of the options to some degree would be anticipated to have at least some impact on the natural environment through increased demand and indirect impacts, such as increased recreational opportunities and interactions with designated habitats. Though there were similarities in terms of those objectives that could be harmfully affected, these are generally greatest and more acute within the Capstone option. This is due to the fact that currently though there is some human interactions at the site these are limited, however by including a large amount of development at the site, it would need a substantial amount of infrastructure which would raise their own significant impacts, as well as creating a number of subsequent impacts. A primary example of this would be new roads and then resultant traffic affecting air quality.

The two options near Rainham score reasonably well in terms of the social and economic objectives but would not give the significant benefits that either Extended Hoo or Lodge Hill would. Furthermore these would have more detrimental impacts than either of the other two.

In terms of sustainability both the Chattenden and Extended Hoo options were 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.

Similar to the situation with housing, employment at the existing sites is important to the area, as has been confirmed by conversations that the Economic Development Team have had with business owners. Furthermore

there is a concern over the gradual degradation of smaller sites. As a result the options that were appraised in the Initial Sustainability Appraisal were in combination with the numerous smaller sites and the established estates mainly located in the urban area. These followed the same locational alternatives as the housing ones.

One of the crucial elements of this section of the appraisal was the information that was available on countryside related employment. This mainly affected appraising the options around Rainham and especially any contribution that Capstone could make. On this basis general trends and message could only be made, as much would be dependent on how they were implemented, of which no information was available at this stage. Therefore more weighting was given to those elements such as what was needed in terms of additional physical infrastructure and the impact of employment in these locations.

In relation to employment floorspace the appraisal again resulted in Chattenden or Extended Hoo being the most sustainable. This is due to the fact that the level of existing infrastructure is greater, as well as the opportunity to tie into a wider range of employment. The solutions around Rainham if properly integrated with the town centre would have benefits but it not well located in terms of either existing transport or infrastructure links.

The overall result of the appraisals if carried forward would mean that development in the future will end up being focused to the north of the existing urban area.

Appraisal Summary

As mentioned within the earlier section on methodology the following symbols have been used within the matrices.

√	Significant benefits
-	Potentially harmful; cannot be balanced
0	No effect; benefits/harm will be balanced
+	Potentially some benefits
×	Not compatible

The following matrices on the following pages are summaries of the Chapters.

Cross-cutting Matrix

	SA Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
		environment	air	water	flooding	Ecological footprint	housing	Previously developed land	health	Poverty/social exclusion	crime	accessibility	Material assets and culture	Renewable energy	transport	Education and workforce	Employment and competitiveness of deprived areas
Policy																	
CS1:Regenerating Medway		0	0	-	0		✓	✓	+	+	0	+	0	0	-	✓	✓
CS2: Quality and Sustainable Design		0	0	+	0	+	✓	✓	0	+	0	0	+	0	+	✓	✓
CS3: Mitigation and Adaptation to Climate Change		✓	0	✓	0	✓	+	0	0	0	0	✓	0	0	0	0	0
CS4: Energy Efficiency and Renewable Energy		0	0	0	0	✓	0	0	0	+	0	+	0	✓	0	✓	✓
CS5: Development and Flood Risk		✓	0	0	✓	✓	+	0	0	+	0	+	0	+	0	0	0
CS6: Preservation and enhancement of Natural Assets		✓	0	0	+	✓	0	0	+	0	0	0	✓	0	0	0	0
CS7: Countryside and Landscape		+	0	0	0	0	0	0	+	0	0	+	+	0	+	0	0
CS8: Open Space, Green Grid and Public Realm		0	0	0	0	0	0	0	✓	✓	✓	✓	+	0	+	0	0
CS9: Health and Social Infrastructure		0	0	0	0	0	0	+	✓	✓	0	✓	✓	0	0	0	+
CS10: Sport and Recreation		-	0	0	0	0	0	✓	✓	0	0	✓	✓	0	0	+	+
CS11: Culture and Leisure		0	0	0	0	0	+	✓	0	+	0	0	✓	0	0	✓	✓
CS12: Heritage Assets		0	0	0	0	0	+	✓	0	+	0	0	✓	0	0	✓	✓
Summary																	

Housing Chapter Matrix

	SA Objective	biodiversity	air	water	flooding	Ecological footprint	housing	Previously developed land	health	Poverty/social exclusion	crime	accessibility	Material assets and culture	Renewable energy	traffic	Education and workforce	Employment and competitiveness of deprived areas
Policy																	
CS13: Housing Provision and Distribution		-	0	-	0	-	✓	✓	+	✓	+	✓	0	+	-	+	+
CS14: Affordable Housing		0	0	-	0	-	✓	✓	+	✓	+	✓	0	0	0	+	+
CS15: Housing and Other Housing Requirements		0	0	-	0	-	✓	✓	✓	✓	+	✓	0	✓	0	+	+
CS16: Gypsies, Travellers and Travelling Showpeople		0	0	-	0	-	✓	✓	0	✓	0	✓	0	0	0	+	+
Summary																	

Economy Chapter Matrix

	SA Objective	biodiversity	air	water	flooding	Ecological footprint	housing	Previously developed land	health	Poverty/social exclusion	crime	accessibility	Material assets and culture	Renewable energy	traffic	Education and workforce	Employment and competitiveness of deprived areas
Policy																	
CS17: Economic Strategy		-	0	-	0	-	+	✓	✓	✓	0	✓	+	✓	-	✓	✓
CS18:Tourism		0	0	0	0	0	+	✓	0	+	0	0	+	+	-	✓	✓
CS19:Retail and Town Centres		0	0	0	0	0	+	✓	0	✓	0	✓	0	0	-	✓	✓
CS20: Education and Personal Development		+	0	0	0	0	+	✓	+	✓	0	0	+	+	-	✓	✓
Summary																	

Energy, Waste and Minerals Chapter Matrix

	SA Objective	biodiversity	air	water	flooding	Ecological footprint	housing	Previously developed land	health	Poverty/social exclusion	crime	accessibility	Material assets and culture	Renewable energy	traffic	Education and workforce	Employment and competitiveness of deprived areas
Policy																	
CS21: Conventional Energy		0	-	0	0	0	0	✓	0	✓	0	✓	0	✓	-	✓	✓
CS22: Minerals Provision		-	0	-	0	0	+	0	0	✓	0	0	0	+	-	✓	✓
CS23: Waste Management		0	0	0	0	0	+	✓	0	+	0	+	0	✓	-	✓	✓
Summary																	

River Medway Chapter Matrix

	SA Objective	biodiversity	air	water	flooding	Ecological footprint	housing	Previously developed land	health	Poverty/social exclusion	crime	accessibility	Material assets and culture	Renewable energy	traffic	Education and workforce	Employment and competitiveness of deprived areas
Policy																	
CS25: The River Medway		✓	0	✓	0	✓	0	0	+	0	0	+	✓	0	+	+	+
Summary																	

Area Policies Chapter Matrix

	SA Objective	biodiversity	air	water	flooding	Ecological footprint	housing	Previously developed land	health	Poverty/social exclusion	crime	accessibility	Material assets and culture	Renewable energy	traffic	Education and workforce	Employment and competitiveness of deprived areas
Policy																	
CS26: Strood		-	0	-	0	-	✓	✓	0	+	+	0	0	0	0	✓	✓
CS 27: Rochester		0	0	0	0	0	+	✓	0	0	0	0	+	0	0	✓	✓
CS28: Chatham		+	+	+	0	+	+	✓	0	✓	✓	✓	0	0	0	✓	✓
CS29: Gillingham		+	0	0	0	+	0	✓	0	+	0	0	0	0	0	✓	✓
CS30: Rainham		+	0	0	0	+	0	✓	+	+	0	+	0	0	0	0	✓
CS31: Lodge Hill		✓	0	+	+	+	✓	✓	0	✓	0	+	✓	✓	+	✓	✓
CS32: Hoo Peninsula and the Isle of Grain		0	0	0	0	0	+		+	+	+	✓	0	0	0	✓	✓
CS33: Medway Valley		0	0	0	0	0	+		+	+	0	✓	0	0	0	+	✓
Summary																	

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Monitoring, Implementation and Review Chapter Matrix

	SA Objective	biodiversity	air	water	flooding	Ecological footprint	housing	Previously developed land	health	Poverty/social exclusion	crime	accessibility	Material assets and culture	Renewable energy	traffic	Education and workforce	Employment and competitiveness of deprived areas
Policy																	
CS34: Developer Contributions		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Summary																	

Appraisal of the Pre-Publication Draft Core Strategy Policies Against the Environmental Indicators

There are a significant number of policies in the draft Core Strategy that seek to ensure some protection and proper account is taken of the natural environment. These are policies CS2 - CS8; CS21 – CS26 as well as some mention within the last three spatial areas, CS31: Hoo Peninsula and the Isle of Grain; CS32: Medway Valley and CS33: Lodge Hill.

The appraisal has considered the contribution the policies would make to the development of the area, based on full and effective implementation and the topic areas listed earlier. Under each topic an outline description is given of how the area might look if the existing trends were to continue, although with the assumptions mentioned earlier applied. For the main appraisal this is then used as a comparator for the situation with the core strategy implemented.

Air Quality

Updated context

On the basis of a slower rate of regeneration occurring and a number of transport measures being completed in the short term, it may be anticipated that there will be a neutral impact on local air quality. However, predicted trends in vehicle pollution emissions are not being realised in ambient concentrations across Europe and any judgements on the future situation in Medway should be treated with caution as a result.

It may be that there could be a slight improvement if future transport improvements are introduced at the same time or in combination with the development of major regeneration sites. However there would be no change to air quality outside the area.

Situation without the Core Strategy

It may be anticipated that air quality in the town centres will improve due to the number of transport changes that are expected and the intended consolidation and relocation of car parks resulting in more efficient traffic movements. In addition, there are a number of initiatives in the third Local Transport Plan (LTP3), which the Core Strategy will help implement. These will also encourage a modal shift away from the private car. This should in turn help to improve air quality.

As one of the main air quality hot spots is along the M2 corridor, there will be shared impacts between Medway and its neighbouring authorities. If a significant modal shift can be achieved, there could be a reduction in the number of vehicles using the route and so benefits to the neighbouring authorities, especially to the west in Gravesham but this could be offset by traffic growth in the wider area.

Situation with the Core Strategy

Growth will be concentrated within the main urban area and at the new settlement at Lodge Hill. There will be a particular focus along the urban waterfront and in and around the town centres. Therefore it would be expected that there could be an impact on air quality focused in these areas. It is considered unlikely that the employment opportunities that are supported through the Core Strategy would make substantial impacts on air quality, unless dominated by heavy goods vehicle movements as opposed to the higher value activities sought. They could lead to an improvement due to the fact that environmental technologies will be encouraged and the resultant scope for reducing the energy loading across the area.

The greatest change in air quality is most likely to occur on the Hoo Peninsula, as this is an area identified for a hub of environmental technologies and other economic development, in addition to the proposed development of Lodge Hill. Though Lodge Hill is intended as an exemplar of sustainability, it will intensify the use of the existing site and will increase substantially the number of people and cars located on and attracted to the Peninsula.

Proposed policy appraisal

The crucial sustainability issue in terms of air is:

- To prevent any additional AQMAs being created

The largest contributor to reduced air quality in Medway is transport. In this respect policy CS24: Transport and Movement is key. The sustainability aspects and links to air quality do feature heavily within the policy wording and explanatory text, therefore it would be expected that this would make a significant positive contribution to this objective.

Air quality hotspots are stated as forming part of the proactive management of the highway network, along with elements that are expected to be delivered to encourage a modal shift from the private car towards more sustainable modes of transport, such as through the development of four park and ride sites over the plan period. In addition, there is also mention in the policy about reducing car parking and parking standards, as well as further actions to improve further shifts in travel modes, such as the expectation for transport assessments to include assessments away from the private car.

Two policies that may also have a more direct impact on air quality are CS4: Energy Efficiency and Renewable Energy and CS21: Conventional Energy Generation. Policy CS4 both through the principle being applied and the wording would be expected to improve air quality and policy CS21, on the basis of being applied and implemented fully, would also help.

In policy CS4 it is stated that developments will be subject to them having no adverse affect on the natural environment and positively promoting the

installation of renewable technologies. In policy CS21 air quality could be improved by the fact it states applications will be assessed in terms of "*their impact on the natural environment and for the potential to re-use waste heat*".

Recommendations to be taken into account

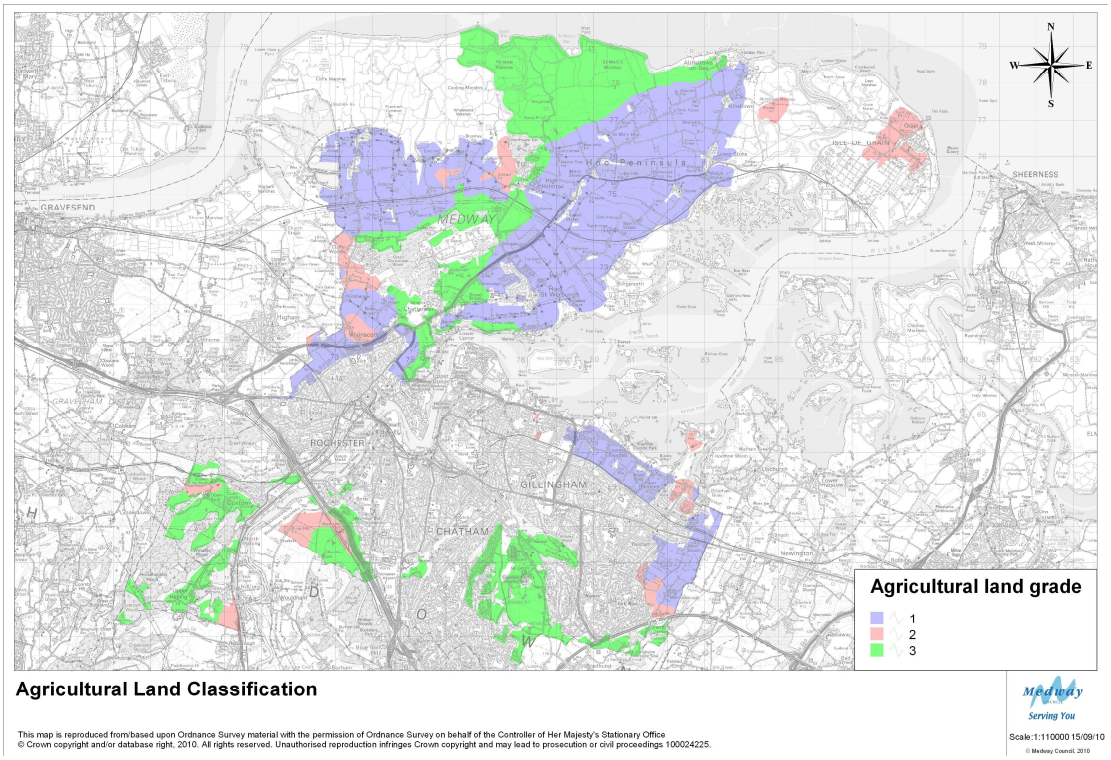
A reference to improving or not harming air quality could usefully be added within the town centre policies, to help to implement strategies to address air quality in or near the AQMAs. Consideration should be given to a category within the Annual Monitoring Report that allows some reporting back on the number of AQMAs.

Water and soil

Updated context

As mentioned within the Final Scoping Report, soil quality varies widely across the Medway area. Most importantly there are large sections that are classified as Grade 1 agricultural land on parts of the Peninsula and some more selected parts to the North and East of Rainham, which are shown on Figure 1 below.

Figure 1: Map showing the Agricultural Land Classification within Medway



The council has identified over 1000 sites which could potentially meet the definition of contaminated land. It is currently in the process of prioritising these sites. To date most of the remediation of brownfield sites which has been undertaken within the Borough has been through development management (planning process by the imposition of suitable conditions and S106 agreements), such as Rochester Riverside and the Akzo Nobel site, where remediation has occurred.

As outlined in the Water Supply State of Medway (SOM) Report it is expected that there will be a water deficit in the area early within the plan period and then later go into a surplus, however Southern Water consider that the supply of water can be maintained overall. At least some of this would be through a regional balancing of supplies.

Plans to increase the level of the Bewl Water Reservoir (located at Lamberhurst, Kent) and for a new reservoir to be located at Broad Oak (nr Canterbury), to be constructed in the middle of the plan period and come on line towards the end of the Plan period have been suggested within the South East Water Resources Management Plan.

If these were to be implemented they would cumulatively have a significant impact in terms of water supplies to the area. The greatest of these would be an increase in supplies as the current amount that is piped across to Thanet would not be needed and so could be retained to serve the area. Additionally, there may be a benefit to designated sites, as well as the nutritional quality of the agricultural land mentioned above.

Currently, wastewater is dealt with by two treatment plants – at Motney Hill, Rainham and near Whitewall Creek, Frindsbury.

Situation without the Core Strategy

Southern Water's introduction of universal metering across the area is expected to be finished by 2012, meaning that there should be a reduction in demand, as suggested in the Appendices of the Water Resource Strategy Action Plan for the Southern Region. This and the national timescale for implementation of the Code for Sustainable Homes are expected to help in terms of counteracting the potential increase in demand that would result from regeneration.

Though the wastewater treatment works at Whitewall Creek does not currently have capacity for dealing with Lodge Hill, it is not constrained and so when necessary Southern Water would expect to be able to extend it to the required capacity. It is also intended that once the planning certainty is gained Southern Water will confirm adoption of water pipes at the Lodge Hill site.

However it should be noted that one of the expected effects of climate change will be a combination of a drier climate, higher temperatures and a greater

number of flash flooding events. Therefore the extreme water stress experienced is unlikely to go away even with the expected reductions, and supplies and infrastructure will continue to be stretched.

Situation with the Core Strategy

In terms of soil it would be expected that though there will be some detrimental impact as a result of mineral extraction being needed and use of materials from this. The high level of regeneration in the area could also create an increased need for a soil treatment site in the area, due to the large amount of contaminated soil being reused. However, development on greenfield land would be more limited as protection has been afforded to the highest quality agricultural land through a number of the area policies. If water supplies are protected and expected schemes implemented then there should be no detrimental impact on sensitive designated habitat sites.

Initially, the situation in terms of water quality and supply would not be expected to be significantly different from that explained in the baseline earlier in this report. As explained Southern Water has specific plans which are expected to ensure supplies for the area over the plan period and based on the expected growth in housing. However, the proposed development of a large multi use cultural facility and employment could well put additional pressure on these.

Proposed policy appraisal

The crucial sustainability issues in terms of water and soil are the following. In terms of water:

- The dependence of supplies on schemes outside the area to ensure adequate supplies in the future with current and expected water stress

- The quality, amount and distribution of water supplies and the physical water environments, such as rivers, inland waterways and seas.

Policy CS30:Rainham gives protection to the important areas of agricultural land on the edges of Rainham and gives particular reference to its location on the urban/rural fringe, as well as the important challenge of balancing access to the countryside and supporting the role of agriculture. Policy CS31: Hoo Peninsula and the Isle of Grain also gives specific cover to ensure that high grade agricultural land is not lost within its last paragraph.

Though these are the only areas where soil is specifically referenced, a number of policies could still impact on the soil environment. Policy CS22: Provision For Minerals that along with the aforementioned policies will be crucial in terms of soil, as this states that "*the Council will make provision for the extraction of at least 0.18 million tonnes per annum land won aggregates*". However, this is also specific in terms of the location this would come from. As a result this would represent full utilisation of the existing permission that

exists and not initially beyond this. On balance, this would be considered to represent the most significant detrimental direct impact on soil within the area. This would be due to the comparative time that the site would be operational against that which it would be in terms of restoration.

In general the other policies that would have, at least, a tangential effect on soil are related to materials and their usage. Policy CS2: Quality and Sustainable Design lays out the main points in relation to materials from the CfSH and Policy CS15: Housing Design and Other Housing Requirements that land should be used effectively. Additionally, there is a degree of protection afforded through the policies mentioned above and policy CS7: Countryside and Landscape as there are also references to the Landscape Character Assessment.

Two policies specifically address the interaction between development and the water environments. These are CS5: Development and Flood Risk and CS25: The River Medway.

Policy CS3:Mitigation and Adaptation to Climate Change makes a contribution towards ensuring that the demand for water is reduced through the imposition of specific standards to be met from the Code for Sustainable Homes and BREEAM. Additionally this policy also aims to help ensure future supplies by mentioning *"support for the proposals in the Final Water Resource Management Plan 2010-2035"*.

Towards the end of a line in policy CS33: Lodge Hill there is mention of water strategies specifically for addressing a reduction in the ecological footprint of the development.

Therefore the Core Strategy will ensure that a reduction of demand occurs from physical building that would not occur otherwise. However, there is no mention in any of the policies or accompanying text to advise about other crucial factors for water quality, such as a reference to Nitrate Protection Zones.

Policy CS5 is the only policy directly involving the water environment, the location of development and future proofing. It does importantly include a number of significant points to address expected impacts from and to water environments due to climate change, such as including the following paragraph. *"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"*

As with the soil environment, there are a number of other policies that could either have direct impacts on the water environment or link to designated habitats and water quality. Though the link to habitats is established the exact impacts are generally of a more indirect nature, such as a reduced flow due to increased abstraction.

As understood through Southern Water's Business Plan and Water Resource Management Plan, the level of housing provision and growth is planned for but will increase demand. Unless this is carefully managed then it will undoubtedly increase pressure on supplies.

Recommendations to be taken into account

It would be advisable for remediation of contaminated sites to be referred to within the Core Strategy due to the number of sites that potentially meet the definition of contaminated land, with further detail in the following Land Allocations and Development Management Policies DPD.

Consideration of how to monitor the impact of policies on water demand and supply should be considered due to the importance of the issue in terms of sustainability.

Waste

Updated context

The new municipal waste contract mean that no provision will be required for treatment/processing of household municipal solid waste within the area, as it will be dealt with elsewhere. There is capacity to deal with most other waste streams at established facilities, at least in the short term.

Both the use of recycled materials and the points for addressing waste as part of the CfSH would be expected to help in reducing the amount of waste that treatment and disposal capacity is needed for. It would also be expected to help towards creating a behavioural change and so help reduce the ecological footprint of the area.

Situation without the Core Strategy

Growth in the area will mean that there will be an increase in the amount of waste generated. However, a large proportion of this will be going out of the area due to the recent waste contract that will apply throughout the whole of the plan period. In addition, fiscal and national policy measures are strongly encouraging the reuse and recycling of materials, notably in construction. This will help to offset increases generated by growth in the area.

There is already significant capacity to deal with certain types, notably industrial and commercial materials but a complete lack of landfill capacity would be likely to cause increasing quantities of materials to be diverted elsewhere, contrary to the proximity principle that is intended to apply to waste. If this occurred there would be increasing negative impacts both within and beyond Medway as a result of the need to transport materials.

Situation with the Core Strategy

Areas of search have been identified within the London Clay on the Hoo Peninsula and Isle of Grain where there is potential for land raising or void creation for the disposal of residues that cannot be disposed of in any other way. Support is also given to additional treatment capacity, particularly at Medway City Estate and Kingsnorth.

This would mean that Medway should be able to manage wastes other than that it creates over the plan period. Due to the high level of regeneration in the area there may be an increased need for a soil treatment site in the area, due to the large amount of contaminated soil needing to be treated. However constantly improving techniques mean that in many cases this can be done on the site where treatment is required.

With potentially decreasing proportions of waste that can only be disposed of through landfill, a new facility catering only for Medway's needs might not be viable. This may result in material being imported from further a field with associated negative impacts on the environment.

Proposed policy appraisal

The crucial sustainability issues in terms of waste are the following.

- Ensuring that there is a reduction in the amount of waste being produced
- Increasing the provision for treatment/processing of waste in the area
- Aiming towards being self sufficient in the future

Policy CS23: Waste Management is the only one that directly addresses waste. The policy is proactive in dealing with the disposal and treatment of the expected waste to be generated in the area. It suggests that treatment facilities should be focused in the existing industrial areas, as well as applying the proximity principle. It also sets a clear set of parameters for standards that will apply to any proposals for a void creation or land raising scheme, in one of the identified areas of search.

A number of the other policies address waste reduction and particularly reuse. Policy CS3 mentions limiting the embodied energy of materials in construction and policy CS2 refers to "*waste reduction in use and construction*". Though not explicit waste treatment or sustainable waste management facilities would be supported under policy CS17, under the banner of "*energy and environmental technologies*".

Overall it would be expected that the policies in the Core Strategy would result in a number of benefits in terms of reducing, reusing and treating waste.

Recommendations to be taken into account

Consider whether more detailed policies should be included the Land Allocations and Development Management DPD to complement the overall approach set out in the Core Strategy.

Biodiversity, Open Space and Landscape

Updated context

Nothing significant has occurred further to the original position mentioned in the Final Scoping Report.

Situation without the Core Strategy

Over the plan period the compensatory habitats that were agreed near High Halstow in relation to the new port at Shell Haven in Essex will be established and so add to the existing amount of designated and non-designated sites. This will be one of the major changes to the area in terms of biodiversity and landscape. As a result of climate change it is expected that the composition of some of the designated sites is likely to change due to coastal squeeze and rises in temperatures.

A number of countryside and access projects are being implemented and further initiatives could reasonably be anticipated without the Core Strategy. These include the Valley of Visions project in the Medway Valley and various High Level Stewardship schemes.

Situation with the Core Strategy

With the core strategy there is a high degree of protection afforded to biodiversity, landscape and open space. This is particularly the case in relation to landscape through references to the Landscape Character Assessment in a number of policies and their accompanying text.

It would be expected that through the plan period there will be increased provision of open spaces within the urban area in conjunction with built developments. There will be some development occurring on the Peninsula but focused in specific locations and so should be in keeping with the landscape character of the area.

It would be expected that the Lodge Hill development would be substantially complete by the end of the plan period, placing some pressure on biodiversity. However its location in a natural bowl should limit its impact on the wider landscape of the Peninsula. It is expected that although there will be a high number of measures in place to ensure that the development has a low

ecological and carbon footprint, recreational pressures from the new population will have an effect on biodiversity.

Policies CS3, CS6 and CS7 all allow for some new habitats to be created and the later spatial policies also mention the Landscape character Assessment and protecting rural settlements. CS7 also promotes a comprehensive Green Grid, again increasing connections and pressures on biodiversity and the wider countryside and green infrastructure.

Proposed policy appraisal

The crucial sustainability issues in terms of biodiversity, open space and landscape are the following.

- Protecting and conserving existing designated sites
- Protecting smaller green sites in the urban area to create corridors for both wildlife and human enjoyment
- Protecting the landscape character of the area
- Allowing controlled increase in access to the countryside

There are a number of policies that cover this topic with Policies CS6, CS7 and CS8 being the most direct. CS6: Preservation and Enhancement of Natural Assets specifically covers existing sites and also where necessary sets out that "*compensation will normally be sought on more than a like-for-like basis*". As such it both deals with preservation; enhancement and compensation of existing designated sites at all levels.

Policy CS7: Countryside and Landscape covers a number of areas related to designated areas, such as the Kent Downs AONB as well as habitats and a number of wider landscape strategies. Policy CS8: Open Space, Green Grid and Public Realm is proactive in trying to ensure that a level of green infrastructure is provided across the area, as well as a coherent network of green spaces that link into a wider network across the Thames Gateway. Furthermore the policy proposes that this should link into the urban area and there should be improved access to them and from the riverfront.

Policy CS22: Provision for Minerals will impact on the landscape through the activity that it is promoting. However extraction is only proposed in one location, part of which already has planning permission, so no new significant land take would occur. Protection is afforded to the landscape through policy CS23: Waste Management in terms of ensuring permission is only permitted where extremely strong cases and evidence have been provided.

Policy CS16: Gypsies, Travellers and Travelling Showpeople does not deal with specific sites but states that these will be looked at through the future

DPD for specific site allocations. It does provide protection to existing features by saying that there should be limited impact "*as assessed in the context of the Medway Landscape Character Assessment*". Policy CS13 is not likely to have much impact in this context, as it does not propose land releases beyond those that have been recognised for some time.

As mentioned within the proceeding section on water and soil, protection is also given to the agricultural land and landscape. This is further extended through the various Area policies.

Though the proposed level of growth is bound to have an impact on open space, landscape and biodiversity, it is not believed this would be as great as initially thought. The reason for this is the level of preservation and protection afforded to the natural environment through the policies discussed above.

Given the overall scale of growth expected there will be associated impacts, such as noise through traffic and so associated impacts on biodiversity and other factors. Policy CS25:The River Medway also gives protection to the water habitats along the river, stating that support will be given where *"measures to protect and enhance the river as a valuable resource for wildlife and biodiversity, including wildlife corridors and habitat enhancement"*. And that *"Opportunities will be taken , in consultation with partner agencies…., to create replacement inter-tidal habitat"*

There is no strong evidence to suggest that there will be significantly greater recreational pressures on the area but it is considered that this will occur due to the level of development and be slightly detrimental. However this is only considered to be a slight overall impact as high level of protection that will be applied through the policies as proposed. It should be noted that within policies CS7; CS30; CS32 and CS33 there is mention of the fact that relevant schemes with partners will only be allowed if they show that a balance will be reached between access and the other uses of the countryside.

Recommendations to be taken into account

None recommended

Climate change mitigation and adaptation

Updated context

Changing climate patterns have the potential to increase incidences of flooding, increase coastal squeeze and will increase the importance of wildlife corridors and buffers to allow species to migrate and adapt.

The gradual introduction of zero carbon buildings and increasing use of renewables has the potential to offset these effects but not at the scale necessary without wider scale interventions.

Situation without the Core Strategy

The impacts of climate change will be more marked as growth continues but local strategies are not in place to augment national initiatives such as the Code for Sustainable Homes.

It is unlikely that the threat from flooding would be addressed in a comprehensive way leaving areas at increasing risk.

A similar situation is likely to exist with mitigation strategies for the natural environment. Some Green Infrastructure (GI) projects would be likely to proceed but without a clear overall guiding strategy in place. There will be a continuation near the beginning of the plan period to teach people about climate change and how they can help to reduce their impact and help businesses to be more green thinking.

Situation with the Core Strategy

The national timescales for the Code for Sustainable Homes will mean that there will be a resultant reduction in some sectors of waste and also that there will be some elements of mitigation to climate change. The area will have a larger proportion of dwellings that are sustainable either as a direct result of their build design or due to retrofitting properties with renewable technologies. These will also be supported by a greater proportion of energy coming from renewable technologies.

There will be a greater scale of habitats and increased access to the countryside. There will be stronger flood defences on vital sites along the river. There will also be a greater number of solutions throughout the area to mitigate against the effects of climate change. There will be more green roofs, greater efficiency of water use and other measures to reduce urban heat island and other effects.

Development on identified regeneration sites along the riverfront have been put through sequential testing both when they were included within the Chatham Regeneration Framework and then individual SPDs. These have shown that as long as there is no extension of the urban area, there is sufficient evidence of their importance to overcome part (a) of the exemption test. In essence these also tend to fulfil part (b). More detail needed to appraise the strategic sites will be available in the Medway Urban Strategic Flood Defence Strategy.

Proposed policy appraisal

The crucial sustainability issues in terms of climate change mitigation and adaptation are the:

- Ensuring buildings are resilient to the expected impacts
- Increasing protection of the waterfront from flooding

- Reducing the ecological footprint of the area

Mitigation is important throughout the Core Strategy, with a few themes, retrofitting; reducing the ecological footprint; renewable energy and landscape and habitat protection, repeated in a number of different policy areas. Adaptation to climate change is also important but this is only specifically referred to in one policy. One issue, which has a specific policy, incorporating both mitigation and adaptation, is flooding.

Policy CS5 is the only policy directly involving the water environment, the location of development and which tries to incorporate future proofing. In addition, to this policy there is also specific mention in policy CS25 that "*development will not be permitted which encroaches onto the natural floodplain beyond the current urban boundaries or threatens the stability or continuity of flood defences*." The last part of this is the element that gives some element of future proofing.

More overarching is policy CS3: Mitigation and Adaptation to Climate Change, which is directed to ensuring that there are contributions from all developments to reducing the ecological footprint of the area.

Policy CS4: Energy Efficiency and Renewable Energy encourages renewable technologies in both residential and commercial developments. It also states that the principles of passive design should be used first to reduce energy loading. It applies a target of 20% to be achieved through these means. It also mentions that where this is not economical compensation will be applied by requiring improvements to existing buildings in the locality. This element is also mentioned within some of the housing and design policies. It also directs developers and others to the Renewable Energy Capacity Study. This can also be looked at in terms of potential ways of achieving the different code levels.

Policy CS33: Lodge Hill has very clear points within it for ensuring that the development is adaptable for the impacts of climate change. There is also an element of this within policies CS2 and CS15

Recommendations to be taken into account

Potentially tightening up some of the wording on some policies so that firmer weight is given to these elements when they are applied.

Appraisal of the Pre-Publication Draft Core Strategy Policies Against the Social Indicators

Community (crime, income and deprivation)

Updated context

The only change since the Final Scoping Report has been in terms of the population, which has been slightly under that predicted. In the middle of 2009 the population estimate was 254,800.

Situation without the Core Strategy

Population growth in Medway has grown at a slower rate than England & Wales since 2001. It is expected that under existing population growth estimations of growth would continue so it would reach 275,200 by 2026 and potentially reach a rounded figure of 280,000 in 2028. This is based on a greater level of housing growth being needed to accommodate current populations, due to the declining household size that has been seen. It is anticipated that the majority of this growth would remain in the urban area through an increase in densities, with some much more minor increase also occurring in the rural area.

It would be expected without the Core Strategy that although the population of the area is younger than a number both regional and national rates, there would be a growth in the older population through the plan period. This has been identified both through work nationally by the Office of National Statistics (ONS), regional work and most recently area profiles published in 2010.

Currently the aging population has been on the periphery of the area, with concentrations around Rainham; adjoining parts of Gillingham; Rochester town centre and parts of Cuxton and Halling. In the future it would be expected that this distribution would mean that this would be where the greatest pressure will be on services.

It would however also be expected that populations in Twydall, would be likely to stay proportionately young. Therefore, it could be possible that the aging population profile might also be lessened or balanced if regeneration resulted in a reasonable proportion of the younger aged population also increasing.

The largest proportion of population change has occurred in those areas where there has been significant regeneration and this would be expected to continue over the plan period. The changes in the demographic make up of the area are crucial to ensuring that the right services are accommodated in the right places, as well as being a key role in ensuring sustainable communities both in the present and future.

The recent trend to a falling average age in Rochester and Gillingham town centres would be expected to continue, as well as the reduced number of dependents as a result of the increased number of the working age population across the central arc of the towns from Chatham to Gillingham.

Situation with the Core Strategy

The area will be expected to be more prosperous with more people working locally and enjoying average earnings closer to the regional average of £33,500 in 2009. The town centres will have better quality open spaces and services and feel safer to transit through, particularly at night. There will be more cultural facilities and people will have greater access to a number of historic assets. The changes to the transport system and the town centres will allow greater access to services and facilities for the population as a whole.

There will be a greater number of multi-functional green spaces in a network across the area, especially connecting across the urban area. These will improve quality of life, as well as the cultural offering and provide greater access to the wider countryside.

Proposed policy appraisal

The crucial sustainability issues in terms of community are:

- Improving access to service for the whole population
- Ensuring safe, clean environments
- Addressing crime issue while improving the night time economy of town centres

Spread throughout the document and policies there are mentions of sustainable communities and community cohesion.

Crime is not directly mentioned in any policies, however there are a number of references to elements that relate to crime. At the end of policy CS8 it mentions, "*easily and comfortably move through and into developments…should maintain attractive and safe streets and public spaces*"

In terms of deprivation there are again no dedicated policies, although there are a number of policies that will affect this, in terms of employment and income. The majority of these are those involving an economic element, which are discussed in the last section against the economic objectives, but there are also other important elements covered such as health inequalities.

Policy CS9: Health and Social Infrastructure is key to this and it contains a commitment to working with Medway Maritime Hospital and the PCT to ensure that their needs are met. It also makes a connection to the

Neighbourhood Action plans. In addition policy CS11: Culture and Leisure is important to the overall feeling and enjoyment people have for an area. It will be important with regard to getting buildings back into use and contributing to the vitality of the area, either directly with community facilities or by creating jobs and income.

The Area policies covering the 5 towns (CS26, CS27, CS28, CS29 and CS30) all identify Local Centres at the end of them and give them added protection. However, where it is known that these may well not be suited towards a traditional use, such as retail, then where the case can be shown for other elements they will be considered. The importance of these is for access to services within the population.

Recommendations to be taken into account

None.

Cultural Heritage and Material Assets

Updated context

There are currently a number of festivals that are held across the area each year forming a large part of the cultural offering in the area. However the formal venues are less high profile and cater for more local than sub-regional or regional audiences. Nevertheless there is a vibrant, if slightly underground, creative scene that exists in Medway. This can, in part, be linked to the University of the Creative Arts. The cultural offering of the area would therefore not be expected to be a significant issue.

Currently the townscape in certain areas, especially of Chatham is poor. There are few sitting or meeting places of a good standard, although there have been signs of improvement with the construction of Waterfront Way.

Higher standards are apparent around Chatham Maritime and specifically the area around Dickens World, which now has a vibrant feel.

There are many fine heritage assets but often these lack visibility or neighbouring uses of much lower visual quality detract from them. Similarly the town centres are not as vibrant or welcoming as they should be and, other than Rochester, have poorly developed nighttime economies.

Situation without the Core Strategy

Without the Core Strategy, it is not expected that there would be any substantial change to the cultural assets that have been identified previously.

Some reinvestment could be expected in the town centres but not on the scale envisaged in the Core Strategy.

Situation with the Core Strategy

The Core Strategy will give a high level of protection to important assets and seek to expand the cultural offer, specifically along the waterfront. There may also be a slight improvement over the plan period to some features if as expected the World Heritage Site Bid is successful.

A key part of this would be the implementation of a number of management plans that would allow greater access to a number of cultural features that currently are limited in terms of their accessibility. This will mean that there is an increase in accessibility through the plan period.

Proposed policy appraisal

The crucial sustainability issues in terms of culture and material assets are:

- Protecting existing assets
- Increasing knowledge of existing assets
- Increasing participation in cultural activities

There is one specific policy on Culture, which is policy CS11:Culture and Leisure and one that is specifically about historic assets, which is CS12: Heritage Assets. As would be expected these policies give a high level of protection to these elements. Additionally, policy CS12 gives support to the area forming the Tentative Bid for World Heritage Status. Policy CS11 gives added weight to a cultural facility located on the waterfront that is also proposed in the Medway Cultural Strategy.

There are of course a number of others that will be of relevance though, such as CS18:Tourism and CS10:Sport and Recreation. Policy CS18 gives support to improving the cultural offer of the area by stating that *"a waterfront theatre and cultural hub which would help to link the tourist offer in Rochester with the Dockyard and Chatham Maritime"*.

Policy CS10 again has an emphasis not just in terms of protecting existing facilities but also in terms of supporting new facilities. It also refers to using the legacy of the Olympics in order for it "to be best used to meet local needs".

In all, the Core Strategy both protects and gives additional weight to providing a number of different cultural elements.

Recommendations to be taken into account

Maybe there should be additional wording to help in terms of giving a more locational basis or importance to the specifically relevant policies.

Transport and accessibility

Updated context

A combination of changes are being made to the road system in and around Chatham and construction of a new dynamic bus interchange will mean an improvement to the traffic flow and bus services through Chatham. This combined with the Urban Traffic Management Control (UTMC) system will reduce the levels of congestion and journey times in the urban area in the short term at least.

Furthermore, with better positioning and a greater mix of car parks located at the edge of Chatham town centre and the associated bus improvements it would be expected there would be opportunities to encourage a modal shift away from the private car.

Situation without the Core Strategy

Through the mechanism of the third Local Transport Plan it would be expected that most of the schemes and measures planned would be implemented. However this might not apply to schemes requiring third party land or improvements associated with new built developments.

In this case planned improvements to rail/bus interchanges, the introduction of park & ride sites and the development of a quality bus network should result in a shift to bus use for urban journeys. Schemes dealing with congestion 'hotspots' should also result in freer flowing traffic, with associated air quality benefits.

Situation with the Core Strategy

This should make it more likely that significant rail station improvements take place, that park & ride sites are provided, parking provision in the town centres is rationalised and necessary junction improvements implemented. It should also improve the prospects of river taxi and other marine services being introduced.

Benefits may however be offset by increased economic activity within the urban area, including more successful town centres.

Proposed policy appraisal

The crucial sustainability issues in terms of transport are:

- Creating a modal shift away from the private car
- Reducing congestion and shortening journey times

Policy CS24 is specific to transport. This in essence lays out requirements for helping to achieve a number of elements in the third Local Transport Plan. There are also references to the strategic road network in a number of other policies.

The wording of policy CS24: Transport and Movement has a clear focus on achieving a modal shift from the private car to other travel modes, such as walking and cycling. It also covers all types of travel modes for both residents and businesses, through preservation of the wharves and jetties. However, parts of this policy would need to be carefully balanced with others, such as policy CS17: Economic Development.

Recommendations to be taken into account

There is no mention of electric vehicles and whether it is expected that there will be any contribution from them or how any associated infrastructure would be provided.

Housing

Updated context

Demographic trends point to a gradually ageing population and a continuing decline in the average size of households, plus a move towards net in migration (out migration has offset positive natural change over recent years). Though the recession has reduced house prices slightly, due to a similar drop in jobs prices are still for many unaffordable. For the year 2008/9 the housing completion figure was 914.

Situation without the Core Strategy

If regeneration is continuing at a slower rate but in locations that are already known, there will be a reasonable amount of new housing constructed. However this would be likely to fall short of meeting local needs from new and smaller households over time and would not reflect Medway's location within the Thames Gateway growth area.

Production would fall without the development of a new settlement at the MoD land at Chattenden Barracks (Lodge Hill).

Situation with the Core Strategy

Housing development in general would continue to be driven by developers and the market. The general standards of housing would be expected to improve both in terms of flexibility and overall sustainability.

Sites in and around the town centres and along the urban waterfront are likely to have a high proportion of smaller units, with family sized units being located in the more suburban locations. Provision would be expected for students and people needing various forms of supported accommodation.

Beyond the urban area the new settlement at Lodge Hill would be expected to have a broad range of house types and tenures but with an overall bias towards family sized accommodation. The use of previously developed land and sustainable forms of construction should limit its impact and its good relationship with other settlements on the Hoo Peninsula should improve the sustainability of these rural settlements.

As such it would be expected that it will be easier for all sections of the community to find a suitable, affordable and sustainable home.

The Core Strategy would allow for some more provision to be made for smaller sections of the community, such as Gypsy and traveller communities.

Proposed policy appraisal

The crucial sustainability issue in terms of housing is:

- Ensuring that an adequate mix, size and tenure of housing is provided at an affordable price

There are a number of chapters within the Core Strategy that contain policies relevant to the social development of the area. These are Chapter 6: Housing; Chapter 7:Economy; Chapter 9: Transport and Movement, as well as some policies towards the end of Chapter 5 and the policies covering the spatial areas. As with the rest of the appraisal the assumption has been made that all policies are fully and effectively implemented.

Chapter 6 solely relates to housing developments. The text at the beginning of the chapter suggests that the housing trajectory will not be even over the plan period and, instead, will peak during the middle part and lessen significantly during the last three years.

It may be that build rates will be more even than indicated in the trajectory but it will be important to monitor progress to ensure supply continues to match need.

Policy CS13: Housing Provision and Distribution mentions general locations within it although the exact specifics are in the supporting evidence base and not explicitly laid out in the Core Strategy. There is however slightly more specifics on types expected in different locations within policy CS14: Affordable Housing.

A large proportion of the expected housing delivery will come from the Lodge Hill development. Given its importance there would be substantial concerns if there were any hindrances to it coming forward. However a delivery schedule is referred to in the spatial chapter.

The proposed policies would not seem to help in terms of evening out any spatial imbalances or significant deficits where they exist. The main difference that will be created by the Core Strategy will be in creating the policy framework for the development of a settlement at Lodge Hill to come forward. It will be expected that this would have a mix of housing types and tenures, as well as a number of other facilities required to keep a market town operational, through community facilities. This will also make up the single greatest proportion of the expected housing of the area in the future.

Policy CS15: Housing Design and Other Housing Requirements is actually the one that would contribute most substantially to ensuring that future housing developments are as sustainable as possible. This is due to the fact that it mentions that housing should be both adaptable in terms of future occupants and the Lifetime Homes Standards and then to address the existing stock in terms of *"its fitness for purpose and raise overall sustainability standards"*.

Recommendations to be taken into account

Confirmation should be sought as early as possible as to the number of dwellings that will be delivered on the Lodge Hill, Chattenden site during the whole Plan period.

Appraisal of the Pre-Publication Draft Core Strategy Policies Against the Economic Indicators

Economy and employment

Updated context

There is great variation across Medway in the proportional working age population, with Chatham town centre and Rochester Riverside having the least economically dependent population. However in contrast Twydall and 'Wainscott, Frindsbury and part of the Peninsula' have relatively low proportional working-age populations, with Twydall's situation being worsened by a relatively high level of benefit dependency.

However, despite being a comparatively sizable business sector in Medway, associated employment in construction is not to the same scale, due to the notably small firms in terms of employee numbers in the sector.

The greatest number of jobs per working age population is in direct correlation to the highest concentration of businesses in the secondary and service sectors, which are centrally focused in the town centres. Furthermore, the main commercial area with the greatest job densities is in the main urban area.

There appears to be a direct correlation between a high number of jobs per working-age resident and a high concentration of businesses in the secondary and service sectors. This is most evident in the main central urban area.

A large proportion of regeneration is focused in the town centres, of which all involve elements of employment. In general these are in the retail and service sectors, but also contributing to other sectors such as B1.

It would be expected that implementation of the Economic Development Strategy (EDS), adopted by the Council in December 2009 would mean that there would be an intensification of uses in the established employment areas. The largest of these are Medway City Estate and Gillingham Business Park but there a number of smaller industrial estates throughout the area. These are in addition to the very large areas at Kingsnorth, Thamesport, Chatham Docks and the Isle of Grain.

There is also a focus in the strategy to encourage growth in the creative industries sector, although there is no suggestion of how or where this should be focused. It is likely however that this would be linked to graduate retention and therefore most likely to be centred on Chatham.

In the Employment Land Review (ELR) that was done by Baker Associates during the summer of 2010, it concluded that future employment proposals could provide 20.78ha of future requirements. However based on projected demand this would still be an under provision, as shown in the table below, although this has been converted to square metres for comparison.

Figure 2:Table showing the Employment Floorspace Supply by Sub Areas

Location	Floorspace Required	Floorspace Supply	Surplus/Deficit
	Sq m	Sq m	Sq m
Town Centre/Waterfront	93,493	73,836	-19,657
M2 Access	193,570	88,605	-104,965
Peninsula	36,604	666,290	+629,686
Other Urban Areas	25,296	4,827	-20,469
Total	**348,963**	**838,487**	**+484,595**

Situation without the Core Strategy

It is expected that through the plan period, there will be considerable improvement in economic opportunities, resulting from regeneration activities, due to a natural increase in the proportional working age population. The activity rate is 'driven up' amongst the local population as economic activity increases and this is strengthened in combination with local initiatives. However as the ELR has identified there is the potential for future employment proposals to supply 20.78ha, although this would still leave a deficit, especially around the M2 corridor.

Situation with the Core Strategy

It is expected that there will be a significant improvement in overall economic performance and much more activity in and around the town centres. The full unmet provision in the town centres would be addressed and Chatham would be the focus for new retail development, with support from the other centres. Chatham would also begin developing as a recognised office location. Strood and Gillingham town centres would also have developing local office markets.

With the progress of the Lodge Hill development there will be additional employment space for higher value jobs to be accommodated along with some small convenience and district centre scale possibilities.

Reinvestment in the established employment areas should ensure that they continue to provide high numbers of jobs. It would be expected that these areas would also attract higher value activities.

Grain and Kingsnorth would become distinctive employment locations but probably featuring lower employment densities and lower average wages than elsewhere.

Rochester Airfield would be expected to be a noted location for higher value activities based on its development as a technology and knowledge based cluster.

Agriculture might be expected to have increased significance as issues around food security intensify.

Proposed policy appraisal

The crucial sustainability issues in terms of economy are:

- Increasing the literacy and numeracy of the population, specifically those gaining Level 2 qualifications or above
- Reducing the proportion of the working age population on benefits
- Increasing the average salary

- Increasing the proportion of people living and working in the area, so reducing the level of outcommuting.

Policy CS17: Economic Development is the key economic policy and then there are a number of others covering different elements. In addition, there are also a few mentions within other policies as well.

Policy CS17 gives added support to certain sectors, as well as within the accompanying text laying out the amount of each use class expected to be delivered over the plan period, though this does not currently have a specific breakdown showing where this is going to be provided. The explanatory text also talks of the Council's partners who will help to implement this. One of the main keys of this policy is to attract higher value activities. Therefore as well as its economic contribution it will also make a positive contribution to tackling deprivation, specifically income deprivation.

Policies CS18-21 all discuss specific sectors of the job market. In addition, policies CS31-33 refer to strong vibrant economies for local people being supported on the Peninsula and in the Medway Valley. These would be expected to be in the rural-based sectors, such as agriculture, horticulture and woodland management or farm diversification. Policy CS21 specifically says that one of the criteria an application will be assessed against will include the use of local labour.

The explanatory text for policy CS19 outlines some specific proposals, such as two smaller scale food stores and a retail park and where they will be located.

Policy CS20: Education and Personal Development discusses the further and higher education focus, but it also mentions a *"distributed adult learning service to ensure reskilling matched to the identified needs of local employers"*. This should help to address deprivation and jobs in some of the more deprived areas, as well as town centres.

As such this range of policies is considered to have significant benefits and positively contribute to the objective of jobs for a range of people in deprived areas. It will also have a positive contribution in helping ensure skills are upgraded and deprivation and social inequalities are tackled.

Through the number of specific policies in the economy chapter and a number of others, such as CS31: Hoo Peninsula and the Isle of Grain and CS32: Medway Valley, there is a very supportive proactive framework for a wide variety of sectors to be accommodated, creating a strong, vibrant economy that would be highly sustainable.

Recommendations to be taken into account

To ensure that the core strategy gives the highest level of potential for the economy, it is felt that there needs to be a greater emphasis on existing smaller business sites located in the urban area, with some allowance for adaptability (possibly applying it to all new developments, including conversions).

The employment provision at Lodge Hill should be carefully considered in terms of its linkages to existing businesses and to ensure that it does not draw people from the other nearby settlements on the Peninsula, that would be harmful to their vitality.

Appraisal of cross-boundary issues

It is considered that the Core Strategy will have limited direct impact upon neighbouring areas due to the fact that no significant developments are proposed close to or straddling administrative boundaries.

The main impacts will to a greater and lesser extent, mainly affect Gravesham, due to the location of Lodge Hill nearer to its administrative boundary. A noticeable impact will be an increased level of traffic across the Peninsula, especially the known use of Higham station by commuters to London. Furthermore there is a coach service that is also heavily used from Grain that would also use the route across the Gravesham area. Even with a mix of residents it is expected that even a small proportion will increase the traffic and congestion from this direction. Partially as a result from this there may be a slight effect on air quality.

The other noticeable impact will be a draw of people from nearby settlements travelling to the shops at Lodge Hill. Especially for those located in Gravesham but closer to Medway, it may be a shorter distance to travel to Lodge Hill than into Gravesend or any of the other nearby settlements. Though the level of employment provision will only be expected to be to deal with that in the settlement and immediate locality, it could similarly draw people for the employment opportunities. This may be exacerbated if there are higher value jobs created resulting in competition to existing employment centres, from Grain; Cliffe; Hoo and as far as Strood and parts of Gravesham.

Below is a written outline of the way that these impacts may be minimised and lessened.

A more prosperous local economy and investment in significant new retail capacity would be liable to ‘claw back’ trade currently being ‘lost’ to nearby centres and reduce out commuting. This could have a negative economic impact on these areas while making Medway more sustainable in economic terms.

The development of Lodge Hill as a settlement is likely to impact most directly on Gravesend as currently many residents on the Hoo Peninsula shop there. This should reduce if Lodge Hill develops as a new service centre for the Peninsula.

There is close cross boundary working on issues such as landscape character and the development of sub regional green infrastructure networks and this should positively benefit from the approach set out in the draft Core Strategy.

Greater economic activity could impact on traffic movements over a wide area but the Core Strategy proposes a number of actions to minimise these. These include a reduction in out commuting, enhanced retail and cultural facilities and the use of rail for the movement of freight. It is considered that, in combination, these should minimise potential increases in traffic on the strategic highway network.

Monitoring of the Core Strategy

The aim of the monitoring system of the SA is to try and set a framework to show whether progress is being made towards sustainable development through the use and time of the Core Strategy's plan period.

The SA framework that was established through the Scoping Report as well as setting a number of objectives also set a number of indicators to be used to help in terms of assessing trends and most importantly to then form the basis for a monitoring framework.

The majority of the indicators within this come from recognised and established organisations that report on a consistent basis. However the timescales between the reporting periods can vary. There are also a relative number that are not currently reported at a local level at present.

Within the last chapter on Implementation, Monitoring and Review a table has been included that proposes a monitoring framework for the Core Strategy. As a result the monitoring proposed here tries to marry up those elements in the LDF that are reported through the Annual Monitoring Report and those included in the SA, which are not.

Due to these issues of differences between the reporting timescales and the fact that the length of the Core Strategy's plan period is 15 years, the first decision that has been taken is over the length of time that it shall cover. It has been decided that the 'Sustainability Reports' will be produced every 5 years. This is also convenient as it will be very easy to see what has been achieved within the different stages of the plan period. Furthermore, it will also link to the same timescales as a number of the other evidence base documents, so if necessary changes to legislation could also be included, when pertinent.

It would therefore be through these 'Sustainability Reports' that progress towards the objectives set out in the SA framework could be seen and compared. Further discussions are needed in terms of evolving exactly how the two systems might progress, however it is initially considered that it may be as follows. The Annual Monitoring Report (AMR) through core indicators and a set of contextual indicators, reports on the LDF annually. Then due to the large number of elements from the AMR that would also be included in the Sustainability Reports, these would replace them every 5 years.

Number	SA Objective	Framework Indicators	Overall progress	Summary
1	Conserve and enhance the diversity and abundance of habitats and species	• Extent and condition of key habitats • Condition of SSSIs • Reported levels of damage to designated sites • Achievement of Biodiversity Action Plan targets • Number/area of Local Nature Reserves • Population of wild birds and farmland birds • Area of land covered by agri-environment schemes	O	
2	Reduce air pollution and improve air quality, including reduction of greenhouse gas emissions	• Achievement of Emission Limit Values • Population living in Air Quality Management Areas • Number of days of air pollution accedances • Emission of greenhouse gases from energy consumption, transport, and land and sea waste management	O	
3	Maintain an improve quality of ground water and surface waters and security of supply	• Quality (biology and chemistry) of rivers, canals and freshwater bodies • Rivers of good or fair chemical and biological water quality • Compliance with EC Bathing Waters Directive • Water use (by sector, including leakage) and availability • Per capita consumption of water • Incidents of major and significant water pollution	O	
4	Reduce risk of flooding and ensure resilience of buildings and minimise the effect on public services and infrastructure	• Properties at risk from flooding • Number of additional houses where flood risk has been reduced • New development with sustainable drainage	O	

		installed		
5	Reduce ecological footprint through prudent use of natural resources, reduction in waste management and sustainable waste management practices	• Waste disposal in landfill. • Percentage of the total tonnage of all types of waste that has been recycled; composted; used to recover heat, power and other energy solutions; and landfilled • Number of new buildings reaching Code for Sustainable Homes Level 4 or above by 2013.	O	
6	Provide opportunity for everyone to live in a decent, sustainably constructed, affordable home suitable to their needs	• Percentage of new and retrofit homes reaching Sustainable Homes Level 4 or above • Housing completions compared with regional guidance. • Affordable homes within the total housing stock. • Homelessness. • Number of unfit homes per 1,000 dwellings.	O	
7	Maximise land use efficiency through appropriate use of previously developed land and existing buildings	• Housing density • Percentage of development on previously developed land	O	
8	Improve the health and well-being of the population and reduce health inequalities	• Death rates from circulatory disease, cancer, and accidents, and suicide. • Infant mortality rates. • Conceptions among girls under 18. • Life expectancy. • Obesity	O	
9	Reduce inequalities in poverty and social exclusion	• Proportion of children under 16 who live in low income households. • Percentage of population of working age who are claiming key benefits.	O	

		• Number of households in fuel poverty • Proportion of population who live in wards that rank within the most deprived 10% and/or 25% of wards in the country. • Access to services for disabled people		
10	Reduce crime and the perception of crime	• Recorded crimes per 1,000 population • Fear of crime surveys • Number of transport accidents • Level of domestic burglaries, violent offences and vehicle crimes per 1,000 population	O	
11	Improve accessibility to key services and facilities (inc. countryside, leisure/recreation and historic environment)	• Percentage of development within 10 minutes or 500m walk of a frequent bus route/rail service. • Access to services for disabled people • Distance to nearest leisure or cultural facility • Percentage of land designated for particular quality or amenity value, including publicly accessible land and greenways. • Proportion of population within 200m of parks and open space • The proportion of Medway residents meeting the Accessible Greenspace Standards: - live no further than 300m away from nearest area of natural green space of 2ha in size - at least one accessible 20ha site within 2km of home - one accessible 100ha site within 5km of home - one accessible 500ha site within 10km of home • Participation in sports, outdoor and volunteer activities	O	
12	Conserve and enhance historic buildings, archaeological sites and	• Percentage of Listed Buildings and archaeological sites 'at risk.'		

	culturally important features and increase engagement by all sections of community	• Buildings of Grade I and Grade II* at risk of decay. • Additional listed building or conservation area designations per annum • Participation in Cultural activities	O	
13	Increase energy efficiency; the proportion of energy generated from renewable sources and the diversity and security of energy supplies	• Electricity generated from renewable energy sources and CHP located in the area. • Energy consumption per building and per occupant. • CO^2 emissions. • Number of households in fuel poverty	O	
14	Reduce traffic and congestion by reducing need to travel and improving travel choice	• Distances travelled per person per year by mode of transport. • Traffic volumes. • Growth in road traffic. • Average vehicle speeds. • Proportion of travel by car. • Investment in public transport, walking and cycling	O	
15	Raise educational achievements through developing opportunities to acquire skills, to develop and maintain workforce	• Proportion of 19 year olds with Level 2 qualifications (% GCSEs A*-C or NVQ equivalent) • Percentage of population of working age qualified to NVQ Level 3 or equivalent. • Proportion of adults with above or below average literacy and numeracy skills.	O	
16	Support and improve employment and economic competitiveness in town centres and deprived areas	• Business start-ups net of closures. • Inward investment. • Social and community enterprises. • GVA per capita	O	

It should be noted in the table above that there are a number of indicators, especially in relation to the economic objectives that are in purple font. These are where more investigation needs to done to find out the exact level of data available. These will then be reviewed and the table amended accordingly as it evolves in any subsequent reports, during the final stages of the Local Development Document production.

Conclusion and summary

As can be seen throughout this document there are variations in terms of the amount the different elements of the Core Strategy will have an effect. In the main it shows that the Pre-Publication Draft Core Strategy has a deep thread of sustainability running through it. This is seen especially strongly in terms of water and soil related elements as well as the landscape, wildlife, biodiversity and countryside elements. It is very interesting that there is also a large amount that has been added into a number of policies that would not necessarily at first hand be considered sustainable.

A clear example of this would be policy CS21: Conventional Energy, which though initially seeming against many of the sustainability principles, once looked at and considered in more detail will make a substantial contribution to a number of sustainability indicators. In relation to this policy it is the mention of showing links to the local labour force and proposals being assessed for their potential to reuse waste heat.

The Core Strategy will ensure that a reduction of demand occurs from physical building that would not occur otherwise. However, there is no mention in any of the policies or accompanying text to advise about other crucial factors for water quality, such as a reference to Nitrate Protection Zones. It also clearly provides a means for comprehensive flood protection to be taken account of as well as including it on a more individual basis through stating the need for SUDS that meet the National Standards.

Overall it would be expected that the policies in the Core Strategy would result in a number of benefits in terms of reducing, reusing and treating waste. In terms of biodiversity, open space and landscape there is a large amount of protection afforded through the Core Strategy, which is vitally important with the growth that would be expected to continue occurring even without it. However, these need to be carefully implemented to manage the increase in recreational pressure that will occur due to growth and also other policies within the document.

There are also elements through a number of policies that will contribute towards future proofing for the impacts of climate change for residents, such as the requirement to meet specific CfSH levels, potentially strong emphasis on the requirement to have investigated the potential for new technologies such as district heating and also to help ensure the retrofitting of existing buildings.

In all the Core Strategy both protects and gives additional weight to providing a number of different cultural elements.

There is a clear focus in terms of Transport and Movement on achieving a modal shift from the private car to other travel modes, such as walking and cycling. It also covers all types of travel modes for both residents and businesses, through preservation of the wharves and jetties. However, parts

of this policy would need to be carefully balanced with others, such as policy CS17: Economic Development.

As such this range of policies is considered to have significant benefits and positively contribute to the objective of jobs for a range of people in deprived areas. It will also have a positive contribution in helping ensure skills are upgraded and deprivation and social inequalities are tackled.

Through the number of specific policies in the economy chapter and a number of others, such as CS31: Hoo Peninsula and the Isle of Grain and CS32: Medway Valley, there is a very supportive proactive framework for a wide variety of sectors to be accommodated and create a strong, vibrant economy that would be highly sustainable.

The monitoring proposed here is a result of trying to marry up those elements in the LDF that are reported through the Annual Monitoring Report and those within the SA framework which are not.

MEDWAY LOCAL DEVELOPMENT FRAMEWORK

Schedule of Representations Received in Response to Public consultation on the Issues and Options report 2009

Submitted to Medway Council's Cabinet 19 October 2010

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				Overall	
			I.H. Smith	Improve schooling, roads, high streets, hospitals before housing.	Development will need to be accompanied by the provision of appropriate infrastructure.
				Restrictions on new house building. The infrastructure in Medway cannot cope with more population. Hospital waiting time, schools, road capacity are all overcrowded.	Housing provision is a requirement of the PPS3 Development will need to be accompanied by the provision of appropriate infrastructure.
		University College for the Creative Arts at Rochester	David Hawkins	Comment to preface: It is disappointing that there is no reference to students who may want to comment - in addition to residents, workers and visitors - particularly given the large number of universities in Medway and the importance of them to the economic/cultural/social life of the local communities.	Provision is made in the housing and education policies to meet the needs of students.
				Preface	
	Question 1			**Q1: Have we identified the right issues?** Answers for question 1 (from questionnaire & website): • 10 Yes/ Agree • 3 No/ Disagree • 5 Don't Know	
	Question 1	CPRE Kent	Brian Lloyd	We are disappointed that the document fails to recognise the issues that face the rural communities in Medway and that it is almost entirely urban focused. We accept that the vast majority of Medway's population lives in the urban areas, but much of the area is rural. The residents of Medway value the countryside around it, and the rural communities have their own needs. We would refer to the initial comments we presented in our letter of 9th April 2009. In particular CPRE is concerned to ensure that the Core Strategy: • maintains and protects the currently defined extent of the Metropolitan Green Belt and defines its role in the Medway context; • recognises and protects the AONB, and explains the importance of the AONB in the Medway context and present how AONB policy will be applied locally; • recognises and protects the areas natural and historical assets; • provides protection for the countryside generally (along the lines of Policy BNE25 of the Local Plan); • seeks to prevent settlement coalescence (as highlighted in Policy KTG1 of the South East Plan); • defines robust and defendable settlement boundaries linked to the definition of a settlement hierarchy; • seeks to ensure viable and vibrant rural communities by recognising the continuing role of agriculture, the need to support appropriate rural employment, the need to maintain and improve rural services and facilities, and the need to meet rural housing needs. The provision of affordable housing is one issue not discussed in the document. This, we consider, is an important topic that must be addressed by policy in the Core Strategy. Although the South East Plan sets an indicative target of 30% for the Kent Thames Gateway sub-region, the Council's 2006 Housing Needs Study concludes that provision needs to be at a rate of 40%. We agree that the need for affordable housing would seem to justify this higher figure. In addition we consider that the Council needs to consider the site size threshold to which this would apply, and we would suggest that consideration be given to a threshold that is lower than the 15 dwellings indicated in PPS3. We consider that this should be 10 dwellings in the urban areas and 5 dwellings in the rural areas, subject to viability testing. In the rural areas we accept that the 'exception policy' has a role to play in providing affordable housing, though historically only modest amounts of affordable housing have been provided under this policy. Such a policy should be included in the Core Strategy provided it is clear that it is intended to meet the needs of local residents, and that clear locational criteria are presented to ensure that proposals relate to the scale and siting of an existing village and the services and facilities present (including public transport).	The issues of the rural areas are specifically addressed in the chapters on the Hoo Peninsula and the Medway Valley and Downs and more generally in the natural assets, landscape and countryside and open space policies. The concerns of the CPRE are addressed in the Core Strategy in policies on the economy, tourism, the natural environment, landscape, open space, the Hoo Peninsula and the Medway Valley and Kent Downs. In accordance with advice contained in the Medway Strategic Housing Market Assessment, a 25% provision of affordable housing will be sought in the urban area and at Hoo St. Werburgh and 30% will be sought elsewhere. This requirement will apply to developments accommodating 15 or more dwellings or on sites of 0.5ha or more.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 1		Alastair Blair	The Strategy shows the right headings which need to be advanced for the development to 2026. The rolling out of the strategy and the workshops has not maximised the exposure of the potential horrors that might occur to the Medway area between now and 2026. Where is the newspaper adverts for the workshops, where is the tv exposure, where is the council actively engaging with the residents and business. The workshops are a poorly attended and are not advertised enough. There is too much reliance on the website. Those without web access are being deprived.	Substantial efforts were made to reach all parts of the community using a variety of techniques in accordance with the Statement of Community Involvement
	Question 1	Viridor Waste Ltd	Mandeep Jutley	Having reviewed the current Local Development Scheme (September 2008), we note that a separate DPD document will not be prepared for Climate Change and Natural Resources. As such we agree with these topics to be addressed in the Core Strategy along with Waste and Energy.	The Core Strategy will address waste, minerals, energy, water and climate change.
	Question 1	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	The Cliffe and Cliffe Woods Parish Council would like to see two further issues added to the LDF. 1) Rural Issues - Although the countryside is covered, there are specific issues relating to the rural areas of the Medway Towns. These areas are affected very differently than the urban area and have many different concerns and aspirations. 2) Heritage - The Medway Towns has a rich heritage and we feel the LDF should make special mention of the vast array of heritage assets and how they will be identified and managed. There is still a strong public feeling that further residential development should be resisted.	Both rural issues and heritage are addressed in the core strategy.
	Question 1	Kent Wildlife Trust	Debbie Salmon	The Trust is pleased to see a commitment to a Green Grid, the preservation of the green projections within the urban area and the suggestion that Local Wildlife Sites should be buffered. However the documents produced so far give little detail on the following points. • How is Medway Unitary Authority intending to protect SPAs, SACs and Ramsar sites from the impacts of the proposed developments? Is an Appropriate Assessment being prepared? • How the green projections present within the urban environment are to be connected both to each other and out into the countryside. • How the Green Infrastructure is to be extended to cover the whole of Medway Unitary Authority. At Present there are only allusions to urban green infrastructure • How the Green Infrastructure will be delivered The Trust would recommend that full details are incorporated within the submission document with a comprehensive map and detailed delivery mechanisms. From our work with other Local Authorities delivery appears to be an important issue in examination.	The Core Strategy has not attempted to buffer designated wildlife sites but the council considers that policies on natural assets, landscape and open space will provide adequate protection. An appropriate assessment will be prepared. The Council will work with other stakeholders to implement its countryside policies.
	Question 1	Dickens Country Protection Society	Chris Fribbins	Generally yes, but would also like to see Heritage and Rural Issues considered as separate topics/chapters	The rural issues are addressed in sections on the Hoo Peninsula and Medway Valley and Downs and Heritage Assets are also specifically addressed.
	Question 1	South East Marine Association	Laraine Soliman	No. Medway has long standing problems which have deteriorated as a result of the Council's hostility to small and medium businesses which have been prevented from providing employment and prosperity. Those business are in turn subject to such levels of restraint and damage by local policies that many have failed or been forced out. There is no Medway cathedral, Medway castle, Medway railway station, Medway dockyard, Medway university or Medway football club but it does have a river which is treated as an impediment to the council's pipe dream aspirations rather than an artery for transport, trade and recreation. The dereliction at Rats Bay and Sun Pier is a shameful blot on the landscape. The Strategy must contain a deliverable policy to halt and reverse the siltation which is accelerating following termination of the use of Rochester Riverside and other regeneration sites by commercial craft. As shipping movements reduce so siltation increases. Along with neglect of public piers (and hence public access to the river) prompt action is necessary otherwise there will be public resentment that the river has become an eyesore. The siltation has an impact on the risk of flooding which has so far been ignored.	The opportunities presented by the River Medway are recognised in the River Medway Policy. Flooding is a potential threat along much of the river and has not been ignored. Developments at Strood Waterfront and Rochester Riverside have been accompanied by the construction of new flood defences and the flooding policy will ensure that the issue is addressed in the consideration of all new riverside developments.
	Question 1	BAE Systems	BAE Systems	Representations made by CB Richard Ellis on behalf of BAE Systems. Answer of Q1-3: BAE Systems does not consider the Council's approach to expansion at Hoo St Werburgh to be robust (Option 2 in Spatial Choices). Rather than consider Hoo St Werburgh and surrounding villages as one homogenous land area, the Council should consider appropriate individual land parcels within this option area on their own merit which have potential to meet the housing shortfall. The BAE Sports and Social Club land which covers land to the east and west of Bells Lane at Hoo St Werburgh partially comprises previously developed land and would, if redeveloped, complement recently approved housing schemes immediately to the south of the site, creating a natural form of development along Bells Lane. This would accord with national and regional planning policy which seeks to focus development on brownfield sites. It is important that the Council is sufficiently detailed in its approach if it is to meet its housing target, particularly since housing sites are expected to have been adversely affected by the current economic downturn. PPS3 (2006) highlights the need for local planning authorities to maintain a flexible, responsive supply of land for housing development. PPS3 paragraph 62 states that Local Development Documents (LDDs) should set out a housing implementation strategy. This should include, amongst other things, scenario and contingency planning to identify different delivery options in the event that actual housing delivery does not occur at the rate expected. We disagree with paragraph 5.16 which states that the proposed new settlement at Lodge Hill should be substituted with another option or the quantity of development in the Core Strategy should be radically above that required by the South East Plan. The Council's reasons for the above is: 'due to the quantity of development that is already committed within the main urban area'. However, the Council itself acknowledges that, "some sites have significant constraints which makes them both complex and expensive to bring forward and [that] this has been exacerbated by recent poor economic conditions" (paragraph 4.23). We are not clear why it is certain that Lodge Hill will be delivered, particularly in the current climate, when such sites are reliant upon major infrastructure delivery. This would suggest that additional modest sites, including development at Hoo St Werburgh, should be given greater consideration by the Council if it is to meet its overall housing target. At present we consider that the Council has placed an	The BAE Sports and Social Club has been considered in the Strategic Land Availability Assessment (SLAA) and rejected. Sufficient sites have been identified to meet housing requirements if some sites do not come forward as quickly as assumed. The SLAA has identified a wide range of housing sites of varying sizes to meet requirements. The rate of housing development at 815 per year, far exceeds the average provision of the last 10 years (681per year). This is a challenging target and the Council has not therefore considered a higher figure.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				over-reliance upon one major housing site. Should that site fail to deliver the numbers of houses expected or become 'bogged down' due to funding infrastructure, this could seriously undermine the Council's objective in the Hoo peninsula. Our client would also wish to highlight that the housing targets specified in the Regional Spatial Strategy for the East of England (RSS, 2008) are minimum targets only. This is particularly significant given that the Medway Towns are a designated regional hub, 'Centre for Significant Change' and 'Diamond for Growth'. The Borough also falls within the Thames Gateway, the UK's largest regeneration area and a major Growth Area. As such Medway has been set a number of significant challenges. While we recognise that a fundamental priority for the Thames Gateway is regeneration of previously developed sites (RSS, paragraph 19.1), the RSS also specifies that, in planning the housing provision delivery, local planning authorities (LPAs) should also take into account the ability to accelerate the rate of housing delivery in Growth Areas (RSS Policy H2). Furthermore, LPAs must also plan and manage the provision of housing to enhance the viability of rural settlements, promote a 'rural renaissance', and therefore meet the long-term needs of rural communities (RSS Policy H2). If the Council is to meet its development requirements, it must therefore adopt a more open approach to housing provision, including at Hoo St Werburgh. Should the Council fail to do so, we would query the Core Strategy's deliverability and thus its effectiveness, as per the requirements of PPS12 (2008).	
	Question 1	Kent County Council	Richard Feasey	Historic Environment The Issues and Options report does not seem to fully appreciate the extent to which 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 are 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. None of these themes are really developed in the Issues and Options document which may lead to Medway failing to maximise the potential of its heritage assets. Waste Capacity Provision and Self Sufficiency Policy W7 of South East Plan states that the figures for capacity provision by sub-region should only be used as a benchmark. The starting point for waste capacity planning in the South East is found in South East Plan policies W3 and W4. These state that Waste Planning Authorities will plan for provision of waste management capacity equivalent to the amount of waste arising and requiring management within their boundaries. Moreover, the recent published study by ADAS into commercial and industrial waste arisings indicates that Commercial and Industrial waste has not grown as fast as the model used to generate the figures in policy W7 and reliance on the benchmark figures in this policy could lead to over provision of facilities. Accordingly, the issues needing to be studied are what is the waste arising in Medway during the period of the LDF and how can net self-sufficiency in provision be provided. Hazardous wastes - There are tasks required by SE plan policy W15 which also need to be considered in addition to the issues presented in paragraphs 4.272 and 4.273: - Identification and safeguarding of sites for storage, treatment and remediation of contaminated soils and demolition wastes - Identification criteria for the determination of large scale specialist hazardous waste facilities - Assessment of available landfill provision and, where necessary, encouragement of the creation of a protective cell for stable hazardous waste Energy SE Plan W11 encourages separation of biomass from waste streams for use in energy production (where this does not detract from recycling and composting). The Issues and Options document only considers biomass (paragraphs 4.311 & 4.313) in respect of fuel cropping and it is also ignored in the issues raised in the energy provision questions 77 to 80. No consideration has yet be given to the part biomass energy production can play in assisting in the disposal of part of the waste streams that arise in Medway.	The historic environment is recognised and addressed in the heritage policy. Local waste arising estimated for MSW, C&I, C, D&E and hazardous wastes have been done, these figures will be used to inform the calculation of any management capacity gap or surplus that can be defined locally. The RSS policy figures arise from modelling that may not be refined by up-to-date local information. Self-sufficiency is a guiding principle that will be central to the waste policies of the Medway Core Strategy. The document will state the quantum of management capacity, if required, that is lacking to achieve this. Including reuse, recycling/composting and final disposal to land. The need to make provision for soil and other construction wastes de-contamination is recognised, as is the potential need for the disposal of stabilised hazardous wastes in protective cells created in operational landfill sites. Loss of reusable/recyclable and compostable wastes to energy from waste facilities, particularly the biomass fraction should only be encouraged if very high rates of reuse, recycle and composting has occurred and the diversion to energy production is not inhibiting the waste management infrastructure being developed to properly respond to the market.
	Question 1	Rochester Bridgewood Ltd	Rochester Bridgewood Ltd	The questions relating to retail uses do not include any reference to out of town centre sites, other than Q51, which relates to local groups and parades of shops. There are a number of locations within the Medway Council area where the retail offer is independent of all the town centres, an example being the land around Rochester Airport. This includes development fronting Maidstone Road (Horsted Retail Park) and retail outlets fronting Rochester Road. There is scope for further retail development of a complimentary nature in the immediate vicinity. There is no specific reference to the provision of specialist retail outlets such as car showrooms. The particular needs of this type of user has been recognised in the context of a specific Local Plan policy and should continue to be considered in the context of the Local Development Framework. No suitable site has ever been found despite a specific alternative site assessment. It tarnishes the image of Medway that residents have to go out of the locality to developments such as Quarry Wood to find a choice of modern car showrooms. Main dealer franchises provide a range of employment particularly highly skilled operatives.	The Core Strategy gives priority to concentrating retail development in the town centres in accordance with PPS4 and out of town retail development will only be permitted in accordance with the "sequential test". On sites in the vicinity of Rochester airfield, priority is given to high quality employment and innovation development.
	Question 1	Frindsbury and Wainscott Community Association	A Wade	Medway is already overburdened with development. Infrastructure is generally inadequate. Traffic congestion abounds. Most of the issues addressed in this document will be difficult -without great restraint on house building in the future.	The transport chapter addresses traffic congestion and an infrastructure plan is being prepared to ensure that infrastructure delivery matches the overall rate of development.
	Question 2			**Q2: Are there other options for meeting our development requirements? If so, what are they? Comment below.** Answers for question 2 (from questionnaire & website): 3 Yes/ Agree 0 No/ Disagree 4 Don't Know	
	Question 2	Trenport Investments Limited	C Hall	There are other options for meeting at least some of the Council's development needs and requirements. One option is to include a strategy to allow an appropriate level of additional housing at key rural service centres (including Cliffe) to help support local shops and rural services for the reasons set out later in this questionnaire in response to Questions 52, 94 and 96. Alternatively Option 2	Sites at Cliffe have been considered in the Strategic Land Availability Assessment and rejected.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				(Expand Hoo – village cluster) should be varied to include expansion of Cliffe.	
	Question 2	Kent Wildlife Trust	Debbie Salmon	Before final decisions are made regarding the location of development an Appropriate Assessment will need to be undertaken alongside the Core Strategy to assess potential individual and in-combination impacts on European protected sites. This assessment should not only focus on development planned within Medway but also cover surrounding authorities especially those delivering growth within the Thames Gateway to ensure in-combination affects are assessed.	Medway Council is currently discussing the scope and extent of the appropriate assessment with Natural England, the Environment Agency and adjoining authorities prior to preparing a screening document and appointing a consultant to carry out the assessment.
	Question 2	Dickens Country Protection Society	Chris Fribbins	The concentration of development in Lodge Hill is to be welcomed, extra sites should not be allocated	Noted
	Question 2	South East Marine Association	Laraine Soliman	Yes. The Council must foster the remaining SME's and encourage new ones to provide employment of every kind including high tech. Existing sites must be encouraged to expand and intensify. A generous supply of variously located sites must be available for them to move up to and to accommodate new companies. It is absurd to suggest that provision of employment on "mixed sites" can and should meet or even make a significant contribution to the demands of the diverse range of businesses required to provide adequate service to the residents. It is irresponsible to suggest that new businesses have to concentrated either at Chattenden (which we were told was to be 'self contained) or Kingsnorth (which is 8 miles from the Pentagon and ever further from where most of us live). Those two sites have been identified for decades without either producing anything. Like so much else in Medway they are aspirations, which do not perform.	The strategy is to provide a range and choice of sites in terms of quality, accessibility, types and sizes for employment. The Defence Estates has appointed a Land Sales Delivery Partner to rapidly progress the development of a new settlement at Lodge Hill/Chattenden and following the grant of planning permission for B1, B2 and B8 at Kingsnorth, the site is now being prepared for development.
	Question 2	Kent County Council	Richard Feasey	Land Raise Creating void is not the only option for the provision of additional non-hazardous landfill void space. Land raise is an alternative as reducing travel distance to landfill, which is at the bottom of waste hierarchy, is a significant issue for sustainably based development. Unlike waste management operations that are higher up the hierarchy, the CO2 emissions from transport to landfill cannot be offset against the beneficial use of the waste material.	The need to create final disposal to land capacity in the absence mineral extraction created voids to provide for the necessary final disposal need not be void creation alone. It can be achieved by re-contouring of land or a combination of both. Location should be proximate to the waste arisings and be capacity matched for self-sufficiency as well as carbon reduction through transport minimisation. Economics of waste site engineering and operational management may well distort an ideally sustainable solution to Medway's final disposal needs.
	Question 2	FWCA Frindsbury and Wainscott Community Association	J R Masey	Preserve some local history along with the new development i.e. Aveling and Porter building in Strood.	The Aveling and Porter building has now been demolished.
	Question 2		Dr D Brighton	Yes. Support industry for employment.	Measures to support employment in Medway are outlined in the economic development chapter.
	Question 3		Alastair Blair	**Q3: What else would you like to see in our Core Strategy when it is produced next year?** No but be confident to challenge the developers move to fill the Medway Towns with houses. Is the "None Support" enough. Why has the council not moved to make Rainham and Capstone Valley SSSI or AONB areas. The bird life and natural flora and fauna need to be saved.	The designation of SSI'S and AONB'S are not the responsibility of Medway Council.
	Question 3		Lillian Harrison	There should be an explanation regarding how the Core Strategy fits in with any other DPDs to be prepared as part of the LDF and when the other documents will appear and be consulted upon. There should be clarity on what Medway Council mean by a 'strategic site' and what happens to 'non strategic sites' in the LDF system? Will mineral and waste sites be 'strategic' sites?	The Core Strategy explains how the LDF system works and is programmed. A strategic site is one whose development is key to the delivery of the whole strategy. Non-strategic sites including minerals and waste will be allocated in a subsequent development plan document.
	Question 3	ScottishPower	Chris Girdham	A positive commitment to support the energy sector alongside measures to reduce carbon emissions.	Noted and specific section included in core strategy
	Question 3	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	As mentioned 1) Rural Issues 2) Heritage 3) Infrastructure requirements (including health)	Rural issues are addressed in the Hoo Peninsula and Medway Valley chapters and heritage in the Heritage Assets chapter. A separate infrastructure plan is being prepared.
	Question 3	Kent Wildlife Trust	Debbie Salmon	• Background information which covers designated sites of nature conservation interest. Most other authorities have also described the extent of Biodiversity Action Plan habitats and species present and biodiversity threats. • An Appropriate Assessment evaluating impacts of proposed development on the European sites. • Policies that provide adequate protection for the SPAs, SACs and Ramsar sites, as well as preserving and buffering national and local sites and enhancing wider biodiversity. • A map and policies for a fully connected Green Infrastructure which extends throughout the urban and rural environment and is incorporated in all new development whatever its function. • Details of how both the European site mitigation and the Green Infrastructure are to be delivered.	Background information on designated sites of nature conservation interest is contained in the Natural Assets and Open Space State of Medway Report. The appropriate assessment will be carried out before the core strategy is submitted to the Secretary of State. Policies of protection and enhancement are included in the strategy. A diagram and policy on the green grid is included. The core strategy is not the appropriate vehicle for a detailed map. Delivery is included in the delivery chapter.
	Question 3		Mari-Anne Harstad	I would like to see 1. a clear link between development and our most deprived neighbourhoods & rural areas 2. a strategy for comprehensive and meaningful engagement with residents, businesses and organisations.	Neighbourhoods are addressed in Sustainable Communities chapter and rural issues in the Hoo Peninsula and Medway

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
					Valley chapters.
	Question 3	South East Marine Association's	Laraine Soliman	A fundamental re-think of stale and unachievable policies for the riverside. Plans for the riverside regeneration sites have been the centrepiece of local planning policy going back before creation of Medway Council. Housing at Medway Maritime has been decades late yet was used to prevent other developments which would have helped employment and the economy. Firm dates for redevelopment of Temple Marshes come and go like the tide. The shocking road access from Medway City Estate (where several of our members are located) has lost jobs and business. The Council's only response has been to squander scarce employment land to other uses including its pet scheme for park and ride which will simply exacerbate the damage to existing firms. Businesses do not have to invest in Medway and residents do not have to stay here. They will not be forced onto Medway's public transport despite infinite further subsidy -affluent residents already avoid the aggravation of shopping in Chatham by buying in Hempstead, Bluewater and Maidstone. Medway Council spends money on every project supported by central government regardless of whether it will improve the life of us who live here.	Medway Valley Park, Rochester Esplanade, Medway City Estate, Chatham Historic Dockyard, Chatham Maritime and St Mary's Island are all examples of successful riverside regeneration projects and Medway Council intends to secure delivery of the remaining regeneration sites identified in the Core Strategy.
	Question 3	Kent County Council	Richard Feasey	A clearer appreciation of the value of Medway's environment, and in particular its historic environment, to the life of the area needs to be included. The Core Strategy needs to demonstrate the extent to which Medway's current profile is the result of historical growth and that 'markers' of that growth are still present in the towns, villages and landscapes of Medway. The Strategy 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. The Strategy should recognise the full range of heritage assets in the area: listed and historic buildings, archaeological sites and monuments, and historic landscapes. If the current distinction between the built environment and the natural environment is retained then it should be explicitly recognised that the built environment also includes archaeological sites and that the natural environment also includes the historic landscape. Construction Demolition Excavation wastes - Even though there is currently sufficient provision in Medway of recycled and secondary aggregates facilities to meet the requirements of SE Plan policy M2, there is still a requirement flowing from this policy for the LDF to identify and safeguard the sites where 0.2 mtpa can be produced. Sustainable design, construction and demolition - There are cross topic issues relating to sustainable waste management that have not been included in the issues and options paper. These relate to SE plan policies W2 and M1 and are: - The re-use of construction and demolition materials in new developments - The promotion of layouts and designs that provide adequate space to facilitate storage, re-use, recycling and composting.	The historic environment is recognised and addressed in the heritage policy. The issue with regard to sufficient capacity to provide for at least 0.2 mtpa of secondary aggregate provision is acknowledged, safeguarding of existing capacity will be addressed. Beyond that, sites may not need to be safeguarded to the exclusion of other employment use to ensure a balance of economic activity across the area.
	Question 3	Port Medway Marina Ltd	Port Medway Marina	The Core Strategy policies should encourage use of the river both for transport and leisure. Leisure uses such as marinas involve investment in the area in terms of jobs (such as engineering and boat building and repairs) and the investment of ancillary businesses. They also add to the attractiveness of an area. The river should also accommodate houseboat moorings as there is an unmet demand/need and they could be provided without undermining environmental protection policies, especially as their provision would reduced pressures on greenfield sites.	Issues relating to the river are addressed in the River Medway chapter.
	Question 3		John Hill	Perhaps mention should be made of conservation areas	Agreed.
	Question 3		Carl Kroon	Maintenance of infrastructure- roads, paths, drains	Noted.
	Question 3		Goodman	Continued commitment to new employment development at Kingsnorth.	Agreed. Waste management development can be incorporated in employment areas given that modern waste management is often analogous to general industrial B2 developments.
	Question 3	Medway Countryside Forum	David Murr	A strong and clear commitment by the Council to provide long-term protection for Medway's areas of local landscape importance, where the retention of the essentially rural character should be the first priority.	The core strategy has replaced local landscape areas with a criteria based policy. Policies on natural assets, landscape and open space should be considered together as an effective means of protecting the rural environment.
	Question 3	FWCA Frindsbury and Wainscott Community Association	J R Masey	A policy to restore Stonehorse Lane in Frindsbury.	The restoration of Stonehorse Lane can be dealt with outside the context of the Core Strategy.
	Question 3		W Mann	Greater emphasis on 'Landscape, Wildlife, Open Space' including proposals/discussion of implementation of the Green Grid	Agreed.
	Question 3		Dr D Brighton	Industrial sites, e.g. Knight Road Strood	Knight Road is addressed in the Strood Town Centre Masterplan, 2009.
	Question 3	RSPB	Fay Martin	The RSPB welcomes the work that has been ongoing in preparation of the Core Strategy; we particularly welcome the adoption of an evidence-based approach. An Appropriate Assessment (AA) of the Core Strategy will be required, as there are likely to be adverse effects on the Special Protection Areas (SPAs) in the area resulting from development proposed in the Core Strategy. We would recommend that evidence be gathered at an early stage to inform the AA so that a robust mitigation strategy can be developed. We understand that a number of technical studies have been commissioned, including a Green Grid Strategy, an Infrastructure Plan and a Landscape Character Assessment and Eco-Systems Services Assessment. To inform the AA, we would recommend that further studies by commissioned, for example identifying areas already under pressure from recreational disturbance and visitor surveys to understand patterns of use across the SPAs (including outside the Medway Council boundary). In developing a Green Infrastructure Policy and mitigation strategy, we consider that work should be undertaken in partnership with neighbouring authorities so that the cumulative impacts of recreational disturbance can be addressed and a strategic approach	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				adopted. The protection of European Sites from recreational pressures (in particular those associated with new housing) is a complex and evolving area in which the RSPB has taken an active role in both evidence base collation/interpretation and policy development at a regional and local level. We would therefore welcome the opportunity for early involvement and discussion to help address these issues.	
	Question 3	Open Spaces Society	Patricia Wilson	There is no mention of Conservation Areas yet these regularly involve landscape and a local mixture of built and natural environment. A gap here we consider.	Conservation areas are included in the Heritage chapter.
				1. Introduction	
	1.10	Land Securities Group Plc	Land Securities Group Plc	Reference is made in the third paragraph on executive summary and paragraph 1.10 to an Area Action Plan being produced in due course in respect of Lodge Hill. This reflects the strategy set out in the current adopted Local Development Scheme (LDS). In light of the revised version of PPS12, the recent feedback provided to Medway Council by the Planning Inspectorate, and the subsequent discussions that the Council has had with Land Securities, we consider that as the Core Strategy progresses, it is amended to reflect any relevant amendments that are subsequently made to the LDS.	Lodge Hill/ Chattenden is now to be included as a strategic allocation and will not be the subject of an Area Action Plan.
	1.11	Viridor Waste Ltd	Mandeep Jutley	Given that Minerals and Waste are being addressed in the Core Strategy, sites should be allocated on the emerging Proposal Map to meet the identified need.	Waste management capacity will be identified as broad locations and minerals as Areas of Search. While waste management sites have some flexibility for location, minerals can only be won where they occur, the potential mineral sites have to be identified as Areas of Search and safeguarded.
	1.15	CPRE Kent	Brian Lloyd	We understand that the 'final draft' of the Core Strategy proposed for 'consultation' in January 2010 will in fact be the Core Strategy published under Regulations 27/28. Therefore, it is not a draft but the final version that the Council considers is 'sound' and what it intends to submit for examination. The accompanying consultation is not intended to be a further opportunity for interested parties to shape the final content of the Core Strategy, and it is unlikely that it will result in anything but relatively minor amendments being made before it is submitted for examination. The purpose of the consultation is to enable formal representations to be submitted that will be taken into account by the Inspector at the examination. This paragraph, therefore, is misleading, and in effect the current issues and options consultation is the final opportunity for people to comment on the matters to be included in the Core Strategy. This is not made clear in the document, and people unfamiliar with the LDF process may not appreciate the importance of commenting at this stage. We consider that to have just this one stage of consultation is inadequate and that there should be a further round of consultation before the Core Strategy is finalised for publication. Ideally, this should be in the form of a draft Core Strategy with proposed worded policies.	The consultation taking place in November/December is on a draft Core Strategy, Section 25 consultation. The final version of the strategy, the submission draft, will be published later.
	1.16		Lillian Harrison	PPS12 is not 'Guidance' it is 'Policy'. There is a very important difference between the two terms.	Noted
				2. The Process to Date and Where We Are Now	
	2.1	CPRE Kent	Brian Lloyd	Again, as we comment on paragraph 1.15, the final document is not a draft.	Noted. See above
	2.4	CPRE Kent	Brian Lloyd	We welcome the intention to produce drafts of the Core Strategy, but consider that it would be better to produce a single draft for consultation as we suggest in our comments on paragraph 1.15.	A single draft has now been prepared.
	2.6	Kent County Council	Richard Feasey	2.6 The State of Medway - the historic environment does not feature as a sole State of Medway report and is treated by a combination of the Built Environment and Natural Assets and Open Space reports. Although there is not a problem with having two reports they have left out some aspects of the historic environment that may have been included had there been a separate historic environment report. There is no mention in either report of Medway's rich archaeological heritage. Both in the urban areas, particularly Rochester, and also in the rural areas, there are many nationally and regionally important archaeological sites. Some of these are known and others yet to be discovered. It is essential that these important assets are treated appropriately in the development control process. A commitment to this in the Core Strategy, would be welcomed as these assets do not feature at all in the Issues and Options report or in the State of Medway reports. Archaeological sites are different from the built environment and it cannot be assumed that they can be covered by the text that applies to the built environment. Similarly, the general role of historic settlement is underplayed in the report. Medway contains numerous settlements, ranging from hamlets and villages to large towns. Many of these are historic in origin and retain their historic cores. There is a risk that new development may threaten these historic cores or individual historic buildings and it is essential that the core strategy includes a strong commitment to their preservation and, if possible, enhancement. New development in historic settlements may also impact on buried archaeological remains. This was formerly underlined in the Kent and Medway Structure Plan (2006), particularly in policies QL6 – 10 and the accompanying SPG3 guidance on Archaeology and Historic Towns. Although the Structure Plan no longer applies it is essential that similar policies are carried forward successfully by the LDF. The historic environment can also be used proactively to help guide successful housing development. If the new developments have no sense of place – no sense that they belong to the towns and villages to which they will mostly be appended – then they are more likely to experience social and economic problems. To achieve this sense of place it would help if the new communities worked with the 'grain' of existing patterns of settlement and landscape in Medway, complementing 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 the layout of the new housing, allowing the older landscape to show through the modern development. The Core Strategy should mention the Historic Landscape Characterisation Survey (2001) which provides an	Archaeology has been addressed in the Heritage chapter.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				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" and Policy QL9 of the KMSP plan required the protection of historic landscape features.	
	2.7	Viridor Waste Ltd	Mandeep Jutley	Having reviewed the State of Medway Report on Waste (January 2009), we make the following comments: 1) We support recognition that the site between Royal Eagle Close and Clipper Close has significant existing and potential capacity, which is allied to the range of possible treatment/processing options, which could enable it to meet the landfill diversion target for Medway (para 4.18). 2) We support recognition that the site between Royal Eagle Close and Clipper Close could manage both municipal waste and Commercial and Industrial waste (para 4.37). 3) We support recognition that the site between Royal Eagle Close and Clipper Close could potentially be used to recover waste from Construction and Demolition streams (para 4.41). 4) We support recognition that there may be capacity to reuse and recycle hazardous waste at the land between Royal Eagle Close and Clipper Close (para 4.69).	The site between Royal Eagle Close and Clipper Close has significant capacity (0.67 mtpa) across a wide range of waste streams. This capacity will be very significant to deliver increased levels of reuse and recycling and potentially recovery (gasification/pyrolysis). Though composting capacity does not appear to be a methodology that the site is deploying it could potentially be used without the need for a new planning. Total negation of final disposal to land does not appear to be a realistic scenario despite the site's high capacity and breadth of waste management potential.
	2.8	tbh developments ltd & helvig ltd	tbh developments/helvig	The work undertaken on the Economic Development Strategy & Employment Land Study to date is not based on any evidence base relating to employment land availability. This evidence base is fundamental to the determination of a Core Strategy and policies for employment land provision (compare for example the evidence base for housing land availability). Any work that the Council does in moving forward this part of the Core Strategy risks being seriously flawed unless and until the employment land evidence base is available.	The core strategy draws upon the Medway Employment Land Survey, 2006, and the Medway Strategic Land Availability Assessment 2010. A further study has been commissioned which will be taken into consideration.
	2.8	Kent County Council	Richard Feasey	The following should also be added to this list: - Historic Towns Survey reports 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 Characterisation Survey (2001) which provides an important tool for understanding the time-depth and historic character of Kent's countryside.	Where these documents have been used to inform the Core Strategy, they will be included in the evidence base.
	2.8	University College for the Creative Arts at Rochester	David Hawkins	The University assumes that the Council will make early contact with the University, as part of the Council's Infrastructure Planning, as required by central government.	Agreed.
	2.9		Lillian Harrison	An explanation on how the sites proposed to Medway Council in this earlier 'call for sites' are to be assessed and considered for inclusion in the CS/later DPDs should be given, for clarity.	The "call for sites" submissions have been taken into account in the preparation of the Medway Strategic Land Availability Study, 2010, which in turn informs the core strategy.
	2.9	tbh developments ltd & helvig ltd	tbh developments/helvig	The "Call for Sites" came too late in the LDF process. The Council should have included its conclusions on the call for sites in the evidence base for the issues and Options report. It is unsatisfactory that the process for consideration of this evidence base is unclear and lagging behind key decisions on Core Strategy being taken by the Council.	Noted.
	2.12		Lillian Harrison	This approach may appear to be somewhat biased towards the Conservation lobby. In order to obtain a balanced approach, there should have been wider stakeholder interest meetings involving minerals/waste operators and developers.	The mineral and waste operators are stakeholders in the process; equity and clarity of the procedure is essential. This dictates that no one area of interest should have exclusive involvement in discussions with the authority.
				3. Conformity with National and Regional Policies	
		Kent Wildlife Trust	Debbie Salmon	Conformity with National and Regional Policy- Within this section there are a number of important policies for ecological protection which are currently absent. The highest level policy is The Conservation (Natural Habitats &c) Regulations 1994. This legislation transposes EC protection of SPA, SAC and Ramsar sites into UK law. The pertinent sections to the Core Strategy are s20 and s48 which state that if a project or plan is likely to have a significant effect on a European site either alone or in combination with other plans, an Appropriate Assessment must be undertaken, and that if the AA finds that the plans affects the site and these effects cannot be mitigated then permission should be refused. As the proposed level of housing and employment development will increase recreational pressure on the estuaries and associated marshland it is essential that such plans are appraised. The Trust welcomes the inclusion of PPS9 but would also wish to see the inclusion of NRM5 of the South East Plan, which reiterates the need to protect international, national and local sites and create a multifunctional green infrastructure.	The Habitats Regulations are referred to in relation to the natural assets policy.
	3.3	Kent County Council	Richard Feasey	The historic environment will be an important planning issue throughout Medway and particularly in the urban cores of Rochester, Chatham and Gillingham. PPG15 and PPG16 (soon to be replaced by new guidance (PPS15)) on the Historic Environment should be added to the list of most significant planning policy documents.	Noted.
	3.9	Viridor Waste Ltd	Mandeep Jutley	We would welcome the opportunity to comment on the management of the identified quantities of waste between 2006 and 2025 for Kent and Medway and whether this should be apportioned between Kent and Medway in principle, and if so how.	The disaggregation of London's waste imports, is a matter for the respective waste planning authorities of Kent County Council and Medway Council to address.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	3.10		Lillian Harrison	Para 3.10 should also provide clarification that it is National Government Policy in MPS1 to maintain a land bank of land won aggregates of at least 7 years as well as requiring the safeguarding of wharves, railheads and associated infrastructure for aggregate use.	The policy requirements of MPS1 will be fully reflected in the Medway Core Strategy, as they relate to minerals supply, safeguarding and the safeguarding of wharves and railheads.
	3.16	Land Securities Group Plc	Land Securities Group Plc	In the context of the regional policy approach to affordable housing, Paragraph 3.16 refers to sub-regional Policy KTG4 of the South East Plan (SEP) which applies an indicative target of 30% of all new dwellings for affordable housing within the Thames Gateway. To avoid ambiguity, we consider that the Core Strategy should also acknowledge the supporting text at paragraph 19.13 of the SEP which states that 30% affordable housing is the maximum judged practical in the sub-region. The Core Strategy should also reflect the flexibility provided for within PPS3 (paragraph 29) in terms of the ability to set different proportions, sizes and types of affordable housing to be sought for a series of site-size thresholds over the Plan period.	The South East Plan was revoked on 6 July 2010 and its provisions no longer apply. The indicative targets for affordable housing in the housing chapter of the core strategy are based upon the Medway Strategic Housing Market Assessment.
				4. Issues and Choices	
		GVA Grimley Ltd	Sheery Sassoon	General comment: We support the overarching planning aim of securing a good environment through sustainable development. We support the Council's objectives to balance economic, social and environmental objectives when assessing the merits of new developments. Once adopted, the Core Strategy will last for a period of 15 years and, in accordance with PPS12, sufficient flexibility should be built into the policies to respond to different issues which change over time. Policies that are too prescriptive are unlikely to stimulate regeneration and development and are unlikely to allow sites to respond to changing social and economic factors, nor respond to developer's aspirations.	Noted.
		Environment Agency	Jennifer Wilson	ISSUES NOT ADDRESSED There is no adequate cover in policies of framework documents related to land contamination and waste matters. PPS23 is not listed under important national policy guidance, this is a major omission. Brownfield sites and land contamination do not appear to be discussed anyway specifically.	Waste policies are included in the core strategy. Policy BNE23 of the Medway Local Plan provides a development management policy on contaminated land. This will be replaced in due course in a subsequent development plan document.
				Sub-Regional Context	
				Protect green belt totally Protect agricultural land completely Protect natural habitat and green spaces Prevent new building except on Brownfield sites	Whilst the core strategy addresses the question of protection of areas from development, national policy always allows for exceptions and therefore total or complete prevention of development is not possible.
			Mike Walters	Eco policies are a current fad. What is most cost effective and beneficial to residents of Medway should take precedence.	The point is noted.
		Medway Renaissance	John Finlayson	Medway needs to be promoted as an eco quarter/knowledge transfer hub.	The core strategy does not promote Medway as an eco quarter as this concept no longer appears to being advocated by Government but the issue of ecologically friendly development is addressed in policies on quality and sustainable design, climate change, energy efficiency and renewable energy and specifically in the Lodge Hill/ Chattenden policy. Knowledge transfer is addressed in the economy chapter.
	4.4	Viridor Waste Ltd	Mandeep Jutley	Dealing with waste produced by Medway is a cross boundary issue. Given that waste and energy are being addressed in the Core Strategy, perhaps this paragraph should be reworded.	While waste movements are not constrained by administrative borders, the main thrust of waste policy is sub-regional self-sufficiency. The Core Strategy will reflect this requirement while understanding that a certain amount of flexibility on cross border waste movements may be more environmentally sustainable
	4.6	Rochester City Airport	Paul Britten	Para 4.6 - Issues and Choices, gives a highlight of the areas strengths and opportunities. A further bullet point should be that Medway has an airport.	Although development is proposed on sites adjoining Rochester Airport, there are no proposals in the Core Strategy for the airport itself and its role is recognised in the Transport and Movement chapter.
	4.6		Lillian Harrison	We welcome the recognition given to the importance of Cliffe Wharf as a safeguarded major aggregate importation and processing facility. It should also be acknowledged here that Cliffe Wharf has the benefit of an operational rail facility which means that the site is important strategically both regionally and further a field for the bulk supply of high grade aggregates into London and the South East region.	The importance of the Cliffe facility for local, sub-regional and regional minerals supply is well understood.
	4.6		Mari-Anne Harstad	Medway has a significant number of deprived neighbourhoods who must benefit from the local development / regeneration.	Neighbourhood issues are addressed in the Sustainable Communities chapter.
	4.9	ScottishPower	Chris Girdham	The suggestion that further energy generation development in Medway may be limited by the Core Strategy is unreasonable and not supported by regional or national energy policy. It is the role of the Core Strategy to facilitate development within Medway that is compatible with, and is therefore supportive of, national and regional energy policy. Government energy policy supports a mix of generation types and its stated objective is to achieve a transition to a low carbon economy whilst ensuring security of energy supply. The Government has advised that there is a need for investment in new generating capacity to be developed in the near term in	The Core Strategy does not seek to impose a limit on further energy generation. The economic chapter supports existing economic functions including the energy industry at Kingsnorth and the Isle of Grain. Support is also afforded by the conventional energy generation policy.

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				order to replace a number of older power stations which are due to close before the end of 2015. Furthermore, it is acknowledged that the delivery of new generating capacity at a level which maintains security of supply will be a challenge in itself. The Energy Markets Report published by the Department of Energy and Climate Change (DECC) in December 2008 suggests that 'the UK will need investment in some 47GW of new capacity by 2020, about 57% of current total capacity and an average annual deployment for new capacity of roughly 4GW, which represents a significant challenge' (EMOR Paragraph 4.6.18). The Climate Change Act 2008 imposes an obligation to ensure 'the net UK carbon account for the year 2050 is at least 80% lower than the 1990 baseline' and that the carbon budget, for the period including the year 2020, must be at least 26% lower than the 1990 baseline. However, in the April 2009 Budget, the Chancellor of the Exchequer announced the world's first ever carbon budget, which commits the UK to cut carbon emission by 34 per cent by 2020. This target is set out in the UK Low Carbon Transition Plan. In July 2009, the Government published their Renewable Energy Strategy. The Strategy was produced as a response to the binding renewable energy targets to 2020 set out in the new EU Energy Directive (COD/2008/0016). The Strategy recognises the need for an increase in the use of renewable energy to 15% of domestic generation by 2020. Whilst efforts continue to increase renewable energy capacity in the UK, low carbon generation from technologies including Carbon Capture Ready (CCR) Combined Cycle Gas Turbine (CCGT) will continue to make a major contribution to reducing emissions. The South East Plan (SEP) (2009) refers to power generation in the Kent Thames Gateway as one of several essential functions of the region, London and the nation (SEP para 19.6). The Plan also recognises that the provision of land for such activities will contribute to diversifying the local economy and reduce dependency on jobs from outside the area. SEP Policy KTG1 requires that provision is made for the future capacity and the viable operation of these essential functions. It follows that clustering of energy development at the Hoo Peninsula and Isle of Grain, where much of the power generation in the South East is located, represents a function of national and regional importance, which has to be supported by the Strategy. This is also consistent with the concept of clustering in SEP Policy RE2. National and regional policy therefore supports the continued development of secure energy generation in Medway.	
	4.11		Lillian Harrison	We agree that the aggregate importation and processing facilities (including the concrete plant) at Cliffe must be safeguarded, as required in National Government Policy in MPS1. As part of the MPS1 requirement for safeguarding, the existing railhead, wharfage and associated storage, handling and processing facilities for the bulk transport by rail or sea (to include both planned and potential areas within the site) must also be safeguarded.	Safeguarding of important minerals and mineral related development is addressed by the minerals policy.
	4.13	NFU SE Region	John Archer	The NFU has traditionally been pragmatic about the loss of agricultural land where essential development is needed, and has simply asked that due consideration of alternative sites is taken, in accordance with PPS7. We agree that 'food security' and an impending food shortage should be added to the factors considered. Estimates are that the world population will increase by 3 billion by 2050, and that food production will have to grow by 80-100% over the same period to keep pace. At the same time, essential development and climate change are reducing the productive area. China and India are consuming more protein in their diets. They are unable to feed their populations from indigenous sources and are buying up more of the food surpluses on the world market, keeping prices higher. The UK is fortunate in that it is likely to remain productive for the foreseeable future. We agree that greater protection should be given to high grade land, on the understanding that some greenfield development will continue to be unavoidable.	The issue of food security and the importance of protecting the best and most versatile agricultural land is recognised and reflected in the draft core strategy.
	4.13		Mari-Anne Harstad	I agree that better protection should be given to high quality agricultural land.	Noted.
	Question 4			**Q4: Should the Core Strategy seek to influence how Government energy policy is applied within Medway**? Answers for question 4 (from questionnaire & website): 19 Yes/ Agree 3 No/ Disagree 2 Don't Know	
	Question 4	CPRE Kent	Brian Lloyd	Yes. With the Climate Change Act 2008 requiring an 80% cut in carbon emissions by 2050 (well within the lifetime of any new generation capacity) it is critical that the LDF should clearly stipulate that no fossil fuel power stations will be permitted without 100% Carbon Capture & Storage (CCS) of combustion emissions from day one of energy generation. There should also be a presumption for CHP, particularly for new development areas, such as Chattenden. There should be active promotion of offshore wind, solar and anaerobic digestion, however all technologies are likely to have site specific advantages and limitations that need full consideration.	The Core Strategy does not seek to impose a limit on further energy generation. The economic chapter supports existing economic functions including the energy industry at Kingsnorth and the Isle of Grain. Support is also afforded by the conventional energy generation policy. Energy efficiency and renewable energy are addressed in a separate chapter.
	Question 4	Viridor Waste Ltd	Mandeep Jutley	The Core Strategy should provide clear guidance on how Medway intend to deliver the energy requirements of the South East Plan.	The Core Strategy does not seek to impose a limit on further energy generation. The economic chapter supports existing economic functions including the energy industry at Kingsnorth and the Isle of Grain. Support is also afforded by the conventional energy generation policy. Energy efficiency and renewable energy are addressed in a separate chapter.

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	Question 4	ScottishPower	Chris Girdham	It is the role of the Core Strategy to facilitate development within Medway that is compatible with, and is therefore supportive of, national and regional energy policy. The Government has advised that there is a need for investment in new generating capacity to be developed in the near term, to replace a number of older power stations which are due to close before the end of 2015. Furthermore, it is acknowledged that the delivery of new generating capacity at a level which maintains security of supply will be a challenge in itself. The South East Plan (SEP) (2009) refers to power generation in the Kent Thames Gateway as one of several essential functions of the region, London and the nation (SEP para 19.6). The Plan also recognises that the provision of land for such activities will contribute to diversifying the local economy and reduce dependency on jobs from outside the area. SEP Policy KTG1 requires that provision is made for the future capacity and the viable operation of these essential functions. It follows that clustering of energy development at the Hoo Peninsula and Isle of Grain, where much of the power generation in the South East is located, represents a function of national and regional importance which has to be supported by the Strategy. This is also consistent with the concept of clustering in SEP Policy RE2.	The Core Strategy does not seek to impose a limit on further energy generation. The economic chapter supports existing economic functions including the energy industry at Kingsnorth and the Isle of Grain. Support is also afforded by the conventional energy generation policy.
	Question 4	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Yes. As net providers of energy for the region we need to aim to reduce the generation of energy by burning fossil fuels, so overtime we should see a reduction in the amount of fossil fuel burning power stations in our area and improvements to the local air quality	The Core Strategy does not seek to impose a limit on further energy generation. The economic chapter supports existing economic functions including the energy industry at Kingsnorth and the Isle of Grain. Support is also afforded by the conventional energy generation policy. Energy efficiency and renewable energy are addressed in a separate chapter.
	Question 4	Kent Wildlife Trust	Debbie Salmon	It is imperative that the Core Strategy seeks to influence how the Government energy policy is applied in Medway for the following reasons:- • It is important that all authorities endeavour to lower carbon emissions and so reduce the effects of global warming on the natural world. • Within Medway and surrounding areas there are a number of important European sites that could be impacted by energy production within the area. • The Trust support wood fuelled energy production as this will result in management of ancient woodland becoming more profitable.	The Core Strategy does not seek to impose a limit on further energy generation. The economic chapter supports existing economic functions including the energy industry at Kingsnorth and the Isle of Grain. Support is also afforded by the conventional energy generation policy. Energy efficiency and renewable energy are addressed in a separate chapter.
	Question 4	Dickens Country Protection Society	Chris Fribbins	With the amount of power generation in the Medway boundaries and close by, we need to influence how energy policy is going to evolve.	The Core Strategy does not seek to impose a limit on further energy generation. The economic chapter supports existing economic functions including the energy industry at Kingsnorth and the Isle of Grain. Support is also afforded by the conventional energy generation policy. Energy efficiency and renewable energy are addressed in a separate chapter.
	Question 4	BAE Systems	BAE Systems	Representations made by CB Richard Ellis on behalf of BAE Systems. Answer of Q4-6: BAE Systems requests that the Council adopts a sufficiently flexible approach in its emerging Core Strategy to recognise and accommodate site-specific circumstances, up-to-date assessments of housing need, supply, and demand, technological advances, policy revisions, and viability considerations. This will ensure development is achievable and deliverable across the Plan period.	Noted.
	Question 4	Kent County Council	Richard Feasey	Questions 4 to 7 Yes Provision for growth at Thamesport and related improvements infrastructure improvements to the A228 and rail access have been a feature of preceding strategic planning policy (Kent and Medway Structure Plan) and the South East Plan recognises the regional significance of Thamesport as deep water, 'gateway' port . The presumption should be in favour of the safeguarding of the aggregate import terminals at Thamesport and Cliffe not least given the strategic role played by Thames Estuary wharves in the handling of marine aggregate and the projected greater role to be played by aggregate imports in future aggregate minerals supply in the South East. Consideration of safeguarding should extend not only to existing capacity /operations but also include investigation of the scope for safeguarding of any potential for their expansion where this would be acceptable given their proximity to sensitive nature conservation areas noted in para 4.11	Safeguarding of important minerals and mineral related development such as the Thames Estuary wharves is addressed by the minerals policy.
	Question 4	RSPB	Fay Martin	No. The RSPB supports the Government's goals set out in The White Paper to cut CO2 emissions by 80% by 2050. To deliver this goal, we consider that a strategic approach to the location of energy facilities will be required. Nevertheless, Medway Council will have an important role in ensuring that energy and CO2 targets are delivered within the Medway region without negatively impacting on the features of conservation or environmental importance, including the European Sites within and adjoining the Council area. The Society also considers that the Core Strategy can assist in meeting these targets by requiring developments to achieve BREEAM or Code for Sustainable Homes targets. We would welcome the inclusion of a policy that requires development to be designed according to the principles of passive solar design as this approach can deliver significant reductions in the energy demand of buildings. We would also welcome the inclusion of targets for on-site energy generation for residential, commercial and public buildings.	The Core Strategy has been prepared in accordance with the current Government policy on energy.
	Question 4	Open Spaces Society	Patricia Wilson	Yes. Essential that the LDF should stipulate that, as things stand with failure to succeed with Carbon Capture process, no new fossil fuel power station(s) will be permitted in Medway (encourage government) Major effective effects should be put into increasing energy from renewable resources.	The Core Strategy does not seek to impose a limit on further energy generation. The economic chapter supports existing economic functions including the energy industry at Kingsnorth and the Isle of Grain. Support is also afforded by the conventional energy generation policy. Energy efficiency and renewable energy are addressed in a

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
					separate chapter.
	Question 5			**Q5: Should further generating capacity be tied to low carbon or carbon neutral solutions?** Answers for question 5 (from questionnaire & website): 15 Yes/ Agree 2 No/ Disagree 0 Don't Know	
	Question 5	CPRE Kent	Brian Lloyd	Yes, but the criteria and definitions need to be very clearly defined. Some applicants may claim carbon neutrality through offset schemes that have dubious benefits or be difficult to verify for effectiveness or double-counting.	National policy on conventional power generation requires provision to be made for carbon capture on new or expanded generation sites.
	Question 5	Viridor Waste Ltd	Mandeep Jutley	The Core Strategy should not be overly prescriptive.	National policy on conventional power generation requires provision to be made for carbon capture on new or expanded generation sites.
	Question 5	ScottishPower	Chris Girdham	Government energy policy supports a mix of generation types and its stated objective is to achieve a transition to a low carbon economy. Whilst support for low carbon or carbon neutral generating capacity should be promoted, an explicit tie to one generation form or another in the Core Strategy is inappropriate, particularly given the prevailing need to address energy security objectives. A more realistic objective which would be compatible with national and regional policy, is to seek that further generating capacity is capable of contributing to European and national targets limiting carbon emissions. Any reference to low carbon generation should recognise that low carbon generation sources such as Combined Cycle Gas Turbine (CCGT) provide more efficient, cleaner generation than conventional gas and coal powered generation. Gas fired generation has been a significant contributor to the UK's carbon emission reductions in recent years. As the technology continues to develop, and subject to the demonstration of viability, CCGT may also support the delivery of Carbon Capture and Storage (CCS). CCGT generated electricity is, and will remain, a significant contributor to the transition to a low carbon economy.	National policy on conventional power generation requires provision to be made for carbon capture on new or expanded generation sites.
	Question 5	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	As a first step we need to introduce carbon capture - with the number of power stations in the Medway area, and in surrounding areas, we could pool facilities in a more efficient way and gain through economies of scale.	National policy on conventional power generation requires provision to be made for carbon capture on new or expanded generation sites.
	Question 5	Kent Wildlife Trust	Debbie Salmon	Low carbon and carbon neutral solutions to energy production will be essential in the fight to alleviate climate change. If carbon emissions continue at current levels there is a severe threat that sensitive habitats and species will be lost; sea level rise is currently a significant factor in Medway, threatening existing habitats of international importance.	National policy on conventional power generation requires provision to be made for carbon capture on new or expanded generation sites.
	Question 5	Dickens Country Protection Society	Chris Fribbins	Suggest that economies of scale should be used to clean up a large part of EXISTING and any new generating capacity	National policy on conventional power generation requires provision to be made for carbon capture on new or expanded generation sites.
	Question 5	South East Marine Association's	Laraine Soliman	Comments to Q5-12 & 26 It is essential to retain existing wharves and employment land having access to them even though more profitable uses might be viable. Disused wharves and other land with access to potential wharfage must be protected because wharves are irreplaceable. Movement of goods by water has important environmental advantages that are only likely to increase during the period of the plan. We must not prevent our successors being able to use the river both for transport and leisure. Leisure use involves investment and hence jobs and training. There is a regional policy (so far ignored by the Council) which needs to be reinforced in a similar fashion to that adopted and approved by the government in respect of the Thames. There should be a new policy promoting marinas and, even more important, ancillary business investment. Marinas can provide a significant impact on the economy not only by making the area more attractive to residents and visitors but by providing employment particularly in engineering and boat building and repairs. Current policies have almost eliminated local facilities. As the number of marine businesses has declined so the core of mutually interdependent services has been eroded. Work which could and should have been done locally has to go elsewhere. Although this obviously applies to leisure boats, it also applies to commercial vessels. Expertise, jobs and investment are all lost as a result of indifference or hostility by the council. To taken just one of many examples, it took one of our member six years to get permission to place some pontoons to enlarge his business. One of the council's criticisms was that there was no evidence of demand. All the pontoon spaces were taken before the pontoon could be finished. Similarly there should be an abundance of workshops and riverside facilities to attract customers, investment and jobs. There is an extreme shortage of houseboat moorings on the Medway yet extensive riverbanks where they could be provided without damage to environmental protection policies. Construction of houseboats of the highest quality is undertaken in the area but the craft have to be taken elsewhere (particularly reaches of the Thames in central London). Not only do houseboats they provide residential facilities of higher quality that can be provided on land, they also reduce demand for housing on greenfield sites.	The River Medway policy supports leisure and activities on and along the river as well as mixed use developments providing new homes and jobs. However, the core strategy will not reverse proposals on riverside sites that are already proceeding.
	Question 5	Natural England	Josh Nelson	Natural England is increasingly concerned with the ability of species and landscapes to adapt to climate change. Natural England would request the Council to ensure that all proposed and future non-renewable power generation projects are fitted with carbon capture and sequestration (CCS) technology. While Natural England supports the use of renewable energy resources for power generation, the Council should ensure that the exploitation of such renewable energy resources is undertaken in such a manner that the district's biodiversity and important landscapes are preserved; in particular, nationally and internationally designated nature conservation sites and the Kent Downs AONB.	Power generation proposals are decided by the government and not Medway Council. However, the council always takes into account possible environmental impacts when consulted on such proposals and when considering renewable energy proposals.
	Question 5		Vivienne Parker	Air quality is poor due to power stations at Damhead Creek, Kingsnorth & Grain so ‘green solutions’ here would improve general health of people of Medway.	The point is noted.

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	Question 5	Frindsbury and Wainscott Community Association	A Wade	Yes. Carbon emissions should be monitored and strictly controlled. New Kingsnorth should not operate without new technology.	The point is noted, though the Secretary of State will determine the nature of the new generation capacity and associated carbon capture system at Kingsnorth.
	Question 5	RSPB	Fay Martin	No. The RSPB considers that in order to achieve The White Paper targets to cut CO2 emissions by 80% by 2050, the emphasis of generating capacity will need to be placed on carbon neutral solutions.	The point is noted.
	Question 6			**Q6: Should the expansion of Thamesport be actively promoted given the impending development of the London Gateway project?** Answers for question 6 (from questionnaire & website): 12 Yes/ Agree 6 No/ Disagree 2 Don't Know	
	Question 6	CPRE Kent	Brian Lloyd	Any expansion of Thamesport must be based on robust evidence of need, and would need to be accommodated within the employment area defined under Policy S13 of the Local Plan. In particular, regard will need to be given to the impact on the important nature conservation interests that adjoin the site.	The economic strategy includes making provision for the expansion of the existing economic functions of the area. The impact on natural conservation will need to be considered.
	Question 6	London Thamesport (Hutchison Ports UK Ltd)	Nicholas Orbell	London Thamesport is an existing facility, and is recognised within the Deep Sea container sector as a significant port for UK imports. The development of London Gateway will provide additional capacity to complement existing capacity that is nearing capacity limits, to meet the forecast UK import growth recognised in the medium to long term. To not support London Thamesport will detrimentally affect not just Medway but the UK economy. The preferred planning consideration should be to distinctly recognise the supporting logistics and transport needs required to encourage related development activity and secure related business activity and employment in the immediate region (being the strategic view for the development of London Gateway). In October 2007 the Government produced a discussion document 'Towards a Sustainable Transport System' (TaSTS). This set out how the Government is responding to i) the recommendations made in the study by Sir Rod Eddington to improve transport's contribution to economic growth and productivity; and ii) how it is ensuring that transport plays its part in delivering the overall level of reduction in carbon emissions recommended by the Stern Eddington Review of the Economics of Climate Change. In summary TaSTS defines the Government's transport goals as wanting the transport system to: - support economic growth - tackle climate change; - contribute to better safety, security and health; - promote equality of opportunity; and - improve quality of life and promote a healthy natural environment. In November 2008 the Government produced 'Delivering a Sustainable Transport System (DaSTS) which set out how the approach set out in TaSTS is being put into practice. DaSTS explains that analysis undertaken by the Government has led to the identification of a number of components of the nation's transport system which, collectively, are critical to the functioning of the system as a whole and to the economic success of the nation. Government will focus on 14 route corridors that link key centres of population to each other and to the busiest international gateways that have the highest volume of goods and people movement. London to the Thames Gateway Ports, which includes Thamesport, is in an area identified as one of the critical route corridors. Thamesport is identified within DaSTS as one of the key routes for freight. Policy T10 of The South East Plan - Regional Spatial Strategy for the South East (May 2009) states that, "relevant regional strategies, local development documents and local transport plans will include policies and proposals for infrastructure that maintain and enhance the role of gateway ports," this includes Medway (Thamesport) and goes on to say, "encouragement should be given to investment in infrastructure that supports short sea connections linking into the wider European network via these ports." The South East Plan goes on to confirm the importance for the major ports, which includes Thamesport, to produce port Master plans in accordance with the Government guidance issued in December 2008 and as confirmed in the Interim Report of the Ports Policy Review (July 2007). Master plans enable better planning for transport interventions and identified transport requirements should then be taken into account in relevant national strategies, local development documents and LTPs. Significantly, the development of London Gateway is unconfirmed. DPWorld reported its latest financial position in August 2009. DPW has put around half of its planned global capacity expansion on hold, and among the affected projects is the London Gateway terminal. The Core Strategy is fundamentally incorrect in its stated assumption that development is "impending".	The economic strategy includes making provision for the expansion of the existing economic functions of the area.
	Question 6	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	There is concern that further expansion of Thamesport should be resisted unless the percentage of freight that is moved by rail is increased and that by road reduced (guarantees from Network Rail would be required for this and there are real conflicts with other rail movements in the area)	The economic strategy includes making provision for the expansion of the existing economic functions of the area.
	Question 6	Kent Wildlife Trust	Debbie Salmon	The Trust would have concerns regarding the expansion of Thamesport due to the increase in shipping and its impact on the protected bird species. Thamesport is located adjacent to The Medway Estuary and Marshes SPA, Ramsar site and SSSI. The ecological impacts of this development need to be assessed as part of the AA to enable Medway Unitary Authority to assess whether impacts can be mitigated.	Medway Council is currently discussing the scope and extent of the appropriate assessment with Natural England, the Environment Agency and adjoining authorities prior to preparing a screening document and appointing a consultant to carry out the assessment.

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	Question 6	Dickens Country Protection Society	Chris Fribbins	Thamesport has a problem with its location at then end of a long 'country lane'. There is insufficient capacity in the rail system to take much more freight to and from the location , so any growth must be linked to rail capacity and lorry movements strictly controlled.	The economic strategy includes making provision for the expansion of the existing economic functions of the area. Development proposals at the Isle of Grain will need to take into account the need for appropriate transport infrastructure. This will be addressed in the Infrastructure Plan.
	Question 6	Natural England	Josh Nelson	Thamesport should only be developed and operated in a manner that does not adversely affect the integrity of the immediately adjacent internationally important wildlife sites, namely the Thames and Medway Estuary and Marshes Special Protection Areas (SPA) and Wetlands of International Importance under the Ramsar Convention (Ramsar Site).	Agreed.
	Question 6	The Peel Group	The Peel Group	In relation to Medway as a sub-regional point of importation, Para 4.10 of the report acknowledges that 'ever larger ships are causing consolidation in the ports industry, with fewer larger facilities in deep-water locations.' As a major owner and operator of ports nationwide, including Chatham Docks and the Port of Sheerness, and also the statutory harbour, pilotage and conservancy authority for 27.3 nautical miles of the River Medway, this is a trend that Peel Ports are continuing to observe. The premise of larger port facilities in deep-water locations is supported by Peel Ports, as the economic and efficiency benefits of these are greater and, in their role as Statutory Harbour Authority, Peel Ports also support the continued success (and expansion) of Thamesport. However, trends towards larger, more versatile, deep-water ports are impacting on the long term viability of smaller facilities, such as Chatham Docks, as working ports. Peel Ports are currently promoting the reorganisation of the Port of Sheerness to involve major mixed-use development and expansion of the current capacity of the Port. Combined with potential expansion at Thamesport and The London Gateway, this will continue to impact on the viability of Chatham Docks as a working port. Any promotion of Thamesport and consideration of expansion proposals at Sheerness, should be reflected in the Medway Core Strategy's stance over the future of Chatham Docks. The Core Strategy must provide a positive framework to ensure the port can be rationalised and the site can be redeveloped for alternative uses (as opposed to falling into underuse or vacancy) in order to respond to the changing focus of Port operations within the Borough. The South East Plan Policy T10 identifies Medway (Sheerness) and Medway (Thamesport) as 'Gateway Ports' and their role should be maintained and enhanced through local planning policy. In the RSS Chatham Docks is not identified as either a 'Gateway Port' or a 'Regionally Significant Port' representing the declining role it has in relation to the other Medway ports. If the expansion of Thamesport is actively promoted through the Core Strategy then the impact of this should be fully addressed and mitigated through the Core Strategy's policies. http://medway-consult.limehouse.co.uk/file/999212	The Medway Strategic Land availability Assessment has identified Chatham Dock as suitable for a number of uses beyond its current use, but has given preference to its retention for B1, B2 & B8 employment development if it ceases to be viable as a dock.
	Question 6	FWCA Frindsbury and Wainscott Community Association	J R Masey	Yes, if it is to compete with the London Gateway site. Hopefully without too much disruption to the area.	The economic strategy includes making provision for the expansion of the existing economic functions of the area.
	Question 6	Frindsbury and Wainscott Community Association	A Wade	No. Thames expansion could have serious impact on the North Kent Marshes & Estuary.	The impact of any expansion of Thamesport on the North Kent Marshes and Estuary will be taken in to account in consideration of any proposals.
	Question 6	RSPB	Fay Martin	No. Thamesport is situated in a highly sensitive location, adjoining the Thames Estuary & Marshes SPA and Ramsar sites and Medway Estuary & Marshes SPA and Ramsar sites. Any proposals for the expansion of the port facilities would have the potential to undermine the integrity of these European Sites. We strongly recommend this matter be thoroughly appraised in the AA of the Core Strategy and we would welcome the opportunity to comment further on this matter prior to the publication of that document.	Medway Council is currently discussing the scope and extent of the appropriate assessment with Natural England, the Environment Agency and adjoining authorities prior to preparing a screening document and appointing a consultant to carry out the assessment.
	Question 7			**Q7: Should aggregate importation terminals at Thamesport and Cliffe be safeguarded for the longer term?** Answers for question 7 (from questionnaire & website): 16 Yes/ Agree 4 No/ Disagree 0 Don't Know	
	Question 7		Lillian Harrison	YES - aggregate importation and processing facilities at Cliffe (including the concrete batching plant) must be safeguarded as required in National Government Policy for Minerals (MPS1). AS part of the MPS1 requirement for safeguarding Cliffe Wharf, the existing rail head, wharfage and associated storage, handling and processing facilities for the bulk transport by rail or sea (to include both existing and potential areas within the site) must also be safeguarded.	Safeguarding of important minerals and mineral related development such as the Thames Estuary and Medway wharves is addressed in the minerals policy.
	Question 7	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Aggregate importation through Cliffe and Thamesport would be supported as long as use of the rail facilities is maximised. In the case of Cliffe, there may need to be some work required to manage the potential conflicts with access to the riverside and the historically important Cliffe Fort.	The fortification at Cliffe is a Scheduled Ancient Monument protected by the provisions of the Ancient Monument and Archaeological and Areas Act 1973. The operator of the North Sea Terminal at Cliffe will have to ensure that the fortification is secured from any adverse impacts or the Secretary of State is able to enforce the provisions of the said act. Access to the riverside along defined Public Rights

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					of Way have to be maintained by the authority to ensure access can safely be maintained and allow the operation of the marine aggregate wharf to continue.
	Question 7	Kent Wildlife Trust	Debbie Salmon	If it is planned that the facilities continue to operate at present rates there is likely to be no further impact on the European sites. However if aggregate importation is set to expand then any increase will need to be factored into the appraisal of impact within the Appropriate Assessment.	There is no marine importation quantity target. The amount of materials landed is a response to the market and wharf capacity. Expansion of wharfage is encouraged by government guidance given that it is understood that land-won aggregates are not sufficient to meet needs and is a depleting resource.
	Question 7	Dickens Country Protection Society	Chris Fribbins	These locations are only suitable if movements into and out of the site can be managed. Use of materials onsite a Cliffe is welcome, although there are some potential conflicts with the landing of aggregates at Cliffe and use of the Saxon Shore Way and access around Cliffe Fort.	The fortification at Cliffe is a Scheduled Ancient Monument protected by the provisions of the Ancient Monument and Archaeological and Areas Act 1973. The operator of the North Sea Terminal at Cliffe will have to ensure that the fortification is secured from any adverse impacts or the Secretary of State is able to enforce the provisions of the said act. Access to the riverside along defined Public Rights of Way have to be maintained by the authority to ensure access can safely be maintained and allow the operation of the marine aggregate wharf to continue.
	Question 7	Natural England	Josh Nelson	The aggregates importation terminal at Cliffe and the nearby processing and storage facilities at Cliffe Pools are immediately adjacent to the Thames Estuary and Marshes Special Protection Area SPA and Ramsar Site and the South Thames Estuary and Marshes SSSI. Any safeguarding of the importation of the aggregate importation terminal (and any development involving storage or processing at the nearby plant) should not lead to adverse effects on the integrity of the designated sites or their interest features.	Agreed,
	Question 7	The Peel Group	The Peel Group	There is an existing aggregate importation terminal adjacent to Thamesport (Foster Yeoman) and this benefits from deepwater in-river berthing of vessels. Peel Ports Medway supports the continued safeguarding of this terminal as a sustainable means of importing and transporting aggregates.	The policy on the River Medway safeguards the aggregate importation terminal at Thamesport.
	Question 7			The construction industry and other commercial activities within the brownfield land/regeneration sector should be supported and prioritised to help ensure delivery of regeneration within the Thames Gateway.	The policy on the River Medway safeguards the aggregate importation terminal at Thamesport.
	Question 7	FWCA Frindsbury and Wainscott Community Association	J R Masey	But concerned with traffic on the B2000.	Noted.
	Question 7	RSPB	Fay Martin	No. The aggregate terminals at Thamesport and Cliffe are situated in highly sensitive locations, adjoining the Thames Estuary & Marshes SPA and Ramsar sites (Thamesport and Cliffe) and Medway Estuary & Marshes SPA and Ramsar sites (Thamesport only). Paragraph 4.11 of the Core Strategy Issues and Options Report states “aggregate importation wharves at Thamesport and Cliffe are safeguarded but they adjoin sensitive nature conservation areas. There will be a need to import increasing quantities of aggregates into the region as land won reserves reduce”. It is not clear from paragraph 4.11 whether it is likely that the use of Thamesport and Cliffe for aggregate importation is likely to increase. Any such proposals for the intensification of the port activities would have the potential to undermine the integrity of the European Sites. We strongly recommend this matter be thoroughly appraised in the AA of the Core Strategy and we would welcome the opportunity to comment further on this matter prior to the publication of that document.	The limiting factors for the intensification of the importation of aggregates at Cliffe and Thamesport are the capacity of the wharves and the market demand, assuming that shipping and dredger capacity is available to meet any increased demand. This would not be ‘picked up’ by the Medway Core Strategy AA unless there was physical expansion as part of the relevant policy of the Medway Core Strategy. The document will reflect government guidance to safeguard operational wharves and their ‘promotion’. The Council is currently discussing the scope and extent of the appropriate assessment with Natural England, the Environment Agency and adjoining authorities prior to preparing a screening document and appointing a consultant to carry out the assessment.
	Question 8			**Q8: Should the Core Strategy make explicit provision now for large areas of habitat creation to offset losses caused by coastal squeeze in the Thames Estuary? If so, on what scale should this be?** Answers for question 8 (from questionnaire & website): 18 Yes/ Agree 3 No/ Disagree 2 Don't Know	
	Question 8	CPRE Kent	Brian Lloyd	Yes, this would be appropriate so that they are more likely to be implemented and because there needs to be a debate about the value and possible compensation of existing land uses in those proposed new habitat areas.	Whilst the Core Strategy supports the principle of habitat creation to offset coastal squeeze, the Environment Agency does not envisage the implementation of this proposal during the lifetime of the Core Strategy. Furthermore, the Secretary of State has not finally approved the Thames Estuary 2100

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					Plan. Consequently no land has been safeguarded in the Core Strategy.
	Question 8	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	The Parish Council feel coastal squeeze on the Thames can be resisted by modest maintenance of the current tidal protection and there would be no need for further habitat creation. Other areas of Medway may have different issues and habitat creation may be preferable for those areas. There is a danger of destroying one habitat to create another.	Noted. Whilst the Core Strategy supports the principle of habitat creation to offset coastal squeeze, the Environment Agency does not envisage the implementation of this proposal during the lifetime of the Core Strategy. Furthermore, the Secretary of State has not finally approved the Thames Estuary 2100 Plan. Consequently no land has been safeguarded in the Core Strategy.
	Question 8	Kent Wildlife Trust	Debbie Salmon	The Trust would fully support the provision of large areas for habitat creation as part of the Green Infrastructure. Habitats lost to coastal squeeze will need to be replaced to ensure the survival of the flora and fauna for which the European sites are designated. However this is not the only threat to these habitats, the rise in population throughout the Thames Gateway will inevitably lead to a considerable increase in recreational pressure. Habitat creation will need to be adequate to achieve the following functions. - Alleviate the affects of coastal squeeze. - Ensure that land which might be taken for development, but which is used by species for which European sites are designated, is accompanied by associated mitigation where appropriate.(NRM5 of the South East Plan) - Ensure alternative natural habitats are provided to enable people to have contact with wildlife, whilst reducing their impacts upon European sites. Within discussions with Swale and Gravesham the Trust has proposed that to ensure protection of the three estuarine SPAs extensive connected habitat networks should be established as mitigation for all developments within the three districts. To ensure delivery, developer contributions should be pooled and the network mapped carefully, to ensure no impact on the European sites. The Trust would be happy to discuss this further. (See attached report produced by the RSPB and KWT in consultation with the EA on possible impacts arising from development planned within Swale, Medway and Gravesham.)	Noted. Policies in the Strategy aim to alleviate, mitigate and compensate for adverse impact on habitats. Working with Swale and Gravesham will be considered where appropriate.
	Question 8	Dickens Country Protection Society	Chris Fribbins	Care has to be taken to avoid the destruction of one good habitat by another. So further consideration is required about the amount and scope of habitat creation.	Noted.
	Question 8	Natural England	Josh Nelson	Natural England fully supports the Council making explicit provision at this stage for suitable areas of habitat creation to offset any areas that may be lost through coastal processes in the Thames Estuary. The extent and nature of these areas should reflect areas of habitats that may be lost; in particular habitats forming part of the internationally important Thames Estuary and Marshes SPA and Ramsar but also the South Thames Estuary and Marshes SSSI (where different) and any BAP habitats outside of designated sites. The extent of habitat creation should be guided by the precautionary principle that underlies European environmental protection. The Core Strategy will need to link to the relevant Shoreline Management Plans, Thames 2100 and the Environment Agency's Regional Habitat Creation Programme.	Whilst the Core Strategy supports the principle of habitat creation to offset coastal squeeze, the Environment Agency does not envisage the implementation of this proposal during the lifetime of the Core Strategy. Furthermore, the Secretary of State has not finally approved the Thames Estuary 2100 Plan. Consequently no land has been safeguarded in the Core Strategy.
	Question 8	Kent County Council	Richard Feasey	Yes this should be explored and as appropriate, defined/ safeguarded in the Core Strategy given the opportunities recognised in the recent TE2100 consultation.	Whilst the Core Strategy supports the principle of habitat creation to offset coastal squeeze, the Environment Agency does not envisage the implementation of this proposal during the lifetime of the Core Strategy. Furthermore, the Secretary of State has not finally approved the Thames Estuary 2100 Plan. Consequently no land has been safeguarded in the Core Strategy.
	Question 8	NFU	Kevin Attwood	No. As yet coastal squeeze and the areas to be replaced has not been fully explored by the EA. It is for the EA to identify and provide the type, quantity and location of any mitigation land in conjunction with landowners not Medway Council	Whilst the Core Strategy supports the principle of habitat creation to offset coastal squeeze, the Environment Agency does not envisage the implementation of this proposal during the lifetime of the Core Strategy. Furthermore, the Secretary of State has not finally approved the Thames Estuary 2100 Plan. Consequently no land has been safeguarded in the Core Strategy.
	Question 8		Goodman	It should be noted that Natural England required habitat creation for application MC2008/0370, even though this approach was not provided for in adopted local planning policies. It should also be noted that, as shown by this application, the optimum location for habitat creation may be outside the administrative boundary of Medway and therefore it is anticipated that any formalised policy for habitat creation would require joint working between Medway Council, Natural England and neighbouring local planning authorities.	Noted
	Question 8		W Mann	Yes. 'Belt and Braces' approach – implement all 7 areas (medway & essex) as soon as possible to ensure we are not caught out. At worst we will replace some agricultural land by important wetland areas for wildlife.	Whilst the Core Strategy supports the principle of habitat creation to offset coastal squeeze, the Environment Agency does not envisage the implementation of this proposal during the lifetime of the Core Strategy. Furthermore, the Secretary of State has not finally approved the Thames Estuary 2100 Plan. Consequently no land has been safeguarded in the

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
					Core Strategy.
	Question 8		Dr D Brighton	Yes. Protect RSPB Northern Hill & Pools	Whilst the Core Strategy supports the principle of habitat creation to offset coastal squeeze, the Environment Agency does not envisage the implementation of this proposal during the lifetime of the Core Strategy. Furthermore, the Secretary of State has not finally approved the Thames Estuary 2100 Plan. Consequently no land has been safeguarded in the Core Strategy.
	Question 8	RSPB	Fay Martin	Yes. The RSPB is concerned that through sea level rises and increased sea erosion, large parts of the Thames Estuary could experience 'coastal squeeze', where the coastal margin is squeezed between the fixed landward boundary and the sea level. Any development on such a potentially dynamic area of coast could inhibit future sustainable coastal management, and prove costly to protect. The Society therefore supports the conclusion of the Thames Estuary 2100 Consultation Plan that land needs to be set aside for habitat creation to offset the effects of coastal squeeze. Although it is not possible at this stage to identify the scale of habitat creation required, we are happy to work with Medway Council to identify work that needs to be undertaken to investigate this issue further and to evaluate the sites that have been identified.	Whilst the Core Strategy supports the principle of habitat creation to offset coastal squeeze, the Environment Agency does not envisage the implementation of this proposal during the lifetime of the Core Strategy. Furthermore, the Secretary of State has not finally approved the Thames Estuary 2100 Plan. Consequently no land has been safeguarded in the Core Strategy.
	Question 9			**Q9: Should the Core Strategy give formal protection to larger tracts of high quality agricultural land?** Answers for question 9 (from questionnaire & website): 22 Yes/ Agree 1 No/ Disagree 0 Don't Know	
	Question 9	CPRE Kent	Brian Lloyd	Yes, particularly Grade 1 and 2 land which may be lost permanently to built development.	The protection of high quality agricultural land will be afforded by the application of the guidance in PPS7 and recognition of this important resource in the Core Strategy.
	Question 9	NFU SE Region	John Archer	See NFU comment at 4.13. While we agree that higher protection is justified for food security reasons, there will be cases where essential development is unavoidable. Nowhere in the consultation document is there any mention of policies to encourage and support agricultural and horticultural businesses, which is one of the best ways of preserving farming activity on agricultural land. Farmers and growers provide cost effective environmental management and other public amenities such as open access land and rights of way, as well as producing food.	Support for agricultural businesses is given in the economic development, Hoo Peninsula and Medway Valley and Downs policies.
	Question 9	Barratt Strategic		PPS7 clearly indicates that the presence of best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification), should be taken into account alongside other sustainability considerations (e.g. biodiversity; the quality and character of the landscape; its amenity value or heritage interest; accessibility to infrastructure, workforce and markets; maintaining viable communities; and the protection of natural resources, including soil quality) when determining planning applications. Whilst PPS 7 goes on to indicate that where significant development of agricultural land is unavoidable, local planning authorities should seek to use areas of poorer quality land (grades 3b, 4 and 5) in preference to that of a higher quality, it makes it clear that exceptions are possible where this would be inconsistent with other sustainability considerations. To seek to give formal protection to large tracts of high quality agricultural land would in our opinion conflict with the aims and objectives of national government guidance, and add another layer of bureaucracy where non is needed. Whilst Para 29 of PPS7 makes it clear that local planning authorities may include policies in their LDDs to protect specific areas of best and most versatile agricultural land from speculative development, it has not in our opinion been demonstrated that large tracts of high quality agricultural land need to be protected. If the council wants to protect specific areas from speculative development they should highlight the areas concerned so that consultees have the ability to comment directly on the implications of this strategy.	The protection of high quality agricultural land will be afforded by the application of the guidance in PPS7 and recognition of this important resource in the Core Strategy.
	Question 9	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	We would support this - there is a need to become more self sufficient as a nation in food production.	The point is noted.
	Question 9	Trenport Investments Limited	C Hall	The Core Strategy needs to be consistent with National planning policies, which have placed less emphasis on the need to protect high quality agricultural land compared to what was previously the case. The emphasis is now on balancing environmental considerations, including sustainability issues, rather than giving an over-riding emphasis on agricultural land quality.	Agreed
	Question 9	Kent Wildlife Trust	Debbie Salmon	Many species associated with farmland have severely declined over recent years, resulting in a number being given priority status in the UK BAP and in the s74 list of Species of principle Importance for Nature Conservation in England. Therefore appropriate management of farmland via environmental stewardship or other schemes should be promoted in order to help deliver obligations to further the conservation of such species.	Agreed
	Question 9		Mari-Anne Harstad	Yes strongly agree. Land owners, farmers need to be better consulted.	The protection of high quality agricultural land will be afforded by the application of the guidance in PPS 7 and recognition of this important resource in the Core Strategy.
	Question 9	Dickens Country Protection Society	Chris Fribbins	With a need for more 'food security' and the need to grow our own food, this may be a good idea but full impact of this needs to be considered - potential conflicts with access to the countryside and a limited bio diversity.	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 9	Natural England	Josh Nelson	Natural England supports the protection of the best and most versatile soils.	The protection of high quality agricultural land will be afforded by the application of the guidance in PPS7 and recognition of this important resource in the Core Strategy.
	Question 9	Kent County Council	Richard Feasey	Yes to contribute self sufficiency assist in reducing food miles and in recognition of the comparative advantage exhibited by the Medway area in the incidence of best and most versatile agricultural land	The protection of high quality agricultural land will be afforded by the application of the guidance in PPS7 and recognition of this important resource in the Core Strategy.
	Question 9		Alastair Blair	Medway Council should resist all attempts to take away areas of natural beauty. Encouragement should be given to retaining agriculture in place of developers in particular in Rainham and Capstone Valley.	Noted.
	Question 9	NFU	Kevin Attwood	Agree with comment submitted by NFU regional officer John John Archer.	Noted
	Question 9	FWCA Frindsbury and Wainscott Community Association	J R Masey	Important to safeguard agricultural land	The protection of high quality agricultural land will be afforded by the application of the guidance in PPS7 and recognition of this important resource in the Core Strategy.
	Question 9	Frindsbury and Wainscott Community Association	A Wade	Yes. Formal protection for high grade farmland nationally and internationally is essential. Especially the Hoo Peninsula which represents one of the highest percentages of Grade I land in the UK.	The protection of high quality agricultural land will be afforded by the application of the guidance in PPS7 and recognition of this important resource in the Core Strategy.
	Question 9	Open Spaces Society	Patricia Wilson	Yes, definitely. Both Grade 1 & 2 land should be protected in view of future dependence on growing UK food. Your word 'larger' is vague. Just because less large such areas exist, they should not be squandered on "infilling" by development e.g. housing or roads, so that 'earth' would be irretrievable small areas are precious for intensive horticultural production or allotment for which demand exceeds supply.	Agreed. The protection of high quality agricultural land will be afforded by the application of the guidance in PPS7 and recognition of this important resource in the Core Strategy.
	Question 10			**Q10: Should Medway's higher education capacity be further promoted with the intention of creating a cluster of regional or national significance?** Answers for question 10 (from questionnaire & website): 11 Yes/ Agree 7 No/ Disagree 3 Don't Know	
	Question 10	CPRE Kent	Brian Lloyd	We have no particular view on the merits of providing a cluster of higher education, but if the Council is minded to pursue this then it is our view that such a cluster should be provided within the urban area where it is easily accessible by public transport.	Although the word 'cluster' is not used, the education policy in the Core Strategy gives strong support to higher education in Medway within the main urban area.
	Question 10	Barratt Strategic		Barratt Strategic supports the promotion of Medway's higher education capacity. The economic and social benefits of higher education establishments in the area should be recognised and support given to enhanced provision such as the new campus for creative arts.	Noted
	Question 10	Rochester City Airport	Paul Britten	Para 10 -Higher Education clusters, does not mention aeronautical engineering which includes Medway's largest employee. Rochester Airport PLC have already highlighted many opportunities that could exist to degree level in this respect. With the newly opened Innovation Centre at the gates of the airport and its location adjacent to British Aerospace an aeronautical cluster could easily evolve. The portfolio Officer for Strategic Development and Economic Growth embraced this concept last year on completion of the Medway Innovation Centre.	The economic development chapter recognises the importance of BAE Systems at Rochester Airfield.
	Question 10	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	We would support this. There is a unique opportunity to create a multi-versity in the area and maximise the common use of facilities and general educational infrastructure.	Although the word 'cluster' is not used, the education policy in the Core Strategy gives strong support to higher education in Medway.
	Question 10		Ian Mawer	The RES highlights the importance of education-led regeneration as a Transformational Target and SEEDA supports the aspiration to improve the HE and FE offer within Medway and the wider Medway/ East Kent sub-region. Increasing the proportion of the working age population holding a degree or better (NVQ 4 and 5) from 27% to 40%, will result in a productivity gain of 3%, an increase in the regional employment rate of 0.75% and a net annual increase in the region's GVA of £3 billion. Supporting the development of HE/ FE cluster would complement RES Target 6 'to maximise the number of people ready for employment at all skills levels, and ensure they are continually equipped to progress in the labour market' and Coastal South East Priority 8 to 'raise educational attainment and aspirations, including a comprehensive approach to enterprise education and improved access to higher and further education. We welcome the recognition of the need to improve opportunities for business start-ups linked to the universities (para. 4.61). This complements RES Target 5 to increase the business stock by 35% by 2016 and Coastal Priority 3 to support enterprise and stimulate the creation of a wide variety of businesses. SEEDA considers that incubator units should form an integral part of permissions for employment sites where appropriate.	Although the word 'cluster' is not used, the education policy in the Core Strategy gives strong support to higher education in Medway.
	Question 10	Kent County Council	Richard Feasey	Yes a cluster of facilities will enable resources to be targeted and will provide greater access to better quality facilities. Medway's role in higher education provision is regionally recognised in the RSS -Policy KTG2	Although the word 'cluster' is not used, the education policy in the Core Strategy gives strong support to higher education in Medway.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 10	University College for the Creative Arts at Rochester	David Hawkins	The University welcomes and acknowledges that Higher and Further Education are key sectors in Medway's plans for its future.	Noted.
	Question 10			No Further increase in student population. There are too many and they deprive the low earners of suitable accommodation.	The growth of the higher education sector is considered to be an essential part of the Core Strategy economic policy.
	Question 10	FWCA Frindsbury and Wainscott Community Association	J R Masey	No need to promote. If good will automatically attract from afield.	Noted
	Question 11			**Q11: Should a site for a new campus for the University for the Creative Arts be formally reserved? If so, where should this be?** Answers for question 11 (from questionnaire & website): 11 Yes/ Agree 5 No/ Disagree 4 Don't Know	
	Question 11	CPRE Kent	Brian Lloyd	We have no particular view on reserving a site for the University for the Creative Arts, but if the Council is minded to do this then it is our view that the site should be located within the urban area where it is easily accessible by public transport.	A site has been identified in the Medway Strategic Land Availability Assessment on the Interface Land in the Historic Dockyard for UCA Campus.
	Question 11	Groundwork Kent & Medway	Simon Green	Yes. The old campus is very cramped and dated. If possible the new UCA campus should be part of the Chatham Maritime cluster of universities for synergy. Other considerations should be public transport access and availability of student accommodation.	A site has been identified in the Medway Strategic Land Availability Assessment on the Interface Land in the Historic Dockyard for UCA Campus.
	Question 11	Barratt Strategic		The possibilities of accommodating enhanced facilities at Chattenden should in Barratt Strategic's opinion be investigated further	Agreed.
	Question 11	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	This should be located close to the other main educational establishments in Chatham/Brompton/North Gillingham	A site has been identified in the Medway Strategic Land Availability Assessment on the Interface Land in the Historic Dockyard for UCA Campus.
	Question 11		Mari-Anne Harstad	Yes, I'm sure the universities know best have they been properly engaged?	Agreed
	Question 11	Dickens Country Protection Society	Chris Fribbins	Any new campus should be located within a reasonable distance of existing higher education facilities to allow shared use of some facilities and maximise the use of public transport and related infrastructure	A site has been identified in the Medway Strategic Land Availability Assessment on the Interface Land in the Historic Dockyard for UCA Campus.
	Question 11	University College for the Creative Arts at Rochester	David Hawkins	The University has stated that it will create a new campus in Kent, and Medway is one of the locations being considered. On that basis, it would seem sensible to identify sites in the Core Strategy that are considered suitable, and the University will work with the Council to ensure that potentially suitable sites are set out in the next version of the developing Core Strategy. However, the University must stress that no final decision has been made on this matter.	A site has been identified in the Medway Strategic Land Availability Assessment on the Interface Land in the Historic Dockyard for UCA Campus.
	Question 11		I.H. Smith	In the old Dockyard area.	A site has been identified in the Medway Strategic Land Availability Assessment on the Interface Land in the Historic Dockyard for UCA Campus.
	Question 11		Carl Kroon	Former City Way site (college) as well as current site.	The Historic Dockyard Interface Land is the only site identified in the SLAA . The City Way and current sites are not being pursued by the UCA and consequently they are not considered in the Core Strategy.
	Question 11	FWCA Frindsbury and Wainscott Community Association	J R Masey	Do not agree, extend where it is now if needed.	Noted. The Historic Dockyard Interface Land is the only site identified in the SLAA . The City Way and current sites are not being pursued by the UCA and consequently they are not considered in the Core Strategy
	Question 11		W Mann	Yes. Consider general Chatham Maritime area including the docks/industrial area around Basin 3.	A site has been identified in the Medway Strategic Land Availability Assessment on the Interface Land in the Historic Dockyard for UCA Campus.
	Question 12			**Q12: Should Medway be actively promoted as an 'eco quarter' within the Thames Gateway? If so, how can this be best achieved?** Answers for question 12 (from questionnaire & website):	

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				12 Yes/ Agree 2 No/ Disagree 3 Don't Know	
	Question 12	CPRE Kent	Brian Lloyd	Yes. This should embrace the general principles contained in the eco-town supplement to PPS1, but should also plan and invest in the retrofit of existing properties and commercial buildings.	The core strategy does not promote Medway as an eco quarter but the issue of ecologically friendly development is addressed in policies on quality and sustainable design, climate change, energy efficiency and renewable energy and specifically in the Lodge Hill/ Chattenden policy. Knowledge transfer is addressed in the economy chapter.
	Question 12	Groundwork Kent & Medway	Simon Green	Medway should aim to improve its carbon footprint by applying more stringent standards to building energy and resources conservation and this should include retrofitting. We are not sure if 'Eco-quarter' is the best mechanism for this and this should (and probably has been) be more thoroughly researched before deciding whether or not to actively promote one in Medway.	The core strategy does not promote Medway as an eco quarter but the issue of ecologically friendly development is addressed in policies on quality and sustainable design, climate change, energy efficiency and renewable energy and specifically in the Lodge Hill/ Chattenden policy. Knowledge transfer is addressed in the economy chapter.
	Question 12		Mari-Anne Harstad	Yes, this sounds like an exciting and dynamic idea and should be progressed as such.	The core strategy does not promote Medway as an eco quarter but the issue of ecologically friendly development is addressed in policies on quality and sustainable design, climate change, energy efficiency and renewable energy and specifically in the Lodge Hill/ Chattenden policy. Knowledge transfer is addressed in the economy chapter.
	Question 12	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	This could be supported, but there is concern about the real benefits for our area. Some of the current suggestions just do not seem practical - District Heating for example could cause much more damage than benefit	The Core Strategy does not go beyond the need for investigation of the feasibility and viability of district heating.
	Question 12	Kent Wildlife Trust	Debbie Salmon	The Trust would fully support the promotion of Medway as an eco quarter. To achieve this all internationally, nationally and locally designated sites need to be buffered, with access limited in sensitive areas. Links of natural habitat should be established between core sites. The Green Infrastructure could contain other functions such as public footpaths cycle ways and food production. (For full details of green design ideas see The Kent Design Biodiversity Appendix at http://www.kent.gov.uk/NR/rdonlyres/6C743069-88B1-49E2-AFA0-FB60FEEA9695/0/BiodiversityFinal.pdf and Revealing the value of Nature by Natural England at http://naturalengland.etraderstores.com/NaturalEnglandShop/CORP113 The Trust would favour renewable energy being used, with wood fuelled local stations being our preferred option. Such energy has a duel function being low in carbon emissions, inexpensive and provides a market for wood obtained from coppicing.	The Core Strategy does not identify buffer zones around designated wildlife sites but the policy on the protection and enhancement of natural assets will apply to the whole of the Medway Area. Consequently, development proposals outside a designated site will be assessed for their impact upon that site.
	Question 12	Dickens Country Protection Society	Chris Fribbins	We would need to see what realistic benefits this would bring to the area before any commitment was made.	Noted
	Question 12	Natural England	Josh Nelson	Natural England would agree with and support Medway in promoting Medway as an Eco Quarter within the Thames Gateway. We would recommend that this is best achieved through: - conservation and enhancement of the natural environment and, in particular, statutorily designated nature conservation sites and the Kent Downs Area of Outstanding Natural Beauty - the provision of multi-functional green infrastructure following the guiding principles of the South East Green Infrastructure Framework - requiring high standards of sustainable construction and design to provide exemplar developments in environmental sustainability terms assisting in particular with strategies for adoptions to climate change.	The core strategy does not promote Medway as an eco quarter but the issue of ecologically friendly development is addressed in policies on quality and sustainable design, climate change, energy efficiency and renewable energy and specifically in the Lodge Hill/ Chattenden policy. Knowledge transfer is addressed in the economy chapter.
	Question 12	GVA Grimley Ltd	Sheery Sassoon	We support policies that encourage developments to incorporate sustainability principles and the use of renewable technologies. However, the Council will need to set out a clear strategy detailing how development can be delivered whilst meeting the Council's objectives. To achieve the Council's objectives of creating an 'eco-quarter', incentives could be offered to developers such as a flexible approach to Section 106 contributions, affordable housing, scale and / or mix of developments. (Suggestion- Further details on how the Council intends to create an eco-quarter should be provided.)	The core strategy does not promote Medway as an eco quarter but the issue of ecologically friendly development is addressed in policies on quality and sustainable design, climate change, energy efficiency and renewable energy and specifically in the Lodge Hill/ Chattenden policy. Knowledge transfer is addressed in the economy chapter.
	Question 12	Kent County Council	Richard Feasey	The scale of development planned for Medway offers extensive opportunity for exemplary projects achieving high levels of sustainable construction. This can be achieved through working with developers to install energy and water efficient devices. Scope for CHP plants and clusters of wind turbines to be incorporated into developments should also be explored. Sustainable travel should be promoted to encourage a modal shift from the car to public transport and to increase walking and cycling provision.	The core strategy does not promote Medway as an eco quarter but the issue of ecologically friendly development is addressed in policies on quality and sustainable design, climate change, energy efficiency and renewable energy and specifically in the Lodge Hill/ Chattenden policy. Knowledge transfer is addressed in the economy chapter. The policy on transport and movement addresses the issue of sustainable travel.
	Question 12		Vivienne Parker	Further promotion of recycling as opposed to incineration and rapid expansion of kitchen waste recycling, retention of tetrapak recycling. Funding for energy saving roadshows. Infrared surveys of old housing stock to identify areas of high heat loss for special targeting. Expansion of allotments. Creation of local nature reserves in vulnerable areas like Capstone Valley, Hoo Peninsula, Central Chatham, Lower Twydall, Luton Banks and Luton Valley.	Increased capacity and retention of existing capacity in waste management infrastructure is central to waste policy that is reflected in the Medway Core Strategy.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 12		Carl Kroon	Eco quarter' quaint government speak but won't work without the citizen participation which is destabilised by council incompetence with regards to recyclables- recyclable have to be collected weekly- the council system would be a joke if they were to improve it, but they have not reached that level.	Comments noted but Medway performing ahead of national targets on recycling
	Question 12			Hoo Fort Island, Cliffe Marshes. Habitat creation through reduced agriculture and channel dredging disposal activities. These areas should be managed entirely for ecological diversification.	Hoo Island is predominantly an operational facility for Peel Port's activities in relation to their statutory duties under the Medway Ports Act 1973. Habitat creation at Cliffe Marshes is, in part, dependant on the Government's response to the TE2100 plan
	Question 12	Frindsbury and Wainscott Community Association	A Wade	What is meant by and "EcoQuarter". Description not available.	The Thames Gateway eco quarter Consultation,2009, document, published by the DCLG, invited local authorities to bid for funding to create an eco-quarter in the Thames Gateway that merits exemplar sustainability status. It also suggests which characteristics and standards should be met in an eco-quarter.
	Question 12		Dr D Brighton	Yes. Recommend Kingsnorth CO2 be dissolved in the Thames	It is not clear how this would be achieved or what the environmental implications would be.
				Population	
				More flexible 'life time' homes should be developed.	The point is noted.
			John Hill	Perhaps an increase in the number of residential units for elderly people should be implemented- i.e. sheltered accommodation.	The point is noted and the housing needs of elderly people are addressed in the housing policy of the Core Strategy.
			I.H. Smith	To make sure the infrastructure is there to support the extra and ageing population	The point is noted.
				Prevent immigration Control illegal immigration Tighter control on work permits Tighter control on foreign students claiming to come for an academic course then never going home Council should be more pro-active in bringing derelict housing back into occupation. Council should be more pro-active in encouraging people in social housing to down-size once their family have left home.	The immigration issues are not those that can be addressed in the Core Strategy. Various initiatives are in place to bring derelict housing back into use and to increase occupation levels.
	4.20	Mccarthy & Stone Retirement Lifestyles Ltd		This is applicable to private sector accommodation as well as public sector accommodation and will require the Core Strategy to have policies that will ensure the delivery of accommodation to cater for an increasing number of older people and single older person households.	The point is noted.
	Question 13			**Q13: Do you agree with the forecasts for population change from 252,200 now to 264,300 by 2026?** Answers for question 13 (from questionnaire & website): 6 Yes/ Agree 7 No/ Disagree 5 Don't Know	
	Question 13	Barratt Strategic		Yes we do accept the forecast population change and feel that in preparing the Core Strategy careful consideration needs to be had to the effects of both the age profile of the Borough, and average household sizes. Not only do the needs of the aging population need to be taken into consideration, but also the fact that the average age of the population within the Borough and the natural increase in population demonstrates a need to provide for family sized accommodation. This will not only cater for the needs of the existing population, but also ensure suitable provision for those moving into the borough and contributing to its economic regeneration. In the context of the above we note that much of the housing land supply is predicated to town centre redevelopment schemes that are by and large high-density flatted developments. Whilst these might address the fact that household sizes are decreasing, they do not cater for families. The council need to ensure that its strategic allocations, (see our comments on question 96) make provision for family sized accommodation. Likewise more needs to be done to accommodate the needs of the elderly – the extent to which the regeneration schemes will meet he needs of the elderly is open to debate. Again the strategic allocations might need to take on board the need to make specific provision for the elderly. In the context of the above, it is possible that in promoting an extended Hoo the proposed urban extensions to Hoo, St Werburgh, High Halstow and Cliffe Woods could look, where possible, to provide for needs of the local elderly population thus enabling people to stay in the local area, existing family accommodation to be freed up and the population profiles of the villages to be more balanced.	Noted. Accommodation for the elderly is addressed in the housing policy of the core strategy. The main urban area has an array of social infrastructure and healthcare resources and is a more sustainable and convenient place to meet the population's demographic needs.
	Question 13	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	The Parish is concerned about the implications of these figures, added to which there is likely to be a more migration into the area while house prices remain lower, on average, and the environment improves. The biggest issue will be how real jobs can be created in the area.	The housing target reflects the population growth that is expected until 2028. The council is preparing an infrastructure plan to ensure that the necessary physical and social infrastructure is there to aid the delivery of these targets as sustainably and equitably as practicable.
	Question 13	Dickens Country Protection Society	Chris Fribbins	The figures seem reasonable. Our only concern is the possible under estimate of inward migration while property prices remain low in comparison with other areas.	Inward migration rates as well as outward rates are taken into account when these figures are developed.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 13	Kent County Council	Richard Feasey	All the key points regarding Medway's demographic structure seem to be included but it is interesting to note that reference is made to Medway's own population projections alongside KCC strategy based forecasts of change in household size. Consistency between sources used is clearly important.	Noted.
	Question 13		Carl Kroon	The national figures have exceeded government figures.	Noted.
	Question 13	Medway Countryside Forum	David Murr	There appears to be a marked discrepancy between the forecasts for population growth in the period to 2026 as set out above (Q13) and those formerly projected and agreed in Council, which accepted 300,000. We would welcome the acceptance of this lower figure/forecast of 264,300, but consider that even at this level of increase the implications for both the urban and rural environment could be very serious.	Forecasts invariably change over time and are reviewed annually.
	Question 13	FWCA Frindsbury and Wainscott Community Association	J R Masey	Get infrastructure right for present inhabitants before more growth. Cannot cope now re: services. Area is getting too large and impersonal.	The housing target reflects the population growth that is expected until 2026. The council is preparing an infrastructure plan to ensure that the necessary physical and social infrastructure is there to aid the delivery of these targets as sustainably and equitably as practicable.
	Question 13	Frindsbury and Wainscott Community Association	A Wade	We seem to have returned to 'Predict and Provide' Policies considered flawed and unacceptable. More dwellings mean more London commuters	Noted.
	Question 13		W Mann	No. Seem rather low if we do build 16,000+ dwellings	Noted.
	Question 13	Land Securities Group Plc	Land Securities Group Plc	Population projections are sensitive to minor changes in methodology and unpredicted changes in trends, e.g. migration or birth rate. The sharp downturn in house-building has had an impact on the ability to forecast the timing of new housing, particularly in areas such as Medway with high housing capacity. We therefore consider that it would probably be sensible for the Council to refer both to its own internal projections and the official Government ONS projections which would give a range against which to plan. This can be monitored over the Plan period.	Noted.
	Question 14			**Q14: In addition to natural population growth, people living longer and reduced household sizes, are there any other demographic factors that should be taken into account when planning for an adequate supply and type of accommodation?** Answers for question 14 (from questionnaire & website): 9 Yes/ Agree 0 No/ Disagree 3 Don't Know	
	Question 14	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Risk of excessive small housing units that are not fit for purpose and become less so if there is any future demographic change. Quality standards are required for the smaller housing units and sub-divided/split properties/flats etc. Poor quality new build and conversions should be resisted.	Noted and new standards are being promoted alongside the core strategy.
	Question 14	Kent Wildlife Trust	Debbie Salmon	Increases in population due to growth via the Thames Gateway will need to be factored into the Appropriate Assessment to analyse impacts on European protected sites.	Noted
	Question 14		Mari-Anne Harstad	Where is the information concerning migrants, we need to establish facilities to ensure good social cohesion, language schools, community projects	See detailed area profiles and proposed vision and objectives in the core strategy.
	Question 14	Dickens Country Protection Society	Chris Fribbins	As the quality of the local environment is improved and people get to understand the rich heritage of the area, high speed train travel etc. there may be increased pressure on inward migration.	Noted
	Question 14	Kent County Council	Richard Feasey	As well as an ageing population, more people are developing conditions in later life, such as dementia and physical disabilities, which mean that the type of accommodation such as that meeting Lifetime Homes Standard/Wheelchair Accessible Homes Standard is of growing importance especially given current levels of provision. Also looking at the overall net migration figures some of the cultural changes which Medway is experiencing is masked. The net outward internal migration cancels out the net inward international migration and so although there is no impact on the total population the demographic profile of the area has changed in recent years.	Noted.
	Question 14			Response from Bloomfields Ltd on behalf of Mr and Mrs P Mercer; and Medway Rewind Services. Additional inward migration from increased attractiveness of area due to improvements in the public realm and transport links (rail) with London. As a consequence there is likely to be a greater demand for dwellings, in particular at the middle to higher end of the market.	Noted and reflected in Thames Gateway growth status.
	Question 14		Mike Walters	EU policy will result in unwanted mass immigration putting a strain on council resources.	Noted.
	Question 14	City of Rochester Society	John Liddiard	Excessive immigration	Noted.
	Question 14			Do not rely on developers to upgrade existing infrastructure. The local government should do this.	Noted.
	Question 14		Alastair Blair	Population for housing expansion should not rely on developer input for infrastructure reinforcement. The structure should come from local and national government.	Arrangements for appropriate and necessary developer contributions are well established.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 14		Carl Kroon	Student (uni) accommodation. If livestock have to have accommodation of certain size and type why doesn't the citizen? Larger population bring with more children, the LDF has no mention of facilities. Chatham in particular is anti-child. A situation that is perpetuated throughout Medway by Council and HSG obligations.	Opinions noted.
	Question 14	FWCA Frindsbury and Wainscott Community Association	J R Masey	Some built that can be easily adapted having the disabled in mind. Support warden controlled homes for some elderly. I do query whether the housing market should be so influenced by split households.	Noted and reflected in proposed housing policies.
	Question 14		W Mann	Need good mix of social and private housing, 1 bed flats to 4 bed houses plus further provision of student accommodation.	Noted and reflected in proposed housing policies.
	Question 14		Dr D Brighton	Yes. Accommodate intake from London, with Hitachi trains. Mix-flats (1/2 bed) near stations and parking, buses. Support local industry development. Hostels for single important workers- not MHS homes	Noted.
	Question 14	Open Spaces Society	Patricia Wilson	Impossible to tell. For instance immigration may vary with reduction in job opportunity e.g. current increases in return of areas nationals. Charges under universities & future/ higher colleges may determine vacancies inflow or exodus of students. If you hold low wages in Medway mean difficulty in affording homes, rented or owned, then more proportion of 'affordable housing' but NB not in green belt. (ref. Para. 4.31 and 4.34.) What should be encouraged is increased use of "under-used upper floor within town centres (para.4.34) possibly by fiscal means?	Points noted and reflected as appropriate in the proposed housing policies.
	Question 14	Land Securities Group Plc	Land Securities Group Plc	We consider that the size of the labour force in Medway is an important issue both in planning for the local economy and transport and commuting. Those population forecasts, which have been produced, which break down population by age bands (e.g. ONS) show only minor growth in the labour force despite higher overall rises in population than Medway Council is projecting. The evidence base for the final Core Strategy needs to contain a thorough assessment of potential labour force growth and change.	The Council's own population/job forecasts include an assessment of the contribution of older workers to future work force demographics to ensure an accurate, understanding of the labour force up to 2026.
				Housing	
			Alastair Blair	Gypsies should be integrated into normal housing. Provision of sites without rules and maintenance of rules should activity be discouraged. Hiding under human rights is just a copout. Special needs is a difficult subject and requires government planning to provide a national norm. Medway should not go it alone.	Noted. The authority will assess the need for Gypsy and Traveller site provision in the area to ensure an equitable and fair response to the needs of a legally defined ethnic group.
		Medway Renaissance	John Finlayson	Provision needs to be made for all types of accommodation to meet the needs of all communities within Medway. The analysis seems to suggest there is an urgent need for units offering extra care for the elderly and to meet single household needs. The LDF will be the spatial planning strategy until 2026. In this context uncertain what bringing sites forward in a timely manner means. Irrespective of the current economic downturn the LDF needs to support the longstanding objectives for the Thames Gateway and the urban regeneration proposed for Medway. It needs to facilitate development with partners and now is the moment of opportunity for growth based on existing Medway. High quality design will be essential to successful place making in Medway. This needs to be embedded in the LDF. Design led place making in certain areas will be transformational and all stakeholders, members the public and partners need to be fully engaged.	Design is addressed in the quality and sustainable design, housing, heritage assets and energy efficiency policies in the Core Strategy.
		Natural England	Josh Nelson	Natural England would expect any housing or regeneration to be of the highest standards in environmental sustainability terms, appropriately located to avoid impacts on the natural environment (in particular, statutory nature conservation sites and the Kent Downs AONB), and contribute to the provision within Medway of multi-functional green infrastructure in accordance with the South East Green Infrastructure Framework.	Design is addressed in the quality and sustainable design, housing, heritage assets and energy efficiency policies in the Core Strategy. The natural assets, landscape and open space policies seek to protect and enhance the natural environment.
	4.21		Steve Banfield	This makes no reference to the plans being proposed for Horsted (a proposed 450 dwellings {APPLICATION NUMBER: MC2009/0630}	Point noted. This site has been included in the Medway Strategic Land Availability Assessment.
	Table 2	CPRE Kent	Brian Lloyd	We note that the identified housing supply to 2026 does not include any allowance for windfall developments. Whilst PPS3 discourages councils from making windfall allowances in their development plans for the first ten years of the plan period, they can do so after the first ten years - i.e. for the period 2016 to 2026. We would encourage the Council to include such a windfall allowance in the Core Strategy in meeting its housing requirements, which will give added flexibility/contingency. With an annual average of 238 windfall completions over the last five years, this is potentially a significant source for future housing.	The Medway Strategic Land Availability Assessment does not include windfall estimates but as they come forward, windfall planning permissions will be included in the overall supply figure in future reviews of the SLAA. They will provide an additional source of supply if some identified sites fail to come forward as soon as expected.
	Table 2	Chatham Historic Dockyard Trust	Bill Ferris	The table indicates that the Interface Land has a capacity for 500 homes. Arguments have been made that this volume is potentially low. Elsewhere in supporting documents the area is described as predominantly mixed use. The Council is about to enter into a Memorandum of Understanding with the landowners, SEEDA and CHDT, which relates to the production of SPD for this critical area following the demise of an earlier development project for the land. There is no evidence of where the suggested volume of housing has been derived from and it might be more appropriate to reference the current, very positive, partnership approach to the production of SPD for this land which is required to deliver multiple outputs including: - The creation of an appropriate arrival to the Historic Dockyard - Development likely to enhance the historic environment and setting of Scheduled Ancient Monuments - Connectivity between the former areas of the once "joined up" Dockyard - A commercial mixed use development likely to complement the emerging Historic Dockyard/Chatham Maritime destination Further weight is added to this approach when in Section 4.121 it is suggested that the site would make an ideal location for a new campus for UCA. The paper does not reference how this might be compatible with the housing proposal.	The Medway Strategic Land Availability Assessment identifies both a mixed-use development and a location for the University of the Creative Arts as suitable alternatives for the Interface Land.
	Table 2	Lafarge Cement UK	David Simms	Proposals for Temple Waterfront are subject to a resolution to grant outline planning permission, subject to signing of a S106 agreement. The outline planning application makes provision for the delivery of up to 620 homes as part of a mixed-use scheme, a figure which should be reflected in Table 2.	Noted

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	4.30	Environment Agency	Jennifer Wilson	We note the comments at 4.30 and 4.39 on Travelling Showpeople and welcome the Council's recognition of the Guild's desire to relocate our existing yard at Strood to a better location should this become available. We further welcome the Council's commitment to preserve this existing yard pending such relocation should it occur. We also note that the Council recognizes the GTAA figures and also that the RSS Partial Review may adjust these figures, which the Council are prepared to accept as valid. Therefore we wish the final document to reflect these points and also to recognize the importance of achievable criteria for "Windfall" applications from Travelling Showpeople in the future.	Noted
	4.31	Abbey Developments Ltd	Abbey Developments Ltd	We consider that any decisions regarding a change to the existing affordable housing provision percentage or threshold should be set out within the Core Strategy document where it can be subject to robust examination and debate. Any change to the percentage or threshold should also be supported by relevant and up to date housing market assessments, which are included within the evidence base for the Core Strategy. We note that policy KTG4 in the Regional spatial Strategy sets out an indicative target of 30% affordable housing in the Kent Thames Valley and paragraph 19.13 which states that "30% affordable housing is the maximum judged practical in the sub-region". Taking this policy and comments into account we consider that, as the policy states, that 30% should be the maximum indicative target. Therefore we consider that there is no justification for discussing affordable housing figures of 40% or higher.	The Core Strategy proposes a policy derived from the Medway Strategic Housing Market Assessment that recommends 25% affordable housing on all sites within the existing defined boundary to the main urban area and Hoo St. Werburgh and 30% affordable housing on all sites elsewhere.
	4.33	University College for the Creative Arts at Rochester	David Hawkins	a. The final sentence is incorrect as it relates to student residential accommodation, as it implies that there is an adequate supply of such accommodation. That is not the case, at least so far as the University for the Creative Arts is concerned. In any event, if the University were to locate its new Kent campus in Medway, there is a concern that the existing supply of student accommodation would not be able to support the needs of the University. b. The University looks forward to working with the Council, and others, to ensure that the residential needs of its students are met.	The issue of student accommodation and the willingness of the Council to work with the Universities and Mid Kent College to help deliver such accommodation in suitable locations are addressed in the housing chapter.
	4.34	Land Securities Group Plc	Land Securities Group Plc	Reference is made at Paragraph 4.20 to the needs of increasing numbers of smaller households, and the need for higher quality solutions. Paragraph 4.34 refers to, inter alia, the shortage of larger house types. We consider that Medway Council may wish to consider expanding upon these statements to avoid any perception of inconsistency with one another.	Noted.
	4.35	Groundwork Kent & Medway	Simon Green	This may need to be reinforced since otherwise some developers may argue to be granted consent on green field sites rather than tackling the more challenging sites first. Apart from the housing need, many regeneration sites are currently blots on the urban landscape near the river and need to be addressed for this reason too.	Noted.
	4.35	tbh developments ltd & helvig ltd	tbh developments/helvig	The Core Strategy should assess the adequacy of the mechanisms for bringing forward existing regeneration opportunities in a timely manner. The role of Medway Renaissance in this respect should be explicitly stated.	Noted.
	4.36		Alastair Blair	None of the existing Lungs for Medway should be breached - Rainham, Capstone should be left as a legacy to the Medway Towns people to enjoy and use. Housing in these areas will kill the benefits of natural habit as local areas for all to enjoy	Noted.
	4.40		Alastair Blair	Leave it where it is	Noted.
	4.40	University College for the Creative Arts at Rochester	David Hawkins	The University looks forward to working with the Council, and others, to ensure that the needs of its students are met.	Noted.
	Question 15			**Q15: Should the emphasis on urban regeneration be retained in housing provision, given the difficulties of bringing sites forward in an economic downturn?** Answers for question 15 (from questionnaire & website): 20 Yes/ Agree 6 No/ Disagree 1 Don't Know	
	Question 15	CPRE Kent	Brian Lloyd	Yes, urban regeneration should remain the focus of the strategy in accordance with the established approach towards development in this part of Thames Gateway. The LDF looks forward to 2026, so it needs to take a long-term view on delivery rather than a knee jerk reaction to the short-term economic downturn. In terms of housing delivery, Medway is also fortunate in being a Growth Area and having a dedicated delivery body in the form of Medway Renaissance.	Noted The Core Strategy is continuing to give priority to the regeneration of the urban area over the release of greenfield sites.
	Question 15		Alastair Blair	Yes but keep away from Rainham and Capstone Valley	Noted The Core Strategy is continuing to give priority to the regeneration of the urban area over the release of greenfield sites.
	Question 15	Groundwork Kent & Medway	Simon Green	Yes. Developers will naturally argue for developing green field sites first when they are cheaper and if the LDF does not have a strong emphasis on urban regeneration it may be difficult to resist greenfield planning applications.	Noted The Core Strategy is continuing to give priority to the regeneration of the urban area over the release of greenfield sites.
	Question 15		Paul Watson	1. In principle, placing an emphasis on urban regeneration accords with the guidance set out in Planning Policy Statements 1 and 3 and the overall strategy promoted in the South East Plan. 2. It is good planning practice to seek to regenerate areas in need of investment and environmental improvement and there are	The Core Strategy is continuing to give priority to the regeneration of the urban area over the release of greenfield sites.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				many sustainability advantages of seeking to utilise previously developed land within areas already served by good public transport options. 3. An urban regeneration focus would assist in minimising the green field land take and therefore in slowing the general outward creep of the main settlements within Medway. 4. However, the advantages of an urban regeneration focus must be balanced against the clear need to deliver new housing and employment generating development within the relevant timescales. The economic realities of delivering housing on sites where there may be substantial abnormal costs related to contamination or due to existing land values must be carefully considered. 5. In this context, PPS12 makes clear that Core Strategies and Allocations documents should not bring forward strategies or allocate land for development where there is a real prospect that the strategy or site is unlikely to be deliverable in the timescale required. 6. It is therefore necessary for the Council to satisfy itself through engagement with landowners, developers and statutory undertakers that land is both available and deliverable. 7. This process has begun and the 'call for sites' consultation which was completed at the end of 2008 will be an important part of this evidence base. 8. Overall, it is our submission that the urban regeneration focus should be retained provided that the Council can be satisfied in respect of delivery. 9. Where there is uncertainty over delivery, it will be necessary for the Council to demonstrate that the strategy is flexible and in essence that it has a 'Plan B'. 10. An approach adopted buy some other authorities has been to identify reserve Greenfield sites which will only be released if monitoring shows that the favoured urban site delivery is falling behind the delivery schedule. 11. In this way inspectors can be confident that strategies are robust and deliverable. 12. In terms of viability it is our experience based on the approach taken by Inspectors at various Core Strategy EIP's, that calculations of viability should build in some assumptions in terms of economic recovery and it is not the case that sites which may appear unviable on the basis of current values must be excluded from consideration. Rather, where sites are unlikely to come forward until later in the plan period it may be appropriate to base calculations of viability on prices that were achieved in 2006 / 2007 prior to the severe economic down turn.	The Medway strategic Land Availability Assessment demonstrates that sufficient housing can be delivered during the plan period to meet housing requirements and individual site phasing has been prepared in association with the site owners. The SLAA has identified a substantial surplus of housing sites, which would be available if there emerges uncertainty over delivery on specific sites.
	Question 15	Barratt Strategic		Whilst Barratt Strategic feel there should continue to be an emphasis on urban regeneration within Medway, there should also be a recognition that urban regeneration alone will not provide for the areas housing needs. As recognised in para 4.23, the development of many urban regeneration sites is often complex, these sites are often severely constrained, and in an economic down turn can be the first to suffer and the last to come back. A more balanced approach needs to be taken to the housing land supply, with a recognition of the merits of less constrained brown field sites, and green field urban extensions. As per our response to question 96, Barratt Strategic feel that the scale of development expected from the urban regeneration sites over the plan period should be scaled back, as should the scale of development that can practically be delivered at Chattenden. As a result Barratt Strategic feels that a further strategic allocation needs to be identified, and have suggested that this should be a scaled down Extended Hoo (including Hoo, St Werburgh, High Halstow and Cliffe Woods). This approach would not in our opinion prejudice the council's urban renaissance program, or conflict with the longstanding objectives of regeneration proposed within the Thames Gateway. Chattenden and extended Hoo will in our opinion provide for a very different but complementary housing offer that is associated with the urban regeneration sites. In effect the policy approach we are suggesting will facilitate a more healthy hosing land supply, catering for all sectors of the community, thus actively assisting in the economic regeneration of the area, and provide a more socially inclusive approach to housing land supply. In our opinion the housing market in Medway has for some time been seen as being heavily weighted towards flatted development, at the expense of family accommodation, which has not necessarily assisted in the urban regeneration of the area.	The extended Hoo option was rejected in the Issues and Options report for the reasons set out in that report.
	Question 15		Gary Brook	Support It is contended that the emphasis on urban regeneration should be retained in housing provision even in sight of the difficulties of bringing housing sites forward in a recessionary market. Our client supports the allocation of strategic sites in sustainable locations as a means of providing for the Council's housing targets. We consider that in meeting these targets the Council should emphasise that housing targets are minimum targets as expressed by the South East Plan, Regional Spatial Strategy (2009). In addition, we consider that the Council should consider suitable unallocated brownfield sites in sustainable locations which would in turn help Rochester obtain inward investment. The Corporation Street Development Framework Supplementary Planning Document (SPD) adopted in November 2008 identifies our client's land as part of a 'main development opportunity site' which encompasses the whole of Corporation Street and encourages both retail and residential development. We consider that out client's site, as part of a comprehensive redevelopment scheme, could provide housing of at least 50 units per hectare and would contribute to the Council's housing targets. In summary it is considered that the Core Strategy should ensure that housing targets are set as minimum targets with flexibility to provide additional housing on suitable and sustainable locations. This will enable the Core Strategy to be flexible; in turn this will heighten the chances of the borough meeting its housing requirements, something which it has failed to meet on a consistent basis since 2001.	The South East Plan was revoked on 6th July 2010 and its provisions no longer apply. Sites in Corporation Street have been assessed in the Strategic Land Availability Assessment.
	Question 15	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Yes, but need to show real improvements in quality. Parking issues need to be addressed - although need for private transport can be reduced, there will still be a requirement in the evening and at weekends,	Noted. The Core Strategy is continuing to give priority to the regeneration of the urban area over the release of greenfield sites. Design and parking are addressed in the quality and sustainable design, housing and transport policies of the core strategy.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 15	Lafarge Cement UK	David Simms	The emphasis on urban regeneration must remain part of the Medway spatial strategy, recognising that such sites are an important opportunity for supporting existing communities and making effective use of otherwise despoiled land. Urban regeneration sites provide an opportunity to support and extend existing local facilities, or to establish new facilities where none currently exist. Such sites, when well related to public transport and local facilities, can support sustainable patterns of travel and can act to support existing, or help establish new, communities.	Agreed, The Core Strategy is continuing to give priority to the regeneration of the urban area over the release of greenfield sites.
	Question 15	Trenport Investments Limited	C Hall	Urban regeneration sites are by their very nature often more complex and costly to develop. During times of economic difficulty greenfield sites are likely to prove to be more likely to be viable and to be able to be developed. In order to help meet the housing needs of Medway, as well as meeting the growth aspirations of the Thames Gateway, there will need to be less emphasis on regeneration until the economy is more economically buoyant and land values mean that more expensive regeneration sites become more viable and can be developed.	The Core Strategy is continuing to give priority to the regeneration of the urban area over the release of greenfield sites.
	Question 15	tbh developments ltd & helvig ltd	tbh developments/helvig	There is a real danger that the Lodge Hill, Chattenden new settlement will detract from the completion of the urban regeneration sites in Medway. Similarly, housing development at Lodge Hill would not appear to be required until well into the the Plan period given the existing permissions/allocations/commitments that exist in Medway. The Core Strategy should therefore seek to defer bringing forward Lodge Hill until the latter part of the Plan period (say not before 2020) and should provide that any start on the new settlement should not adversely affect the commitment to and completion of regeneration opportunities within the urban area.	Whilst the Strategic Land Availability Assessment includes phasing, the core strategy does not preclude sites coming forward earlier than expected for development.
	Question 15	Kent Wildlife Trust	Debbie Salmon	Development, positioned at the urban waterfront, provides opportunities to re-establish natural vegetation along the banks of the Medway and other watercourses by development pulling back from the banks. Research shows that if 15 meters is conserved from the top of each bank 90% of the flora species are conserved which in turn maintains the ecological quality of the river itself. Many of the Local Authorities within Kent aim to enhance the river Medway the continuation of this process in Medway would increase the ecological resilience of this important river. The Trust would wish to make the following comments to highlight our specific concerns regarding the following developments. Temple Waterfront The Trust has previously had concerns regarding the loss of Brownfield habitat and disturbance to birds caused by recreational pressure. The proposed mitigation is in our opinion adequate however it is important this mitigation is included in ensuing conditions. The Upnors This area contains Cockham Woods SSSI. This site should be managed, buffered and connected into the wider Green Infrastructure as part of development plans.	The impact of development on Brownfield habitats is recognised and addressed in the natural assets policy.
	Question 15	Dickens Country Protection Society	Chris Fribbins	This would be supported as making best use of previously developed land, but care is required to maintain quality, design and space standards.	Design is addressed in the quality and sustainable design, housing, heritage assets and energy efficiency policies in the core strategy.
	Question 15	Abbey Developments Ltd	Abbey Developments Ltd	Whilst we note that the long term aim for Medway has been towards urban regeneration and that this aim has been developed and refined over a period of years we consider that in the current economic climate that serious consideration has to be given to bringing forward sites which are less complex in terms of their planning, infrastructure and remediation. The complex nature of several of the urban regenerations sites and the costs associated with these, which are exceptional as noted in paragraph 4.35, 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 would be sustainable due to their location to adjacent to and within existing development and their size would mean that the level of additional infrastructure required would be minimal. Locating development in sustainable locations would accord with Policy H2 of the Regional Spatial Strategy which states that new housing whether on Brownfield or Greenfield land should be in sustainable locations. We note the comments in paragraph 5.16 regarding the possibility that releasing Greenfield land could undermine the delivery of urban regeneration sites. However, 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 remediation costs and extensive infrastructure requirements rather than a lack of demand for reasonably priced homes. Smaller Greenfield sites could provide family housing in sustainable locations adjacent to existing family units in a shorter time period. Our client has a small Greenfield site which 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 require minimal infrastructure improvements and would be able to deliver housing within a short timeframe.	The Core Strategy is continuing to give priority to the regeneration of the urban area over the release of greenfield sites. The Medway Strategic Land Availability Assessment demonstrates that sufficient housing can be delivered during the plan period to meet housing requirements and individual site phasing has been prepared in association with the site owners. The SLAA has identified a substantial surplus of housing sites, which would be available if there emerges uncertainty over delivery on specific sites. The SLAA identifies many small sites within the urban area, which are less complex and could come forward in the current economic climate.
	Question 15	BAE Systems	BAE Systems	Representations made by CB Richard Ellis on behalf of BAE Systems. Answer of Q15-21: PPS3 (2006) highlights the need for local planning authorities to maintain a flexible, responsive supply of land for housing development. This is particularly important given that the Council recognises that “some sites have significant constraints which makes them both complex and expensive to bring forward and [that] this has been exacerbated by recent poor economic conditions” (paragraph 4.23). As stated in paragraph 4.35, additional sites do not need to be identified provided those that are already identified are brought forward in a timely manner. However, BAe Systems considers this to be a high risk approach given that the Council also notes that development costs for sites along the urban waterfront are exceptional and will require further public funding. This would suggest that additional provision should be made if the Council is to meet its housing targets. This would accord with national guidance, as PPS3 paragraph 62 states that Local Development Documents (LDDs) should set out a housing implementation strategy. This should include, amongst other things, scenario and contingency planning to identify different delivery options in the event that actual housing delivery does not occur at the rate expected. Our client would also wish to highlight that the housing targets specified in the Regional Spatial Strategy for the East of England (RSS, 2008) are minimum targets only. This is particularly significant given that the Medway Towns are a designated regional hub, ‘Centre for Significant Change’ and ‘Diamond for Growth’. The Borough also falls within the Thames Gateway, the UK’s largest regeneration area and a major Growth Area. As such Medway has been set a number of significant challenges. While we recognise	See response to Paul Watson on question 15. The South East Plan was revoked on 6th July 2010, and its provisions no longer apply. The BAE systems site at Hoo St. Werburgh has been rejected in the SLAA.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				that a fundamental priority for the Thames Gateway is regeneration of previously developed sites (RSS, paragraph 19.1), the RSS also specifies that, in planning the housing provision delivery, local planning authorities (LPAs) should also take into account the ability to accelerate the rate of housing delivery in Growth Areas (RSS Policy H2). Furthermore, LPAs must also plan and manage the provision of housing to enhance the viability of rural settlements, promote a 'rural renaissance', and therefore meet the long-term needs of rural communities (RSS Policy H2). If the Council is to meet its development requirements across the Plan period, it must therefore adopt a more open approach to housing provision, including at Hoo St Werburgh. Should the Council fail to do so, we would query the Core Strategy's deliverability and thus its effectiveness, as per the requirements of PPS12 (2008).	
	Question 15	GVA Grimley Ltd	Sheery Sassoon	According to the preface, the Core Strategy will last up to 2026. Given its lifetime and the probability that the there may be further periods of economic instability, policies should be worded flexibly and build in strategies that encourage urban regeneration and housing provision in potential economic downturns. It is considered that policies should continue to support urban regeneration, including residential developments, throughout the duration of the Core Strategy, including periods of economic instability. (Suggestion: Policies should encourage development and urban regeneration throughout the duration of the Core Strategy, including periods of economic uncertainty. Strategies which encourage housing to be brought forward at all stages of the economic cycle should be developed and built into planning policies.)	Comments noted and considerable flexibility is built into the core strategy.
	Question 15		Ian Mawer	While we recognise the very real challenges faced by local authorities and developers in delivering regeneration in the current economic environment, we consider that the Core Strategy, being the long-term strategic document for Medway should take a long-term and flexible approach and maintain the objective to realise regeneration aspirations for the area. SEEDA continues to support an average annual increase in GVA per capita of at least 3%.	Noted.
	Question 15	Kent County Council	Richard Feasey	Yes. The Core Strategy need to plan for the medium/long term rather than alter the fundamentals of strategy in response to current circumstances. A sustained emphasis on urban regeneration would be consistent with the thrust of the RSS (Policy KTG1(i): Core Strategy)	Noted.
	Question 15	The Peel Group	The Peel Group	It is noted that the report identifies that units with planning permission, including existing allocations not yet started and identified regeneration sites, provide housing capacity beyond that required by the RSS (16,300 unit minimum requirement between 2006 and 2026 against a theoretical capacity for 19,300 units). It is also noted that at this stage of the Core Strategy, the Chatham Docks site is not identified as regeneration site or housing allocation, despite the substantial opportunity for regeneration that the site provides. The emphasis on urban regeneration in housing provision should be retained through the Core Strategy. However, given existing difficulties of bringing forward such sites in an economic downturn the Council should identify additional regeneration sites, including Chatham Docks, to provide alternatives and increase the likelihood of achieving the minimum RSS requirement as it unlikely that all of the regeneration sites currently identified will come forward within the Core Strategy period. Whilst the priority should remain delivering development on regeneration sites and previously developed land within the urban boundary, such as Chatham Docks, the Core Strategy should also recognise that a range of sites need to be provided, including small sites outside the urban boundary which should also have a role to play in delivering housing where they are appropriate in scale and well related to the existing urban area. Urban regeneration through housing provision also provides further opportunities. For example housing development at Chatham Docks will help to facilitate other forms of development, including a mix of uses and the rationalisation of the port. Therefore housing is a key element delivering employment and leisure uses on a number of regeneration sites.	The Core Strategy seeks to protect existing employment sites from development for other uses in order to avoid the necessity of releasing greenfield sites for employment use. Chatham Docks is safeguarded as a dock in the River Medway and Transport policies. Sufficient sites have been identified in the SLAA to avoid the need for the release of greenfield sites outside the urban boundary for development.
	Question 15	Mercer		A greater balance is needed in the provision of residential sites to ensure that there is an available and deliverable supply of housing land in Medway. In the current economic climate it is unlikely that many of the larger regeneration sites identified for housing will come forward due to high costs associated with their development (de-contamination, infrastructure provision). Having regard to this, a greater variety of sites including greenfield land within and adjoining the urban area, should be identified for residential development to ensure the supply of dwellings is maintained within the Medway area. Such a strategy will also assist in maintaining investor confidence in the area through the provision of new houses on smaller sites.	The Core Strategy is continuing to give priority to the regeneration of the urban area over the release of greenfield sites. The Medway strategic Land Availability Assessment demonstrates that sufficient housing can be delivered during the plan period to meet housing requirements and individual site phasing has been prepared in association with the site owners. The SLAA has identified a substantial surplus of housing sites that would be available if there emerges uncertainty over delivery on specific sites. Furthermore, the SLAA has identified a wide variety of sites of various sizes throughout Medway to meet its requirements.
	Question 15		Peel Investments (Intermediate) Ltd	The Core Strategy should recognise that a range of sites need to be provided and that whilst urban regeneration should remain a priority there is also opportunity for other sites to deliver housing, particularly given the complexities involved in many of the urban regeneration sites and the current economic climate. Alternatives could include sites outside the urban boundary which should also have a role to play in delivering housing where they are appropriate in scale and well related to the existing urban area. Wooley's Orchard would make a significant contribution to meeting future housing targets in Medway within a sustainable location. The site is close to local shops and the scale of opportunity provides the ability and resources to improve local community facilities and to improve bus services to this part of the urban area. Development would help to extend the existing community and help to support local facilities. The site is large enough to be developed in a way that can be sensitively designed not to impact on adjoining residential areas. Rainham should be considered as an option for sustainable expansion. It is well linked to neighbouring towns of Chatham and Gillingham and has strong local transport facilities and local services, including schools. These facilities include a regular train service that serves London, with High Speed services from December 2009, as well as Ramsgate,	Wooley's orchards has been assessed and rejected in the SLAA and options for development to the east and north of Rainham have been considered and rejected in the Issues and Options report.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				Dover, Canterbury, Faversham, Sittingbourne, Gillingham, Chatham and Rochester. The site is within 1km of the railway station. As such Rainham presents a number of positive attributes making it suitable for expansion. For the reasons outlined above, the site at Wooley's Orchard is considered to be a good candidate for residential development. It is accepted that as a greenfield site, most available brownfield sites will, in sequential terms, be preferred options and considered before greenfield locations, particularly if the focus through the Core Strategy remains on urban regeneration sites. However, Wooley's Orchard can provide a sustainable alternative to relying solely on urban regeneration sites to deliver the housing requirements over the core strategy period.	
	Question 15	City of Rochester Society	John Liddiard	Q15-21 How about provision for self build housing by individuals or groups Additional growth should be concentrated on or adjacent to the urban areas concentration of effort and resources leads to improved facilities.	Noted. Self build projects can be considered through the development management system as they arise.
	Question 15	Medway Countryside Forum	David Murr	We support the emphasis on urban regeneration within those sites identified as important to the Thames Gateway Strategy (e.g. Chatham, Rochester Riverside), but are concerned that in much of Medway there has been, and continues to be, a regrettable trend towards intensive in-filling of open space, gardens and sites where dwellings are cleared to be redeveloped. This is the inevitable consequence of a distortion of the Gateway strategy away * from outward expansion restraint to promotion of a growth agenda. *Restraint of outward expansion.	The SLAA has not considered open space for development unless already committed and recent government changes to PPS3 are likely to reduce the amount of garden space lost to development.
	Question 15	RSPB	Fay Martin	No. The RSPB considers that the economic downturn provides Medway Council with an opportunity to reconsider the environmental appropriateness of the current urban regeneration emphasis. We are particularly concerned with proposals to focus housing delivery within the Medway urban area at riverside sites. The number and scale of waterfront developments are likely to have a negative impact on the Medway Estuary and Marshes SPA. Of particular concern is the Chatham Docks site, which is located adjacent to Medway Estuary and Marshes SPA. The development has the potential to result in a number of impacts that could potential damage the SPA, including from land and/or water-based recreational activities. We strongly recommend that the riverside sites be thoroughly appraised in the AA of the Core Strategy and we would welcome the opportunity to comment further on this matter prior to the publication of that document.	Medway Council is currently discussing the scope and extent of the appropriate assessment with Natural England, the Environment Agency and adjoining authorities prior to preparing a screening document and appointing a consultant to carry out the assessment.
	Question 16			**Q16: Cramped internal living space and poor standards of amenity have been recognised as a national problem, should minimum internal space standards be introduced and an explicit requirement for higher quality design established?** Answers for question 16 (from questionnaire & website): 21 Yes/ Agree 4 No/ Disagree 1 Don't Know	
	Question 16	CPRE Kent	Brian Lloyd	Yes, it should be an objective of the LDF to ensure the highest quality development that also meets the needs of residents.	The Council is currently preparing a supplementary document on internal space standards.
	Question 16	Groundwork Kent & Medway	Simon Green	Yes. There has been a national trend towards very cramped units and in principle all homes should meet the space standards already set for social housing.	The Council is currently preparing a supplementary document on internal space standards.
	Question 16	Mccarthy & Stone Retirement Lifestyles Ltd		Paragraph 4.26 is in danger of coming across as 'ostracizing' flatted developments as acceptable forms of housing. Whilst I would support the notion of producing good quality housing with good quality living environments I question whether the use of specific standards would be the best way to go. The Council will need to consider the implications to housing delivery and affordable housing delivery if it seeks to impose standards that would result in reducing housing densities. There may be a requirement to release more greenfield land to make up for the shortfall in numbers created by using minimum space standards for dwellings. An environment impact assessment should be carried out to ascertain the impact upon housing delivery. If space standards are to be adopted then they should be applied flexibly.	The Council is currently preparing a supplementary document on internal space standards. The impact on delivery and the implications for greenfield land will be taken into account before any space standards are adopted.
	Question 16		Gary Brook	Object With regards to paragraph 4.26, our client agrees that design of flatted developments needs to be carefully considered so as to ensure a higher quality environment. However, it is considered that it is not always appropriate to demand that set standards are met due to various site constraints and individual site characteristics. We are aware that certain development proposals will be in areas where open space amenity is poor and the Council will therefore need to ensure they are designed appropriately so as to incorporate open space and other amenities. We consider that development proposals already have to deal with strict design regulations and that applying further restrictions may result in schemes becoming unviable. Individual scheme design and merits should be justified within design and access statements and measured against good design policies within the relevant plans, rather than placing further arbitrary requirements which may frustrate development. We do not consider that applying further restrictions to design is entirely necessary and we therefore request that the Council adopt a flexible approach and consider development proposals on a case by case basis taking into account individual site characteristics both constraints and merits and existing amenities in the area.	The Council is currently preparing a supplementary document on internal space standards. The question of viability will be taken into account when considering the application of design standards on a site by site basis.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 16	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Strongly support this suggestion - and the need to ensure it applies to residential conversions into bed sit/flats.	The Council is currently preparing a supplementary document on internal space standards.
	Question 16	Kent Wildlife Trust	Debbie Salmon	The Trust is not qualified to comment on internal space standards however we would recommend that design of development include energy saving technology, enhancements for wildlife such as bat and bird boxes and connected Green Infrastructure throughout the built environment linking open spaces and other ecological hot spots. (For further information on ecological enhancements, corridors and stepping stones see The Kent Design Guide, Biodiversity Appendix at http://www.kent.gov.uk/NR/rdonlyres/6C743069-88B1-49E2-AFA0-FB60FEEA9695/0/BiodiversityFinal.pdf	Noted.
	Question 16	GVA Grimley Ltd	Sheery Sassoon	We support the development of high quality housing in Medway. We consider that every new residential dwelling should have access to suitable quantity of internal space. However we consider that this should be treated flexibly with regard to site specific circumstances and demand for units of different sizes. Policies relating to internal space standards and design may therefore sit more comfortably in an SPD which has the flexibility to be updated regularly and respond to market innovation. (Suggestion- A separate SPD to be published setting out residential space and design standards which can be updated on a regular basis.)	Agreed. The Council is currently preparing a supplementary document on internal space standards.
	Question 16	Kent County Council	Richard Feasey	Minimum space standards also enable people to live in their own homes for longer, for example if they require aids and adaptations or become a wheelchair user.	Noted.
	Question 16	University College for the Creative Arts at Rochester	David Hawkins	The University would welcome the opportunity of liaising with the Council, and others, to ensure that new purpose-built student residential accommodation satisfies certain minimum criteria, including space standards and sustainability.	Noted.
	Question 16		Peel Investments (Intermediate) Ltd	Minimum internal space standards and explicit requirements for high quality design will potentially impact on the viability of schemes. Any standards should not stifle development and a blanket minimum standard would not be appropriate for all types of development opportunity. Therefore, any standards will need to retain flexibility to respond to the characteristics of any individual site or scheme. If the Council is minded to establish minimum housing space and design standards we consider that they should come forward through a Supplementary Planning Document to undergo separate consultation and scrutiny.	The Council is currently preparing a supplementary document on internal space standards.
	Question 16		Dr D Brighton	No. Smaller houses for MHS. To sell- balance supply/ demand. Quality- building regs.	The Council is currently preparing a supplementary document on internal space standards.
	Question 16	Open Spaces Society	Patricia Wilson	Yes, if these improvements are compatible with modestly- priced and affordable housing.	The Council is currently preparing a supplementary document on internal space standards.
	Question 17			**Q17: What types and location of sites should be specified to meet the needs of the gypsy and traveller communities – assuming a requirement of at least 14 pitches?** Answers for question 17 (from questionnaire & website): 3 Yes/ Agree 3 No/ Disagree 4 Don't Know	
	Question 17	CPRE Kent	Brian Lloyd	Whilst we support the need to provide sites for gypsies and travellers, we do not consider that the scale of provision identified makes the identification of sites in the Core Strategy a strategic matter. We consider that this is a matter that is best addressed in the supporting DPD.	The housing chapter includes a criteria based policy for the provision of sites for gypsies and travellers but does not address site locations or numbers. This will be included in a subsequent development plan document.
	Question 17	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	The Parish Council would not wish to comment and commit other areas to this allocation. We have already seen areas taken over and given special planning permission in our Parish - these sites should be taken into consideration as part of the local provision (Green belt policies and building outside of agreed village boundaries has been permitted where other forms of development would not have been allowed)..	The housing chapter includes a criteria based policy for the provision of sites for gypsies and travellers but does not address site locations or numbers. This will be included in a subsequent development plan document.
	Question 17	Dickens Country Protection Society	Chris Fribbins	We have seen a number of sites given permission by the Planning Inspectorate in areas outside of allocated residential development where nobody else can develop. These sites should be taken into consideration when assessing requirements.	Noted The housing chapter includes a criteria based policy for the provision of sites for gypsies and travellers but does not address site locations or numbers. This will be included in a subsequent development plan document.
	Question 17		Vivienne Parker	One of the Brownfield sites on the outskirts of Grain village.	The housing chapter includes a criteria based policy for the provision of sites for gypsies and travellers but does not address site locations or numbers. This will be included in a subsequent development plan document.
	Question 17			Gypsy sites should be planned. L.E.A. should provide gypsy sites for itinerate gypsy. Illegal planning on gypsy sites should be controlled and planning consent should be rigorously enforced. Protect green belt/ agricultural land/ green spaces totally.	Noted.
	Question 17		Carl Kroon	Site requires easy access to allow large vehicle in/out; areas to erect equipment for test and maintenance.	The housing chapter includes a criteria based policy for the provision of sites for gypsies and travellers but does not address site locations or numbers. This will be included in a subsequent development plan document.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 17			The RSS may require up to 30 new pitches and 7 stopping pitches for transit purposes. A small land take for this level of provision. This should be recognised and pose no real problem for the CS to make delineated provision. Integrated into the general population in a safe and contained way. Must not be on substandard and unattractive sites that would exacerbate the underlying antagonisms between the traveller and settled population. Chattenden should be seen as a significant opportunity to identify a deliverable solution to a significant level of whatever RSS requirements finally transpire.	The housing chapter includes a criteria based policy for the provision of sites for gypsies and travellers but does not address site locations or numbers. This will be included in a subsequent development plan document.
	Question 17	FWCA Frindsbury and Wainscott Community Association	J R Masey	Sites should have strict regulations regarding litter and safety and security of the environment.	The housing chapter includes a criteria based policy for the provision of sites for gypsies and travellers but does not address site locations or numbers. This will be included in a subsequent development plan document.
	Question 17	Frindsbury and Wainscott Community Association	A Wade	Travellers create many problems within a locality with rubbish and dumping - sites need to be strictly overseen and controlled.	The housing chapter includes a criteria based policy for the provision of sites for gypsies and travellers but does not address site locations or numbers. This will be included in a subsequent development plan document.
	Question 17		W Mann	Provide necessary pitches on brownfield sites, preferably 2-3 sites. Provide all main services and charge appropriately.	The housing chapter includes a criteria based policy for the provision of sites for gypsies and travellers but does not address site locations or numbers. This will be included in a subsequent development plan document.
	Question 17		Dr D Brighton	Yes. Mixed site, fenced, with water, sewage, like mobile home parks, bin collection- worked ok at Farnham, Surrey.	The housing chapter includes a criteria based policy for the provision of sites for gypsies and travellers but does not address site locations or numbers. This will be included in a subsequent development plan document.
	Question 17	Open Spaces Society	Patricia Wilson	ref. para. 4.28 you should tell us if a final report has been completed (footnote 26 at page 26)	The partial review of the SE Plan has been abandoned following the revocation of that plan. The housing chapter includes a criteria based policy for the provision of sites for gypsies and travellers but does not address site locations or numbers. This will be included in a subsequent development plan document.
	Question 18			**Q18: What quantity and types of accommodation are likely to be needed to meet the needs of non self-contained households, including those with special needs?** Answers for question 18 (from questionnaire & website): 3 Yes/ Agree 1 No/ Disagree 9 Don't Know	
	Question 18	Mccarthy & Stone Retirement Lifestyles Ltd		PPS3 states that Local Authorities need to plan for a mix of of housing on the basis of the different types of households that are likely to require housing over the plan period. This will include having particular regard to current and future demographic trends and the accommodation requirements of specific groups such as older people. The South East Plan identifies the changing age structure of the Region with an anticipated increase in the proportion of people over the age of 65 by 2028. The draft Plan acknowledges that this will have implications for the type of housing needed. Policy CC11 of the draft plan entitled 'Supporting an Ageing Population' recognises the significant increase in the proportion of older people in the Region in the plan period advising that local planning authorities should pay regard in their Local Development Framework to assessing and planning for the social needs that will arise from an ageing population. This would include the need to make provision of new housing developments to support older people living independent lives. The Policy's supporting text states "…….coupled with the complexity associated with changing lifestyle and housing aspirations, and the Government's desire to provide greater housing choice for older people, this means there will be a need for a variety of housing options to be made available, including support for older people living independent lives in their own homes, sheltered housing and extra care housing….. for a significant number the benefits of sheltered or extra care housing will be essential if they are to maintain an independent lifestyle. The provision of such housing offers choice, frees up under-occupied family sized homes and offers an improved quality of life including improved mental and physical wellbeing of older people". The emerging RSS recognises the implications for planning and the Region that will occur from the projected increase in the proportion of older people, so much so that they have deemed it a sufficient concern to have a specific policy relating to the ageing population. As local authorities in the South East Region will have to have regard to the South East plan in their local development frameworks I would anticipate, and hope to see this issue promoted in the Medway Core Strategy. In terms of local need the Medway Housing Market Assessment identified a need for 1,929 units of sheltered accommodation, of which 727 would be in the private sector in the three years from the date of the report which was 2005. Given Paragraph 4.16's identification that the number of people over retirement age is set to increase by 10,000 in the next years then I would anticipate that the Housing Market Assessment's would need to increase substantial to meet the housing need identified by this increasing population cohort. On behalf of my Client, it would suggest that the Council need to adopt clear policies promoting, and essentially for a Core Strategy ensuring delivery of accommodation for older people. This should include the allocation of specific, suitable sites for older persons	The housing design policy makes provision for a mix and balance of housing of different types and tenures, having regard to the strategic Housing Market Assessment. It also requires housing design to meet the need of the elderly. The question of allocation of sites will be addressed in a subsequent development plan document.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				accommodation so as to ensure deliverability.	
	Question 18	Government Office for the South East	Hazel Long	Affordability is an issue, with local earnings well below the regional average and a shortage of affordable housing. With circa 9,000 households registered on the housing waiting list, is the share of new affordable units sufficient to meet need? What provision has been made for older people's services? Although 85% of the current population of 251,700 live in the five towns, rural areas are home to 12% of Medway's population. What is the Council's policy for the provision of rural affordable housing?	Affordable housing is addressed in the Housing Chapter.
	Question 18	GVA Grimley Ltd	Sheery Sassoon	It is recommended that the Council continue to encourage a mix of housing within developments which reflect market demand and local requirements. These should therefore be reviewed and updated on a regular basis. It is therefore considered that policies relating to housing mix, including those with special needs may therefore sit more comfortably in an SPD which can be updated regularly and respond to local and market requirements. (Suggestion- A separate SPD to be published setting out residential mix which can be updated on a regular basis.)	Noted.
	Question 18		Ian Mawer	Answer to Q18-20, RES Target 9 seeks to 'Ensure sufficient and affordable housing…space of the right quality, size and type to meet the needs of the region and support its competitiveness''. SEEDA therefore considers that these questions ask the right questions, and must be informed by the Council's evidence base, particularly the SHLAA and demographic projections.	Noted.
	Question 18	Kent County Council	Richard Feasey	Community accommodation for people with special needs and requirements can also assist people to live in their own homes from longer, as well as being in line with the Government's Sustainable Communities Agenda. If community facilities are built for all sections of the community, it gives a place for people to meet, learn new skills, train to live independently, learn to live with dementia etc. The key requirement for this type of accommodation is that it is accessible, both physically and geographically.	The housing chapter addresses the issue of housing provision for people with special needs.
	Question 18		Carl Kroon	Low level access with doors that can accommodate wheel chair access, built on flat sites.	The policy on housing design deals with adaptability to meet the needs of the disabled.
	Question 18	FWCA Frindsbury and Wainscott Community Association	J R Masey	Should be included in SE Plan figures.	The housing chapter addresses the issue of housing provision for people with special needs.
	Question 18		Dr D Brighton	Yes. Family houses for Downs Syndrome adults and carer. Better homes for elderly – cared for.	The housing chapter addresses the issue of housing provision for people with special needs.
	Question 19			**Q19: Are there any specific housing needs related to the Black and Minority Ethnic communities that should be addressed in the Core Strategy?** Answers for question 19 (from questionnaire & website): 1 Yes/ Agree 7 No/ Disagree 7 Don't Know	
	Question 19	FWCA Frindsbury and Wainscott Community Association	J R Masey	No. Standards should be the same for all.	No particular housing problems for black and minority ethnic communities have been identified in the Medway Strategic Housing Market Assessment.
	Question 19		Dr D Brighton	No. Usual language and education problems	No particular housing problems for black and minority ethnic communities have been identified in the Medway Strategic Housing Market Assessment.
	Question 20			**Q20: Should specific provision be made for high quality detached housing?** Answers for question 20 (from questionnaire & website): 6 Yes/ Agree 7 No/ Disagree 2 Don't Know	
	Question 20	CPRE Kent	Brian Lloyd	In accordance with national planning policy, it is appropriate for the LDF to provide a range and choice of housing that meets the need of all. This, we consider, is best done by planning integrated communities that provide a mix of housing. The large redevelopment sites available in Medway will facilitate this approach.	The housing design policy makes provision for a range and choice of housing.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 20	Barratt Strategic		Yes there should be specific provision for high quality detached housing. The existing housing stock in Medway id made up predominately of terraced housing. More recent developments have focused on flatted accommodation. As recognised in the State of Medway Housing Report (Nov 08) there are few detached units in Medway. The lack of supply of family sized accommodation, including high quality detached units has in our opinion been partly to blame for the significant level of out migration Medway has suffered over the years. In addition the lack of high quality detached housing makes it difficult to attract higher paid employees and investment by quality employers, who themselves have the potential to invest in the local area, and thus help foster economic regeneration. In our opinion the Core Strategy needs t provide for a mixture of housing sizes and types, including specifically housing suited to the needs of small households and an element of spacious property capable of underpinning sustainable regeneration, and freeing up movement through the housing stock. As has been recognised elsewhere in Kent where economic regeneration is a key, there is a need to make specific provision for family sized accommodation/high quality detached units. In the context of the above we would draw the councils attention to Thanet DC decision to highlight the need for 34% - 50% of total dwellings in its strategic allocations at Westwood and Minster being a mixture of three and four bedroom homes (policies H6 and H7 of Thanet LP refers)	The housing chapter of the Core Strategy recognises that Medway has a very small proportion of 'executive style' accommodation and makes specific provision for the inclusion of such housing as part of schemes that offer a range of housing types. The recent decision by the Government to abolish the minimum density targets in PPS3 facilitates this policy.
	Question 20	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	We can recognise some of the benefits of this type of allocation, but on balance would want to see more mixed developments	The housing chapter of the Core Strategy recognises that Medway has a very small proportion of 'executive style' accommodation and makes specific provision for the inclusion of such housing as part of schemes that offer a range of housing types. The recent decision by the Government to abolish the minimum density targets in PPS3 facilitates this policy.
	Question 20	Lafarge Cement UK	David Simms	It is important that Medway plans to deliver a range of housing types which meets the full range of housing needs. It is also important to recognise that any site is capable of delivering a range of dwelling types if planned properly and not required to meet overly prescriptive density or other development criteria. Whilst the need to deliver detached homes is supported, this should be done in a way which allows all sites to be brought forward offering a range of dwelling types and sizes, capable of providing a choice of accommodation.	The housing chapter of the Core Strategy recognises that Medway has a very small proportion of 'executive style' accommodation and makes specific provision for the inclusion of such housing as part of schemes that offer a range of housing types. The recent decision by he Government to abolish the minimum density targets in PPS3 facilitates this policy.
	Question 20	Dickens Country Protection Society	Chris Fribbins	A broad mix would be required and attempts should be made to ensure mixed developments rather that sole developments of this kind.	The housing chapter of the Core Strategy recognises that Medway has a very small proportion of 'executive style' accommodation and makes specific provision for the inclusion of such housing as part of schemes that offer a range of housing types. The recent decision by the Government to abolish the minimum density targets in PPS3 facilitates this policy.
	Question 20	Kent County Council	Richard Feasey	The text suggests that a shortfall in detached properties has been identified in Medway and might therefore be addressed in the Core Strategy although the findings of the Strategic Housing Market Assessment are still awaited.	The housing chapter of the Core Strategy recognises that Medway has a very small proportion of 'executive style' accommodation and makes specific provision for the inclusion of such housing as part of schemes that offer a range of housing types. The recent decision by the Government to abolish the minimum density targets in PPS3 facilitates this policy.
	Question 20		Mercer	Attracting higher quality professional and managerial occupations will be dependent on the quality and range of housing available. Specific provision should therefore be made for lower density high quality detached housing.	The housing chapter of the Core Strategy recognises that Medway has a very small proportion of 'executive style' accommodation and makes specific provision for the inclusion of such housing as part of schemes that offer a range of housing types. The recent decision by the Government to abolish the minimum density targets in PPS3 facilitates this policy.
	Question 20	Frindsbury and Wainscott Community Association	A Wade	High quality dwellings should be a standard in all developments -size an important choice possibly a smaller provision.	The housing chapter of the Core Strategy recognises that Medway has a very small proportion of 'executive style' accommodation and makes specific provision for the inclusion of such housing as part of schemes that offer a range of housing types. The recent decision by the Government to abolish the minimum density targets in PPS3 facilitates this policy.
	Question 20	Open Spaces Society	Patricia Wilson	Better to create a mix of housing in the hope that it will lead to more integrated communities.	The housing chapter of the Core Strategy recognises that Medway has a very small proportion of 'executive style' accommodation and makes specific provision for the inclusion of such housing as part of schemes that offer a range of housing types. The recent decision by the Government to abolish the minimum density targets in PPS3 facilitates this policy.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 21			**Q21: How should the problem of bringing older owner-occupied properties up to modern standards be addressed? Should selective redevelopment be considered as an option?** Answers for question 21 (from questionnaire & website): 6 Yes/ Agree 6 No/ Disagree 3 Don't Know	
	Question 21	Barratt Strategic		We do not see how the council can advocate the selective redevelopment of older owner occupied properties that do not reach modern standards. This would involve costly CPO. Instead, as part of their approach to combating climate change, the council should look at ways to fund improvements to the existing housing stock. This would be a much more cost effective approach and a lot less disruptive to the local community	The housing policy makes provision for the improvement and renovation of existing housing stock rather than selective redevelopment.
	Question 21	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Natural redevelopment occurs as properties are recycled for the new generations.	Noted
	Question 21	Dickens Country Protection Society	Chris Fribbins	This may be a natural consequence of recycling households from elderly to younger generation	Noted
	Question 21		Vivienne Parker	Too expensive, refurbishment is cheaper & better.	Agreed
	Question 21		I.H. Smith	Not redevelopment in most cases, support, help with the owner/ landlord	Agreed
	Question 21		Carl Kroon	Pre 1919 building cannot be brought up except by demolition and rebuild.	Noted
	Question 21	FWCA Frindsbury and Wainscott Community Association	J R Masey	With loans if needed. Selective redevelopment only with the consent of the occupier. Some of the old properties have character which is lacking in most current buildings (Good example Grange Farm Development)	The housing policy makes provision for the improvement and renovation of existing housing stock rather than selective redevelopment
	Question 21	Frindsbury and Wainscott Community Association	A Wade	No. Many older properties are often significantly superior in construction to new dwellings. Selective redevelopment is not acceptable, it indicates the removal of choice.	The housing policy makes provision for the improvement and renovation of existing housing stock rather than selective redevelopment
	Question 21		W Mann	Yes. Essential update existing old housing stock as well as providing new developments elsewhere.	The housing policy makes provision for the improvement and renovation of existing housing stock rather than selective redevelopment
	Question 21		Dr D Brighton	Yes. Don't make MHS services engineer redundant. Repair more. Redevelopment only if condemned.	The housing policy makes provision for the improvement and renovation of existing housing stock rather than selective redevelopment
				Transport	
		Medway Countryside Forum	David Murr	We understand that the construction of an additional road/mixed modal crossing of the Thames/Medway estuaries has been promoted at high level, notably by some of it's advocates within the County Council. We are strongly opposed to this and consider that it would be a completely inappropriate approach to achieving a sustainable transport system for this area, and would inevitably further raise pressures for excessive and damaging development. The important conservation and landscape areas on the Hoo Peninsula would be particularly vulnerable to spoliation, and the hinterland of the Thames and Medway Special Protection Areas would be seriously affected.	The issues of a Lower Thames crossing will be addressed separately from the Core Strategy.
			Alastair Blair	First- control development to meet local demand. Second- work within national policies but do not spread development on to rural areas at Rainham and Capstone.	There are no proposals in the Core Strategy to develop in the Capstone or in the rural areas of Rainham.
				Control local development of transport to meet demand, work with National policies but do not allow spread of development into rural areas in Rainham and Capstone Valley.	There are no proposals in the Core Strategy to develop in the Capstone Valley or in the rural areas of Rainham.
			Mike Walters	Bus facilities provided by ARRIVA are insufficient on Sundays and at nighttime. I drive a London bus often until 2 am and my earliest start time is 4:30am. People need to get to work and go home at night. The Medway tunnel should be modified with barriers for a combined pedestrian and cycle way.	Bus services are principally the responsibility of the bus companies; The design of the Medway Tunnel precludes its use by pedestrians and cyclists on safety grounds.
		Medway Renaissance	John Finlayson	Regeneration sites are an opportunity to address congestion and are not necessarily the cause. The transport strategy hopefully will major on modal shift. This ties in with current concerns about air quality, which will remain an issue unless there is significant modal shift away from private car use. Parking standards need to be carefully reviewed on the basis of traffic restraint to encourage a modal shift. High parking requirement can adversely affect the viability of regeneration sites particularly in town centres. High Speed 1 will be an important catalyst for the regeneration of Medway. Improvements to the stations as transport hubs need to be actively promoted by the LDF. Access for all and increased connectivity is a major priority for Medway. River crossings and improved transport facilities must feature.	The Transport strategy places a great emphasis on public transport, whilst walking and cycling are also supported. It allows for parking standards to be reduced on sites well served by public transport and promotes improvements to the railway stations. The feasibility of a river crossing is being investigated.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
		Natural England	Josh Nelson	In order to best protect species and landscapes against the effects of climate change, Natural England would encourage transport initiatives and policies that reduce reliance on the private car and promote public transport provision where such initiatives and policies lead to a reduction in carbon production. Natural England would also encourage initiatives and policies which have the effect of reducing and/ or minimising air quality impacts on statutory nature conservation sites and on users and inhabitants of the Kent Downs AONB. Any river taxi or wharf protection proposals should avoid adverse impacts on statutory nature conservation sites.	Noted
			Steve Banfield	1. Over many years Medway's Public Transport infrastructure has been extremely poor - It did at least appear again in the evenings after deregulation (- with KCC & later Medway/KCC subsidies). Unfortunately it is still very poor on Sundays. Transport to most of the areas would need to be vastly improved. You could almost do with a Medway towns monorail or underground 24 hour system to get to stations. 2. A transport link in to Strood Rail Station would be of limited use - since it is only on the Charing Cross/ Canon Street line. Rochester or Chatham would be better.	A monorail or underground system would not be viable.
			Barry Knight	Residents' parking is a joke, particularly in Gillingham. Parking is no easier than before (no surprise there then) and the price is rocketing. The so called consultation period in ME7 coincided when things were a bit tight with the redevelopment of the hospital car park. And did residents really request for restricted parking until 10PM? One might expect this in central London but Gillingham?	Noted.
	4.43	Network Rail (Town Planning)	Mike Smith	To the point "Mainline and Grain Freight Line capacity limitations â€" resulting in restricted ability to move freight by rail"- Network Rail currently has a scheme in progress to provide improved infrastructure & operation	Noted.
	4.44		Barry Knight	The "fast" domestic rail services is probably a misnomer for Medway - given the slow run through to Northfleet and the pinch point at the Rochester Bridge. Also the terminus at St Pancras is not helpful for most commuters - involving a tube journey for many where previously one was not necessary. This and the premium to be paid may mean the commuter will be reluctant to leave the "classic" services - even if South Eas Trains have slowed these down over the years and will be adding additional stops in December 2009.	Noted.
	4.45		Alastair Blair	Towns and traffic will always be congested. Apply traffic management techniques which allow best flow. Convince the public by better public transport that the car should be second option. See Santander in Spain and many other european cities. Little change to road layouts but heavy investment in busses.	The transport strategy places great emphasis on public transport.
	4.46	CPRE Kent	Brian Lloyd	We are surprised that these assessments have not already been undertaken as this site is being put forward as the Council's favoured location for development.	Preliminary assessments have been carried out but more detailed assessments will be required as the detailed form of development is clarified
	4.51	Network Rail (Town Planning)	Mike Smith	Station environments – Chatham, Gillingham, Rochester and Strood stations all included in National Stations Improvement Programme – options being investigated to re-locate Rochester station with Medway Council	The transport policy includes provision for station improvements.
	4.52	London Thamesport (Hutchison Ports UK Ltd)	Nicholas Orbell	This line has potential for freight capacity, thereby by-passing the congested cross London lines. Greater access to the West Coast Mainline should be considered, for the benefit of containerised freight from London Thamesport together with Channel traffic.	The upgrading of the Medway Valley Line as strategic link to Gatwick would need to be investigated at a strategic level. The South East plan does not address the issue nor is it included in the Kent Rail utilisation strategy and consequently it is not included in the Core Strategy.
	4.54	Groundwork Kent & Medway	Simon Green	Whilst there are an increasing number of people arguing in favour of a waterbus system, these cannot really be described as "efforts" in the sense of detailed feasibility studies or plans. Given that the problem in Medway is partly about cross river connections as well as the potential up and down river, a better case can be made than in some place with many good cross river connections (eg London). There should be more emphasis on encouraging this the key to which is the condition of the piers themselves and addressing the high tidal range. Piers need to have a high quality environment and to be viable as destinations in themselves and the LDF should include policies to encourage this and to support feasibility studies. Many other coastal estuaries in UK have good cross river ferry systems which would have lower capital costs than cable cars and possibly similar in revenue terms.	The Transport and River Medway policies make provision for use of piers and river taxis.
	4.55	Rochester City Airport	Paul Britten	Although we welcome the inclusion of Rochester Airport in the Transport sector no mention is made of its safeguarded status although this issue is raised in regard to Stoke microlight facility. Amateur pilot training is a misnomer as many go on to gain further and professional qualifications. It is a vital licensed drop off and refuelling stop for royal, military, security services, survey, photographic and other business flights. It is the base for the newly commissioned police helicopter run jointly with Essex police.	Noted. The Transport and Movement chapter notes that Rochester is a licensed facility and subject to airspace safeguarding by the Council.
	4.55	tbh developments ltd & helvig ltd	tbh developments/helvig	Whether Rochester Airfield will continue in use as a general aviation airfield and what land within the airfield site might be available for development is crucial to the realisation of the strategic employment development at the site provided for in South East Plan Policy KTG3. The Issues and Options Report is completely silent on this fundamental issue and this needs to be remedied when the Core Strategy itself is published. The Council also needs to commit to making any employment development land within the airport perimeter available within a specified timescale.	The development strategy for the airport and the land surrounding it is set out in the draft core strategy.
	4.56	Groundwork Kent & Medway	Simon Green	It is hard to see how encouraging microlights can be justified particularly if this unnaturally restrains other developments. Microlights are a minority leisure activity, which can be provided for elsewhere in Kent if there is sufficient need.	The Core Strategy does not encourage microlights and the Issues & Options report sought views on an existing facility at Stoke..
	Question 22			**Q22: Have the correct transport issues been addressed? If not, which further issues should be considered?** Answers for question 22 (from questionnaire & website): 3 Yes/ Agree	

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				9 No/ Disagree 4 Don't Know	
	Question 22	CPRE Kent	Brian Lloyd	Generally, we consider that the right transport issues have been identified but there are two major omissions. Firstly, no mention is made of the prospect of a Lower Thames Crossing even though one of the options being considered by Government would involve a crossing point from the Hoo Peninsula. The Council should state its strong objection to this in the Core Strategy on the grounds of the severe environmental impact that it will have on internationally important nature conservation interests. Secondly, there is no recognition of Rochester Airfield and its potential contribution to transport and tourism. Whilst any expansion of the airfield would be inappropriate, we consider that it contributes to the transport mix of the area and provides important aviation related employment. It also provides a significant open green area in the urban area that would contribute towards the green grid strategy. The future role of the airfield, therefore, needs to be considered in the Core Strategy.	The issue of the Lower Thames Crossing id dependant on decisions by government and, if necessary, will be dealt with a in future review of the Core Strategy. The development strategy for the airport and the land surrounding it is set out in the draft core strategy.
	Question 22	Government Office for the South East	Hazel Long	Has the Council considered the five goals of DaSTS - supporting economic growth, tackle climate change, promote equality of opportunity, contribute to better safety, security and health, and improve quality of life; - Consider improved access to Thamesport.	The five goals of DaSTS are addressed in the transport policy. Improved access to the international gateway at Grain is identified as a key action.
	Question 22	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	There is not much in the way of practical solutions that will provide realistic improvement, but not much we can suggest to improve matters. Only small steps and recognition of 'best practice' when it is carried out.	Noted.
	Question 22	Lafarge Cement UK	David Simms	The issue of parking and its relationship with railway stations is highlighted, but needs to recognise that this is not necessarily only a problem in the immediate vicinity of stations or other areas where restrictions might be established. Where parking regimes are designed to restrict or control parking, recognition must be given to the potential for parking problems to be displaced beyond those controlled areas to surrounding areas. Such parking regimes must therefore be planned holistically as part of an overall transport and accessibility strategy for those areas.	Noted.
	Question 22	Trenport Investments Limited	C Hall	The only comment that we would wish to make is the general comment that we are surprised that there appear to be no transportation issues relating to roads and highways.	The transport policy proposes selective junction improvements and the appendix identifies where they will take place. The main priority is to improve public transport.
	Question 22	Lafarge Cement UK PLC	David Simms	The only comment that we would wish to make is the general comment that we are surprised that there appear to be no transportation issues relating to roads and highways.	The transport policy proposes selective junction improvements and the appendix identifies where they will take place. The main priority is to improve public transport.
	Question 22	Kent Wildlife Trust	Debbie Salmon	The Trust welcomes plans to increase access to public transport and improve pedestrian and cycle ways. These can be included in the Green Infrastructure so long as wildlife enhancements such as wildflower rich roadside verges and indigenous hedgerows are included in design.	Noted.
	Question 22	Dickens Country Protection Society	Chris Fribbins	Transport issues correctly aim to encourage more use of public transport but restrictions on private use through restrictions of access and parking tend to affect the rural communities much more than the urban population.	Noted.
	Question 22	South East Marine Association's	Laraine Soliman	No. In addition to taking steps to reduce the gridlock which is gradually overtaking Medway (which public transport will not solve because it has to be accompanied by high parking costs as well as subsidy) there should be a waterbus operation to provide interest particularly for visitors. Unfortunately the policy of neglecting public access to the river will add to the capital as well as revenue costs but such investment should be made in an effort to improve Medway's poor image. Although such services would help to reduce future siltation, funds will have to found for expensive dredging unless commercial shipping can also be attracted. The recent visit of the Black Prince cruise ship indicates an opportunity which should be explored because the highway traffic associated with that business arises outside of peak hours.	The River Medway policy encourages the protection and provision of piers for river taxis and other services.
	Question 22	GVA Grimley Ltd	Sheery Sassoon	We support the Council's general approach for delivering infrastructure improvements and proposals to improve public transport, particularly the upgrading of the Medway Valley Line as a strategic link to Gatwick. Details of how these improvements will be delivered should be included. We propose that the Council should issue a programme of infrastructure improvements including details of how these will be delivered. This will allow for sites surrounding infrastructure hubs to be developed efficiently, in accordance with PPS1. (Suggestion- Policy should include a programme setting out when and how infrastructure will be delivered.)	The Core Strategy will be accompanied by an infrastructure plan when it is submitted to the Secretary of State. The upgrading of the Medway Valley Line as a strategic link to Gatwick would need to be investigated at a strategic level. The South East plan does not address the issues nor is it included in the Kent Rail utilisation strategy and consequently it is not included in the Core Strategy.
	Question 22	The General Aviation Awareness Council	The General Aviation Awareness Council	Protecting General Aviation interests within the Medway area is vital, with particular reference to Rochester Airport. The availability of an airport within Medway is an asset that is currently under-used. Its potential to enhance the area's economic base has not been exploited due to lack of investment (which is in turn due to leases being of insufficient length to justify such expenditure).	The Transport and Movement chapter notes that Rochester is a licensed facility and subject to airspace safeguarding by the Council. The development strategy for the airport and the land surrounding it is set out in the draft core strategy.
	Question 22	Port Medway Marina Ltd	Port Medway Marina	A waterbus operation would be beneficial for tourism, transport links and Medway businesses. Increased river activity would also assist in reducing future siltation, which is worsening due to the considerable reduction in shipping movements (which is turn is a consequence of riverside re-development projects). Increased siltation could also have an impact upon flooding.	The River Medway policy makes provision for river taxis.

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	Question 22		Vivienne Parker	This section links poor air quality with areas of traffic congestion, but the worst area for air quality is Hoo Peninsula with traffic congestionnot an issue but pollution from power stations is. Air quality in Medway is getting worse and this needs to be addressed in other ways apart from just tackling transport issues.	The policy on Health and Social Infrastructure seeks to promote, protect and improve the health of Medway's population. A more specific policy on air pollution will be included in a subsequent development plan policy document.
	Question 22		I.H. Smith	better public transport i.e. later in the evenings	Public transport is principally a matter for private transport providers but is promoted in the core strategy.
	Question 22	FWCA Frindsbury and Wainscott Community Association	J R Masey	- Evening bus service - Bridge for Stonehorse Lane, Frindsbury - More use made of Mineral railway to Grain - Controlled parking zone near Strood station has moved on-street parking elsewhere i.e. Banks Way, Frindsbury - Should be more control over people	Given that there are two nearby bridges across the by-pass at Rochester Road and Dillywood Lane, a new bridge at Stonehorse Lane is difficult to justify. There are no proposals to introduce passenger services on the Grain railway lane. Detailed parking issues are not a matter for the Medway Core Strategy. Public transport is principally a matter for private transport providers but is promoted in the core strategy.
	Question 22		Dr D Brighton	No. Linked bus/ train season tickets. Why does Medway have to share so much of Hitachi SE trains costs- they are not fast from Chatham.	The transport policy promotes the introduction of linked bus/train ticketing.
	Question 22	RSPB	Fay Martin	No. Paragraph 4.55 of the Core Strategy – Issues and Options Report highlights that Rochester Airport would "require significant investment to bring it up to modern standards". It is not clear from paragraph 4.55 whether it is proposed to upgrade or increase air services at Rochester Airport. Aviation is the fastest growing source of greenhouse gas emissions, and airports can cause direct or indirect damage to wildlife sites. Rochester Airport is near to Medway Estuary and Marshes Special Protection Area (SPA) and Holborough to Burham Marshes SSSI. Any expansion of facilities or services has the potential to have an impact on internationally and nationally important bird populations through disturbance. We strongly recommend this matter be thoroughly appraised in the AA of the Core Strategy and we would welcome the opportunity to comment further on this matter prior to the publication of that document.	The Transport and Movement chapter notes that Rochester is a licensed facility and subject to airspace safeguarding by the Council. The development strategy for the airport and the land surrounding it is set out in the draft core strategy. As the Core Strategy does not propose to increase air services at Rochester Airport, this will not be an issue for the Appropriate Assessment. However if, in future, an expansion is proposed, the impact on wildlife sites will need to be addressed.
	Question 22	Open Spaces Society	Patricia Wilson	Although much has been mooted about a lower Thames Crossing, possibly including the Hoo Peninsula, would strongly opposite this. The Peninsula not only parades open space in stark contrast to the large conurbation which is largely concreted over, but provides also good Grade agricultural land likely to increase in importance as demand grows for home-produced" food. It comprises a variety of conservation interests which include internationally & nationally valuable sites.	The issue of the Lower Thames Crossing is dependant on decisions by government and, if necessary, will be dealt within a future review of the Core Strategy. Good quality agricultural land will be safeguarded by the application of the guidance in PPS7.
	Question 23			**Q23: Should a scheme be developed for another crossing of the Medway to link Chatham with Medway City Estate, for the use of pedestrians, cyclists and public transport?** Answers for question 23 (from questionnaire & website): 12 Yes/ Agree 9 No/ Disagree 0 Don't Know	
	Question 23	CPRE Kent	Brian Lloyd	Yes, in principle this seems a good idea worth exploring in more detail.	The Core Strategy doe not propose a new Medway crossing but the Transport Plan Appendix identifies the investigation of a new crossing as an action to be carried out by the Council.
	Question 23	Groundwork Kent & Medway	Simon Green	Yes and this would best be addressed through a water ferry system which could link St Mary's Island, Upnor, Chatham Dockyard, MCE, Star Pier, MCE again and Strood Pier (with link to station) as well as possibly further up and down stream. This would be more cost effective, environmentally sensitive and flexible than a fixed link like a bridge, tunnel or cable cars. It requires good piers to attract passengers and operators.	The River Medway policy supports the principle of a river taxi.
	Question 23	Viridor Waste Ltd	Mandeep Jutley	This issue needs further investigation. The Medway City Estate includes a number of warehouse/industrial types of uses. The types of servicing and delivery vehicles reflect the nature of these uses. As such, any conflict between the existing uses, and their possible intensification, with a crossing for pedestrians, cyclists and public transport needs to be carefully considered.	The Core Strategy doe not propose a new Medway crossing but the Transport Plan Appendix identifies the investigation of a new crossing as an action to be carried out by the Council.
	Question 23	Barratt Strategic		Yes there should be another crossing of the Medway to provide pedestrians and cyclists with easier access between Chatham and Medway City Estate. Furthermore this link should be opened to public transport providers to enhance public transport links between Chatham and Medway City Estate	The Core Strategy doe not propose a new Medway crossing but the Transport Plan Appendix identifies the investigation of a new crossing as an action to be carried out by the Council.
	Question 23	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	We can see potential practical difficulties with this, but would support it.	The Core Strategy doe not propose a new Medway crossing but the Transport Plan Appendix identifies the investigation of a new crossing as an action to be carried out by the Council.

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	Question 23		Mari-Anne Harstad	Yes strongly agree. This is key to linking up these and the surrounding areas with the centre.	The Core Strategy doe not propose a new Medway crossing but the Transport Plan Appendix identifies the investigation of a new crossing as an action to be carried out by the Council.
	Question 23	Dickens Country Protection Society	Chris Fribbins	Would support this, although recognise the problems of providing sufficient access on the Chatham side of the river (especially road access for buses etc.)	The Core Strategy doe not propose a new Medway crossing but the Transport Plan Appendix identifies the investigation of a new crossing as an action to be carried out by the Council.
	Question 23	Kent County Council	Richard Feasey	This would help to ease congestion. However with improved ventilation is there scope for pedestrians and cyclists to use the Medway tunnel?	This has been fully investigated and has not been found to be viable.
	Question 23			Response from Bloomfields Ltd on behalf of Elm Court Estate Developments Ltd; The General Aviation Awareness Council; Medway Sports and Leisure Park Ltd; Mid Kent College; Port Medway Marina; Medway Rewind Services Q23/25. The greater the provision of transport links and initiatives the more attractive the area will be to investors and inward migration.	Noted.
	Question 23		Vivienne Parker	A pedestrian crossing over the Medway would impede use of the Medway by local sailors.	The Core Strategy doe not propose a new Medway crossing but the Transport Plan Appendix identifies the investigation of a new crossing as an action to be carried out by the Council.
	Question 23	FWCA Frindsbury and Wainscott Community Association	J R Masey	A cable car system over river to & from Chatham preferable to bridge, that may interfere with shipping. Although a crossing may not be needed if the Canal Rd bus service to & from Chatham becomes available.	The Core Strategy doe not propose a new Medway crossing but the Transport Plan Appendix identifies the investigation of a new crossing as an action to be carried out by the Council.
	Question 23	Frindsbury and Wainscott Community Association	A Wade	Another crossing from City Estate to Chatham on a possible flood plain? Chatham will have to improve considerably to justify an expensive crossing. When the Medway Tunnel was under construction we requested facilities for walkers and cyclists It was refused on financial grounds. A short sighted policy in the event.	Noted
	Question 23		Dr D Brighton	No. Not a Tunnel. Ferry (foot, motorboat) too slow, even from Sun Pier. Extend Dockside through the tunnel to the trading estate.	Noted
	Question 23	RSPB	Fay Martin	Q23 - 25: No. The RSPB supports the approach set out in paragraph 19 of PPG13, which states “a key planning objective is to ensure that jobs, shopping, leisure facilities and services are accessible by public transport, walking, and cycling” we would therefore welcome a positive approach to promoting non-car travel, including improved pedestrian and cycle links. Any proposals for additional transport infrastructure will however need to be balanced with the environmental constraints of the area. In the wrong location and/or without effective mitigation transport infrastructure proposals could have a negative impact on features of nature conservation concern, including internationally designated sites, for example by increasing opportunities for access to those sites. We therefore strongly recommend this matter be thoroughly appraised in the AA of the Core Strategy and we would welcome the opportunity to comment further on this matter prior to the publication of that document.	As the Core Strategy is not proposing a new crossing of the Medway, this will not be the subject of an Appropriate Assessment. However the environmental impact of such a scheme will need to be part of the Council’s investigation of the concept.
	Question 24			**Q24: How can public transport capacity be increased to tackle the additional demands that will arise from the regeneration of the area? Should this include greater priority for buses if linked to substantial service improvements?** Answers for question 24 (from questionnaire & website): 8 Yes/ Agree 2 No/ Disagree 4 Don't Know	
	Question 24	CPRE Kent	Brian Lloyd	Yes, we consider that enhanced public transport should be at the heart of the regeneration of the area. We agree that this should include greater priority for buses linked to service improvements. Importantly, this should include increased frequency of services along with dedicated bus lanes. As part of this we would support the extension of Fastrack into Medway. There should also be improved quality of the buses used to make them more attractive to users, and services must be affordable to attract new passengers. Such improvements to the public transport services will require a significant financial commitment from the Council, and must be fully embraced by those who wish to undertake development in the area.	Measures proposed in the transport chapter include increasing capacity, reliability and quality of public transport, fast track styles services, park and ride sites, improved interchanges with railway stations, improved railway stations, high quality real time information and cross mode ticketing systems.
	Question 24	Government Office for the South East	Hazel Long	How does this feed into the transport objective of sustainable travel, accessibility and social inclusion; - where will the funding come from for the expansion of the Fastrack model into Medway?	An increase in the capacity of public transport will help to encourage a shift away from the use of the private car and provide a greater accessibility to all the population. The funding of fast track is addressed in the Infrastructure Delivery Plan.

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	Question 24	Barratt Strategic		We would support the principle of the expansion of the fast track bus model within Medway. In addition we would suggest that the council look at bus only areas within the town centres. If traffic congestion is a serious issue then the means of tacking this will need to be weighed against other infrastructure contributions normally sought of developers. The council has the ability to decide what it's priorities are and to seek contributions accordingly – as long as these are fairly and reasonable related to the proposed development. The introduction of higher parking charges/road pricing will only affect those who are already disadvantaged. Likewise park and ride facilities are not in our opinion likely to be successful as the nature and level of congestion is such that unless these are located some way from the main urban areas they will not have any really effect – the lessons learnt in Maidstone should be taken into account on considering this proposition	Measures proposed in the transport chapter include increasing capacity, reliability and quality of public transport, fast track styles services, park and ride sites, improved interchanges with railway stations, improved railway stations, high quality real time information and cross mode ticketing systems.
	Question 24	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Concern about the limited amount of road space to achieve segregation for buses. Rural areas usually need private transport more than the urban areas to access basic retail and other social infrastructure, so can be affected more by restrictions - such as reduced/expensive parking provision and any congestion caused by bus priority.	Measures proposed in the transport chapter include increasing capacity, reliability and quality of public transport, fast track styles services, park and ride sites, improved interchanges with railway stations, improved railway stations, high quality real time information and cross mode ticketing systems.
	Question 24	Lafarge Cement UK	David Simms	Public transport capacity is not only about providing adequate service levels, it is also about delivering an integrated and effective network. Where Section 106 contributions are sought from new development towards public transport provision, this should be on the basis of contributing to a coordinated strategy which recognises that combining contributions from adjacent sites can be an effective and efficient way of delivering public transport improvements which achieve greater benefits than through a sequence of individual interventions. This approach would allow a range of measures to be implemented as part of a package, delivering integrated solutions.	Measures proposed in the transport chapter include increasing capacity, reliability and quality of public transport, fast track styles services, park and ride sites, improved interchanges with railway stations, improved railway stations, high quality real time information and cross mode ticketing systems.
	Question 24		Mari-Anne Harstad	Cycle paths, bus and scooter lanes are all required. Buses should have more investment.	Noted.
	Question 24	Kent County Council	Richard Feasey	Improved services more routes, increased frequency. Better links from different parts of Medway to other urban areas e.g. Rochester to Maidstone.	Measures proposed in the transport chapter include increasing capacity, reliability and quality of public transport, fast track styles services, park and ride sites, improved interchanges with railway stations, improved railway stations, high quality real time information and cross mode ticketing systems.
	Question 24		Vivienne Parker	Public Transport capacity cannot be increased all the time. Arriva want more and more public cash to maintain existing services. Consideration should be given to provision of in house public transport to areas where there are high levels of free bus pass users and Arriva are reducing services as a result.	Measures proposed in the transport chapter include increasing capacity, reliability and quality of public transport, fast track styles services, park and ride sites, improved interchanges with railway stations, improved railway stations, high quality real time information and cross mode ticketing systems. The Council subsidises a number of bus services but any expansion would depend on the demand and availability of funds.
	Question 24		I.H. Smith	More bus lanes- more by passes	Measures proposed in the transport chapter include increasing capacity, reliability and quality of public transport, fast track styles services, park and ride sites, improved interchanges with railway stations, improved railway stations, high quality real time information and cross mode ticketing systems.
	Question 24		Carl Kroon	Medway buses are run as a monopoly by Arriva. Buses stop running at 7pm week days and forget about travel on Sundays. Medway is hills and valleys	Measures proposed in the transport chapter include increasing capacity, reliability and quality of public transport, fast track styles services, park and ride sites, improved interchanges with railway stations, improved railway stations, high quality real time information and cross mode ticketing systems.
	Question 24	FWCA Frindsbury and Wainscott Community Association	J R Masey	Agree to fast track if roads will accommodate it.	Noted.
	Question 24		W Mann	Integrated bus services/fast track/trolley buses. Better use of railway line from Hoo junction to Grain to serve the Peninsula and Lodge Hill in particular	Noted. Measures proposed in the transport chapter include increasing capacity, reliability and quality of public transport, fast track styles services, park and ride sites, improved interchanges with railway stations, improved railway stations, high quality real time information and cross mode ticketing systems. There are mo proposals for trolley buses or passenger use of

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					the Grain railway line.
	Question 24		Dr D Brighton	Yes. Buses as required, extended as required.	Noted.
	Question 24	Open Spaces Society	Patricia Wilson	Priority devices for bus transport can only work if “substantial service improvements” are guaranteed. Many bus services are irregular, do not run on time and there are few indicators at bus stops to help passengers. The central bus station is depressing and needs an inspired face-lift. The system (Arriva) does nothing to encourage users to seek speedy address.	Measures proposed in the transport chapter include increasing capacity, reliability and quality of public transport, fast track styles services, park and ride sites, improved interchanges with railway stations, improved railway stations, high quality real time information and cross mode ticketing systems. Construction of a new bus station at Globe Lane, Chatham, has started.
	Question 25			**Q25: Should a case be made for the upgrading of the Medway Valley Line as a strategic link to Gatwick?** Answers for question 25 (from questionnaire & website): 13 Yes/ Agree 6 No/ Disagree 0 Don't Know	
	Question 25	CPRE Kent	Brian Lloyd	This may be worthy of further examination, but we suspect that there will be significant difficulties in delivering it.	The upgrading of the Medway Valley Line as a strategic link to Gatwick would need to be investigated at a strategic level. It is not the Kent Rail utilisation strategy and consequently it is not included in the Core Strategy.
	Question 25	Government Office for the South East	Hazel Long	The Kent RUS does not recommend a link to Gatwick from the Medway area. Could this be privately funded or the issue raised through Network Rail?	The upgrading of the Medway Valley Line as strategic link to Gatwick would need to be investigated at a strategic level. It is not included in the Kent Rail utilisation strategy and consequently it is not included in the Core Strategy.
	Question 25	Barratt Strategic		We would support the upgrading of the Medway Valley Line as a strategic link to Gatwick. Whilst this strategy would require co - operation with a number of other authorities, the Medway valley line is to all intense and purposes underutilised. The possibility of upgrading this line, and we would suggest, enhancing the interchange at Strood, will not only enhance public transport provision, but help in the regeneration of the area as it would make connectivity with Maidstone, Tonbridge/Tunbridge Wells much more user friendly. Whilst we acknowledge the investment required around Redhill to help facilitate this, we would suggest that discussion are initiated with Reigate and Banstead Borough Council as Reigate/Redhill is both an identified regional hub and growth point in the South East Plan and development within this area could also assist in bringing forward what would be a very useful east west rail link.	The upgrading of the Medway Valley Line as strategic link to Gatwick would need to be investigated at a strategic level. It is not included in the Kent Rail utilisation strategy and consequently it is not included in the Core Strategy.
	Question 25	Lafarge Cement UK	David Simms	We would support proposals for making more effective use of the Medway Valley line and which recognised the need to enhance facilities at Strood station in support of this. Any such proposals should recognise the physical or environmental constraints which might influence proposals, particularly as the line passes through existing residential areas.	The upgrading of the Medway Valley Line as strategic link to Gatwick would need to be investigated at a strategic level. It is not included in the Kent Rail utilisation strategy and consequently it is not included in the Core Strategy.
	Question 25	Lafarge Cement UK PLC	David Simms	Lafarge would support proposals to upgrade the Medway Valley Line, including proposals for it to be upgraded as a strategic link to Gatwick. It is an important line linking the Medway Towns and Maidstone and it would benefit the area if it were to be upgraded, irrespective of whether it provides a strategic link to Gatwick. The line is also important as a strategic link to Ebbsfleet International Station, with its high speed rail links to central London and to Europe	The upgrading of the Medway Valley Line as strategic link to Gatwick would need to be investigated at a strategic level. It is not included in the Kent Rail utilisation strategy and consequently it is not included in the Core Strategy.
	Question 25		Mari-Anne Harstad	Yes it would relieve pressure from our existing roads	The upgrading of the Medway Valley Line as strategic link to Gatwick would need to be investigated at a strategic level. It is not included in the Kent Rail utilisation strategy and consequently it is not included in the Core Strategy.
	Question 25	Dickens Country Protection Society	Chris Fribbins	We recognise the real difficulties of getting capacity on the line from Redhill to Gatwick and therefore that a full service would be difficult to implement, but this should be explored and perhaps other solutions investigated.	The upgrading of the Medway Valley Line as strategic link to Gatwick would need to be investigated at a strategic level. It is not included in the Kent Rail utilisation strategy and consequently it is not included in the Core Strategy.
	Question 25	Network Rail (Town Planning)	Mike Smith	At present Network Rail is investigating schemes to reduce bottlenecks at Redhill and Gatwick Airport, if and when capacity can be released there it is highly likely there will be conflicting demands for additional capacity therefore the Kent RUS does not recommend services from Medway Towns to Gatwick within the current control period.	The upgrading of the Medway Valley Line as strategic link to Gatwick would need to be investigated at a strategic level. It is not included in the Kent Rail utilisation strategy and consequently it is not included in the Core Strategy.
	Question 25	Kent County Council	Richard Feasey	Kent's Local Transport Plan supports improved rail connections to Gatwick from Kent and given the catchment population within the Medway Towns making full use of the potential of the Medway Valley Line in this regard from its terminus in Medway would make sense in both improving the nodality of the Medway Towns as a regional hub and in improving their connectivity with other regional hubs (Maidstone, Tonbridge /Tunbridge Wells and Redhill/Reigate).	The upgrading of the Medway Valley Line as strategic link to Gatwick would need to be investigated at a strategic level. It is not included in the Kent Rail utilisation strategy and consequently it is not included in the Core Strategy.
	Question 25		Carl Kroon	Medway is major urban area in Kent and has no direct access to Gatwick. It would also provide access to towns on the way.	The upgrading of the Medway Valley Line as strategic link to Gatwick would need to be investigated at a strategic level. It is not included in the Kent Rail utilisation strategy and consequently it is not included in the Core Strategy.

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	Question 25		Dr D Brighton	No. Too expensive, slow. National type coach firm Hempstead Valley, direct (not via Victoria Coach station)	The upgrading of the Medway Valley Line as strategic link to Gatwick would need to be investigated at a strategic level. It is not included in the Kent Rail utilisation strategy and consequently it is not included in the Core Strategy.
	Question 25	Open Spaces Society	Patricia Wilson	This is welcome in principle, as would reduce pressure on M25.	The upgrading of the Medway Valley Line as strategic link to Gatwick would need to be investigated at a strategic level. It is not included in the Kent Rail utilisation strategy and consequently it is not included in the Core Strategy.
	Question 26			**Q26: Should formal protection be given to local wharves and Chatham Docks over the long term?** Answers for question 26 (from questionnaire & website): 16 Yes/ Agree 4 No/ Disagree 1 Don't Know	
	Question 26	CPRE Kent	Brian Lloyd	Yes, we consider that this would be desirable in order to help facilitate greater use of the river.	The River Medway policy safeguards wharves and Chatham Docks.
	Question 26	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Although we recognise the problems of getting access to the Brighton Mainline, we would support the provision of a reliable and regular Gatwick link - it has not been reliable or frequent enough in the past to gain and retain high levels of use.	Noted.
	Question 26	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Yes - but where public access to the riverside is not compromised	The safeguarding of wharves and docks inevitably precludes public access to working areas.
	Question 26	Kent Wildlife Trust	Debbie Salmon	The Trust has no objection to safeguarding of wharves and docks being preserved however if boat traffic is increased this will need to be appraised for disturbance impacts on protected bird species.	Noted.
	Question 26	Dickens Country Protection Society	Chris Fribbins	Public access to the river should be a maim priority, but where the use of wharves and docks can be managed they should be protected.	Noted.
	Question 26	Kent County Council	Richard Feasey	Questions 26/27 Many of the wharves and docks along the Thames and Medway are of historic importance and relate to earlier periods in Medway's history. The enhanced care and protection of such heritage assets based on an appropriate assessment would be supported. Safeguarding of future scope for leisure/public transport movements along the Medway would be judicious given the extensive urban regeneration/intensification that is planned	The River Medway policy safeguards wharves, piers and jetties. Where such facilities are recognised as historically important, such as the Historic Dockyard, these are given protection by the historic assets policy.
	Question 26	The Peel Group	The Peel Group	Peel Land and Property (Ports) Ltd. consider that no formal protection should be given to Chatham Docks and object to any protection given to the site as a working Port in subsequent rounds of the Core Strategy consultation. Para 4.53 of the report states 'Use of the River Medway for commercial shipping has been declining for many years, but remain important for both the local and regional economies. A number of local wharves are currently safeguarded but there is some uncertainty over the long-term future of Chatham Docks, due to a trend towards larger ships and the condition of the locks.' As previously identified Para 4.10 of the report acknowledges that 'ever larger ships are causing consolidation in the ports industry, with fewer larger facilities in deep-water locations.' Both of these issues do not accord with the option of giving Chatham Docks formal protection over the long term. The decline in demand for shipping use at Chatham Docks is making the operation increasing unviable, and the improvement/expansion of more suitable facilities elsewhere along the Medway (e.g. Peel Ports' aspirations for the expansion of Port of Sheerness) are likely to exacerbate these trends, but also offset the loss of Chatham Docks. As well as the declining suitability of Chatham Docks for modern shipping requirements, any long term safeguarding of the wharves and dock use would also fail to respond to the significant opportunities that this site presents. Currently the land is under-utilised, with a low employment density and many vacant and large hard-standing areas. The site has the potential to significantly diversify the local economy and to continue to support a range of economic opportunities. There is also the potential, through regeneration, to open up a currently inaccessible part of the waterfront and integrate the site with its surroundings. These opportunities would be stifled and would not come forward if Chatham Docks was afforded any long term formal protection as a dock. This will result in higher levels of vacancy and under-use and the site will not contribute to the local economy. We also highlighted that South East Plan Policy T10 does not identify Chatham Docks as a 'Gateway Port' or a 'Regionally Significant Port'. Therefore, not giving formal protection to Chatham Docks as a port over the long term would not be inconsistent with the hierarchy and approach set out in the RSS. Whilst Chatham Docks should not be afforded any protection over the long term due to the declining condition of the locks and trends to larger vessel sizes, there are a number of other third party terminals which are served directly off of the River Medway and hence their continued existence and potential expansion are more suited and would be beneficial to Medway Borough. These operational terminals in third party ownership include: • National Grid (LNG); • Foster Yeoman (Aggregates); • BP Terminal (Oil); • Oakhamness Jetty (Oil); • Kingsnorth Jetty (Coal);	The River Medway policy safeguards port capacity at Chatham Docks. The transport chapter states 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 is should continue to be safeguarded.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				• Euro Wharf (Aggregates); • Scotline Wharf (Forest Products); and • Crown Wharf (Forest Products) Peel Ports Medway would support the safeguarding of these terminals and the contribution they can continue to make to operations on the River Medway.	
	Question 26		Vivienne Parker	Q26 & 27. Wharves and piers need to be maintained to serve the needs of the local sailing and fishing fraternity.	The River Medway policy safeguards wharves, jetties and piers.
	Question 26		Dr D Brighton	No. Docks have store rooms	Noted.
	Question 26	RSPB	Fay Martin	Q26 - 27: No. The RSPB would be concerned about any plans that could increase boat traffic in the Medway. Numbers of birds in the estuary have declined, and it is possible that this is, at least in part, due to disturbance. Therefore, any plans must be tested under the Habitats Regulations to ensure no adverse impact on internationally important bird populations.	Noted. Medway Council is currently discussing the scope and extent of the appropriate assessment with Natural England, the Environment Agency and adjoining authorities prior to preparing a screening document and appointing a consultant to carry out the assessment.
	Question 27			**Q27: Should formal protection be given to the existing network of piers and jetties along the river, notwithstanding the difficulties of promoting river taxi services?** Answers for question 27 (from questionnaire & website): 17 Yes/ Agree 2 No/ Disagree 1 Don't Know	
	Question 27	CPRE Kent	Brian Lloyd	Yes, we consider that the existing piers and jetties should be protected, as their removal would mean that any prospect of a viable river taxi service would also be removed. With a growing population, and positive promotion through the regeneration agenda, the prospect of a viable river taxi service should increase.	The River Medway policy safeguards wharves, jetties and piers.
	Question 27	Groundwork Kent & Medway	Simon Green	Yes. Without the piers, cross river improvements would be impossible and it is very unlikely that fixed links (bridges, tunnels or cable cars) could ever be financed. However a flexible approach has to be taken. For example if a developer wanted to promote a scheme on or next to a pier that was acceptable in other planning terms and retained the pier facility this should be supported. An analogy is the redevelopments over urban railway stations.	The River Medway policy safeguards wharves, jetties and piers.
	Question 27	London Thamesport (Hutchison Ports UK Ltd)	Nicholas Orbell	This policy proposal can only be considered in the context of a wider, cohesive linked transport network proposal. There are merits to promoting river services as environmentally sustainable and to avoid road congestion. The Council may want to consider appropriate measures as a wider green travel initiative involving appropriate developments.	Noted.
	Question 27	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Because of the tourist potential (the river could provide a very important link between heritage sites) we would support this. There are real problems in trying to use the river as a regular public transport option.	Noted.
	Question 27	Kent Wildlife Trust	Debbie Salmon	If a regular taxi service were established it should be routed so there is no disturbance to sensitive areas in and around the estuaries.	The River Medway policy encourages the establishment of river taxis.
	Question 27	Dickens Country Protection Society	Chris Fribbins	Many piers and jetties have been damaged and not repaired. Use of the river for tourism and as an alternative to heavy goods traffic should be encouraged.	The River Medway and Tourism chapters recognises the potential for river Taxis and supports their provision.
	Question 27	Port Medway Marina Ltd	Port Medway Marina	The River Medway is a vital element of this area which is wholly under-used at present due to lack of investment and the loss of many river based employment sites due to regeneration proposals. We have a client who has already expressed an interest in operating a river taxi service and wishes to promote this concept as a way of generating interest in the river, boosting the local (and wider) economy, providing new transport links and adding to tourist attractions in the area. This service would also restore existing piers and bring them back to serve their original function.	The River Medway chapter recognises the potential for river taxis and supports their provision.
	Question 27		John Hill	It is important that Strood Pier to Sun Pier Chatham are re-opened as soon as possible.	Noted.
	Question 27	Frindsbury and Wainscott Community Association	A Wade	With improved protection the river could be used as an alternative highway.	Noted.
	Question 27	Open Spaces Society	Patricia Wilson	In principle it is retrograde to see these constructions disappear but these seems no burning enthusiasm to re-establish river traffic. [If the council could not devise river transport to link council offices at Strood with Compass Centre, as Medway flowed past both, these seems little hope. However, with the spokesman for Chatham Dockyard appealing passionately for greater revenue, it could be the making of tourism for there to be a seasonal river taxi service linking it with the 'honey-pot' of central Rochester Cathedral and Castle etc]	The River Medway chapter recognises the potential for river taxis and supports their provision.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 28			**Q28: Should a formal safeguarding regime be introduced for the microlight facility at Stoke?** Answers for question 28 (from questionnaire & website): 6 Yes/ Agree 6 No/ Disagree 6 Don't Know	
	Question 28	CPRE Kent	Brian Lloyd	This is a small facility that would not warrant specific reference or safeguarding in the Core Strategy.	Agreed.
	Question 28	Groundwork Kent & Medway	Simon Green	No. See comment above re para 4.56	The Core Strategy does not identify a safeguarding area for microlights.
	Question 28	London Thamesport (Hutchison Ports UK Ltd)	Nicholas Orbell	The conflicts with other proposals need to be better understood. In particular, the focus of the estuary area for power related developments, including potential onshore wind projects (recognising the existing BP scheme) may of greater significance and benefit. The potential development of tall structures, notably power lines and stacks, should be properly evaluated. Alternative sites for the Microlight leisure activity may be identified, avoiding future conflict, and consideration given in the longer term to a encouraging relocation of this amenity to avoid planning related conflicts.	The Core Strategy does not identify a safeguarding area for microlights.
	Question 28	ScottishPower	Chris Girdham	Safeguarding proposals should be compatible with Civil Aviation Authority (CAA) guidelines.	The Core Strategy does not identify a safeguarding area for microlights.
	Question 28	Kent Wildlife Trust	Debbie Salmon	If further air traffic is planned from this facility it must be ensured that this has no impact on the SPA bird species.	No Additional air traffic is proposed for this site.
	Question 28	Dickens Country Protection Society	Chris Fribbins	Although we would not object to this use, it is located by major electric pylons and can generate some noise nuisance - especially if it was to grow significantly perhaps special safeguarding is unnecessary.	No Additional air traffic is proposed for this site.
	Question 28		Goodman	There is no basis for introducing a safeguarding regime for Stoke Airfield and the introduction of such a provision in the Core Strategy could serve to constrain the delivery of the important economic development objectives on the Hoo Peninsula. In particular, no safeguarding restrictions should be introduced that would adversely affect the approved development of the Kingsnorth Employment area pursuant to permission MC2008/0370. It should be noted that the operation of Stoke Airfield was considered in detail in an Aviation Statement submitted in support of above referenced permission, which concluded that, in any event, Stoke Airfield's operations would not constrain the development of the Kingsnorth Employment Area.	No Additional air traffic is proposed for this site.
	Question 28	Open Spaces Society	Patricia Wilson	Surely this can scarcely warrant special Strategic policy?	Noted..
				Economy	
			Goodman	The best method of ensuring that the Kingsnorth Employment Area is able to continue effectively to the delivery of the five strategic priorities which have been identified is to continue to provide a broad employment allocation on the land for a mix of Class B uses. It is agreed that Kingsnorth Employment Area may be an appropriate location to accommodate businesses specialising in environmental technologies, however it is also an appropriate location to accommodate a range of other businesses that are not specialising in environmental technologies. The policy context for Kingsnorth Employment Area should not restrict the ability of Goodman to effectively market the site for a range of occupiers.	The core strategy's economic development policy does not restrict the employment opportunities at Kingsnorth.
			I.H. Smith	Bring in some lower tech jobs.	Noted.
		Medway Renaissance	John Finlayson	Higher skilled employment needs to be created. Regeneration can be the catalyst for improving employment. To compliment the development of the Thames Gateway as an eco region environmental technology needs to be promoted. Per-conditions to foster environmental technologies already exist on Hoo peninsular- DEGW study provides evidence base. A key element of Medway as an improved place will be the development of Chatham into a full functioning city centre with a vibrant retail offer and strong office market. Development of higher skilled employment at Rochester Airport needs to be promoted.	Both regional policy and the core strategy are encouraging higher quality jobs as a key to raising the prosperity of the area. The regeneration, economic and retail town centre policies support the development of Chatham as a city centre and the development of environmental technology.
		Natural England	Josh Nelson	Natural England would expect any economic development to be of the highest standards in environmental sustainability terms, appropriately located to avoid impacts on the natural environment (in particular, statutory nature conservation sites and the Kent Downs AONB), and contribute where possible to the provision of multi-functional green infrastructure in accordance with the South East Green Infrastructure Framework. Lodge Hill – if this settlement community proposal has an employment function designed to meet more than local needs, sufficient public transport links – particularly to the Medway towns – should be provided, funded by developer contributions as appropriate.	Policies on energy efficiency, climate mitigation sustainable design, landscape, natural assets and open space, make provision for environmental sustainability, protection of the natural environment and provision of green infrastructure. The policy on Lodge hill/Chattenden makes provision for improved public transport.
	4.59		Barry Knight	Due, no doubt, to a healthy shadow economy	Noted.
	4.61	University College for the Creative Arts at Rochester	David Hawkins	a. The University looks forward to working with the Council, and others, to ensure that its graduates are provided with an opportunity to remain in the area and to make an even more important contribution to the local economy than currently. b. A dialogue with students, through workshops and surveys (to ascertain their needs), might assist.	The issues of student housing, graduate support programmes and working closely with the Universities are addressed in the housing, education and economic development chapters.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	4.62	tbh developments ltd & helvig ltd	tbh developments/helvig	The findings of the Council's own draft Economic Development Strategy is that there is a dearth of good quality employment sites in the Borough. The Core Strategy needs to address how this situation is to be remedied with clear proposals for the delivery of new, quality employment development sites.	The Strategic Land Availability Assessment has identified a substantial supply of a wide range of size and quality sites for all types of employment development. Provision for this is made in the economic policy.
	4.64	National Grid Property Holdings Limited		Representation made on behalf of National Grid Property Holdings Ltd by Planning Perspectives LLP. Agree that the land at the Isle of Grain is one of only a few very large (brownfield) sites in the greater southeast and is of strategic significance. For this reason the site should continue to be allocated for employment uses in the emerging Medway LDF.	Noted.
	4.66	Groundwork Kent & Medway	Simon Green	We would agree with these comments for Medway City Estate. Due to the way it was developed, there is a high degree of fragmentation, poor environment in most parts, unadopted roads and a "loop" road with a break in it because the two arms are misaligned and separated by a building. Consideration should be given to proposals for redevelopment that address these issues successfully and contribute to an overall improvement. MCE is unsuitable for a change of use to residential but in some locations there could be more office (particularly back office) developments than at present if the small industrial users can be provided with new, economically priced accommodation nearby. To some extent higher buildings (eg 6-7 stories) could be allowed if of high visual quality which would increase the density which is very low for a near city centre location. However significant changes will need to address th poor public transport connections, especially with Strood Station and across the river.	Noted. The principle of improvement of existing employment areas is addressed in the economic development strategy where reinvestments strategies will be promoted for each area.
	4.66	Viridor Waste Ltd	Mandeep Jutley	It should be acknowledged that existing employment areas are suitable for all types of uses which generate employment (including waste and resource management uses). Any re-investment in the area should not have a detrimental impact on the operations of existing operators.	Noted.
	4.69		Lillian Harrison	The 4th bullet point fails to recognise that some existing employment sites would be difficult to move and it would be better and more sustainable to encourage growth at these existing sites where other reasons dictate (for example proximity to the source of raw materials and/or proximity to facilities for onward transportation of goods or end products). Therefore there should be an additional bullet point specifying that existing employment areas should be encouraged to grow wherever possible.	The core strategy does not aim to move existing employment sites, only to improve them and increase densities where appropriate.
	4.69	tbh developments ltd & helvig ltd	tbh developments/helvig	This comment relates to the fourth bullet point. The draft Medway Economic Development Strategy 2009-2011 in para 10.15 refers to all the key actions listed as being necessary to ensure the adequate provision of employment space. It does not refer to them as sequential steps towards making adequate employment land available. Consequently, promoting employment development around Rochester Airfield is not a final step in employment land provision it is one of a number of parallel actions. The review of potential for better utilisation of existing employment sites is a complex exercise and needs to be based on a proper assessment of the existing pattern of freehold and leasehold premises within an area and when these might be freed up for redevelopment, rather than being aspirational based.	Noted.
	4.69	University College for the Creative Arts at Rochester	David Hawkins	The University looks forward to working with the Council, and others, to ensure that these objectives are met.	Noted.
	Question 29			**Q29: Do you agree with the five strategic priorities proposed in the draft Medway Economic Strategy, namely concentrating on specific sectors, upskilling the workforce, developing higher education, improving the availability of employment sites and improving the image of the area? If not, what alternatives would you suggest?** Answers for question 29 (from questionnaire & website): 14 Yes/ Agree 6 No/ Disagree 0 Don't Know	
	Question 29	CPRE Kent	Brian Lloyd	We generally agree with the five strategic priorities, though we note that retaining existing employment related to energy and shipping is not included as a priority.	The expansion of existing economic functions, including energy and port related uses is included in the economic policy.
	Question 29	Viridor Waste Ltd	Mandeep Jutley	We agree that the key 5 strategic priorities are acceptable. In respect of Strategic Priority 1 (Sector Development), one of the key actions is 'an exploration of the potential for establishing centres of excellence in environmental technologies and building products/construction.' We support recognition that energy and environmental technologies are capable of generating significant employment opportunities, and that the development of this sector would be entirely consistent with the Thames Gateway's 'eco-region' concept (Page 20). This should be reflected clearly in the Core Strategy. It should also be acknowledged that Medway City Estate is favoured for non-office uses. We note reference to Medway City having been developed in piecemeal manner and now accommodating a 'an unhappy mix of users, who between them fail to make the most effective use of the site as well as in some cases occupying high value land with low value/non-intensive uses. In addition, getting into and out of the Estate at peak times is notoriously difficult. That having been said, this remains a popular location' (page 31). We understand that the Medway City Estate's Vision study seeks to provide a strategic framework for the redevelopment of the estate, illustrate its potential and establish strategies for realising this potential. We note that Medway Renaissance and the commissioned consultants are progressing matters. We have reviewed the document titled 'Five Towns Make A City Medway - A Concept for Medway's Future' published by Medway	The five principles of the Medway Economic Development Strategy are reflected in the economic chapter. The appendix to the transport chapter identifies a short term priority for dealing with access problems to Medway City Estate. Investigations are underway. The core strategy does not propose any residential development on Medway City Estate.

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				Renaissance. This refers to redeveloping Medway City Estate to provide a high density mixed use development with employment and residential opportunities. The Estate is not vacant brown field land, and nor is it a Greenfield site. Therefore treating it as such is likely to lead to unfeasible and non-deliverable strategies. The Core Strategy should look to develop and re-invest in the area without a detrimental impact on the existing operators and uses in the area.	
	Question 29		Gary Brook	Object Our client in principle agrees with the five strategic priorities but has concerns that these five priorities identified will not be sufficient to provide for future employment needs and demands for the area. We express particular objection to bullet point 4, of the strategic priorities. The Council should consider providing flexibility for alternative uses where existing employment uses can be proven to be surplus to requirements, are unviable in the current use and are located in an unsustainable location. Subject to the introduction of flexibility, the Council should consider alternative uses on existing employment sites where the alternative use is clearly of more benefit to the amenity of the area and will facilitate significant benefits sought by the LDF Core Strategy that would outweigh the loss of the existing employment use, or improve the balance of uses in a particular location. This is of particular concern within town centre locations where employment use may not necessarily be appropriate. Where this is the case, the Council should adopt a flexible approach when considering alternative uses on existing employment sites.	Over the last 25 years many old industrial areas have been developed for other uses as part of Medway's regeneration strategy, However, in order to help retain employment in the area without releasing greenfield sites for development the economic policy protects the remaining employment areas from losses to other classes of development.
	Question 29		Lillian Harrison	The 4th bullet point fails to recognise that some existing employment sites would be difficult to move and it would be better and more sustainable to encourage growth at these existing sites where other reasons dictate (for example proximity to the source of raw materials and/or proximity to facilities for onward transportation of goods or end products). Therefore there should be an additional bullet point specifying that existing employment areas should be encouraged to grow where-ever possible.	See response to William Harm's on para, 4.69.
	Question 29	ScottishPower	Chris Girdham	The choice of Strategic Priorities is generally supported. However, there should be greater recognition within the emerging Strategy of the positive contribution that can be made towards meeting the objectives of these priorities by the established and emerging energy generating sector. For example, Strategic Priority 1 states: 'the most significant opportunities lie in the further development of sectors it can grow from within, most notably creative industries and tourism'. These sectors should include energy generation and associated and emerging opportunities in, for example, carbon capture and storage together with other environmental technologies. Indeed demonstrable positive contributions could be made to all of the Strategic Priorities by the energy and associated environmental technology sectors. These opportunities are recognised in the Medway Enterprise Vision 2020 Report (MEV) which is referred to within the draft Medway Economic Strategy (MES). The MEV concludes that 'onshore and offshore wind farms, a biomass hub, district heating and a world class centre for carbon capture and storage research are just some of the potential high level environmental cluster catalyst products (that are) viable for Medway'. There is also recognition at paragraph 5.11 of the MES that emerging energy proposals at Kingsnorth could catalyse further job creation in energy and/or environmental industries through the development of a cluster of related businesses. To realise such potential, the energy sector in Medway should be encouraged and prioritised by greater emphasis and support for the sector within both the MES and Core Strategy.	The expansion of existing economic functions, including energy and port related areas are included in the economic policy. It states that the energy and environmental technology sectors will be encouraged.
	Question 29	tbh developments ltd & helvig ltd	tbh developments/helvig	See comment on para 4.69 above.	Agreed.
	Question 29	Kent Wildlife Trust	Debbie Salmon	The Trust welcomes the promotion of environmental technology. We recommend that when assessing unused sites Medway bear in mind that some abandoned brownfield sites act as biodiversity hot spots within the urban area. These sites should be fully surveyed before planning permission is granted. Although employment facilities have less recreational impact on European sites than housing effects such as emissions, noise and water pollution will need to be assessed within the AA. Damage from emissions is especially pertinent to the North Downs Woodland SAC. Pollution of the watercourses could have an impact on all SPAs within the locality.	The natural assets policy addressed the issue of wildlife on development sites. Medway Council is currently discussing the scope and extent of the appropriate assessment with Natural England, the Environment Agency and adjoining authorities prior to preparing a screening document and appointing a consultant to carry out the assessment.
	Question 29	Dickens Country Protection Society	Chris Fribbins	Supported, but not convinced it will deliver more economic development in Medway, but willing to give it a chance.	Noted.
	Question 29	dha planning	Klaire Lander	The five strategic priorities emphasise the need to provide 'higher value economic activities'. However, it should not be overlooked that a significant amount of land is also required for employment uses which are not high value technological or office based. The needs of land hungry uses such as general industry and construction industries should be accounted for, and sufficient land should be identified to meet this need. This is particularly the case due to the location of Medway within the Thames Gateway, where a large amount of construction will take place and industries are required to support this. The redevelopment of large swathes of former employment land for housing has meant that there is now an inadequate supply of general industrial land within Medway. It is crucial therefore that one of the Council's strategic priorities in relation to the 'economy' is ensuring that adequate land is made available for general open storage and industrial uses, including companies to support the construction industry. It should also be recognised that town centres are not always the best locations for such land-hungry developments as these sites are better suited to housing and other less land-intensive or intrusive business uses. Therefore, existing employment sites located outside of town centres and well separated with neighbouring housing should be retained. A policy should be included within the Core Strategy to allow for the retention of existing employment sites, in accordance with existing saved Local Plan policy ED3.	The Strategic Land Availability Assessment has identified a substantial supply of a wide range of size and quality sites for all types of employment development. Provision for this is made in the economic policy. Provision is also made for the retention of existing employment land.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 29	South East Marine Associationâ€™s	Laraine Soliman	Comments on Q29-36 Medway's economic policies have failed to halt the areas continuing relative deterioration. Many of the questions confirm the Council's misconception of what is required to provide investment and jobs. Medway needs an abundance of space for a wide variety of SME's particularly along the riversides. Trying to find space for yet more riverside intensive residential development damages investment and employment. It is silly to speak of "a more concentrated form of development" when there is a dearth of employment land. Although there is unmet demand for sites where our members (and new investors) would provide new jobs they do not necessarily make good neighbours with residential development. Obviously some involves work which may be noisy or have to be carried out in the open (e.g. on hauled-out or new vessels).	The Strategic Land Availability Assessment has identified a substantial supply of a wide range of size and quality sites for all types of employment development. Provision for this is made in the economic policy.
	Question 29	BAE Systems	BAE Systems	Representations made by CB Richard Ellis on behalf of BAE Systems. BAE Systems (BAES) asks that the Council takes into consideration the representations they submitted on 15th May 2009 in relation to the draft Medway Economic Development Strategy 2009-2012. With regard to Strategic Priority 1, Sector Development, we note that the Council had ambitions to attract sector-specific interests in high technology and pharmaceutical businesses; however, this has previously been overly optimistic (paragraph 10.4, draft Medway Economic Development Strategy 2009-2012). In seeking to promote sector specific interests, we request that the Council adopts a positive and constructive approach which is flexible enough to respond to changing economic circumstances and specific local demand. With regard to Strategic Priority 4, Employment Space, BAES strongly supports the intensification of employment uses on appropriate sites, particularly given that Medway's potential to generate significant new employment opportunities could be severely constrained following reallocations of employment land for residential use and the general lack of good quality sites in the Borough. Our client welcomes the prioritising of appraising Rochester Airfield and neighbouring sites for further development opportunities as a key action under Strategic Priority 4, as set out in the draft Medway Economic Development Strategy 2009-2012. BAES is aware that there has been a strong historical aspiration for the land adjacent to Rochester Airfield to become a high quality, business, scientific, technology, and knowledge-based cluster, notably within Policy S11 of the Medway Local Plan (2003) and within the Kent & Medway Structure Plan (2004). Adopted RSS Policy KTG3 reiterates the desire for high quality proposals for intensifying or expanding the technology and knowledge sectors on land adjacent to Rochester Airfield. This is reflected in Core Strategy paragraph 4.60 where BAES is cited as having the potential of 'anchoring' a cluster of complementary businesses of regional significance at Rochester Airfield. Certainly the area's redevelopment accords with the national and regional prioritisation of focusing development on brownfield, urban land. The site is also located close to the M2 motorway and served by the Park & Ride to the north of the site, thereby meeting PPG4 requirements to locate businesses in locations well served by transport infrastructure so as to avoid unnecessary congestion. Our client welcomes the opportunity to assist the Council in delivering economic growth, provided policies and strategies support its business aims.	Noted. Where sites have a locational or another advantage for attracting high tech or high quality investment, it would be inappropriate to open them up for other types of development which could be easily accommodated elsewhere.
	Question 29	BAE Systems	BAE Systems	Representations made by CB Richard Ellis on behalf of BAE Systems. Comments to Q29-36. Our client wishes to stress the need for the Council to maintain a flexible approach to development of the economy which accommodates site-specific considerations and up-to-date assessments of need, supply, and demand. This will ensure development is achievable and deliverable across the Plan period and is particularly important given the broad definition of economic development in draft PPS4, where it is defined as that which provides employment opportunities, generates wealth or produces or generates economic output/product, and includes retail, leisure, offices, arts and tourism. Regional policy also requires Local Authorities to be flexible in their approach to employment land supply in order to be able to respond positively to changes in global, regional, and local economies (RSS Policies RE1 and RE3). This is all the more important given the current economic climate.	Noted. Where sites have a locational or other advantages for attracting high tech or high quality investments, it would be inappropriate to them up for other types of development which could be easily be accommodated elsewhere.
	Question 29		Ian Mawer	SEEDA is broadly supportive of the five strategic priorities proposed in the draft Medway Economic Strategy. We particularly welcome support for development of specific sectors including creative industries, environmental technologies and building products/ construction plus. SEEDA is eager to see genuine transformational opportunities come to fruition, and we support the development of key sector consortia including South East Media Network and South East Centre for the Built Environment (see Action 3.1 of the RES) The approach to identifying appropriate employment sites seems sensible, and will of course need to be fully evidenced through the ELR and SHLAA. We consider that the identification of strategic employment sites such as Kingsnorth and Grain is appropriate within the Core Strategy, and welcome consideration of promotion of sites for specific business sectors to deliver physical and economic regeneration. Such proposals should be properly evidenced and where possible, linkages made between job creation and the skills priorities for the borough. Priority 4 for the Coastal South East seeks to 'ensure that sufficient employment land is provided through redevelopment of brownfield land and refurbishment of existing stock, to provide new and flexible employment space'	Noted.
	Question 29	The Peel Group	The Peel Group	The five strategic priorities identified represent a good basis upon which to shape the future economy in Medway. Particularly, strategic priority iv. 'improving the availability of sites by first reviewing existing mixed use allocations, then assessing the potential to better utilise existing employment areas, then carrying out an audit of underused sites' will help to improve the use of currently under-utilised employment areas.	Noted.
	Question 29	Rochester Bridgewood Ltd	Rochester Bridgewood Ltd	It is essential that the availability of employment sites within Medway is improved. There is a dearth of such sites given the re-development of many former large scale industrial sites such as all those located at Rochester Riverside. It is vital to broaden the area's economic base through the provision of a wide range of new sites that meet the needs of a diverse range of businesses. These should not only be of differing sizes but also be in locations where people want to work or visit. To give an example, land at Rochester Bridgewood offers some 1.5ha that is very well related to other employment sites, has excellent transport linkages and is in the area recommended by the Council's economic consultants.	Land at Bridgewood, to the east of Rochester Road has been rejected in the Strategic Land Availability Assessment for employment or other development.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 29	Elm Court Estate Developments Ltd	Elm Court Estate Developments Ltd	Encouragement should be given to the retention and creation of small-scale low cost start-up units as many of these have been lost to re-development for non-employment uses. Remaining sites (such as Elm Court) should be retained as they provide a range of units to meet the needs of businesses of different sizes.	The Core strategy seeks to retain all existing employment sites.
	Question 29	Port Medway Marina Ltd	Port Medway Marina	Q29-36. There is a need to provide land for a wide variety of small and medium sized businesses, especially fronting the river. While there is a place for some residential development by the River Medway, too much would damage investment and employment in the wider area.	Medway's long term strategy for the riverside at key sites, such as Rochester Riverside, Strood Waterfront and Medway Valley Park has been to open up the riverside to uses other then employment in accordance with the former Thames Gateway Planning Framework. Consequently most but not all new employment developments will take place away from the riverside.
	Question 29		Carl Kroon	Specific sectors are too specific and do not fit the people. Square peg into round hole Further up-skilling so far has not worked. The Council seems hell bent on shutting Rochester Airport. The biggest hurdle is positive image of the area. Outsiders may have heard of Chatham, Rochester or Gillingham but not of Medway. Keep on mentioning city this, city that, but city status was lost and there is no council impetus to get it back.	The need for image building is recognised in the economic development policy. As landowner Medway Council has had opportunities to close Rochester Airport but has not done so. The Core Strategy does not propose its closure.
	Question 29	NFU	Kevin Attwood	Whilst not disagreeing with the aims it would be a step forward to see agriculture and horticulture mentioned as they are pivotal not only to the landscape but also food security. I have enclosed the latest NFU booklet on 'Why Farming Matters to Every Part of the UK'.	Agriculture is addressed in the economic policy and the Hoo Peninsula and Medway Valley and Downs chapters.
	Question 29		W Mann	Yes. Key are availability of land for employment sites and transport links. - Develop Kingsnorth and Gain sites and upgrade their road and rail links including fast track. - Up-skill workforce by expanding Mid Kent College/Royal School of Engineering initiative at Brompton. - Further develop higher education.	The development of Kingsnorth and Grain and improvements to their access, up-skilling of the workforce and development of higher education are all addressed in the Core Strategy.
	Question 29		Dr D Brighton	Hope 'specific sector' include medical engineering, University Technology Park (for spin-off from R & D), the business park at Rochester Airport sounds too critic.	The economic policy includes health as one of the specific sectors to be encouraged.
	Question 30			**Q30: Do you agree that existing mixed-use allocations should be reviewed with a view to increasing their proposed employment capacity?** Answers for question 30 (from questionnaire & website): 14 Yes/ Agree 4 No/ Disagree 1 Don't Know	
	Question 30		Alastair Blair	Yes, but keep focused on the use of Rainham and Capstone are rural habitats NOT housing	The Chapter on Options and Alternatives in the Core Strategy explains that the existing balance between employment and other uses or subject to supplementary planning documents will not be changed.
	Question 30	Viridor Waste Ltd	Mandeep Jutley	All existing employment allocations should be reviewed as well as existing mixed use allocations. Existing employment areas should be protected for employment generating uses, some of which may be industrial in nature.	The Chapter on Options and Alternatives in the Core Strategy explains that the existing balance between employment and other uses on sites subject to supplementary planning documents will not be changed.
	Question 30	Barratt Strategic		If existing mixed use allocations are to be reviewed to increase their employment capacity, and we can see why the council might feel this is necessary given the shortage of high quality office accommodation near to the rive/ within the main urban areas, there will clearly be a need to review the manner in which the councils housing land supply requirements are to be met. This in our opinion strengths our suggestion that the council have at least 2 strategic allocations – a reduced Chattenden, and smaller Hoo urban Extension.	The Chapter on Options and Alternatives in the Core Strategy explains that the existing balance between employment and other uses on sites subject to supplementary planning documents will not be changed.
	Question 30		Gary Brook	Object Our client objects to the review of the mixed use allocations in view of increasing employment capacity. We believe that mixed use policies should ensure flexibility which can incorporate potential for a range of uses. Whilst it may be appropriate to review the existing allocations this should be founded on a robust evidence base. It is highly inappropriate to seek to increase employment on mixed use sites without evidence to support this change as it could render these sites unviable for the mixed use scheme sought. This is of particular importance on sites in sustainable locations good transport facilities which would be best suited for mixed use schemes incorporating both residential and employment uses.	The Chapter on Options and Alternatives in the Core Strategy explains that the existing balance between employment and other uses on sites subject to supplementary planning documents will not be changed.
	Question 30		Lillian Harrison	YES allowing for re-investment / future growth at existing employment areas should be encouraged wherever possible.	Noted.
	Question 30	ScottishPower	Chris Girdham	The principle of this initiative is supported. However, where mixed uses are proposed they shouldn't prejudice existing or future expansion of industry. The scope of such an initiative should not only be concerned with raising capacity, it should also be needs based, properly focussed and support employment uses at locations that are sustainable. It should also recognise that certain areas offer greater sustainability advantages than others.	The Chapter on Options and Alternatives in the Core Strategy explains that the existing balance between employment and other uses on sites subject to supplementary planning documents will not be changed.
	Question 30	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Yes, mixed use should be explored and adopted, but would be wary of relying on local employment being supported by local housing except for very small businesses.	The Chapter on Options and Alternatives in the Core Strategy explains that the existing balance between employment and other uses on sites subject to supplementary planning documents will not be changed.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 30	Lafarge Cement UK	David Simms	This approach should be treated with caution. There remains an overarching need to deliver new homes, and a need to ensure that these offer a range and choice of housing types. Mixed use development - where there is a balance of homes and other uses, allows an opportunity for this. Where the employment content of sites is increased, there is a risk that the housing component may be marginalised, and that the balance of activity between daytime employment uses and evening and weekend residential activity (the benefit which mixed use proposals achieve) is lost. The opportunity for local facilities to be supported by a residential population is also reduced when employment uses become disproportionately dominant in a mixed use scheme.	The Chapter on Options and Alternatives in the Core Strategy explains that the existing balance between employment and other uses on sites subject to supplementary planning documents will not be changed.
	Question 30	tbh developments ltd & helvig ltd	tbh developments/helvig	It would appear too late for the Council to undertake such a review where planning permission for redevelopment has already been given (eg Rochester Riverside). This review would need to be carried out as a matter of extreme urgency to form part of the employment land availability evidence base for the Core Strategy. There must be doubts whether such a review in the timescale available is feasible.	The Chapter on Options and Alternatives in the Core Strategy explains that the existing balance between employment and other uses on sites subject to supplementary planning documents will not be changed.
	Question 30	Kent Wildlife Trust	Debbie Salmon	If further land take is planned, any impacts on biodiversity will need to be mitigated within the Green Infrastructure in line with PPS9. Business premises can provide further opportunities for extension of the Green Infrastructure. The Wildlife Trusts run a national accreditations scheme known as the Biodiversity Benchmark. Businesses are evaluated for biodiversity enhancements on site the Benchmark being awarded to companies that meet the high ecological standards of the scheme. This can then be used in marketing as evidence that the company encourages wildlife. (For further information regarding the Biodiversity Benchmark see http://www.wildlifetrusts.org/index.php?section=corporate:biodiversity:whatisit	Noted, The Chapter on Options and Alternatives in the Core Strategy explains that the existing balance between employment and other uses on sites subject to supplementary planning documents will not be changed.
	Question 30	Dickens Country Protection Society	Chris Fribbins	Mixed use supported, although there is limited scope except for very small business for residential/employment mix.	The Chapter on Options and Alternatives in the Core Strategy explains that the existing balance between employment and other uses on sites subject to supplementary planning documents will not be changed.
	Question 30	GVA Grimley Ltd	Sheery Sassoon	We support policies which increase employment opportunities and growth in the economy subject to relevant planning considerations. A number of uses which fall outside of the traditional 'B' Class uses create employment opportunities and the emerging policy should recognise the economic contribution these uses make. In accordance with draft PPS4, where it is considered necessary to safeguard land from other uses, a range of sites should be identified to facilitate a broad range of economic development including mixed uses. We support the current mixed use allocation at Colonial House and consider that this should be carried forward in the emerging policy. A flexible, mixed-use allocation at the site would help to deliver redevelopment of the site and bring back a vacant site into use, creating economic benefits for Chatham Maritime and Medway Council. (Suggestion- Employment-generating uses, including those which fall out of the traditional employment 'B' Class uses will be encouraged. Mixed use allocation at Colonial House to be retained.)	The encouragement of employment generating uses including those other then B use classes could lead to the development of retails and other uses which the Core Strategy seeks to locate in the town centres. The future of Colonial House can be dealt with through the development management system.
	Question 30	The Peel Group	The Peel Group	Both existing mixed-use allocations and other sites that have the potential to increase employment capacity through creating a mix of uses on site should be reviewed. This will allow currently underutilized sites to bring forward more jobs as well as a range of other uses.	The Chapter on Options and Alternatives in the Core Strategy explains that the existing balance between employment and other uses on sites subject to supplementary planning documents will not be changed.
	Question 30	RSPB	Fay Martin	Q30 - 33: No. The RSPB believes that the planning system has a key role to play in achieving sustainable development and therefore supports a constraints based approach to identifying the most appropriate locations for development. In the wrong location and/or without effective mitigation, employment development in the Medway area could have a negative impact on features of nature conservation concern, including internationally designated sites, for example by increased noise and disturbance due to construction activities. We therefore strongly recommend that this matter be thoroughly appraised in the AA of the Core Strategy and we would welcome the opportunity to comment further on this matter prior to the publication of that document.	Medway Council is currently discussing the scope and extent of the appropriate assessment with Natural England, the Environment Agency and adjoining authorities prior to preparing a screening document and appointing a consultant to carry out the assessment.
	Question 31			**Q31: Do you agree that re-investment in and a more concentrated form of development should be promoted in established employment areas?** Answers for question 31 (from questionnaire & website): 10 Yes/ Agree 6 No/ Disagree 2 Don't Know	
	Question 31	CPRE Kent	Brian Lloyd	We agree that it would be beneficial to make more intensive use of existing employment sites where this can be achieved without adverse impact on the environment, highway network and residential amenity. Therefore, this needs to be considered on a site by site basis rather than as a blanket objective.	Noted.
	Question 31	Groundwork Kent & Medway	Simon Green	Yes in respect to our comments on para 4.66 re Medway City Estate	Noted. The principle of improvement of existing employment areas is addressed in the economic development strategy where reinvestments strategies will be promoted for each area.
	Question 31	Viridor Waste Ltd	Mandeep Jutley	Avenues for potential re-investment in employment areas should be welcomed. Where this involves intensification of uses with no significant detrimental impacts, it should be encouraged.	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 31		Lillian Harrison	It is not always possible to 'concentrate' operations in established employment areas, where such uses need large areas for storage or raw materials and products as well as space to facilitate the onward shipping of products. Growth of these commercial businesses - in order to increase employment and invest in the area, may often need an expansion of existing employments sites. This issue should be recognised. Re-investment is a commercial decision which cannot be assumed to be acceptable or achievable in all established employment areas, perhaps this should be 'encouraged' rather than 'promoted'?	Reinvestment in existing employment sites is only one element of the economic strategy. The provision of additional employment land complements the intensification of existing estates.
	Question 31	ScottishPower	Chris Girdham	The principle of this initiative is supported. However, the emphasis should not only be on raising capacity, it should also be needs based, properly focussed and support employment uses at locations that are sustainable. It should also recognise that certain areas offer greater sustainability advantages than others.	Noted.
	Question 31	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Yes - but road infrastructure issues need to be considered.	Noted.
	Question 31	Dickens Country Protection Society	Chris Fribbins	Yes - although care has to be taken to ensure road infrastructure is sufficient to support it.	Noted.
	Question 31	BAE Systems	BAE Systems	Representations made by CB Richard Ellis on behalf of BAE Systems. BAES strongly supports the intensification of employment uses on appropriate sites, the principle of which accords with RSS Policy RE3. This seeks to, amongst other things, make efficient use of existing and underused sites and premises through increasing the intensity of use on accessible sites. This is particularly significant for Medway, given that its potential to generate significant new employment opportunities could be severely constrained following reallocations of employment land for residential use and the general lack of good quality sites in the Borough.	Noted.
	Question 31	GVA Grimley Ltd	Sheery Sassoon	In principle, we support policies which encourage the investment of employment generating uses, including established employment areas. Details of the employment areas which will benefit from the investment should be included as well as how the investment will be secured and applied. (Suggestion- The policy should how investments for employment areas will be secured and applied.)	The economic policy promotes re-investment strategies for existing employment areas. This will need to be done in co-operation with site owners with investment coming from the private sector.
	Question 31	The Peel Group	The Peel Group	Whilst re-investment in employment areas is important, this should not be at the expense of potential to create mixed-use development on existing areas of employment, which may provide greater community, economic and environmental benefits. More concentrated forms of development should be promoted in established employment areas, although this should involve recognising the potential for introducing other uses to ensure maximum benefit and enable increased employment levels.	The policy of the economic strategy is to safeguard existing employment areas.
	Question 31	Rochester Bridgewood Ltd	Rochester Bridgewood Ltd	While the improvement of existing established employment areas is to be welcomed, such action would not result in the provision of adequate employment land throughout the Medway Council area. There has been a significant loss of sites ranging from the very large to small, to other forms of development, partly due to the pressures to accommodate new housing predominantly on brownfield land. This has resulted in a shortfall of alternative sites for new business to be established or for existing businesses to relocate. Sites such as Rochester Bridgewood would assist in meeting this need. It is close to urban development, being surrounded by industrial sites and has excellent access to primary routes.	Land at Bridgewood, to the east of Rochester Road has been rejected in the Strategic Land Availability Assessment for employment or other development. .
	Question 31	FWCA Frindsbury and Wainscott Community Association	J R Masey	Do not agree with employment land on Med. City Estate to go for housing. The council had the chance to improve the estate with the retention of wardens lake. Short-sighted decision.	No housing is proposed on Medway City Estate.
	Question 31		W Mann	Q31 & 32. Would implementation lead to further congestion?	Access congestion will need to be taken into account.
	Question 31	Open Spaces Society	Patricia Wilson	Agree that intensification of development should be considered where individual cases warrant it to limit expansion into green open space.	Noted.
	Question 32			**Q32: Do you agree that previously developed land around Rochester Airfield should be the focus for higher value economic activities?** Answers for question 32 (from questionnaire & website): 9 Yes/ Agree 5 No/ Disagree 1 Don't Know	
	Question 32	CPRE Kent	Brian Lloyd	This could be appropriate, provided it did not result in the closure of the airfield and a reduction in the open green corridor.	There is no proposal to close the airfield in the Core Strategy.
	Question 32	Barratt Strategic		We can see the sense in promoting the area around Rochester Airfield as high tech business park and feel the council should actively encourage this.	Noted.
	Question 32	Rochester City Airport	Paul Britten	Para 4.69 - We agree that the focus around the airfield should be for higher value (possibly aeronautical) economic activities. Please see Q10 where we also believe this should be in conjunction with higher education. In turn this also brings other employment opportunities for all of working age. None of this should be to the detriment of airport operations which are of course protected by the airports safeguarding plan.	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 32	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Yes - although it is remote from the railway stations and would tend to rely on road access from the M2 and M20. Public transport provision from Chatham/Rochester/Strood would need to be improved.	Both Rochester Road and Maidstone Road are bus routes. The level of services is a matter for the bus companies. Although contributions can be sought from the developers if the scale of development warrants it.
	Question 32	tbh developments ltd & helvig ltd	tbh developments/helvig	This question is not understood. What is meant by "previously developed land around Rochester Airfield"? This terminology needs to be precisely defined. Similarly, how does the question arise from any statement or information in the Issues and Options Report? This is an unsatisfactory question until a more precise definition of its meaning is given.	Previously developed land is defined in PPS3.
	Question 32	Kent Wildlife Trust	Debbie Salmon	The Trust would require more information as to the wildlife present before we were able to express an opinion regarding this location.	The natural assets policy makes provision for dealing with wildlife on development sites.
	Question 32	Dickens Country Protection Society	Chris Fribbins	Yes, although this area will be primarily served by M2 and the M20 - unless some significant investment in links to the town centres can be provoded.	Both Rochester Road and Maidstone Road are bus routes. The level of services is a matter for the bus companies. Although contributions can be sought from the developers if the scale of development warrants it.
	Question 32	BAE Systems	BAE Systems	Representations made by CB Richard Ellis on behalf of BAE Systems. Our client welcomes the prioritising of appraising Rochester Airfield and neighbouring sites for further development opportunities. BAES is aware that there has been a strong historical aspiration for the land adjacent to Rochester Airfield to become a high quality, business, scientific, technology, and knowledge-based cluster notably Policy S11 of the Medway Local Plan (2003) and within the Kent & Medway Structure Plan (2004). Adopted RSS Policy KTG3 reiterates the desire for high quality proposals for intensifying or expanding the technology and knowledge sectors on land adjacent to Rochester Airfield. This is reflected in Core Strategy paragraph 4.60 where BAES is cited as having the potential of 'anchoring' a cluster of complementary businesses of regional significance at Rochester Airfield. Certainly the area's redevelopment accords with the national and regional prioritisation of focusing development on brownfield, urban land. The site is also located close to the M2 motorway and served by the Park & Ride to the north of the site, thereby meeting PPG4 requirements to locate businesses in locations well served by transport infrastructure so as to avoid unnecessary congestion. However, BAES considers that the Council's past over-optimism for the site emphasises the importance of maintaining a flexible approach to economic development on previously developed land around Rochester Airfield. This will ensure that any (re-)development of the site adapts to meet market demand in accordance with PPS4. Our client welcomes the opportunity to assist the Council in delivering economic growth, provided policies and strategies support its business aims.	Noted
	Question 32	The General Aviation Awareness Council	The General Aviation Awareness Council	Rochester Airport and its hinterland should be protected. The closer development comes to the edges of the airport, the less it can be used. This site needs proper investment (based upon a long lease) to help in realise its potential to add to the Medway area's transport links to the rest of the UK and Europe. This is an under-used asset and could add to the wider economy. While employment related development in the immediate vicinity may create some jobs, optimum use of the Airport could lead to far higher numbers.	Building on adjacent land would be controlled to ensure the safety of operations at the airport. The Core Strategy includes no proposals for the airport itself.
	Question 32		Dr D Brighton	Not the business park. what higher value activities do you mean?	A business park was proposed on the airport in the Medway Local Plan but this is no longer being pursued. Higher value activities generally means development in the use class B1 (a) and (b) categories.
	Question 33			**Q33: Should the new settlement at Lodge Hill, Chattenden be identified as an employment location meeting more than purely local needs?** Answers for question 33 (from questionnaire & website): 9 Yes/ Agree 6 No/ Disagree 2 Don't Know	
	Question 33	CPRE Kent	Brian Lloyd	It is proposed that a significant part of the site (20 - 25 ha) will be provided for employment uses and therefore it will inevitably be more widely attractive whether it is promoted as such or not. It's primary purpose, though, should be to provide local employment for local people which would suggest that it should be promoted for more general employment uses, with an emphasis on B1 type uses, rather than more specialist employment uses that would attract workers from further afield. It should also be well integrated with the proposed residential development with access on foot and by cycle given priority.	The new employment provision at Lodge Hill will be an important component of Medway's overall employment offer, Therefore, it is considered it will provide higher end employment opportunities. Given this, it is not considered that it will threaten in any way, the delivery of Medway's urban regeneration sites. The importance given to employment opportunities at Lodge Hill is reflected in the corresponding chapter within the Draft Core Strategy.
	Question 33	Barratt Strategic		Whilst there are some merits in identifying part of the new settlement at Chattenden as a strategic employment location (ala kings Hill) we do have some reservations about the effects this would have on the economic regeneration of the main urban areas, especially when access to these areas is seen as one of the impediments to regeneration. Providing a highly accessible strategic employment centre outside the main urban areas is bound to act as a counter draw and thus have the ability to prejudice the council's long term economic regeneration aspirations. Furthermore such a strategy is in our view less sustainable than concentrating the main employment locations within the urban area and leaving the employment provision proposed at Chattenden as that which would serve a local need.	The new employment provision at Lodge Hill will be an important component of Medway's overall employment offer, Therefore, it is considered it will provide higher end employment opportunities. Given this, it is not considered that it will threaten in any way, the delivery of Medway's urban regeneration sites. The importance given to employment opportunities at Lodge Hill is reflected in the corresponding chapter within the Draft Core Strategy.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 33	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	In practical terms it could not be anything else. Traffic movements would tend to work against the main 'commuter flow' so may not be an issue.	The point is noted.
	Question 33	Dickens Country Protection Society	Chris Fribbins	Yes, although these are likely to employ people from outside the area in practice - it is not Port Sunlight or Bourneville.	The point is noted.
	Question 33	FWCA Frindsbury and Wainscott Community Association	J R Masey	Yes, if not detrimental to site maybe less housing and more employment would be a good thing. With more use being made of mineral railway -a station maybe for passenger travel also.	The points are noted. However, it is not felt that the provision of a new passenger station is currently appropriate.
	Question 33	Open Spaces Society	Patricia Wilson	Chattenden should mainly cater for local employment needs rather than attracting recruits from further afield.	The new employment provision at Lodge Hill will be an important component of Medway's overall employment offer, Therefore, it is considered it will provide higher end employment opportunities. Given this, it is not considered that it will threaten in any way, the delivery of Medway's urban regeneration sites. The importance given to employment opportunities at Lodge Hill is reflected in the corresponding chapter within the Draft Core Strategy.
	Question 34			**Q34: What further efforts could be made to encourage graduate retention in Medway and the development of spin off businesses from the universities?** Answers for question 34 (from questionnaire & website): 3 Yes/ Agree 0 No/ Disagree 7 Don't Know	
	Question 34	ScottishPower	Chris Girdham	Provide a land use strategy that provides further support to those sectors and industries that already create high value/skilled jobs and have the potential to form part of wider clusters/nationally or internationally significant centres of excellence. Energy is one such sector which provides the potential for establishing stronger links with education and skills training.	Agreed. These matters are addressed within the Draft Core Strategy.
	Question 34	University College for the Creative Arts at Rochester	David Hawkins	a. The University looks forward to working with the Council, and others, to ensure that its graduates are provided with an opportunity to remain in the area and to make an even more important contribution to the local economy than currently. b. A dialogue with students, through workshops and surveys (to ascertain their needs), might assist.	Noted.
	Question 34	FWCA Frindsbury and Wainscott Community Association	J R Masey	Have high principles in planning, not just monetary considerations.	Noted.
	Question 34		Dr D Brighton	Yes. University technology park	Noted.
	Question 35			**Q35: Should land at Kingsnorth and Grain be actively promoted as locations for environmental technology and related activities?** Answers for question 35 (from questionnaire & website): 16 Yes/ Agree 3 No/ Disagree 1 Don't Know	
	Question 35	CPRE Kent	Brian Lloyd	Yes, this would seem desirable, particularly if linked with developing green technology.	Noted.
	Question 35	Groundwork Kent & Medway	Simon Green	Yes as Medway should seek to benefit from this large growth market and these are suitable locations with sea and rail access but this will imply that they have all the necessary infrastructure including high speed broadband and improvements to the rail corridor.	Noted.
	Question 35	Viridor Waste Ltd	Mandeep Jutley	The development of schemes that provide environmental technology and related activities should not be restricted to any given cluster vision. The Core Strategy should make clear that schemes which promote environmental technology and related activates will be welcomed in appropriate locations as well as identified cluster areas. Consideration should also be given to creating such a cluster within the Medway City Estate.	Noted. In terms of Kingsnorth and Grain, these clusters have evolved over a long time period. The Core Strategy will also support clusters of environmental technologies in other appropriate locations where they arise or exist.
	Question 35	ScottishPower	Chris Girdham	Due to existing operations and locational advantages, these areas are of strategic importance for energy generation and deliver nationally important benefits. The importance of the energy sector and the continued need to support it is recognised in the South East Plan. Therefore energy generation and related technologies, which may require provision for Carbon Capture and Storage	Noted. These matters are addressed within the Draft Core Strategy.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				(CCS), itself an environmental technology, should generally be accommodated at these locations. Synergies between energy development and related environmental technologies such as CCS should be provided for. Where opportunities exist to develop other forms of environmental technology and related activities, these should be supported provided they address environmental constraints.	
	Question 35	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Yes, this should be a growth industry and may offset some of the local power generation using fossil fuels.	Noted.
	Question 35	National Grid Property Holdings Limited		Representation made on behalf of National Grid Property Holdings Ltd by Planning Perspectives LLP. We have no objection to the land at Grain being promoted as a location for environmental technology and related activities, but this should not be at the expense of wider employment land uses. National Grid's landholding at the Isle of Grain is currently allocated for Class B1 (Business), Class 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 employment opportunities. These uses could include environmental technology and related activities but should not be limited to just these elements.	Noted. This matter is addressed within the Core Strategy.
	Question 35	Kent Wildlife Trust	Debbie Salmon	The Trust welcomes the promotion of environmental technology but due to their locations such facilities should ensure no impact on estuarine habitats.	Noted, the Core Strategy will seek to properly protect estuarine habitats.
	Question 35	Dickens Country Protection Society	Chris Fribbins	This could be just one option for these sites and although this is welcome it should not be the sole option.	Noted. In terms of Kingsnorth and Grain, These clusters have evolved over a long time period. The Core Strategy will also support clusters of environmental technologies in other appropriate locations where they arise or exist.
	Question 35	Kent County Council	Richard Feasey	Yes. Kingsnorth and Grain would be appropriate areas for environmental technologies and related activities building on the permission for the wind turbines and making use of the large sites that exist there.	Noted.
	Question 35	Rochester Bridgewood Ltd	Rochester Bridgewood Ltd	Land at Kingsnorth and Grain has been promoted for employment related uses for many decades with little take-up due to their relative isolation. Those sites which are better related to good transport links and the urban area are far more likely to be developed in the short to medium term.	Noted but there has recently been strong commercial interest in these sites. Therefore, the Council is confident of their ability to deliver major employment related activities within a reasonable time-period.
	Question 35	Frindsbury and Wainscott Community Association	A Wade	Yes. If linked with green technology and safeguarding protected areas.	Noted.
	Question 35		Dr D Brighton	Yes. Nurture industry of all sorts/ levels.	Noted.
	Question 36			**Q36: What further strategies might be proposed to bring benefits claimants of working age back into employment?** Answers for question 36 (from questionnaire & website): 1 Yes/ Agree 1 No/ Disagree 3 Don't Know	
	Question 36	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Training should be made more accessible to older people	Noted.
	Question 36		Mike Walters	Apply a points scheme for work so working people get precedence over benefits claimants for housing.	Noted.
	Question 36		Vivienne Parker	The Council should encourage benefit claimants to work as volunteers for them within Gun Wharf and other council buildings in order to acquire new skills in a practical setting.	Noted.
	Question 36			Withdrawal of benefits.	Noted.
	Question 36		Carl Kroon	Providing jobs locally relevant to claimant skills. "Square pegs in round holes".	Noted.
	Education & skills				
		Medway Renaissance	John Finlayson	The universities at Medway continue to prosper and Medway needs to develop as a student destination and respond to the increasing student population. Economic benefits of the universities need to be maximised with graduate retention, research and development and knowledge transfer. A new campus in Medway for the UCA would significantly help.	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	4.76	University College for the Creative Arts at Rochester	David Hawkins	For para. 4.76 -4.125 The University is pleased to see that the developing Core Strategy has a section on education and skills.	Noted.
	4.82	University College for the Creative Arts at Rochester	David Hawkins	For para. 4.82 -4.88. The University is pleased to see that the developing Core Strategy has a section on the universities at Medway, and that it acknowledges the contribution that the higher and further education sectors make to the local economy, and the learning opportunities they provide for residents.	Noted.
	4.88	Rochester City Airport	Paul Britten	Mid Kent College campus at Horsted has now closed and has been earmarked (with no development brief) for a large housing estate. It is a shame that with its location adjacent to BAe and the airport it was not used to further higher aeronautical education. Furthermore this major residential development with the certain prospect of being noise sensitive is being considered so close to the airport.	Noted. However, planning consent for residential development has already been issued, and construction activity has commenced on the site.
	4.89	Chatham Historic Dockyard Trust	Bill Ferris	Section 4.89 rightly makes much of the desire to help UCA develop a new campus in Medway. It is believed that similar encouragement should be given to University of Kent which, as the Council knows, has funds allocated to develop a major new learning facility within the Historic Dockyard designed to attract hundreds of creative arts students and help to increase the sustainability of the University's existing operation. There will be a need to encourage the University to continue its expansion in Medway, to assist it raise additional funding and to engage with the university to ensure that maximum benefit for the area can accrue. Highlighting UCA alone might not be perceived to achieve that.	Noted. The Core Strategy is supportive in principle of university related activities being sited at the Historic Dockyard given its close proximity to the existing cluster of university facilities, and overall suitability. Therefore, if proposals come forward from other universities, they will be treated in exactly the same way as any proposal from the University of Creative Arts (UCA)
	4.89	University College for the Creative Arts at Rochester	David Hawkins	a. The University is appreciative of the special mention made in this paragraph. b. However, the use of the words "University College" is incorrect, and those words should therefore be deleted.	Noted.
	4.9	University College for the Creative Arts at Rochester	David Hawkins	The University has stated that it will create a new campus in Kent, and Medway is one of the locations being considered.	Noted.
	4.120	University College for the Creative Arts at Rochester	David Hawkins	a. The University is appreciative of the special mention made in this document. b. The words "The Fort Pitt campus" should be replaced with "UCA's Fort Pitt campus", for the avoidance of any doubt.	Noted.
	4.121	Chatham Historic Dockyard Trust	Bill Ferris	Section 4.121 names the Interface Land as a potential site for the UCA development and there is certainly potential for this and land-owner support. Mention of other possible sites is made but they are not named. Later a specific question is asked to consultees about which might be a preferred site. With only one suggestion specifically given in the text this seems a self fulfilling prophecy, however appealing the Interface Land site might be this seems inappropriate!	Noted.
	4.121	University College for the Creative Arts at Rochester	David Hawkins	a. The University has stated that it will create a new campus in Kent, and Medway is one of the locations being considered. On that basis, it would seem sensible to identify sites in the Core Strategy that are considered suitable, and the University will work with the Council to ensure that potentially suitable sites are set out in the next version of the developing Core Strategy. However, the University must stress that no final decision has been made on this matter. b. As previously stated, if the University were to locate its new Kent campus in Medway, there is a concern that the existing supply of student accommodation would not be able to support the needs of the University.	Noted.
	4.125	Rochester City Airport	Paul Britten	We think that creating an employment cluster with relevant education facilities At Rochester Airport would make it a centre of excellence. Regrettably opportunities in this respect so far have been ignored. Policy KTG3 of the South East plan is quite clear on this point.	The Core Strategy is promoting the Rochester Airfield site as a technology and knowledge based hub.
	Question 37			**Q37: Should Universities at Medway be further promoted to create a higher education centre of regional or national significance?** Answers for question 37 (from questionnaire & website): 12 Yes/ Agree 3 No/ Disagree 2 Don't Know	
	Question 37	Barratt Strategic		Barratt Strategic supports the concept of the universities of Medway being promoted to create a higher education centre of regional/national importance. This strategy would in our opinion enhance the image of the area. The range of subjects now on offer will help diversify the skills base of those who live in the local area, address the skills miss match that occurs in certain sectors, and bolster the areas economic regeneration.	Noted.
	Question 37	Kent Wildlife Trust	Debbie Salmon	If extra students are resident in Medway the recreational pressure they exert on the SPAs should be evaluated within the AA.	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 37	Frindsbury and Wainscott Community Association	A Wade	Not without corresponding infrastructure improvements.	Noted.
	Question 38			**Q38: Do you agree that a new campus of the University for the Creative Arts should be promoted in Medway? If yes, do you have a preferred location?** Answers for question 38 (from questionnaire & website): 12 Yes/ Agree 3 No/ Disagree 1 Don't Know	
	Question 38	Groundwork Kent & Medway	Simon Green	Yes. UCA and its predecessors are something that Medway is rightly proud off. The 'Interface Land' between Dickens World and the Historic Dockyard would be an excellent location due to its proximity to the dockyard, the River and the other nearby universities with which it could share some facilities.	Noted.
	Question 38	Barratt Strategic		Barratt Strategic supports the principle of a new campus for the University of Creative arts being promoted in the borough. As per our response to question 10/11 the possibilities of accommodating enhanced facilities at Chattenden should in Barratt Strategic's opinion be investigated further	Noted.
	Question 38	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Yes, close as possible to existing higher education facilities	Noted.
	Question 38	Kent Wildlife Trust	Debbie Salmon	The proposed location appears to be in the locality of the Medway and Marshes SPA and increased occupation is likely to have an impact on the SPA. However this site could also provide important linkages within the Green Infrastructure. The Trust would recommend that natural habitat corridors be provided to ensure contact with nature for the students and linkages through the urban environment for wildlife.	Noted.
	Question 38	Dickens Country Protection Society	Chris Fribbins	Located close to new/existing higher education facilities	Noted.
	Question 38	GVA Grimley Ltd	Sheery Sassoon	Answer to Q38 & 39- We support the growth of the education sector to within Medway Council. It is considered that this could help to attract investment to Medway and bring a number of associated benefits such as creating employment opportunities. (Suggestion- The policy should encourage the growth of the higher education sector in Medway.)	Noted. A specific policy relating to education is included in the core strategy.
	Question 38	University College for the Creative Arts at Rochester	David Hawkins	The University has stated that it will create a new campus in Kent, and Medway is one of the locations being considered. On that basis, it would seem sensible to identify sites in the Core Strategy that are considered suitable, and the University will work with the Council to ensure that potentially suitable sites are set out in the next version of the developing Core Strategy. However, the University must stress that no final decision has been made on this matter.	Noted.
	Question 38		Vivienne Parker	Difficult to move UCA as it is preserving the remains of Fort Pitt within its structure and demolition of the building would leave a redundant site.	Noted.
	Question 38		John Hill	Possibly, if really needed.	Noted.
	Question 38		Carl Kroon	City Way college site and current site.	Noted.
	Question 38		W Mann	Yes. Near other universities so can share other facilities such as library, sports facilities and accommodation.	Noted.
	Question 39			**Q39: Should Mid Kent College promote its new campus as a regional hub for construction skills?** Answers for question 39 (from questionnaire & website): 13 Yes/ Agree 2 No/ Disagree 1 Don't Know	
	Question 39	Barratt Strategic		As a national house builder with close ties to Medway, Barratt Strategic would be pleased to support Mid Kent College in promoting its new campus as a regional hub for construction.	Noted.
	Question 39	Mid Kent College	Mid Kent College	Mid Kent College's new Â£86m campus in Medway provides a range of courses in all aspects of construction and civil engineering from craft level to Foundation degree. In the design of the campus, care has been taken to ensure that current professional standards of equipment have been provided in the spacious workshops and classrooms. Good links with local industry have been forged over many years of operating courses in construction skills and help enhance the opportunities for students. The College also works with a number of partner schools in the delivery of link programmes for 14-16 year olds and the new Diplomas. The close proximity to the Royal School of Military Engineering (RSME), which boasts the largest construction training centre in Europe, and the fact that the College recently won the contract to deliver the civilian training there, is further evidence of the existing skills base and capacity to develop a regional hub at the College.	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 39	FWCA Frindsbury and Wainscott Community Association	J R Masey	As far as the Royal School of Engineering is concerned.	Noted.
	Question 40			**Q40: Do you support the concept of schools as 'community hubs'?** Answers for question 40 (from questionnaire & website): 10 Yes/ Agree 5 No/ Disagree 1 Don't Know	
	Question 40	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	We would support this - although there would need to be some financial input to schools to help them overcome some of the problems with access and security, heating and lighting.	Noted.
	Question 40	Dickens Country Protection Society	Chris Fribbins	Yes, if practical arrangements can be made that do need the whole school to be heated/lit etc.	Noted.
	Question 40	Kent County Council	Richard Feasey	Yes. Facilities can be concentrated and will allow greater access to all sections of the community. Sharing resources can reduce costs of additional building and this saving can be used to provide additional facilities.	Noted.
	Question 40		Vivienne Parker	but not at the expense of losing other community hubs like churches and community centres.	Noted.
	Question 40	FWCA Frindsbury and Wainscott Community Association	J R Masey	Possibly where amenities are short in certain areas.	Noted.
	Question 40		Dr D Brighton	No. encourage industry to invite schools visits, work days	Noted.
	Question 41			**Q41: What strategies should be promoted to improve the employment prospects of the more socially disadvantaged?** Answers for question 41 (from questionnaire & website): 2 Yes/ Agree 0 No/ Disagree 7 Don't Know	
	Question 41		Sara Fadil	I feel that more social enterprises within Medway should be considered to help the beggars off the streets to help those with mental health and learning difficulties. More funding should be ready, to support and help those businesses to get up and running.	Noted.
	Question 41		Vivienne Parker	The Council should encourage benefit claimants to work as volunteers for them within Gun Wharf and other council buildings in order to acquire new skills in a practical setting.	Noted.
	Question 41		Carl Kroon	Providing training for suitable the individual and for the job.	Noted.
	Question 41	FWCA Frindsbury and Wainscott Community Association	J R Masey	Q41& 42. Make adult education affordable and available.	Noted.
	Question 42			**Q42: What strategies should be promoted to encourage lifelong learning and up skilling in the workplace?** Answers for question 42 (from questionnaire & website): 3 Yes/ Agree 0 No/ Disagree 5 Don't Know	
	Question 42	Kent Wildlife Trust	Debbie Salmon	Providing opportunities to volunteer for practical conservation tasks and establishing wildlife orientated community groups will enable people to learn about ecology and habitat creation and management as well as providing them with a healthy pastime.(See Natural England's Revealing the Value of Nature at http://naturalengland.etraderstores.com/NaturalEnglandShop/CORP113 and Natural Health manifesto at http://www.naturalengland.org.uk/ourwork/enjoying/health/ournaturalhealthservice/default.aspx for further details on health benefits of contact with nature).	Noted.
	Question 42		Sara Fadil	Q42-43 There should not be many spend (for instance) in helping someone start up a pub or retailer, but for businesses that will offer back something good into the community money (even tax payers money) should be considered for such ventures.	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 42		I.H. Smith	cheaper evening courses	Noted.
	Question 42		Carl Kroon	Financial cost is prohibitive for the individual. Time constraints are normally not possible.	Noted.
	Question 42		Dr D Brighton	Q42 & 43. Yes. Fund industry to train apprenticeships/ graduate training.	Noted.
	Question 43			**Q43: What strategies should be promoted to more closely match the skill needs of local employers?** Answers for question 43 (from questionnaire & website): 2 Yes/ Agree 0 No/ Disagree 5 Don't Know	
	Question 43	South East Marine Association's	Laraine Soliman	The investment envisaged by SEMA would create jobs for a wide range of employees including those who cannot at present find work locally because of the council's misguided employment policies; provision must be made for those who already live here and that requires a generous supply of small sites for SMEs particularly close to the river.	The core strategy acknowledges the importance of employment related activities along the River Medway. A specific chapter has been included in relation to this.
	Question 43		Mike Walters	Apply assisted funding to local youngsters who need vocational training at local colleges.	Noted.
	Question 43		I.H. Smith	Get employers involved	Noted.
	Question 43	FWCA Frindsbury and Wainscott Community Association	J R Masey	More liaison between employers and schools	
				Retailing & Town Centres	
				Council should support and promote town centre shopping. Why is it free to park at Hempstead shopping centre but not at town centres?	The Core Strategy makes provision for improved park & ride services. Free parking within town centre car parks s is not considered practical and is beyond the scope of the core strategy.
		Medway Renaissance	John Finlayson	The future role of the 5 town centres and Hempstead Valley needs to be clearly set out. Substantial investment in retail in the recent past has not really been in the historic centres but has been in out of centre retail and large food stores. Chatham has been identified as one of 12 centres within the Thames Gateway for significant change. The LDF needs to deliver this successful change. Public realm improvements to Medway are already programmed.	The CorerStrategy addresses this matter. One of its key aims is to significantly improve the retail offer within Chatham town centre. The Council has also just produced the Best Street / High Street Development Brief which sets out proposals for how new retail and other appropriate uses might be best accommodated. This has been adopted as a Supplementary Planning Document.
		Natural England	Josh Nelson	Retail provision at Lodge Hill should cater for the needs of the community at the proposed development in order to limit carbon from retail visits.	Retail provision at Lodge Hill will be required to be at an appropriate scale to serve local needs. It will not be allowed to be excessive in size, so as to threaten the commercial viability of other retail centres elsewhere in Medway.
	4.129		Barry Knight	The decline is not helped by increasing car park restrictions and car park prices. Medway town centre retailers need all the help they can get when the better off can easily drive to Hempstead Valley, Bluewater and Lakeside.	Noted
	4.135		Barry Knight	Due, perhaps, to unrealistic levels of business rates and over priced car parks (it is free at Hempstead Valle and Bluewater).	Noted.
	4.142	tbh developments ltd & helvig ltd	tbh developments/helvig	The NLP study has a number of deficiencies in its consideration of the need for additional convenience goods floorspace for a large foodstore. Firstly, there is significant leakage of food shopping expenditure outside of Medway from the Hoo Peninsula and other areas. Secondly, the existing large foodstores in Medway are overtrading. These deficiencies have two implications namely, that there will be a need for large food store sales floorspace before 2016 and that in the context of the revised draft PPS4 Medway is not benefiting as much as it should be from the significant number of retail jobs that new large foodstore floorspace would generate.	The NLP study is considered by the Council to be fully robust.
	4.151		Barry Knight	If trains stop at Strood it is hard to see how they can be "High Speed".	It is a fact that high speed rail services take little more than half an hour to travel between Strood and London St Pancreas.
	Question 44			**Q44: Should a major new retail development of at least 30,000 sq.m be a priority for Chatham?** Answers for question 44 (from questionnaire & website): 12 Yes/ Agree 5 No/ Disagree 2 Don't Know	
	Question 44	CPRE Kent	Brian Lloyd	We are unable to comment on the quantity proposed, but we would agree that the focus for new retail development should be at Chatham.	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 44		Paul Watson	Answer to Q44 & Q45 1. These questions are highly significant in terms of the way in which the strategy for the Medway area will be shaped over the next 20 years. They will also have an impact beyond the end of the plan period. 2. It is our submission that key to these matters is the statement made at paragraph 4.149 of the issues and options paper: "Other than Chatham, none of the centres is large enough to compete with other centres in Kent. Accordingly, the case for Chatham to be the main focus for retail investment is strong. Equally, it is also important that the other centres have defined roles."3. It is of course tempting to seek to spread development to a number of different locations on the basis that everyone should get some share of the additional retail development. Certainly a decision on which town should be seen as the prime location within the district can be politically sensitive with competing interests between the main towns in Medway. 4. However, the clear danger of a strategy based on diluting the retail focus away from one main town is that none of the centres will grow and provide the level of retail service and quality necessary to compete with the other major centres within Kent. 5. By focussing the majority of retail growth within Chatham there is a far greater prospect that higher order national retailers can be attracted to Medway. The presence of a major department store for example would provide a significant draw. 6. The Core Strategy can seek to focus new development in Chatham through the spatial policies relating to retail provision. However, it is considered that if Chatham is to attract the kinds of retailers that will lift the town and allow it to compete with the larger centres in Kent, this must go hand in hand with wider townscape improvements and improvements to public spaces. 7. An improved town centre environment will enhance Chatham's reputation as a retail destination. It is considered that improved public spaces could be designed as gateways at key points in the town centre and contain places to sit, eat and meet as part of the wider shopping experience. 8. We therefore support the potential strategy of focussing retail growth on Chatham combined with a programme of townscape and public space enhancements within Chatham as proposed in the Chatham Centre & Waterfront Development Brief.	The strategy addresses this matter. One of its key aims is to significantly improve the retail offer within Chatham town centre. The Council has also just produced the Best Street / High Street Development Brief which sets out proposals for how new retail and other appropriate uses might be best accommodated. This document has been adopted as a Supplementary Planning Document. The need for major improvements to the public realm is also dealt with in the Core Strategy.
	Question 44	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	There is a need to improve the retail offering and overall environment of Chatham Town Centre, and if this development does deliver this, it would be supported.	The strategy addresses this matter. One of its key aims is to significantly improve the retail offer within Chatham town centre. The Council has also just produced the Best Street / High Street Development Brief which sets out proposals for how new retail and other appropriate uses might be best accommodated. This document has been adopted as a Supplementary Planning Document. The need for major improvements to the public realm is also dealt with in the Core Strategy.
	Question 44	Kent County Council	Richard Feasey	In recent years major stores i.e. M&S and Next have ceased operating in Chatham the town and that has had a major impact on the retail offer in the town centre. The current shopping offer is very much lower end of the market which is not fitting to Chatham's role as a primary regional centre for significant change (RSS Policy TC1). Considerable redevelopment is required to encourage major high street stores to return/locate in the centre and the need for a major injection of core comparison floorspace is acknowledged.	Noted. The strategy addresses this matter. One of its key aims is to significantly improve the retail offer within Chatham town centre. The Council has also just produced the Best Street / High Street Development Brief which sets out proposals for how new retail and other appropriate uses might be best accommodated. This document has been adopted as a Supplementary Planning Document. The need for major improvements to the public realm is also dealt with in the Core Strategy.
	Question 44		W Mann	Yes when access/ transport issues proven to be overcome.	Highway improvements are currently being made in central Chatham. The Core Strategy proposes further park & ride provision.
	Question 44	Open Spaces Society	Patricia Wilson	Q44 & 45. No. With areas of empty retail units the council should concentrate on making the shopping experience more attractive or improving car parking and relocating the central bus station, also improving the river side path which is a disgrace and hazardous at the back of Staples for instance.	The Core Strategy addresses this matter. One of its key aims is to significantly improve the retail offer within Chatham town centre. The Council has also just produced the Best Street / High Street Development Brief which sets out proposals for how new retail and other appropriate uses might be best accommodated. This document has been adopted as a Supplementary Planning Document. Work on a new dynamic bus facility is now underway. It is likely to be operational in spring 2011.
	Question 45			**Q45: Should Chatham also be a priority area for townscape improvements and enhancements to public areas?** Answers for question 45 (from questionnaire & website): 17 Yes/ Agree 3 No/ Disagree 0 Don't Know	

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 45	Kent Wildlife Trust	Debbie Salmon	Townscape improvements provide another opportunity to include enhancements and wildlife corridors within the town centre. Green roofs and walls lend themselves well to retail outlets, wildlife verges or indigenous hedgerows provide linear routes. Public spaces could be planted with indigenous or insect-attracting species and street trees planted in a natural medium will provide habitat for common birds and reduce the heat island effect within the centre, cooling the atmosphere and providing shade.(See The Kent Design Guide Biodiversity Appendix at http://www.kent.gov.uk/NR/rdonlyres/6C743069-88B1-49E2-AFA0-FB60FEEA9695/0/BiodiversityFinal.pdf for further details on townscape enhancement	These matters are addressed in the Core Strategy.
	Question 45	Kent County Council	Richard Feasey	Chatham town centre is very tired and run down and improvements to public areas is a necessity to encourage major retail stores.	The strategy addresses this matter. One of its key aims is to significantly improve the retail offer within Chatham town centre. The Council has also just produced the Best Street / High Street Development Brief which sets out proposals for how new retail and other appropriate uses might be best accommodated. This document has been adopted as a Supplementary Planning Document.
	Question 45	FWCA Frindsbury and Wainscott Community Association	J R Masey	Will be needed after all the disruption. The improvements done in 1992/3 made a big difference, but not appreciated it seems, please keep area open near river. Pedestrians not considered by demolishing St John Hawkins bridge.	The demolition of the bridge has opened up access to the river. The Council is keen that the regeneration opportunities that this presents are properly grasped.
	Question 45		W Mann	Yes, but need to improve other areas where people live (such as Luton High Street in particular) and not just public areas. Need to show public that regeneration is relevant to them.	Regeneration is at the heart of the Core Strategy. Reference is made in it to the need for neighbourhood plans in respect of certain areas.
	Question 45		Dr D Brighton	With Rochester/ Gillingham- small improvements. Do not tarmac concrete roads, like Arethusa road	Noted.
	Question 46			**Q46: Do you agree with the strategies for Strood capitalising on its public transport links and a central area plan to better 'knit' the centre together?** Answers for question 46 (from questionnaire & website): 8 Yes/ Agree 5 No/ Disagree 0 Don't Know	
	Question 46	Lafarge Cement UK	David Simms	With the introduction of domestic high speed rail services, Strood has an important opportunity to benefit from enhanced connectivity within the sub-region. Whilst there is a clear need to consider the central area of Strood, its hinterland should not be ignored. The importance of schemes such as Temple Waterfront in supporting Strood's regeneration, both in terms of being sources of investment in public transport and in establishing important focal points for activity, should be recognised and incorporated as a key element of any such strategy.	Noted. The importance of Temple Waterfront to the regeneration of Strood is acknowledged within the Strood section of the Core Strategy.
	Question 46	Kent Wildlife Trust	Debbie Salmon	See question 45 for suggestions of wildlife enhancements within town centres.	Noted.
	Question 46	FWCA Frindsbury and Wainscott Community Association	J R Masey	There are good crossings for Strood High St so would not agree to pedestrianisation, as shops would suffer. Aveling & Porter building should be incorporated in new development. It is part of Stroods history many wish to save.	Noted. The Strood Masterplan has been produced in order to shape the future regeneration of the town centre.
	Question 47			**Q47: Do you agree with the strategies for Rochester retaining and developing its role as a tourist centre but with some new retail development to better meet the day-to-day needs of a growing local population?** Answers for question 47 (from questionnaire & website): 20 Yes/ Agree 1 No/ Disagree 0 Don't Know	
	Question 47		Gary Brook	Support Our client supports the strategy for retaining and developing the tourist centre of Rochester as this is likely to help attract investment to the area. We consider the Town Centre of Rochester benefits from good transport links and would be an appropriate and sustainable location for a small to medium sized local convenience store. A development proposal of this kind would be well supported as part of the whole comprehensive redevelopment of the Corporation Street quarter to cater for existing population and future residents of the area. It is considered that redevelopment involving both retail and residential development in accordance with the Corporation Street Quarter SPD (2008) together with paragraph 4.154 of the Core Strategy issues and options report would be welcomed and supported.	Mixed-use regeneration in Rochester is a component of the Core Strategy. Proposals of an appropriate mix and scale will be strongly supported.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 47	Kent Wildlife Trust	Debbie Salmon	If further tourism is to be encouraged within Rochester this is likely to increase recreational pressure on the SPAs. The feasibility of extra tourists and the impact they may have on European sites should be explored within the AA.	Noted.
	Question 47	Kent County Council	Richard Feasey	provides a distinctive shopping experience in comparison with other centres in the Medway towns and this should be maintained. However the scope for some additional convenience retail to bolster the centre's role as a neighbourhood shopping centre is supported.	Noted.
	Question 47	Frindsbury and Wainscott Community Association	A Wade	Yes. There is a need for some food retail development -but it should be restricted to encourage local retailers to thrive.	Noted.
	Question 47	Open Spaces Society	Patricia Wilson	Yes, developing its tourism role; but provision of better retail outlets (especially food) to discourage so much travel to Strood, Chatham	Noted.
	Question 48			**Q48: Do you agree with the strategies for Gillingham focusing its efforts on meeting the needs of the rapidly growing student population and the development of Medway Park as a regional sports complex?** Answers for question 48 (from questionnaire & website): 13 Yes/ Agree 2 No/ Disagree 1 Don't Know	
	Question 48	CPRE Kent	Brian Lloyd	As well as students, the strategy for Gillingham should also seek to meet the needs of the indigenous population.	Noted. The Strategy seeks to regenerate the town centre, and to reduce deprivation.
	Question 48	Groundwork Kent & Medway	Simon Green	Yes so long as this also benefits local residents. Many local people do not have cars (to get to other shopping areas) and their low incomes make paying bus fares etc difficult. Gillingham town centre has been damaged historically by Hempstead Valley, and might be more damaged as Chatham is improved so the focus needs to be a on a reasonable range of local retail services for people living and working within a reasonable walking distance.	The Strategy seeks to develop Chatham as a sub-regional retail centre. However, it also seeks to support the other town centres within Medway in order to maintain and boost their overall viability and vitality.
	Question 48	Kent Wildlife Trust	Debbie Salmon	Although primarily developed for sports there are opportunities to establish a wildlife corridor or stepping stones through Medway Park.	Noted.
	Question 48	FWCA Frindsbury and Wainscott Community Association	J R Masey	As long as we retain Deangate also.	Noted.
	Question 48		W Mann	What are 'student needs'?-pubs, bars, discos, cheap cafe, off-licence? Need to improve the area for the permanent residents.	The Strategy seeks to regenerate the town centre, and to reduce deprivation.
	Question 49			**Q49: Do you agree with the strategies for Rainham consolidating it's existing role and becoming a more obvious focus for local services?** Answers for question 49 (from questionnaire & website): 15 Yes/ Agree 1 No/ Disagree 0 Don't Know	
	Question 50			**Q50: Do you agree with the strategies for Hempstead Valley being encouraged to diversify into a more typical district centre with re-investment in its retail function to retain its competitiveness over the longer term?** Answers for question 50 (from questionnaire & website): 15 Yes/ Agree 2 No/ Disagree 1 Don't Know	
	Question 50	CPRE Kent	Brian Lloyd	Yes, this seems appropriate but efforts should also be made to integrate the centre into the local community and make it less car dependent.	Noted.
	Question 50	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Yes, although there is a need to assess impact on smaller local shopping parades etc.	Noted.
	Question 50	Kent Wildlife Trust	Debbie Salmon	See question 45 for suggestions of wildlife enhancements within town centres.	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 50	Kent County Council	Richard Feasey	Consideration should be given to the role of Hempstead Valley being broadened to include some community space, to facilitate night time activities, provide entertainment etc.	Noted.
	Question 50		Alastair Blair	Yes, but no footprint increase of buildings.	Noted.
	Question 51			**Q51: Should the current policy that seeks to retain all local groups and parades of shops be reviewed with a new emphasis being placed on the larger local centres, which serve defined neighbourhoods?** Answers for question 51 (from questionnaire & website): 6 Yes/ Agree 10 No/ Disagree 2 Don't Know	
	Question 51	CPRE Kent	Brian Lloyd	No. Local shops fulfill a useful and valued role that contribute towards making local communities sustainable, and policies should be provided in the LDF that seek to retain them as important local services.	The Council will seek to protect local centres wherever these are still considered viable.
	Question 51	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	No, these are real local shopping they should be retained, but further work may be required to market them and make them more affordable for local residents.	The Council will seek to protect local centres wherever these are still considered viable.
	Question 51	Lafarge Cement UK	David Simms	Existing and emerging local centres should continue to be protected as part of a recognition of their importance to local communities and the way in which they support sustainable patterns of local movement. Creating larger centres will rely on establishing larger catchment areas, meaning that some residents may end up further from facilities. Local shopping parades can be an important community focus and provide day to day needs within the commuity and should therefore be afforded continued support.	The Council will seek to protect local centres wherever these are still considered viable.
	Question 51		Vivienne Parker	We need to be aware that an ageing population is also a less mobile population and keeping shopping is important socio-economically and is more environmentally sustainable.	The Council will seek to protect local centres wherever these are still considered viable.
	Question 51	FWCA Frindsbury and Wainscott Community Association	J R Masey	Should be retained.	The Council will seek to protect local centres wherever these are still considered viable.
	Question 51		W Mann	No. Would this lead to loss of corner shops and local P.O?	The Council will seek to protect local centres wherever these are still considered viable.
	Question 51	Open Spaces Society	Patricia Wilson	Local groups and parades of shops should be cherished in that they encourage local "loyalties" encourage users to use cycles and walking, so reducing car travel. Especially the council should support retention of lost offices.	The Council will seek to protect local centres wherever these are still considered viable.
	Question 52			**Q52: Should explicit protection be afforded to rural shops and associated uses, given the sustainability benefits to the rural area?** Answers for question 52 (from questionnaire & website): 19 Yes/ Agree 1 No/ Disagree 0 Don't Know	
	Question 52	CPRE Kent	Brian Lloyd	Yes, we consider this to be essential. Protection and support should also be provided for other services and facilities in the rural communities, not just shops.	Noted.
	Question 52	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Yes we would support more investigation into how local village shops can be retained and improved. They are currently a very costly alternative and 'drive' those that can to travel long distances for shopping, those that cannot suffer high prices and sometimes very severe restrictions on choice.	Noted.
	Question 52	Trenport Investments Limited	C Hall	One of the most effective 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.	The Council is required to consider the overall sustainability of development. Therefore, development that is likely to generate significant new traffic movements to jobs and facilities some distance from it, is unlikely to be supported.
	Question 52		Mari-Anne Harstad	Yes strongly agree. Organic, local, fruit / veg / butcher and unique shops should also be protected.	Noted.
	Question 52	Dickens Country Protection Society	Chris Fribbins	Rural shops and facilities are likely to come under even more pressure so Rural Issues need to be considered in detail	The Council is required to consider the overall sustainability of development. Therefore, development that is likely to generate significant new traffic movements to jobs and facilities s some distance from it, is unlikely to be supported.
	Question 52		Vivienne Parker	Central Cliffe at Hoo now has no rural shops and given lack of public transport, funding should be sought urgently to develop a basic retail outlet which sources its fresh produce locally so elderly people in particular do not have to travel for their weekly	Noted, but this is not a matter that can be addressed at the Core Strategy level.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				shopping.	
	Question 52	NFU	Kevin Attwood	Whilst use or lose is fine as advice for rural communities where planning policy can protect, enhance and encourage rural shops it must be correct to do so to retain the benefits for rural communities. Medway does not have a large rural area but all too often it seems lost among city aspirations and regeneration policies. It would be good to see adequate reference in the CS.	The Council will seek to protect community facilities wherever they are still viable. The Hoo Peninsula and Isle of Grain, Medway Valley and retail policies within the Core Strategy explicitly address this matter.
	Question 52		Dr D Brighton	Yes. French supermarkets have to sell local product. Reduce small shops business rates.	Noted, but this is not a matter that can be addressed at the Core Strategy level.
	Question 52	Open Spaces Society	Patricia Wilson	Yes, rural communities need all the help they can get, and should be encouraged to support sale of farm produce which probably reduces the amount of packaging as compared with e.g. Supermarkets saves transport from rural people travelling to urban shops, also provide social services with café's facilities "pick your own", sometimes children's activities and education (rural).	Noted, but this is not a matter that can be addressed at the Core Strategy level.
	Question 53			**Q53: What retail function do you think the new settlement at Lodge Hill should have? Do you agree that its retail development should be carefully phased to limit the impact on nearby rural settlements?** Answers for question 53 (from questionnaire & website): 12 Yes/ Agree 0 No/ Disagree 3 Don't Know	
	Question 53	CPRE Kent	Brian Lloyd	As part of the Lodge Hill development, retail provision should primarily be aimed at meeting the day to day needs of the resident population together with a range of other essential community services and facilities. It should not be developed as an out of centre retail destination that will attract people from the wider urban area. We agree that care will need to be taken to manage the introduction of this new retail, but this will be as much about the scale and nature of the retail provided, and the specific retailers involved, as it is about phasing. We consider that the key is to ensure that provision is truly aimed at meeting local needs, and that the size of the units provided is appropriate for this.	The views expressed with regard to local needs provision are dealt with in the Lodge Hill policy in the Core Strategy.
	Question 53	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	There is a mixed reaction to this in the Parish. Lodge Hill has the potential to provide many facilities that are lacking in other areas on the Hoo Peninsula, but this could also threaten what little provision some of our villages have - needs more investigation 'Rural Issues' topic	The Hoo Peninsula and Isle of Grain policy within the Core Strategy explicitly addresses this matter.
	Question 53	tbh developments ltd & helvig ltd	tbh developments/helvig	Retail provision at Lodge Hill should be of a scale to serve its resident population and not of a scale (particularly in terms of large foodstore provision) that would attract journeys by car from within the Medway Towns urban area. The new settlement would be an unsustainable location for any large scale retail development given its free standing location outside the urban area.	Retail provision at Lodge Hill will be required to be at an appropriate scale to serve local needs. It will not be allowed to be excessive in size, so as to threaten the commercial viability of other retail centres elsewhere in Medway.
	Question 53	Dickens Country Protection Society	Chris Fribbins	Although this has the potential to provide a better quality of provision and reduce the need to travel into the urban areas, there will also be impacts on remaining village shops which will need some support - perhaps as part of a 'collective/co=op' with Lodge Hill.	Retail provision at Lodge Hill will be required to be at an appropriate scale to serve local needs. It will not be allowed to be excessive in size, so as to threaten the commercial viability of other retail centres elsewhere in Medway.
	Question 53	Kent County Council	Richard Feasey	A local centre should be provided although the practicality of phasing needs further consideration.	The Lodge Hill section of the Core Strategy addresses this matter.
	Question 53		Alastair Blair	Suitable local shops, pub, church, schools, health services. All development should be phased to minimise impact on all influenced peopled and settlement.	The Lodge Hill section of the Core Strategy addresses this matter.
	Question 53		John Hill	I feel that only retail units to serve the new planned settlement should be provided and yes, this should be carefully phased to limit impact on nearby settlements.	Retail provision at Lodge Hill will be required to be at an appropriate scale to serve local needs. It will not be allowed to be excessive in size, so as to threaten the commercial viability of other retail centres elsewhere in Medway.
	Question 53		Carl Kroon	Lodge Hill retail should work within current local retail and enhance the new community.	Retail provision at Lodge Hill will be required to be at an appropriate scale to serve local needs. It will not be allowed to be excessive in size, so as to threaten the commercial viability of other retail centres elsewhere in Medway.
	Question 53	Frindsbury and Wainscott Community Association	A Wade	Any request for a possible food superstore should be resisted at all costs. The impact on the Hoo Peninsula would be unacceptable.	Retail provision at Lodge Hill will be required to be at an appropriate scale to serve local needs. It will not be allowed to be excessive in size, so as to threaten the commercial viability of other retail centres elsewhere in Medway. However, it is important that proper and adequate retail provision is made within the development in order to ensure that Lodge Hill residents' needs are fully provided for.
	Question 53		W Mann	Yes. Retail development for local needs- Lodge Hill and environments.	Retail provision at Lodge Hill will be required to be at an appropriate scale to serve local needs. It will not be allowed to be excessive in size, so as to threaten the commercial viability of other retail centres elsewhere in Medway. However, it is important that proper and adequate retail

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
					provision is made within the development in order to ensure that Lodge Hill residents' needs are fully provided for.
				Community & Social Infrastructure	
		Medway Renaissance	John Finlayson	Development and investment in these facilities needs to go hand in hand with the development of Medway as a 21st century city. The LDF should present a clear picture of the infrastructure requirements as a result of its policies. A robust evidence base should underpin the infrastructure requirements. The importance of this is further emphasised by the proposed introduction of the Community Infrastructure Levy.	An Infrastructure Delivery Plan is being produced in order to fully address likely infrastructure requirements over the plan period up to 2026.
		Natural England	Josh Nelson	Natural England would support the developments of health initiatives and programmes to connect people with the natural environment through outdoor recreation. To bring about health benefits to the citizens of Medway and encourage engagement with and use of Medway's green spaces, Natural England would recommend the commissioning of health services to enable every GP or community nurse in Medway to be able to signpost patients to an approved health walk or outdoor activity programme.	Noted, but this is not a matter that can be addressed at the Core Strategy level. Nevertheless the Strategy can, and does, address the provision of green spaces, and a green grid. It also promotes improved cycling and pedestrian provision within developments.
	Question 54			**Q54: With a shift away from direct provision to the commissioning of health and social care services how can future accommodation needs be established to allow sites to be identified and safeguarded?** Answers for question 54 (from questionnaire & website): 2 Yes/ Agree 2 No/ Disagree 8 Don't Know	
	Question 54	Kent County Council	Richard Feasey	Commissioning future accommodation needs to take account of facilities which would enable people to live independently for longer, such as community facilities/hubs, combined health and social care resources, investment into technology to enable people to live in their own homes for longer. Future projections of population growth, including growth in the numbers of older people should be used to estimate the projected increase in numbers of health and social care clients.	These matters are addressed within the Housing chapter of the Core Strategy.
	Question 54		Carl Kroon	How about asking the charities, carers and users?	Noted.
	Question 54	FWCA Frindsbury and Wainscott Community Association	J R Masey	A survey should be carried out of the elderly to ascertain their preference for care facilities.	Noted.
	Question 54	Frindsbury and Wainscott Community Association	A Wade	Provision for respite care for elderly and special needs is non-existent on the west bank or soon will be with the sale of Shaws Wood. In spite of public petitions there is a real need for local neighbourhood care.	Noted.
	Question 54		Dr D Brighton	No. Commissioning- contract out, why? A Unitary Authority is funded to provide these, roads and waste etc. not to fund an army of administrators to do it.	Noted.
	Question 55			**Q55: Do you agree with the idea that, as far as possible, facilities should be clustered together at a neighbourhood level?** Answers for question 55 (from questionnaire & website): 15 Yes/ Agree 2 No/ Disagree 0 Don't Know	
	Question 55	CPRE Kent	Brian Lloyd	We agree that it is sensible to co-locate services as far as possible, but it needs to be recognised that different services have different catchment areas. Also, it must be recognised that there needs to be a different approach to providing services in the rural and urban areas respectively. The concept of a 'neighbourhood' may be relatively easy to define in the urban context and they may have the critical mass and ease of access to support and sustain a wide rage of services and facilities. In the rural areas, though, neighbourhoods will primarily comprise individual villages which often will have a more limited population but the demand for local easily accessible services is just as strong. The rural communities should not be disadvantaged by a 'one size fits all' approach to the provision of local services.	Noted.
	Question 55	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Yes - and more definition of what neighbourhood means in the context of the rural areas.	It is fully accepted that the needs of the inhabitants of rural areas need to be considered as part of neighbourhood provision.
	Question 55	Lafarge Cement UK	David Simms	As our response to question 51 demonstrates, we consider that local facilities should be at the heart of communities. In that context, where feasible, health and other community facilities should be located to support local centres - doing so provides greater footfall and a sense of focus which can help to support commercial operations - as well as providing a focus for activity.	Noted.
	Question 55	Kent County Council	Richard Feasey	Strongly agree that facilities should be clustered at neighbourhood level, to align with the Sustainable Communities agenda, and to enable communities to develop in the locality, as opposed to having to travel to the nearest town for services and facilities.	Noted.
	Question 55	Open Spaces Society	Patricia Wilson	The term 'neighbourhood' is very vague, it may be a cluster focused on a village; or on beach/ waterside activities (at Upnor) , or an groupings of ethnic determination.	It is accepted and recognised that different types of neighbourhoods exist. However, provision at a more localised level is likely to usually be beneficial in comparison

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
					to a more centralised approach.
	Question 56			**Q56: The Kent Fire and Rescue Service is currently reassessing its services in Medway. Do you have any views on what pattern of facilities should be promoted?** Answers for question 56 (from questionnaire & website): 5 Yes/ Agree 0 No/ Disagree 5 Don't Know	
	Question 56	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	We would want to see steps to retain village fire stations, the fast response times are appreciated by local residents.	Noted, but this is ultimately a matter that will be determined by the Kent Fireand RescueService, rather than the Local Planning Authority.
	Question 56	Dickens Country Protection Society	Chris Fribbins	Village fire stations should be protected where possible	Noted, but this is ultimately a matter that will be determined by the Kent Fire and Rescue Service, rather than the Local Planning Authority.
	Question 56		I.H. Smith	More local stations - less large depots	Noted, but this is ultimately a matter that will be determined by the Kent Fire and Rescue Service, rather than the Local Planning Authority.
	Question 56			Tailor patterns suitable to meet needs now and the future but do not fund if developers will not.	Noted, but this is ultimately a matter that will be determined by the Kent Fire and Rescue Service, rather than the Local Planning Authority.
	Question 56		Alastair Blair	Obviously what is sufficient to meet local needs, now and in the future.	Noted, but this is ultimately a matter that will be determined by the Kent Fire and Rescue Service, rather than the Local Planning Authority.
	Question 56		Carl Kroon	With new Lodge Hill, Strood side would need expansion. Div HQ to use old Horsted college site once demolished.	Noted.
	Question 56	FWCA Frindsbury and Wainscott Community Association	J R Masey	The mud rescue gear should stay in Strood.	Noted.
	Question 56	Frindsbury and Wainscott Community Association	A Wade	Yes. Fire & Rescue need to be locally based bearing in mind the river and bridge can be a barrier.	Noted, but this is ultimately a matter that will be determined by the Kent Fire and Rescue Service, rather than the Local Planning Authority.
				Leisure, Culture & Tourism	
		Open Spaces Society	Patricia Wilson	Leisure. This heading/ definition lacks inclusion of informal and unorganised activities which is often catered far by open space (see Q66-68) and seems to equate rather with sport.	Sport, green space and green grid provision are all matters that are addressed in the Draft Core Strategy.
			I.H. Smith	Better marketed and fill empty shops quickly and support them	Noted.
		Medway Renaissance	John Finlayson	The regeneration benefits of cultural activity and facilities are recognised. The LDF needs to be clear as how Medway's current offer will be developed and promoted during the plan period. The overall tourist offer -Rochester/Chatham/Gillingham needs to be optimised. Identified weaknesses in relation to a poor evening economy in certain areas, particularly Chatham town centre need to be addressed and the number, location and quality of the hotels.	Noted. These are all important issues that have been addressed in the Draft Core Strategy.
		Natural England	Josh Nelson	Natural England would support recreational facilities - particularly outdoor facilities -providing they are not incompatible with the protection or enhancement of designated nature conservation sites or landscapes. Natural England would particularly support initiatives encouraging local people to use and value the natural environment and would encourage the Council to promote and reduce barriers to engagement with and use of Medway's green spaces; for instance, through participation in walking to health initiatives (WHI).	Noted. The Council is implementing various initiatives to encourage greater use of Medway's green spaces. It is also promoting various initiatives to encourage healthier lifestyles.
	4.199	The Theatres Trust	Rose Freeman	We are pleased to see at para. 4.199 & 4.202 that your theatres are acknowledged and that a new multi-functional cultural development is planned. However, there should be an overarching policy to promote and protect your existing community facilities in the Core Strategy as without such a policy it could become difficult to retain an essential community asset particularly where land values become higher for an alternative use. This policy should 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.	The supporting text to the culture and leisure policy in the Draft Core Strategy refers to the importance of Chatham's two theatres to the Medway economy.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	4.200	Chatham Historic Dockyard Trust	Bill Ferris	Chatham Historic Dockyard is the Lead Museum for Kent and part of one of four lead museums in the SE region under MLA funded Renaissance in the Regions. It is, however, not mentioned in section 4.200 where the other two excellent museums in Medway are credited. Medway should be proud to be home to such a significant institution and should use the status as further evidence of its existing cultural credentials. Even more surprisingly the new project – part funded by Medway Council, CLG and SEEDA - known as National Museums at Chatham (National Maritime Museum and Imperial War Museum) with its permanent and international standard touring exhibition gallery is not referenced at all. This project, due to open in 2010 received support and funding on the basis that it was a force for change in terms of Medway's cultural offer and positioning. Not referencing it is truly perverse and presents a false picture of future provision likely to distort planning and potentially lead to duplication of facilities.	Noted.
	4.201		Barry Knight	Why should it. We're right next door to London.	Noted.
	4.203	The Theatres Trust	Rose Freeman	The Medway Economic Development Statement is quoted on page 58 to firmly establishing Chatham as a city centre of cultural and leisure activities â€¦, therefore the protection of theatres is essential if future generations are to have the opportunity to experience the joys of drama, dance, music and opera and The Theatres Trust wishes to be assured that the Local Development Documents are robust enough to include specific guidance on protecting existing and encouraging new arts and cultural provision.	The supporting text to the culture and leisure policy in the Draft Core Strategy refers to the importance of Chatham's two theatres to the Medway economy.
	4.203	University College for the Creative Arts at Rochester	David Hawkins	The University is grateful for this acknowledgement.	Noted.
	4.204	Rochester City Airport	Paul Britten	There would appear to be no provision for an increase in tourism during the 2012 Olympics. Due to Rochester Airports location in Medway it would make an ideal out of London staging post to reach the games.	The Council has, and will continue to, work to maximise the opportunities for Medway to benefit from the staging of the 2012 Olympics in London. Various initiatives are in place in order to attract more tourists to the area at that time.
	Question 57			**Q57: Should provision be made for a major new stadium? If so where and what form might it take** Answers for question 57 (from questionnaire & website): 5 Yes/ Agree 8 No/ Disagree 1 Don't Know	
	Question 57	CPRE Kent	Brian Lloyd	We are unable to comment on the need for a major stadium, but if such a facility is considered desirable it needs to be sited in a location that provides maximum accessibility by public transport. This would suggest that a site within the urban area would be the most appropriate, as close as possible to a railway station, rather than outside of the urban area on greenfield land.	Noted.
	Question 57	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	On balance the Parish Council would not support this - but if it was provided it must be near rail and major road access (M2 for example)	Noted.
	Question 57		Mari-Anne Harstad	No thanks, small is beautiful! Lets have more smaller event locations that will support more uses, afterall Medway is made up a numer of towns and each one shoudl have its own event arena (small or large) these I feel will be more sustainable and relevant to our many different needs. I also think these are far more likely to be used by local groups and visited by local people vs one large stadium that attracts strangers from outside Medway. Lets treat residents with respect and serve them first.	Noted.
	Question 57	Medway Sports and Leisure Park Ltd	Medway Sports and Leisure Park Ltd	Yes, provision should be made for a major new stadium as the existing site at Priestfield is wholly unsuited to modern day requirements. Gillingham FC is part of the history of the town and the only league football club in Kent. It is one of the few features that puts the locality 'on the map'. Its continued presence in Gillingham should be supported, it being of particular value to the local community. It should be recognised and given protection (paragraph 11, PPG17). It is an existing major sporting facility which needs to be enhanced. The Mill Hill site is unaffected by any of the constraints identified in paragraphs 27-30 of PPG17. Priestfield Stadium is unsuitable for its existing use (let alone improvement) and so Mill Hill accords with paragraph 25 of PPG17, being an urban fringe location. For many years alternative sites for the football club have been considered and discounted. It was concluded that Temple Marsh was unsuitable. The recently considered next alternative site at Chatham Docks would lead to a loss of jobs and would adversely affect the local economy as a consequence. Such a proposal would also be contrary to the provisions of policy T12 of the South East Plan. Indeed the Council at Q26 is considering whether the Dock be given special protection because it is an invaluable, irreplaceable and sustainable transport and employment site. There is no special need for such a resource to be developed for a stadium and housing when this use can be readily located elsewhere. If the Dock was to be developed for non shipping related purposes, this would result in a loss of wealth creation opportunities to the Medway Towns for generations to come. Developing the Docks for non B class employment uses will necessitate the provision of a similar site elsewhere (amounting to some 35 to 40 hectares), located close to the existing employment population. Furthermore, the cost of developing this site would be significant. The high existing use value of the Docks and the significant likelihood of expensive decontamination costs of the former Naval Base will result in the need for a very much higher level of enabling development than a greenfield site in order to ensure the financial viability of the Club. Gillingham Football Club should ideally be located in Gillingham, not Strood, or Chatham. Land at Mill Hill in Gillingham provides a very suitable alternative site for a major new stadium for the following key reasons: - Mill Hill is immediately available.	Noted. However the club have not promoted this, or any other, site to the Council in connection with the core strategy.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				- Access is excellent as it is bounded by the Gillingham by-pass (Yokosuka Way). Public transport links can be readily provided. - It is close to the most densely populated parts of Medway. - It is well related to new residential development at Grange Farm, yet far enough away so as to cause little (if any) direct impact. - The site is of sufficient size to accommodate the Club, its associated parking and other facilities. - Recognising it is highly probable that the club will require some form of associated enabling development, the site is also capable of accommodating this. - Furthermore, the construction cost of such development would be significantly less in respect of a site such as Mill Hill than for previously developed land. For example, there would be no financial burden of decontamination. - Its development will assist in regeneration and much needed employment opportunities, especially in the deprived neighbouring districts of Twydall and Lower Gillingham. - Locations such as Kingsnorth and Chattenden are not in Gillingham, which is the historic home of the Club. They are unlikely to provide such regeneration benefits and are not sustainable locations in their own right. - It would draw people into the area and significantly boost the local economy. - There are no other sites in Medway that can match the advantages that Mill Hill offers. - The community, including residents and supporters, should no longer have to endure sub-standard facilities at the largest sporting facility in Kent and Medway. - In addition to being the home of Gillingham Football Club, it could serve a multi-purpose role – for example a venue for concerts, other sporting events and business conferences. In summary, Mill Hill is immediately available; will not compromise existing employment and business uses and is deliverable. It has the potential to bring an exemplar sporting facility to the Medway Towns. It would act as a regional attraction, and catalyst for regeneration for the area as whole.	
	Question 57		Alastair Blair	Q57-61, All should have a long term plan to relate to the needs of the people in Medway now and to 2026 and beyond.	Noted
	Question 57		Carl Kroon	Combined Rugby/Football with easy access to motorway and rail and bus routes.	Noted
	Question 57		W Mann	Yes. Should primarily be for Gillingham FC, but be able to handle RU if need should ever arise. Need site with good road links e.g. Chatham Maritime alongside No.3 Basin/Pier Approach Road; Adjacent to A289 N of railway; Junction of A289+B2004; Along B2004-Matheus (derelict) riding school	Noted
	Question 57	RSPB	Fay Martin	No. In the wrong location and/or without effective a major new stadium could have a negative impact on features of nature conservation concern, including internationally designated sites, for example by increased disturbance during construction. We therefore strongly recommend this matter be thoroughly appraised in the Habitats Regulations Assessment of the Core Strategy and we would welcome the opportunity to comment further on this matter following the publication of that document.	Noted
	Question 58			**Q58: Should further sports hall provision be made? If so should this be in standalone locations, in conjunction with secondary schools or a combination of both?** Answers for question 58 (from questionnaire & website): 10 Yes/ Agree 3 No/ Disagree 3 Don't Know	
	Question 58	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Yes - both. Also investigate usage of Buckmore Park with Tonbridge & Malling - currently a criminal waste of a facility.	Noted
	Question 58		Mari-Anne Harstad	Yes. Strood and or Hoo Peninsula would be great locations to deliver great sports and healthy living facilities. All should benefit not just schools, changing the culture and availablilty of sport/activity in our rural and poorest areas should be high priority.	Noted
	Question 58		Mari-Anne Harstad	Community centres could easily be developed to include Sports Halls.	Noted
	Question 58		Vivienne Parker	In conjunction with secondary schools.	Noted
	Question 58		John Hill	If really needed. In conjunction with schools.	Noted
	Question 58		Carl Kroon	Combination. New academies have halls and so do university complex. Also sports area a former scout HQ nr Bluebell Hill.	Noted
	Question 58	FWCA Frindsbury and Wainscott Community Association	J R Masey	Both but depends on demand and cost. What happened to Temple School Community Hall plans.	Noted
	Question 58		W Mann	Yes. If Black Lion/Medway Park is lost to average user for badminton, 5-aside, gym etc then need provision elsewhere in schools and/or stadium	Noted
	Question 59			**Q59: How might participation rates in sport be improved in Medway?** Answers for question 59 (from questionnaire & website): 2 Yes/ Agree 0 No/ Disagree	

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				6 Don't Know	
	Question 59		Mari-Anne Harstad	1) Attractive discounts, money is the biggest barrier to particpation. 2) Better choice and availability 3) Cheap / free transport to sports & healthly living facilities would encourage partcipation. My observation is the majority of gym users drive themselves to their club, if you do not own a car or buses or not available at the time and place you choose to go then this actively excludes a large proportion of the population. It is also not sustainable.	Noted
	Question 59			Make them cheaper- offer free passes to people with long term health issues like diabetes, heat conditions etc	Noted
	Question 59		Carl Kroon	Participation has to be because people want to. Time, cost and access are against participation.	Noted
	Question 59	FWCA Frindsbury and Wainscott Community Association	J R Masey	Promoted more in schools. And reduce costs to attend facilities.	Noted
	Question 60			**Q60: Should further significant provision be made for playing fields in Medway?** Answers for question 60 (from questionnaire & website): 14 Yes/ Agree 4 No/ Disagree 0 Don't Know	
	Question 60	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Yes, we are short of provision. Some work perhaps in making these more general purpose as sports tend to only use them for part of the weekend.	Noted
	Question 60	Trenport Investments Limited	C Hall	Trenport would wish to comment that a significant area of additional playing fields could be provided at Cliffe as part of a residential development at the village, which has been promoted by Trenport, including the recent call for sites as part of the Strategic Land Availability Assessment.	Noted
	Question 60	Dickens Country Protection Society	Chris Fribbins	Playing fields need to be designed to be more multi-use and more varied than large areas of mown grass.	Noted
	Question 60		Carl Kroon	The local government and national government are directly the cause of obesity. They destroyed the curriculum and sold off school field to fill their own brown wallets.	Noted
	Question 60	Frindsbury and Wainscott Community Association	A Wade	Yes. Selling playing fields should be resolutely refused. Swimming facilities more locally based. There is a shortage/ non existent local tennis courts for informal use.	Noted
	Question 60		W Mann	Yes (particularly if Q57 leads to loss of playing fields) I suggest Hempstead (opposite Shopping Centre) per current plan.	Noted
	Question 61			**Q61: Is land required for any other significant sports developments? If so, for what and where?** Answers for question 61 (from questionnaire & website): 4 Yes/ Agree 4 No/ Disagree 2 Don't Know	
	Question 61	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Protect what we have	Noted
	Question 61		Sara Fadil	I think that the land that lays around the war memorial on the Lines- the wooded area that goes toward Fort Amherst- As it is now just a spot for drinkers, druggies…etc	Noted
	Question 61		Mike Walters	Rede common would be ideal for promoting affordable model flying facility under British Model Aircraft Rules. See website officially recognises as a sport control line and small radio control.	Noted
	Question 61		Vivienne Parker	Creation of a water park for water sports training in the vicinity of St Mary Marsh to act additionally as a flood lagoon in the event of potential flooding from the Thames.	Noted
	Question 61		Carl Kroon	Children and youth require areas nearby where they can run, climb and ride bicycles/ skateboards.	Noted
	Question 61	FWCA Frindsbury and Wainscott Community Association	J R Masey	Would be nice to return to roller skating at casino in Rochester.	Noted

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 62			**Q62: Should the Reach Project be the focus for new cultural provision, bearing in mind its potentially wider regeneration benefits?** Answers for question 62 (from questionnaire & website): 3 Yes/ Agree 4 No/ Disagree 5 Don't Know	
	Question 62	The Theatres Trust	Rose Freeman	Questions 62 or 63: We are pleased to see a section on this topic but note that there are 5 questions relating to the provision of sporting facilities, two for cultural facilities and two for tourist related items. Cultural activities include the visual arts, music, performance arts, crafts, museums, libraries, theatre and cinema. A visit to the cinema, the theatre, the museum or the library can stimulate the imagination and promote mental well-being and aid lifelong learning and is equally important for residents and visitors as are playing fields and leisure centres.	Noted. The Core Strategy gives clear recognition to the importance of Medway's cultural assets, and to the need to safeguard and enhance these.
	Question 62		Vivienne Parker	The centre of Chatham is less accessible to large parts of Medway and inaccessible intervals of public transport after 7pm. It also denies the dispersed nature of Medway where it takes nearly an hour to travel by car from southern to northern extremities of Medway. Local cultural hubs should be promoted.	Noted
	Question 62	FWCA Frindsbury and Wainscott Community Association	J R Masey	Would be nice to keep the open aspect near the library.	Noted
	Question 63			**Q63: Should provision be made for any other significant cultural projects? ? If so, what and where?** Answers for question 63 (from questionnaire & website):: 3 Yes/ Agree 4 No/ Disagree 6 Don't Know	
	Question 63		Mari-Anne Harstad	Yes a choice of venues should be available for a large Multi-Cultural Festival. Events like these that bring the different groups and stakeholders toghether to celebrate and promote what Medway truly has to offer.	Noted
	Question 63		Carl Kroon	Arts -painting, sculpting, writing, poetry and modelling seem to have been glossed over. Medway has a substantial Arts scene which is focused out of N.A.C. Perhaps in consort with UCA, a month long event highlighting the talent.	Noted
	Question 63	FWCA Frindsbury and Wainscott Community Association	J R Masey	Build a new theatre behind the facade of the theatre royal.	Noted
	Question 64			**Q64: Given a dispersed pattern of hotel development should future provision be restricted to more central sites?** Answers for question 64 (from questionnaire & website): 10 Yes/ Agree 5 No/ Disagree 0 Don't Know	
	Question 64	CPRE Kent	Brian Lloyd	Yes, we agree that this should be the objective.	Noted
	Question 64	Lafarge Cement UK	David Simms	Whilst providing hotel accommodation in central, well connected locations reflects national planning policy guidance and will help to sustain centres, it is important to recognise the diversity in the hotel market, and the need to meet a range of demands - some hotels will therefore need to locate close to other important demand generators, such as strategic highway connections or important commercial activity zones.	It is accepted that there are different types of accommodation requirement that cannot all be met in the same way. The Core Strategy recognises the economic importance to Medway in providing additional visitor accommodation, particularly with regard to the higher end of the market.
	Question 64		Mari-Anne Harstad	Bed & breakfast and small guest houses owners should be better supported. New developments should make space for this type of accommodation all over Medway.	Noted.
	Question 64	GVA Grimley Ltd	Sheery Sassoon	We support the promotion of tourism related uses throughout Medway. We do not consider that hotel facilities should be restricted to town centres but should instead be promoted throughout Medway, including areas near Chatham Maritime such as Colonial House where there is an existing permission for a hotel and in areas where proven to be viable and where the development proposals can be demonstrated to have no detrimental impacts on townscape, the environment and infrastructure capacity. It is considered that the Council should complete a Hotel Needs Assessment to established the anticipated level of demand of tourist accommodation within Medway. (Suggestion- Hotel developments will be encouraged in locations where other tourist facilities are available and where a demand for the facility can be demonstrated through the hotels needs and visitor accommodation assessment.)	Noted.
	Question 64	Kent County Council	Richard Feasey	Hotel development should be focussed on Rochester, Chatham (especially if the Reach project on the Waterfront is achieved) and Chatham Dockyard as easily accessible to Dickens World and the Historic Dockyard.	Noted..

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 65			**Q65: Have you any suggestions as to how Medway's major tourist attractions might be better presented and marketed?** Answers for question 65 (from questionnaire & website): 5 Yes/ Agree 1 No/ Disagree 2 Don't Know	
	Question 65	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Reduce the cost. Investigate heritage 'linkages' and investigate as part of LDF	Noted. Efforts to lengthen the time visitors spend in Medway are being made. Improved linkages between individual tourist destinations will be one way of achieving this, another means of doing so will be further and better visitor accommodation provision.
	Question 65	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Heritage topic in LDF. Exploit more heritage links between sites - a journey through Medway's Heritage	Noted. Efforts to lengthen the time visitors spend in Medway are being made. Improved linkages between individual tourist destinations will be one way of achieving this, another means of doing so will be further and better visitor accommodation provision.
	Question 65	Kent Wildlife Trust	Debbie Salmon	The Trust would have concerns regarding the Medway and Thames Estuary and Marshes SPA being marketed as a tourist attraction. We understand the importance of environmental tourism within Medway but this will need to be managed in order to avoid impacts on European sites.	Noted.
	Question 65		Mari-Anne Harstad	A more 'joined up' approach is required. Without it we will not attract the inward investment we need. The World Heritage bid and Great Lines Heritage Park coudl be a good cataylst for getting this started.	Noted. Efforts to lengthen the time visitors spend in Medway are being made. Improved linkages between individual tourist destinations will be one way of achieving this, another means of doing so will be further and better visitor accommodation provision.
	Question 65	Dickens Country Protection Society	Chris Fribbins	Suggest more linkages between current and underused facilities.	Noted. Efforts to lengthen the time visitors spend in Medway are being made. Improved linkages between individual tourist destinations will be one way of achieving this, another means of doing so will be further and better visitor accommodation provision.
	Question 65	Natural England	Josh Nelson	Major tourist attractions: Natural England is pleased to see the recognition of tourism opportunities afforded by environmental assets, including the internationally designated nature conservation sites of the Thames and Medway Estuary and Marshes. Although we are glad to see recognition of potential human pressures on designated nature conservation sites, we would like to see greater recognition of the potential sensitivity to disturbance of nature conservation interests and the consequent need for nature conservation sites to be well managed in order to ensure that their special interest is not damaged. Preservation and enhancements of landscapes (by reference to landscape character assessment) is important to promoting and sustaining tourism in Medway. Preservation and enhancement of landscape character and biodiversity resources in the Thames and Medway Estuary and Marshes could make a vital contribution to tourism in Medway as long as visitor pressure on these internationally important nature conservation resources is sensitively and sustainably managed. Concentrating on improving biodiversity value in The Great Lines City Park would increase its attractiveness to visitors. In this and all other projects and proposals for green infrastructure provision in Medway, Natural England would recommend the Council are guided by and incorporate the principles set out in the South East Green Infrastructure Framework.	The 'preservation and enhancement of natural assets' section of the Core Strategy deals with impacts on sites of nature conservation importance. The 'countryside and landscape' section of the strategy addresses the issue of landscape character.
	Question 65	Kent County Council	Richard Feasey	The list of tourism attractions in 4.204 identifies most of the major attractions in Medway although it possibly underestimates the potential of the river Medway itself. There are a range of smaller, more local, attractions in Medway that would benefit from improved conservation and presentation and that could in turn contribute significantly to the regions wellbeing, sense of place, and economic potential. Medway has long been an area of military significance for the UK. Much of this importance is derived from the presence of the historic dockyard and the Issues and Options Report suggests that this is appreciated. However, the potential of the defence systems that surround the dockyard are less recognised. In particular, the fortifications of Grain constitute one of the most powerful and varied sets of defence sites in the country. These could play a much greater role in Medway's tourism industry which could be particularly important given the range of challenges faced by that part of Medway. There are additional defence sites along the Medway that could be incorporated into river-based tourism, even if some, such as forts Hoo and Darent could not be visited. Within the Hoo peninsula the remnants of the Second World War GHQ Stop Line forms one of the most complete military landscapes of the Second World War in Kent and in conjunction with the nearby military remains at Chattenden could again play an important economic and social role in this growth area. Further to the west, Cliffe Fort also has an undeveloped tourism potential. Promotion of the cycling and walking opportunities in Medway particularly linked to the wildlife and natural assets of the area. Promotion of a water taxi particularly linking the Chatham Dockyard/Marina to Upnor providing facilities for walkers and cyclists on board to encourage trips over to the Isle of Grain and the Hoo Peninsula.	Noted. The Core Strategy now includes a chapter specifically dealing with the River Medway.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 65		Sara Fadil	local advertising/ online (facebook)	Noted.
	Question 65		Mike Walters	Park and ride facilities on major festivals to alleviate Strood traffic jams.	Noted.
	Question 65		Vivienne Parker	Tie each attraction in with high quality restaurants instead of low quality cafes.	Noted.
	Question 65		John Hill	Refer to truth under their area name (i.e. Rochester or Gillingham) and not Medway.	Medway is the borough's name. However, the individual five towns that form it are still highly valued in their own right.
	Question 65		Carl Kroon	Medway's Big Problem. What is Medway? Medway is a river. City Status.	Medway is the borough's name. However, the individual five towns that form it are still highly valued in their own right. Medway is strongly committed to achieving city status.
	Question 65	FWCA Frindsbury and Wainscott Community Association	J R Masey	Keep Visitors Centre in Rochester open. Also use Aveling & Porter building for culture i.e. gallery, archive, community centre etc.	Noted.
	Question 65		Dr D Brighton	Castle gardens band concerts on Sunday 2-4pm, Jun-Aug. Morning dancing on Sunday, afternoon at central car park area. Eastgate House- central social club, for meeting. Dickens cottage- open (guided) More choir concerts rather than Cathedral organ concerts. Flags outside the Information Centre. Flags on the High Street, June -September	Noted.
	Question 65	Open Spaces Society	Patricia Wilson	Rochester information centre is excellent and cannot be faulted. I doubt that tourism is so well promoted in Chatham and Gillingham. Many interesting sites are not signed well enough to encourage exploration. Council support for Medway little theatre and Medway film society is welcome, both are first-rate, the same cannot be said for the decor of the Brook Theatre, and for lack of tea/ coffee bar.	Noted.
				Landscape, Wildlife, Countryside & Open Space	
		Environment Agency	Jennifer Wilson	The appraisal of the area has not included the significant freshwater/estuarine resource of the Medway River and tributaries. This is a key issue due to the potential opportunities and constraints it may pose to development, with regard to biodiversity and other environmental limits such as water quality. Watercourses also provide a valuable contribution to green networks as corridors, providing great biodiversity and recreational resource. The Water Framework Directive requires all water bodies to reach good ecological quality, and to not deteriorate in ecological quality, with development being an important way in which improvements and deterioration can occur. We look to the Development planning system to be a support to the aims of this Directive, and thus for protection to be afforded to this resource through the councils policies. As lead for the protection of aquatic habitats and species, the Environment Agency will seek to ensure that the protection of aquatic biodiversity is addressed at all levels and stages of the planning system. Beyond this, we believe that the consultation document has picked out the key issues and that a core strategy based on these will provide protection to the valuable components of the Medway area.	Noted. A core strategy cannot deal with the matter in detail but a range of policies provide a basis for ensuring that water quality is fully taken into account.
	4.215	Groundwork Kent & Medway	Simon Green	This section should be expanded and a policy needs to be developed relating to it. There is a very large amount of community and charity activity related to improving and maintaining green and open spaces. Apart from the many voluntary groups affiliated to the Countryside Forum, Medway benefits from three significant professional charities: Groundwork, Kent Wildlife Trust and RSPB. The LDF should recognise and support the role these organisations have in this field.	Noted but the core strategy is not the best vehicle to recognise their un doubted contribution..
	4.216	NFU SE Region	John Archer	The comments on 'insensitive' and 'modern' farming practices are some 20-30 years out-of-date. Since 1987, more than 17,000km of hedgerows have been restored through agri-environment schemes and there are now about 515,000km of hedges on English and Welsh farms. Since 1997 the Hedgerow Regulations have prevented the unrestricted removal of hedges. Modern farming practices do not include the over-application of insecticides. The agricultural use of chemicals is highly regulated both by government agencies and by the industry-led Voluntary Initiative. Apart from improvements in application methods, the usage has reduced from 35.6 million kg in 1997 to 22.4 million kg in 2006. Some cases of pesticide pollution have been traced back to amenity users, including local authorities. On the other hand, 6 million hectares of farmland is in Environmental Stewardship of some sort (65% of all elegible land). Farmers and growers are fully engaged in improving environmental conditions and providing cost effective landscape management for the wider public good. Repeating tired anti-farming propaganda from a bygone age is not likely to engender enthusiastic co-operation from farmers today.	Noted. The Council recognises the importance of conservation work undertaken by farmers, and is committed to assisting it wherever possible.
	4.222	NFU SE Region	John Archer	The NFU agrees with the Government position. The plethora of existing statutory designations is sufficient protection and we agree that criteria-based policies should be used. Admittedly our interest is based on experience of non-statutory designations adding to the restrictions on agricultural development in the countryside. All our valued landscapes are semi-natural and were shaped originally by farming. The unreasonable restriction of agricultural development will simply hasten the removal from the land of the very people whose forebears created the landscape and who now manage it as part of their day-to-day business.	Noted.
	Question 66			**Q66: Should adaptation to climate change be a cornerstone for our strategy for the countryside, given the probable need to protect large areas to allow habitats to adapt and species to migrate as global temperatures rise?** Answers for question 66 (from questionnaire & website): 20 Yes/ Agree 4 No/ Disagree 0 Don't Know	
	Question 66	CPRE Kent	Brian Lloyd	Yes, the need to understand the impact of climate change on the countryside is extremely important and the LDF needs to be proactive in identifying and delivering necessary adaptations.	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 66	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Yes adapt AND protect habitats.	Noted.
	Question 66	Trenport Investments Limited	C Hall	No. The cornerstone for Medway's strategy for the countryside should be to support rural communities, including maintaining levels of services and facilities, possibly through additional development and expansion of suitable settlements, if necessary, and diversifying the rural economy. (See response to question 52 for amplification of this issue).	The Council is committed to ensuring the long-term sustainability of Medway's rural communities. The policy on landscape and the countryside allows for development in accordance with PPS4 and PPS7 subject to a number of safeguards.
	Question 66	Kent Wildlife Trust	Debbie Salmon	The Trust would support landscape scale enhancement to mitigate the effects of climate change on the natural world. As global temperatures rise flora and fauna species will need to move to cooler climates. Landscape scale enhancement will also provide the following benefits. • Provide buffering for internationally, nationally and locally designated sites to protect them from impacts of increased population and construction. • Provide safe migration corridors through the urban environment. • Ensure increased contact with biodiversity for urban populations. • Connect, create and extend Biodiversity Action Plan habitats. • Contribute to the national and international BAP targets • Enable urban population to enjoy wildlife increasing physical and mental health. • Ensure connections between districts and across county boundaries to enable species to move throughout Britain. Within discussions with Swale and Gravesham the Trust has proposed that to ensure protection of the three estuarine SPAs extensive connected habitat networks should be created as mitigation for all developments within the three districts. For the proposed habitat creation to be delivered contributions from developers would need to be pooled and the network mapped, to ensure no impact on the European sites or the birds that use them. The Biodiversity Opportunity Areas, if adopted would help in the delivery of landscape scale enhancement and would enable Medway Unitary Authority to conform to the Principals contained within Defra's guidance on Conserving biodiversity in a changing climate: guidance on building capacity to adapt at http://www.ukbap.org.uk/Library/BRIG/CBCCGuidance.pdf The Trust would be happy to discuss this further and we would also recommend that Medway Council contact the Kent Biodiversity Partnership for further information on BOAs. (See attached report produced by the RSPB and KWT in consultation with the EA on possible impacts arising from development planned within Swale, Medway and Gravesham.)	Noted although these are matters to be addressed primarily through the development management system..
	Question 66		Mari-Anne Harstad	My opinion is this is far too a specific question to ask. A more active debate should explore to fully understand what implications would be. Can we have some soft strategies in the local development framework which include practical actions to engage and empower the local community so that people can connect to the development and regeneration that directly affect them.	Noted. The Core Strategy identifies a number of bodies and projects which involve people in the implementation of environmental policies
	Question 66	Dickens Country Protection Society	Chris Fribbins	This is probably just one of a number of strategies and would not stand on its own	Noted. Policies on natural assets, landscape, open space and climate change seek to protect, extend and enhance natural habitats.
	Question 66	Natural England	Josh Nelson	Natural England would agree strongly that adaptation to climate change should be a cornerstone for the Council's strategy for the countryside given the increasing evidence of impacts upon habitats, landscapes and species associated with rising global temperatures. Natural England would support the use of policies to both preserve and enhance existing environmental assets but also to extend these areas where possible; and further to allow for the creation and maintenance of habitat stepping stones and functional corridors to assist species migration in response to changing climatic conditions. Natural England would recommend that the regional Biodiversity Opportunity mapping produced by the South East England Biodiversity Forum is used to inform policies on habitat creation and enhancement.	Policies on natural assets, landscape, open space and climate change seek to protect, extend and enhance natural habitats.
	Question 66	Environment Agency	Jennifer Wilson	Yes. Key issues surrounding this are the need to mitigate for the loss of intertidal habitat through coastal squeeze, and ensuring that biodiversity has the scope to move through the landscape in response to changing conditions, and that the landscape has the ability to adapt and continue to provide ecosystem services. The first stage of this is recognising what services are provided and the threats to these. We would recommend that a strategic green network is identified and that this is protected, through core strategy policies and potentially also through a Supplementary Planning Document, as part of adaptation to climate change and to give a clear direction to development now and in the future.	Policies on natural assets, landscape, open space and climate change seek to protect, extend and enhance natural habitats. However, land has not yet been safeguarded to create habitat in mitigation for the loss of intertidal habitat as the approach to be taken has not yet been raised by the Environment Agency.
	Question 66	Kent County Council	Richard Feasey	Yes. Adaptation to climate change should be a cornerstone of countryside strategy. It should take into account projects such as BRANCH and the Wildlife Trust Living Landscapes. Providing habitats for species does not mean that people are excluded from the area - users can get increased enjoyment from areas which are beneficial to biodiversity. Additional comments - When considering areas for expansion/development the impact they will have on protected species and habitats (through scoping surveys and if necessary further specific protected species surveys) should be considered as an integral part of the design of development in order to incorporate them rather than having to provide mitigation for the loss of habitat. If any habitats and protected species will be impacted (indirectly or directly) mitigation strategies should be produced to ensure there is no net loss of habitat.	Policies on natural assets, landscape, open space and climate change seek to protect, extend and enhance natural habitats. The open space policy makes provision for a green grid, which encourages public access to green spaces. The natural assets policy seeks the incorporation of wildlife habitat in development schemes.
	Question 66	NFU	Kevin Attwood	No. The effects of climate change at the level of Medway are not yet sufficiently quantified or understood to make it the cornerstone of a countryside strategy.	Policies on natural assets, landscape, open space and climate change seek to protect, extend and enhance natural habitats.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 66	RSPB	Fay Martin	Yes. The RSPB considers that climate change presents one of the greatest threats to biodiversity. The planning system has a key role play in protecting the environment, including addressing the causes and effects of climate change. The RSPB would therefore welcome a proactive approach to protected areas to allow habitats and species to adapt to the effects of climate change. We would therefore welcome a requirement for development to pursue a net gain in biodiversity as this is promoted by PPS9.	The policy on natural assets makes provision for environmental compensation to be sought on more than a like-for-like basis.
	Question 67			**Q67: Given Government advice to replace landscape designations with criteria based policies and local character areas, which of the following options should be considered for landscape protection:** **1. Retention of Areas of Local Landscape Importance?** **2. Use of criteria based policies as advocated in Government guidance?** **3. A new system of Integrated Land Management based on individual landscape character areas?** Answers for question 67 (from questionnaire & website): 1: (12 Yes/ Agree; 1 No/ Disagree; 1 Don't Know) 2: (4 Yes/ Agree; 10 No/ Disagree; 0 Don't Know) 3: (9 Yes/ Agree; 6 No/ Disagree; 1 Don't Know)	
	Question 67	CPRE Kent	Brian Lloyd	Firstly, we would highlight that part of the Kent Downs AONB falls in Medway and being an important national designation this clearly needs to be acknowledged in the Core Strategy. Although Government guidance generally discourages repetition of policy at the local level, we consider that it is appropriate for the Council to include a policy in the Core Strategy that sets out the importance of the AONB in the Medway context and to present how AONB policy will be applied locally. With regard to the local landscape designations (special landscape areas as well as ALLIs), we note from the State of Medway Report on Natural Assets and Open Space (paragraph 1.4) that these may be retained if a special justification can be made. We would like to explore in detail with Medway Council what would comprise this special justification, as we are of the view that these important, and widely valued, designations should be retained if possible. Indeed, we note that the Secretary of State specifically saved Policy BNE34 of the Local Plan (Areas of Local Landscape Importance) to give the opportunity to the Council to justify their retention in the LDF. PPS7 encourages the use of a generic policy approach to landscape character, rather than local designations. We accept that there is merit in this approach in that it would recognise the landscape character of all parts of the countryside, provided it is based on a robust landscape character assessment that is adopted as Supplementary Planning Guidance and which is specifically referred to in policy. However, we are more attracted by the 'Integrated Countryside Management' approach as potentially a more sophisticated approach, especially if this means that specific character areas area defined on the Proposals Map. Before endorsing this alternative approach, however, we would wish to better understand how it would operate and how it might change the established approach to development in the countryside.	They Council considers that, together with policies on the protection of natural assets and open space, the criteria based policy on landscape and countryside together with the Medway Landscape Character Assessment provides a more comprehensive means of protecting the countryside as a whole, than ALLI's alone. It does not see the need to pursue the integrated land management course, as this would require a reassessment of the landscape character to a greater level of detail than is required for the purpose of countryside protection.
	Question 67	Barratt Strategic		We feel the council have to use a criteria based policy, rather than landscape character assessments when looking at how to protect local landscape areas. Para 24 of PPS7 is clear on this point. It states:-"The Government recognises and accepts that there are areas of landscape outside nationally designated areas that are particularly highly valued locally. The Government believes that carefully drafted, criteria-based policies in LDDs, utilising tools such as landscape character assessment, should provide sufficient protection for these areas, without the need for rigid local designations that may unduly restrict acceptable, sustainable development and the economic activity that underpins the vitality of rural areas."Para 25 goes on to state:-"Local landscape designations should only be maintained or, exceptionally, extended where it can be clearly shown that criteria-based planning policies cannot provide the necessary protection. LDDs should state what it is that requires extra protection, and why. When reviewing their local area-wide development plans and LDDs, planning authorities should rigorously consider the justification for retaining existing local landscape designations. They should ensure that such designations are based on a formal and robust assessment of the qualities of the landscape concerned."Given the above we do not see how the council can try to retain the Areas of Local Landscape Importance. Likewise we do not feel that a new system of individual landscape character areas would be a realistic approach to adopt.	The Council considers that together with policies on the protection of natural assets and open space, the criteria based policy on landscape and countryside together with the Medway Landscape Character Assessment provides a more comprehensive means of protecting the countryside as a whole, than ALLI's alone. It does not see the need to pursue the integrated land management course, as this would require a reassessment of the landscape character to a greater level of detail than is required for the purpose of countryside protection.
	Question 67		Lillian Harrison	The use of criteria based policies as specified in Government Policy (not guidance) should be the chosen route for this issue. Designation of local landscape areas (including ALLIs) in emerging LDFs places far too much, un-necessary restriction on future economic development.	The Core Strategy advocates this approach within its 'countryside and landscape' policy. Medway Council considers that together with policies on the protection of natural assets and open space, the criteria based policy on landscape and countryside together with the Medway Landscape Character Assessment provides a more comprehensive means of protecting the countryside as a whole, than ALLI's alone. It does not see the need to pursue the integrated land management course, as this would require a reassessment of the landscape character to a greater level of detail than is required for the purpose of countryside protection.
	Question 67		Owen Sweeney	1.I should like to endorse the arguments and support others who request the retention of ALLIs in Medway, particularly the views put forward by Medway Countryside Forum. 2.This position is based partly on personal experience of Public Inquiries in both Medway and Swale which provides additional evidence of the need for ALLIs. 3.Inspectors at those Public Inquiries listened carefully to the numerous cases put forward by landowners and potential developers-and their lawyers-to encroach onto or nearly eliminate some of the existing ALLIs for housing and other development.In addition to their pleas to build on specific sites within the ALLI designated areas, it was clear that, during these PI discussions but also more generally, developers collectively were conducting a massive campaign and attack on the whole concept of ALLIs.They used every opportunity to denigrate their existence	Medway Council considers that, together with policies on the protection of natural assets and open space, the criteria based policy on landscape and countryside together with the Medway Landscape Character Assessment provides a more comprehensive means of protecting the countryside as a whole, than ALLI's alone. It does not see the need to pursue the integrated land management course, as this would

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				and made no bones about their wish to see them removed totally from Local Plans. 4.It was equally clear that the local councils and planners involved, in those cases pursued by developers against existing local plan intentions, wanted to prevent development and ably used to the full in their arguments the overt ALLI designations to justify their opposition to such development. 5.In the end, Inspectors in the disputed cases found in favour of the local councils and it was clear that the act of designation weighed heavily, if not totally, on that publicly well-supported layer of landscape protection in the Inspectors' minds. 6.We should think very carefully, therefore, about the consequences of losing any part of that hierarchy of landscape designations which appropriately complements the existing wildlife hierarchy through local, county/unitary, national and European/International levels. And nowhere more so than in Medway. 7.Why do we say this? Of all the councils here in Kent, local residents know the pressures Medway is under for houses, employment land, transport etc stemming from the Thames Gateway regeneration. Medway Countryside Forum has consistently said over recent years that whilst the Thames Gateway planning documents claimed that this was a balanced framework, virtually all of the emphasis and publicity went on the building and development side of the coin and so relegating the importance of the need for green "infrastructure", urban green lungs, buffer-zones, fringe areas, visual amenities etc equally there in the framework and particularly for heavily-urbanised conurbations like Medway. 8.In that sense, we are not like much of the rest of Kent. Although many residents did not want a unitary authority here, what is the point of being different in Medway if our Council does not make use of the separate and unique powers it possesses to relate them specifically to the needs of Medway? What we are saying is that Medway has already taken too many hits on its ever-reducing natural environment recently and if we are to have any hope of protecting the last remaining "separations", green lungs etc the last thing we should be doing is removing a tried and tested layer of protection which has served us well in the past, because of its clarity and definition, and replacing it with an ambiguous, fuzzy and vulnerable assessment capable of subjective argument and partisan advocacy. Make no mistake, landowners/ developers would love to see the removal of ALLIs and replaced with a policy full of loopholes owing to its lack of designation. For the sake of Medway residents, our Council/planners should not forego this effective means of development control. 9.We say that Medway Council should acknowledge that the existing ALLIs do reflect those green areas in the towns and their surrounds which deserve specific retention, as designated areas, even if they are grounded on criteria-based character assessment. And if Medway is the only part of Kent which retains ALLIs, with their vital act of definition, then so be it for there is a good case that Medway needs ALLIs more than the rest of Kent because of its built-up nature and Thames Gateway responsibilities. 10.To summarise our case:- - ALLIs have served Medway - and outside Medway - well in the past in protecting such valued green lungs from development - we do not believe that Government dictates that Medway Council has to drop ALLIs for the option is there to argue for them and we wish our Council to do this, please - there is nothing to be ashamed of in having a hierarchy of landscape designations alongside a wildlife hierarchy. If we are dismissive of ALLIs, does this go for SLAs too and, in the future, perhaps AONBs? A ladder with only one rung is hardly a ladder. Yes, we know that the K&MSP is no longer extant but that does not mean that the Inspector - who accepted our arguments for the retention of ALLIs and SLAs at the last Examination in Public - was wrong in his reasoning and conclusions after that serious debate - by all means use criteria-based landscape character assessment or any other favoured methodology but it is the act of designation that counts - the act of defining ALLIs is also a signal to residents that this is a valued piece of green environment locally which should be respected and appreciated. It can also act as a spur against dereliction by landowners which our Council can use, if necessary, to encourage those who may be negligent - appreciating defined ALLIs is all part of encouraging local residents to take more "ownership" and concern for their nearby natural environment without necessarily travelling to more distant hot- spots/attractions - please remember that Medway Countryside Forum is not just a few community-minded individuals. Those who have loyally attended meetings over many years/commented thoughtfully on many Council documents etc often speak for tens or hundreds of people in their respective nature conservation bodies, residents/community associations etc and we should like our Council to recognise such on issues important as this - because of its key position in the Thames Gateway, Medway of all places in Kent needs ALLIs. 11.For the above reasons, we reject any dismissal of ALLIs by Government, planners or others that to support ALLIs is backward-looking and out-of-date or that other ways are self-evidently more "intelligent". We believe they have proved their worth, are recognised and supported by the public, and any moves towards a less defined, ambiguous and amorphous status for these essential green lungs for Medway would seriously endanger their future existence. Please retain designated ALLIs for the sake of Medway residents and those who follow us.	require a reassessment of the landscape character to a greater level of detail than is required for the purpose of countryside protection.
	Question 67	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Retain Areas of Local Landscape Importance (in some cases explain their part in Medway's heritage). Also use criteria based policies where appropriate Would want to investigate more the benefits, or otherwise of Integrated Land Management	Medway Council considers that together with policies on the protection of natural assets and open space, the criteria based policy on landscape and countryside together with the Medway Landscape Character Assessment provides a more comprehensive means of protecting the countryside as a whole, than ALLI's alone. It does not see the need to pursue the integrated land management course, as this would require a reassessment of the landscape character to a greater level of detail than is required for the purpose of countryside protection.
	Question 67	tbh developments ltd & helvig ltd	tbh developments/helvig	Once again the evidence base is not available on which to make a properly informed judgement on the options set out. Option 1 appears at face value contrary to Government guidance in PPS7 and therefore unacceptable. Option 2 cannot be properly evaluated without knowing what the criteria based policy will be (or would this be a separate policy for each character area?); Option 3 again cannot be properly evaluated without knowing the details of individual land management strategies.	Medway Council considers that together with policies on the protection of natural assets and open space, the criteria based policy on landscape and countryside together with the Medway Landscape Character Assessment provides a more comprehensive means of protecting the countryside as a whole, than ALLI's alone. It does not see the need to pursue the integrated land management course, as this would require a reassessment of the landscape character to a

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
					greater level of detail than is required for the purpose of countryside protection.
	Question 67	Kent Wildlife Trust	Debbie Salmon	Integrated Land Management is usually not based on Landscape Character Assessments as generally these focus as much on the man made environment rather than what should be naturally present, however Canterbury City Council has commissioned Jacobs to undertake a Landscape and Biodiversity Assessment. This is a groundbreaking document, which combines landscape character with biodiversity goals. The Trust supports this document and would recommend that Medway Council consult with Canterbury regarding the method used. The Ecosystems Approach is put forward by the Convention on biological Diversity and international organisation, which has three main aims. • the conservation of biological diversity. • The sustaninable use of its components • The fair and equitable sharing of the benefits from the use of genetic resources. The ecosystems approach has been formulated to endeavour to achieve the aims. The restoration of natural landscapes is advocated for example grazing marsh with efforts to increase water quality and flood previously drained land. There would also be a push to reconnect large areas to ensure resilience to any changes in for instance climate. The main aim is to increase biodiversity with exploitation of the resources that natural management provides. In the case of grazing marsh this could be meat production, flood attenuation or tourism. The local population should be fully involved in the management process and should reap the rewards. However all activities should have no impact on the ecosystem so tourism should not cause bird disturbance and grazing should be at levels which will maintain the grazing marsh rather than damaging it. Both national policy PPS9 and The Natural Environment and Rural Communities Act and regional policy NRM5 and CC8 reflect this approach as do the Biodiversity Opportunity Areas, the Branch Project and the Living Landscapes work undertaken by the Wildlife Trusts. The Trust would urge Medway to examine these projects when considering their Green infrastructure as adoption of BOA's will ensure links are contiguous throughout Britain .(For further information on The Ecosystem Approach see http://www.cbd.int/doc/speech/2009/sp-2009-06-29-japan-en.pdf and http://www.cbd.int/ecosystem/sourcebook/ For Biodiversity Opportunity Areas map for the South East see http://strategy.sebiodiversity.org.uk/map.php for report on method used to identify the BOAs see http://strategy.sebiodiversity.org.uk/data/files/BOA/opportunity_area_mapping_methodology_0808.doc For biodiversity opportunity statements see http://www.kentbap.org.uk/resources/boas/	The Medway Core Strategy advocates a criterion-based approach in line with government policy. This is set out in the 'countryside and landscape' policy.
	Question 67		Mari-Anne Harstad	Too often we accept Government 'guidance' without challenging what is right for our own area. Each location is unique and shoudl be treated as such.	Noted.
	Question 67	Dickens Country Protection Society	Chris Fribbins	A mixture of ALL of these is required.	Noted.
	Question 67	Natural England	Josh Nelson	Natural England would support the Council in its desire to move away from the use of local landscape designations in line with government guidance, as long as sufficient recognition and protection is given to important landscapes outside the protective designation of the Kent Downs AONB. Natural England would welcome the use of our work on Ecosystems Services in formulating an appropriate approach to the protection and enhancement of Medway's important landscapes; we would be happy to assist the Council in developing any approach the Council wishes to put forward to deal with any replacement of current local landscape designations.	Noted.
	Question 67	Environment Agency	Jennifer Wilson	All options should be considered. An SPD may be relevant for landscape protection in order to explore the issue in more detail and give stronger guidance to developers as to what is necessary -this may introduce the system of Integrated Land Management.	Noted and a landscape character assessment has been prepared.
	Question 67	Rochester Bridgewood Ltd	Rochester Bridgewood Ltd	Areas of Local Landscape Importance should be deleted as a countryside protection tool as the broad-brush approach is a blunt instrument that does not recognise the individual characteristics of specific areas. Their status has been diminished over time with Central Government guidance advising that little weight should be afforded to land with such a designation. The time has come for this to be removed completely.	Medway Council considers that together with policies on the protection of natural assets and open space, the criteria based policy on landscape and countryside together with the Medway Landscape Character Assessment provides a more comprehensive means of protecting the countryside as a whole, than ALLI's alone. It does not see the need to pursue the integrated land management course, as this would require a reassessment of the landscape character to a greater level of detail than is required for the purpose of countryside protection.
	Question 67		Mercer	PPS7: Sustainable Development in Rural Areas states that criteria based policies such as Landscape Character Assessments should provide suitable protection to Areas of Landscape Importance not subject to national designations, as rigid local designations may unduly restrict acceptable sustainable development. Accordingly, Areas of Local Landscape Importance should be replaced with a criteria based policy approach.	Noted.
	Question 67		John Hill	Q67-72. Provided that full "safeguards" are incorporated.	Noted.
	Question 67	NFU	Kevin Attwood	Government guidance in PPS7 advocates criteria-based policies and this should be the basis of the CS to follow government guidance and be soundly based. The integrated land management system is a step beyond government guidance and is not appropriate. Rather recognition of agriculture and its role as custodian of the landscape would be preferable.	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 67	Medway Countryside Forum	David Murr	Q67(2). Refers to criteria-based landscape policies as advocated by the government. We believe that the existing policy BNE34 (Areas of Local Landscape Importance) in the adopted Medway Local Plan is indeed based on a set of ˜criteria - or statements " justifying the designation of specific areas where the retention of the essentially rural character should be the first priority with reference to integrated land management, this need not be precluded by a policy of retaining designated landscapes.	Noted.
	Question 67	Frindsbury and Wainscott Community Association	A Wade	1) Yes. Retention of Areas of Local Landscape Importance is of paramount importance. Necessary criteria already exist in the adopted local plan page 83 Policy BNE33 para.3 -what other criteria is necessary? We suspect a development agenda. No mention of conservation areas 2)No. Protection of green belt 3)No. Retaining and protecting the Strategic Gap between Medway and Maidstone -why not?	Noted.
	Question 67	Open Spaces Society	Patricia Wilson	This Society is strongly in favour of Option 1 namely the Retention of Areas of Local Landscape importance for the following reasons: 1. As a voluntary worker for this Society, formerly the Commons Open Spaces and Footpaths Preservation Society founded in 1865, the cornerstone for my work has been the Medway Local Plan (2003). The guidance provided for the Built and Natural Environment by Policy BNE 34 was and is first-rate in its simple analysis of sites, many of which have been the subject of our comments, such as Hogmarsh Valley, Horsted Valley, Chattenden Ridge, Nashenden Valley, Mierscourt/ Meresborough, Cliffe Pools and Halling Common. The nub of this Policy is 'the area's landscape character and function.… Providing an attractive setting to the urban area and surrounding villages, and so marrying the green infrastructure to urban areas and rural settlements. 2. This designation as distinct from many others in the Local Plan received special mention by the Inspector in linking it to the Thames Gateway- a greenspace strategy for Thames Gateway" (2004) on its very first page asserts that the core principles outlined need to inform the regional spatial strategies and local development framework that combine to shape environmental quality in this area. Why, therefore, should either Option 2 or 3 be superimposed on Thames Gateway? 3. Greening the Gateway (6.16) stresses that local people have a vital role to play and there is need for community involvement, going so far as to say the success of the Gateway landscape will be determined in large part by the extent of support from local people in establishing and caring for their local element of greenspace network, and reinforcing local distinctiveness. However, if this is to translate into action and achievement, we 'locals' need all the help we can get, since the Unitary Authority is such a large and diverse area. What we need to hang on to is relatively straightforward comprehensive Guidance, and this we have in the designations currently provided in the Local Plan for Areas of Local Landscape Importance. We view with dismay any projected abandonment of such a valuable tool. 4. There is added virtue in retaining this designation to encourage involvement of local citizens. With widespread concern about the loss of social cohesion, here is what may prove to be a common interest in where we live and what our surroundings are like- in other words, a sense of place. Action may vary from individual to groups, from physical to literary such as participating in the planning process, but if one does not understand the basic values of landscape, then citizens are loth to become involved. 5. In your Core Strategy report we welcome positive comments at paras. 4.210 and 4.220 about the present ALLO designation, which endorse the conclusions of the MLP. The fact that 'local people have consistently strongly supported these designations' encourages us to hope that you will avoid the confusion of imposing another different layer of methodology in the Thames Gateway. You explain that Government favours a change which it openly admits would reduce "need for rigid designations that might unduly restrict acceptable development". Acceptable to whom we ask? We ask you to support Option 1.	Noted.
	Question 68			**Q68: Which 'strategic' countryside projects and initiatives should be incorporated into the Core Strategy?** Answers for question 68 (from questionnaire & website): 5 Yes/ Agree 0 No/ Disagree 6 Don't Know	
	Question 68	CPRE Kent	Brian Lloyd	We would support all of the projects outlined in paragraph 4.217 of the Issues and options document, and there should be a strong commitment in the Core Strategy to delivering them.	These projects are recognised in the Core Strategy.
	Question 68	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	All applicable projects and initiatives should be included - and room for more.	Noted.
	Question 68	Lafarge Cement UK PLC	David Simms	Lafarge is committed to the 'Valley of Visions Project' for the bringing forward a range of enhancement projects in the Medway Valley. This strategic countryside project should be incorporated into the Core Strategy.	The Valley of Visions is included in the landscape and countryside chapter in the Core Strategy.
	Question 68	Kent Wildlife Trust	Debbie Salmon	All conservation activities within the area should be identified and their work incorporated into the habitat network. To ensure multifunctionality, organisations from e.g. conservation, archaeology historical societies and leisure services, should work together to deliver and manage the Green Infrastructure.	Agreed.
	Question 68		Mari-Anne Harstad	The LDF is a good tool to assist enable delivery of ALL countryside projects and initiatives including the Biodiversity Action Plan. They are all in existance for a reason and so a collaborative approach is required to maximise this opportunity. The diversity in the groups/organisations/plans/strategies must not be a barrier to representing theuir vision, values and people they represent.	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 68	Natural England	Josh Nelson	Strategic countryside projects and initiatives We would agree with inclusion within the Core Strategy of the plans strategies and projects set out at paragraph 4.217 of the Issues and Options Report, namely: - Greening the Gateway and Thames Gateway Parklands - The Kent Downs AONB Management Plan - The Valley of Visions Project - Four Parishes Plan - Medway Green Grid We would recommend strongly that the Council refers to and incorporates the guiding principles of the South East Green Infrastructure Framework in bringing forward specific projects and, also, in its approach generally to green infrastructure provision in Medway1. We would request the Council pays sufficient regard to the potential development and recreational pressures on designated nature conservation sites in its bringing forward of any projects that could affect such sites and that proposals are designed to and/or incorporate measures to avoid any adverse effects on nature conservation interests. 1 Available to download from http://www.gos.gov.uk/497648/docs/171301/SEGIFramework.finaljul09.pdf	Noted.
	Question 68	Environment Agency	Jennifer Wilson	TE2100 and Environment Agency Regional Habitat creation plan identify the need for managed realignment sites and the associated freshwater grazing marsh. Several sites within Medway Council's authority could provide the potential for creating this habitat providing opportunities for enhanced biodiversity. The South East Biodiversity Strategy aims to provide a framework for the delivery of biodiversity targets. Biodiversity Opportunity Areas identify priority areas for the restoration and creation of Biodiversity Action Plan habitats to restoring ecosystems and ensuring wildlife can respond to climate change, maintaining and enhancing Medway's biodiversity value.	The 'Core Strategy provides a clear policy framework in relation to this.
	Question 68		Vivienne Parker	Protection of the countryside corridors into the town centre to preserve the "trefoil" appearance of Medway and the nearness of everyone to the countrtside.	The open space policy aims to protect countryside corridors into the urban areas.
	Question 68		Alastair Blair	Maintain all existing rural areas (Rainham, Capstone and Hoo) as a legacy for future generations.	Policies on natural assets, landscape and open space offer protection to the rural area
	Question 68		Carl Kroon	Greening the Gateway Medway Green Grid Valley of Visions Four Parishes Increase number of allotments	The 'Core Strategy provides a clear policy framework in relation to this.
	Question 68	FWCA Frindsbury and Wainscott Community Association	J R Masey	Protection of farmland. Stonehorse Lane should be returned to a wildlife corridor and stepping stones as it was before being severed.	Noted.
	Question 68		W Mann	-Implement Green Grid - Implement 4 parishes project - Implement climate amelioration per Q8 - Turn Sir Terry's vision into a practical plan and implement - Get RSPB moving at Cliffe Pools, contrast what we have there with RSPB site at Rainham, Essex	The 'Core Strategy provides a clear policy framework in relation to this
	Question 68		Dr D Brighton	Yes. Marked walking routes be mapped better, e.g. Upper Halling to Cuxton. -potted history of Rochester, including Abdication house. - Rochester Museum down protected history, like Museum of London. = London Story	Noted.
	Question 68	RSPB	Fay Martin	Yes. Given the South East Plan requirement to deliver 16,300 dwellings in Medway by 2026, the RSPB considers that Medway should liaise with Natural England in respect of the specialist work that is being undertaken to investigate the existing and predicted recreational pressures on the internationally designated sites. This work can help to inform appropriate mitigation measures to offset the negative impacts of development. Mitigation is likely to include areas of alternative green space, access management and wardening of water based recreation. Policy CC8 (Green Infrastructure) of the South East Plan recognises the potential broader role of open space in mitigating the impact of growth on sites of international nature conservation importance. We would therefore welcome a commitment provide appropriate mitigation, including alternative green space to reduce recreational pressure on European Sites.	The 'Core Strategy provides a clear policy framework in relation to this
				Minerals	
	4.233		Lillian Harrison	It should be clarified that the 13.25mtpa related to LAND WON sand and gravel (not including marine dredged/secondary and recycled or imports, which are identified elsewhere as 'assumptions' in the Guidelines),	The up to date government national and regional guidance for land won aggregate supply is reflected in the Medway Core Strategy policy for aggregate mineral supply.
	4.234		Lillian Harrison	The figure referred to in the second sentence, appears to be incorrect. The current SEERA consultation for land-won sand and gravel is for 9.01mtpa, a considerable reduction on the June 2009 CLG Guideline figure for the south east (which equates to 12.18mtpa). In later editions of this CS, it should be explained that this figure is going to be (or has been) subject to scrutiny at the Examnination in Public of the South East Plan Land-won Minerals Policy (M3) in October 2009.	The inaccuracy is noted and will be corrected in the next iteration of the Medway Core Strategy.
	Question 69			**Q69: Do you agree that sand gravel reserves at Grain and south east of Hoo St. Werburgh are the most suitable to meet Medway's required regional contribution? If not, what alternative locations would you propose and have you any evidence that they could be commercially exploited?** Answers for question 69 (from questionnaire & website): 9 Yes/ Agree 5 No/ Disagree 2 Don't Know	
	Question 69	CPRE Kent	Brian Lloyd	These are environmentally sensitive areas, but we are unable to comment in detail as we are not sure of the extent of the land involved. We would wish to see more detail before providing specific comments.	The need to safeguard mineral bearing areas will be represented graphically in the Core Strategy.
	Question 69	ScottishPower	Chris Girdham	The extraction of these mineral resources is supportable in principle, provided that any further mineral extraction or related development is compatible with other important land uses, which include energy generation, and any other environmental and socio-economic priorities	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 69	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	This is supported, although there would need to be positive management of lorry movements on and off site.	Noted.
	Question 69	National Grid Property Holdings Limited		Representation made on behalf of National Grid Property Holdings Ltd by Planning Perspectives LLP. We assume that the sand gravel reserves at Grain are those located on the Medway Produced plan entitled "KEY ISSUE: Options for Mineral Extraction; Hoo and Grain"? If this is the case, we note that the options for extensions include the area of land either side of the Grain Road just to the north of the National Grid landholding. There is no in principle objection to these landholdings being utilised for this purpose, but this should not interfere with the significant strategic development potential, energy related uses and employment opportunities that exist on the wider National Grid, Isle of Grain landholding. There should not be a specific LDF allocation for aggregate mineral extraction on the Grain site, because this could impinge upon its significant employment land potential. We feel that the existing allocations proposed in the existing Medway Local Plan should remain as they are, because this gives greater flexibility and will allow the most appropriate development to take place on this strategically important site in the future.	The geological evidence does not support the presence of river terrace gravel deposits of any material economic size within the area owned by the National Grid at Grain.
	Question 69	Kent Wildlife Trust	Debbie Salmon	It will be important when considering locations for gravel and sand extraction on the Hoo peninsular and Grain that any effects on the SPAs are taken into account within the AA and appropriately mitigated. In all cases the Trust would recommend that once extraction ceases the pits be enhanced for wildlife. (For further details on restoration of minerals sites for Biodiversity see After Mineral Restoration for Nature and Communities at http://www.afterminerals.com/projectinfo.aspx	Noted.
	Question 69	Dickens Country Protection Society	Chris Fribbins	Yes, although lorry movements need to be managed.	Noted.
	Question 69			Minerals exploitation should not be undertaken in designated nature conservation sites or outside such sites in a fashion, extent or manner that would adversely impact on the nature conservation interest of the sites. Protection of wharves for aggregate importation should likewise ensure that designated sites are protected. We would refer to our answer to question 7 for further detail on the terminal at Cliffe.	Noted.
	Question 69	Natural England	Josh Nelson	Minerals exploitation should not be undertaken in designated nature conservation sites or outside such sites in a fashion, extent or manner that would adversely impact on the nature conservation interest of the sites. Protection of wharves for aggregate importation should likewise ensure that designated sites are protected. We would refer to our answer to question 7 for further detail on the terminal at Cliffe.	Noted..
	Question 69	Mineral Products Association	Andrew Bromley	This is an unusual question to be asking the public. It is the responsibility of the council to decide which sand and gravel resources are most suitable to meet Medway Councils required regional apportionment.	The point is noted.
	Question 69	Kent County Council	Richard Feasey	Yes - subject to confirmation of deliverability. Consideration of mineral reserves should be extended expanded to the need for safeguarding of resources beyond the current plan period including the role of 'buffering' around mineral safeguarding areas to protecting them from inappropriate development. Substantial gravel reserves by Grain power station could provide potential supplies for the long term. Para 4.235 refers to Perry's Farm having an estimated 150,000 tons remaining whilst the earlier of State of Medway Minerals Report refers to estimated reserves of 165,000 -214,500 tons . Are these two references to capacity compatible?	Updates from aggregate monitoring exercises now indicate that there are no longer any (June 2010) economically viable deposits at Perry's Farm, Grain.
	Question 69		Alastair Blair	River and sea dredging should be considered. Plus a more positive thrust through recycling. The Dutch do it and they export to Kent.	These are in terms of land based facilities but extraction below the high water mark is not subject to the planning regime.
	Question 69	FWCA Frindsbury and Wainscott Community Association	J R Masey	Providing the land is returned to the same condition as agreed now.	Noted..
	Question 69	RSPB	Fay Martin	No. Although no details are provided on the precise location or boundaries of the potential sand and gravel reserve sites at Hoo St. Werburgh and Grain, the broad locations are closely related to the Medway Estuary & Marshes SPA and Ramsar sites and the Thames Estuary & Marshes SPA and Ramsar sites, respectively. The RSPB's view is that direct land take from designated nature conservation sites must be avoided, as must land take from sites with existing non-designated nature conservation value. Sites adjacent to SPA / Ramsar wetlands must be avoided to ensure that extraction operations do not cause a disturbance impact on internationally important bird populations. We strongly recommend this matter be thoroughly appraised in the Habitats Regulations Assessment of the Core Strategy and we would welcome the opportunity to comment further on this matter following the publication of that document All mineral extraction sites should have a presumption that restoration will be to nature conservation after use, including reedbed and open-water habitats. This will enable Medway to make a positive contribution to Kent Biodiversity Action Plan targets.	Restoration of mineral workings is a requirement of the mineral planning system under the Environment Act 1995. The actual form of restoration suitable to the locality would be a matter addressed at the planning application stage.
	Question 70			**Q70: Do you agree that Medway's existing minerals importation wharves should be safeguarded for the long term?** Answers for question 70 (from questionnaire & website): 16 Yes/ Agree 2 No/ Disagree 0 Don't Know	

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 70		Lillian Harrison	YES. National Policy in MPS1 makes it clear that aggregate wharves and their associated infrastructure (including railheads, wharfage and associated storage, handling and processing facilities for the bulk transport by sea or rail of minerals) should be safeguarded. This policy also extends to requiring existing concrete batching plants to be safeguarded. This policy also requires potential storage, handling & processing areas at these facilities to be safeguarded. It is therefore essential that the aggregate importation facility and associated infrastructure (including railhead) at Cliffe are safeguarded in the Medway CS as a nationally/regionally important strategic site for aggregates.	Noted.
	Question 70	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Yes, but as previously commented - there needs to be protection/enforcement of use of railway connections where available for offsite movement. The potential conflict of access to the river side and heritage sites such as Cliffe Fort needs to be managed.	The fortification at Cliffe is a Scheduled Ancient Monument protected by the provisions of the Ancient Monument and Archaeological and Areas Act 1973. The operator of the North Sea Terminal at Cliffe will have to ensure that the fortification is secured from any adverse impacts or the Secretary of State is able to enforce the provisions of the act. Access to the riverside along defined Public Rights of Way have to be maintained by the authority to ensure access can safely be maintained and allow the operation of the marine aggregate wharf to continue.
	Question 70	Kent Wildlife Trust	Debbie Salmon	The Trust has no objections to the importation wharves being safeguarded so long as there is no increase in container traffic that could affect the SPAs. However any increase in size or volume will need to be assessed as to its impacts on European sites.	Noted.
	Question 70	Dickens Country Protection Society	Chris Fribbins	Yes, but note previous comments regarding sensitive management of riverside location and heritage.	Noted.
	Question 70	Mineral Products Association	Andrew Bromley	Yes, all infrastructure related to the strategic transport of minerals should be safeguarded in line with national policy (MPS1, Para.13.).	Noted.
	Question 70	Kent County Council	Richard Feasey	Yes -see also comments under Question 7 above. .	Noted.
	Question 70	RSPB	Fay Martin	The existing minerals importation wharves at Thamesport and Cliffe are situated in a highly sensitive location, adjoining the Thames Estuary & Marshes SPA and Ramsar sites (Thamesport and Cliffe) and Medway Estuary & Marshes SPA and Ramsar sites (Thamesport only). Any such proposals for the intensification of the port activities would have the potential to undermine the integrity of the European Sites. We strongly recommend this matter be thoroughly appraised in the Habitats Regulations Assessment of the Core Strategy and we would welcome the opportunity to comment further on this matter following the publication of that document.	Noted. Medway Council is currently discussing the scope and extent of the appropriate assessment with Natural England, the Environment Agency and adjoining authorities prior to preparing a screening document and appointing a consultant to carry out the assessment.
	Question 71			**Q71: Do you agree that there is no case for safeguarding chalk and clay reserves as there are no specific national or regional requirements to do so and there is no current quarrying taking place for the cement industry?** Answers for question 71 (from questionnaire & website): 6 Yes/ Agree 6 No/ Disagree 3 Don't Know	
	Question 71	Lafarge Cement UK PLC	David Simms	Separate representations have been made by Lafarge Cement UK PLC pointing out that there is a strong case for safeguarding chalk reserves in the vicinity of the proposed Medway Works. These representations state: 1.0 Introduction 1.1 Lafarge welcomes the opportunity to respond to the above consultation. The comments below are in response to the 'Minerals' section of the consultation, specifically 'Non aggregate Minerals' (paragraphs 4.250 – 4.261 and Question 71). 1.2 In summary, Lafarge considers that there is a case for safeguarding chalk reserves and the basis of this view is set out below. 2.0 Background to Cement Manufacture in the South East 2.1 For 150 years the heart of British cement manufacture, the South East now hosts no active manufacturing at all. Northfleet cement works was the last, closing in 2008. Nor is there any longer any operational clinker manufacturing capacity in adjoining regions. Westbury cement works (Wiltshire) was mothballed in 2009 and Barrington (Cambridgeshire) was closed at the same time. 2.2 Currently, therefore, the nearest British manufacturing capacity to Medway is at Cauldon (Staffordshire) Hope (Derbyshire) and Ketton (Rutland). 2.3 Medway, the South East and adjoining regions therefore depend upon imported cement, either via road and rail from Hope, Ketton or other more distant factories, or via sea from Europe to one of several import terminals, including Theale (Berkshire), Northfleet and West Thurrock (Essex). 2.4 In November 2001 planning permissions were granted to Lafarge for Medway cement works, between Halling and Snodland.	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				Although the majority of the cement works and quarry areas lie within Kent and Tonbridge & Malling, a significant portion is within the administrative area and planning control of Medway Council. In 2003 planning permissions were granted by both Medway and Kent for the rail sidings to serve the works. Medway and Kent County councils, therefore, share the planning control over the developments. 2.5 All of these permissions have been implemented and development has been taken to the point of preparations for the actual cement works construction. However difficult and, recently, deteriorating commercial conditions have meant that it has not yet been possible to bring Medway works to completion. 2.6 It is however wrong of the I&O Report to say, as it does at paragraph 4.254, that the UK is too expensive for cement manufacturing. Although cement is typically more expensive to manufacture in the UK (and Western Europe) than in, say, the Near or Far East, what matters to a customer and to an economy as a whole is the cost at the point of use: that is, the manufacturing and distribution costs. As cement is a high bulk, medium value, product, transport costs loom large in the overall delivered cost. Lafarge, as a world-wide cement manufacturer, certainly trades cement between countries, including importing into the UK, but such movements are – to use a parallel with electricity generation – “peak load” supplies. The “base load” of supply is usually better handled by local manufacturing, which also has benefits to local economies and avoids the logistic difficulties of sea-borne import. 2.7 In recent years a further important consideration has come to the fore. In addition to relative economics, customers and specifiers are increasingly influenced by the carbon footprint of the cement they buy/specify. It will therefore be critical that a majority of cement is manufactured locally with imports used only to "top up" to deal with fluctuating demand. 2.8 This approach is endorsed by the fact that all four UK cement manufacturers have pursued similar policies of modernising their best-placed cement works and all, despite the current economic difficulties, continue to develop projects intended to improve UK manufacturing and cement transport capabilities. 2.9 It is, therefore, Lafarge’s firm intention to develop Medway Works through to production. Although in the current the economic downturn global cement companies’ investment plans have been thrown into turmoil, the continued rise and volatility in energy prices and the need for a sustainable UK cement industry should result in further consolidation to fewer larger and more energy-efficient cement making facilities. 2.10 In turn the chalk reserves currently permitted at Medway, and possible extensions thereof, should be safeguarded in both Medway and Kent. They are world class deposits that will one day form an integral asset for inward investment and become part of a valuable UK manufacturing asset and result in cement manufacturing continuing in the South East for many years to come. 3.0 Conclusion 3.1 Therefore, Lafarge considers there is a strong case for safeguarding chalk reserves in the vicinity of the Medway Works project (1). The basis of safeguarding is set out in MPS1 paragraph 13, where the first bullet point suggests Mineral Safeguarding Areas in order that proven resources are not needlessly sterilised by non-mineral development; the third bullet point suggests defining Mineral Safeguarding Areas (MSAs) in Local Development Documents “to alert prospective applicants for non-minerals development to the existence of valuable mineral resources.” 3.2 Such an approach would also secure the future of the permitted reserves against conflict with future alternative development within, say, a 500m stand-off from the planning permission limits. While the risk currently is minimal, as the land concerned is currently owned by Lafarge, that might not remain the case during the longer term. In that event, the public interest in a major South East cement manufacturing facility could be protected by safeguarding. 1 Traditional cement manufacture used chalk and clay, usually quarried in separate quarries. Medway Works will use chalk and marl (the clay-rich lower chalk strata), won from a single quarry. Lafarge therefore has no argument to make that clay per se should be safeguarded but chalk and its underlying chalk marl should be.	
	Question 71	Kent Wildlife Trust	Debbie Salmon	The Trust supports the conservation of habitat from excavation if possible, however if quarries are needed the Trust would recommend that they be enhanced for wildlife when excavation ends.	Noted.
	Question 71	Dickens Country Protection Society	Chris Fribbins	We would agree that there is very limited scope remaining	Noted.
	Question 71	Mineral Products Association	Andrew Bromley	No, MPS1 (Para.13) does not specify what minerals should be safeguarded, however there is a requirement for Mineral Planning Authorities to define Minerals Safeguarding Areas (MSAs) for all resources that are, or may become economically viable in the foreseeable future. As both clay and chalk have been quarried historically they must be of value and therefore safeguarded.	MPS1 makes clear in paragraph 13 that it is the presence proven resources that should be safeguarded. Proven means that the nature of the deposit has been investigated and documentation to demonstrate the economic nature of the deposit supports the safeguarding of the area where the resources are presumed.
	Question 71	South East England Partnership Board	Tom Kingston	With reference to question 71, chalk reserves need to be safeguarded in line with South East Plan Policy M4. We recognise the points in paragraph 4.256; however safeguarding does not necessarily mean the mineral will be exploited and it is needed to protect against sterilisation from non-minerals development.	Noted.
	Question 71	Kent County Council	Richard Feasey	There may be a distinction to be drawn between not identifying preferred areas for working in the absence of currently quantifiable requirements and safeguarding of resources for the longer term. The latter should certainly be closely considered. Kent currently has one active site producing London Clay (Norwood on Sheppey). This site has only a 3 year reserve. As we have jointly discussed the potential for locally sourced London clay of the purpose of flood defence maintenance and enhancements needs to be pursued /confirmed with the Environment Agency in the interests of both the Medway CS and the Kent MWDF CS.	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 71			Out of town sites, which do not impact on major communities.	Noted
	Question 71		Carl Kroon	Events are changing all the time and to not have access to local chalk and clay would be foolish.	The Chalk is a massive geology in the area and despite being significantly covered by landscape protection designations access could be made for the sustainable exploitation of this resource if the 'need' were to outweigh the environmental impact(s).
	Question 71			May be a need to examine the cement industries needs in more detail to establish if chalk safeguarding is required.	The point is noted.
	Question 71	FWCA Frindsbury and Wainscott Community Association	J R Masey	Understood planning was passed for works at Holborough.	The planning permission has been implemented by the developer/operator put progress to fully implement the quarrying and plant site has not yet occurred.
				Waste	
			Alastair Blair	Waste management should focus on recycling everything. Development of South London waste partnership could be used as a model.	Noted. The waste hierarchy recognises that it will generally be the case that not everything can be recycled.
				Transfer stations should have a second area where items are bought- money to the council. Examples can be found in Hampshire.	Noted.
		Medway Renaissance	John Finlayson	National waste targets will require 50% of waste in Medway to be recycled/composted by 2026. Yet no question about promoting recycling, The LDF needs to be clear as to how the Council will provide, develop and implement a more sustainable waste strategy.	Noted.
		Environment Agency	Jennifer Wilson	The waste strategy does not really identify any synergy with waste and energy, although reference is made to Allington and Belvedere WtoE incinerators. However Medway is served by important port facilities and transport links, which potentially make it a key area for possible waste/energy enterprise parks and innovative waste treatment, linked to the work being done by the cluster of universities in hazardous waste streams, including paper & power stations ashes and other wastes like pharmaceutical wastes and river dredging. This should be a consideration. There is also no significant mention of secondary construction and demolition wastes and recycling allowing replacement of virgin aggregate.	These matters are addressed in the draft core strategy..
		Natural England	Josh Nelson	Waste facilities should be designed and constructed to avoid detrimental impacts on the natural environment and, in particular, statutorily designated nature conservation sites and the Kent Downs AONB.	Noted.
			Barry Knight	No mention of neighbourhood waste and the scarcity of litter bins in the parts of Gillingham that I frequent. It doesn't exactly encourage people not to litter.	Noted but these are not matters that can effectively be addressed through the core strategy.
	Table 4	Environment Agency	Jennifer Wilson	The table within this paragraph should be amended to clarify that the figures quoted are in thousands of tonnes, the table as it stands does not state this, so is misreporting the figures by a factor of 1,000.	The table is correct; the figures are in real tonnages
	Table 5	Viridor Waste Ltd	Mandeep Jutley	We understand that Plot L includes Pelican Reach. It would be helpful for the Core Strategy to make clear what site / area is being referred to,	Noted but the core strategy cannot define such areas.
	4.282	Viridor Waste Ltd	Mandeep Jutley	In accordance with PPS 10, we support the approach in the Core Strategy for communities to take more responsibility for their own waste - to enable sufficient and timely provision of waste management facilities to meet the needs of their communities, particularly through waste disposal at nearest appropriate installations (PPS10 para 3)	Noted.
	4.289	Viridor Waste Ltd	Mandeep Jutley	We support the approach to creating industry clusters in appropriate locations, and believe Medway City Estate is a candidate. Although Medway City Estate is an employment area, the nature of uses within this area is comparable with industrial areas. As recognised in the Waste Report (January 2009), there is capacity for waste recovery at land between Royal Eagle Close and Clipper Close, and this site should therefore be allocated.	The Medway Core Strategy will not allocate sites as a site specific Development Plan Document would. If further capacity to divert wastes from landfill is required the quantum and general location where it can be delivered will be in the plan.
	4.291	Viridor Waste Ltd	Mandeep Jutley	We question why it is desirable to have a network of smaller facilities to handle a full range of materials collected from local companies. This site would remain suitable for a waste transfer station as well as for other recovery processes. This should be acknowledged in the Core Strategy.	Noted.
	4.293	Environment Agency	Jennifer Wilson	Whilst it has been recognised void space is soon to run out in the district, the options infer if markets allow for London Clay to be a viable product, void space would subsequently be made available for landfill. Seeing landfill in the future as a possible solution to disposing of waste does not seem to embrace new technology and processes in dealing with waste, with little reference possible energy production from waste, i.e. anaerobic digestion processes.	Noted and the matter is addressed in the draft core strategy.
	Question 72			**Q72: What provision should be made for additional waste disposal capacity, based on in vessel composting and other new technologies?** Answers for question 72 (from questionnaire & website): 2 Yes/ Agree 2 No/ Disagree 3 Don't Know	
	Question 72	Viridor Waste Ltd	Mandeep Jutley	The Core Strategy should recognise and build on the recovery capacity at land between Royal Eagle Close and Clipper Close, as identified in the Waste Report (January 2009).	This recovery capacity has been well understood and reflected in the waste policy of the Core Strategy.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 72	Biffa Waste Services	Mary Tappenden	Provision clearly needs to be made for additional waste management capacity in Medway for recycling, treatment and disposal. The plan identifies that waste is currently being transported out of the district to Rainham in Essex, an arrangement that it is acknowledged cannot continue. Tables 5 to 8 identify the scale of the shortfall in capacity but in order to be considered sound the plan needs to go further. Recent draft guidance on minerals and waste policies in LDF's issued by PINS states at paragraph 2.3 that "essentially the Core Strategy should indicate WHAT minerals and waste management developments and facilities are required; WHERE they are to be located; WHEN they are to be provided; and HOW they will be delivered…. Where specific sites can be identified, they should form the subject of allocations, either as strategic allocations in the Core Strategy, or in subsequent site allocations DPD's. Otherwise broad locations and/or areas of search should be clearly identified in the text and shown in the key diagram. Where there are cross boundary issues such as the transfer of minerals and/or waste from one administrative area to another, these should be addressed. This is particularly important where there is a reliance on another area to provide part of the strategic requirement for minerals or where waste is managed and disposed of outside the plan area". The Core Strategy as it stands identifies WHAT is required but does not indicate WHERE new facilities are to be located. We consider that the plan should at least identify areas of search for recycling and treatment facilities to meet the identified need. The Core Strategy should be technology neutral and should not rely on in vessel composting as a solution. Where landfill is concerned, the plan identifies that approximately 3 million tonnes of residual waste from the Medway area may need to be disposed of by 2026. Further at paragraph 4.293 the plan identifies that there is no existing permitted void space in the area and that only landfills/landraise in London Clay may be acceptable. The Core Strategy needs to illustrate the extent of London Clay in the Medway area and to identify potentially suitable sites for landfill/landraise. It is incumbent upon the Local Authority to investigate such sites with relevant landowners to determine deliverability. For example you will be aware that Biffa submitted a planning application for a northern extension to the Shakespeare Farm site. Although this land is not within our control and we therefore cannot promote it through this plan, consultations on our previous application showed that such a facility could be technically viable. Potential proposals such as this should be investigated through the plan process. Finally, paragraph 4.292 identifies that there is substantial capacity at the permitted Belvedere and Allington Energy from Waste Plants and the inference is that waste from Medway could be handled by these facilities without the need to provide further capacity in North Kent. Whilst this may be the case, there is no evidence to support this claim. The Core Strategy needs to identify how much capacity there is at these two facilities and how much is already committed and for how long. The two facilities were promoted on the basis that they were required to meet a pressing need for London and the South East Region and it is not clear whether there is any spare capacity for Medway's waste.	Noted and provision is made in the draft core strategy.
	Question 72	tbh developments ltd & helvig ltd	tbh developments/helvig	Unlike other parts of the Issues and Options Report, this chapter seems to have a reasonably comprehensive evidence base, although the statistics for commercial and industrial waste become confusing. What is lacking is any clear indication that the Council has a Core Strategy in mind on which to consult. For example, the report states that incineration capacity in North Kent outside Medway is likely to be adequate to meet needs (implicitly including Medway's needs) but then cites a need for new landfill capacity. This appears somewhat contradictory. If there is no contradiction this needs to be explained. The report seems to largely ignore the impact of regeneration initiatives at Temple Marsh on waste handling capacity for commercial and industrial and construction waste because several waste management facilities will be lost by redevelopment within that area. What is very evident is that there is a need for new waste management capacity in Medway for facilities to recover waste as a raw material or for re-use, or to process waste so that it can be recycled. This capacity is needed across most if not all waste streams (that is municipal, commercial and industrial, and construction). The Core Strategy should clearly identify what additional capacity is required and how and where this can be provided. The Issues and Options report has also been based on a premise that the Medway Council 25 year municipal waste contract has been let which is not, as a matter of fact, the case. The municipal contract is being re-tendered and will not be let for a further 2 years. The Core Strategy must therefore make provision for the necessary facilities to collect, treat and dispose of Medway Council's waste within its own area if a sustainable municipal waste strategy is to be incorporated in the LDF.	These matters are addressed in the draft core strategy..
	Question 72	Dickens Country Protection Society	Chris Fribbins	New ways of processing waste are going to be required. Locations need to be sensitive to their environment and issues such as lorry movement, external lighting, noise and smell need to be managed carefully.	Noted.
	Question 72	Environment Agency	Jennifer Wilson	For the reasons presented in paragraph 4.283 we would suggest that provision for new waste management capacity based on recycling and recovery technologies may be best made in partnership with neighbouring authorities, as happens elsewhere in the country. Waste management planning is in many ways becoming more strategic as European and Government policies are forcing a movement away from the traditional solution of cheap landfill towards technologies that recover value from waste. These new technologies are typically capital intensive. Waste minimisation and recycling mean that after many decades of growth, waste volumes are beginning to level off and fall in some cases, and that waste is being managed in more diverse ways. The more this happens the wider the catchment area for a particular waste facility becomes. This means that new facilities may be developed on a county or regional level. That said, given the existing population of Medway, and the proposed development of additional housing, the borough could be an appropriate location for new waste recycling and recovery operations, and would provide a local market for the export of products from those processes, such as electricity or heat. Consideration should also be given to planning new capacity to treat and recycle construction and demolition waste. An Environment Agency study which estimated the amounts of construction and demolition waste that may be produced as a result of the Governments housing targets for the Thames Gateway suggest that additional capacity to manage this waste stream will be required, and that some of this capacity, most probably as a Soil Treatment Centre, could be located in Medway. The estimates for Medway are for around 230,000 tonnes of non hazardous	Noted. The Council is always happy to work in partnership and many of these points are covered in the draft core strategy.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				waste from construction of new homes, and from demolition, clearance and excavation of sites prior to construction around 380,000 tonnes of inert waste 420,000 tonnes of non hazardous waste and nearly 350,000 tonnes of hazardous waste. In terms of managing contaminated soils, we would support the use of a hub and cluster type approach, or the development of fixed soil treatment centres.	
	Question 72		Carl Kroon	Q72 & 73."In Vessel" areas need to be sited where populations are, they need to be subdivided more and include more types. They need to be emptied more often or actually emptied; the use of Allington incinerator needs to be transportation by barge up River Medway to Allington. Dredging of river which has been neglected.	Noted.
	Question 72	RSPB	Fay Martin	No. The RSPB supports the waste management hierarchy: Reduce - Reuse - Recycle - Recover. On the basis of the above hierarchy the focus should be placed on achieving higher levels of waste reduction and recycling before other technologies such as energy recovery or ultimate disposal should be considered.	Noted.
	Question 73			**Q73: Should a cluster of complementary facilities be promoted for waste handling, treatment and disposal? If so, in what location?** Answers for question 73 (from questionnaire & website): 8 Yes/ Agree 1 No/ Disagree 3 Don't Know	
	Question 73	Viridor Waste Ltd	Mandeep Jutley	As set out previously, the land between Eagle Way and Clipper Close is an ideal location. The Medway City Estate attracts non-office based industries, and this would provide a focus and steer for the area.	Noted.
	Question 73	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	We would support a wide range of waste processing options.	Noted.
	Question 73	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	From our understanding there is likely to be little benefit to the rural areas of this.	Noted.
	Question 73	tbh developments ltd & helvig ltd	tbh developments/helvig	The former Alloy Wheels site (now called Temple Park) at Priory Road, Strood, offers the opportunity for such a cluster of waste handling, treatment and disposal facilities and is a sustainable location being previously developed land within the urban area where the majority of Medway's waste is produced.	The Medway Core strategy will not identify specific sites; overall capacity has to match arisings to effect sustainable self-sufficiency
	Question 73		Mari-Anne Harstad	I would like to see a more sophisticated waste management system in Medway and wish for more investment to be made.	Noted.
	Question 73	Environment Agency	Jennifer Wilson	We would support the development of a synergistic waste economy within Medway, with waste transfer, treatment and reprocessing capacity to turn treated waste in a raw material that could be used as raw materials in the manufacture of new products. However, we do not believe that it is a necessary prerequisite to new waste developments, as other factors such as environmental constraints, proximity to waste producers or end users, access to good transport links, land availability, economic and social have a bearing on the decisions that are taken. A planning policy that ensures that permissions are only granted to high quality, low environmental impact, good neighbour waste management facilities would encourage this type of approach. By creating synergies, demand is created for the collection and treatment of recycled material which provides a more stable market for the providers and users of recycled materials.	Noted.
	Question 73		I.H. Smith	In an area of very low population	Noted.
	Question 73	FWCA Frindsbury and Wainscott Community Association	J R Masey	Extension of Viridor's on Medway City Estate maybe!	Noted.
	Question 73		W Mann	Yes. Utilise Kingsnorth	Noted.
	Question 74			**Q74: Should provision be made for the creation of new landfill void or a land raising option considered to address Medway's long term landfill requirements? If so, in what location?** Answers for question 74 (from questionnaire & website): 5 Yes/ Agree 6 No/ Disagree 3 Don't Know	
	Question 74	CPRE Kent	Brian Lloyd	No, we do not consider that landfill or land raising is an acceptable means to dispose of waste.	Noted.
	Question 74	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	We see no justification for this or, especially, any suitable sites.	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 74	National Grid Property Holdings Limited		Representation made on behalf of National Grid Property Holdings Ltd by Planning Perspectives LLP. There is a suggestion by Medway Council that there is a need to identify an area within Medway for a specialist waste facility. Whilst the National grid landholding at the Isle of Grain could be seen to be a suitable location for this type of facility, we do not think that it should be designated for this purpose at this stage in time. If the existing allocations for B1 (Business), Class B2 (General Industry), Class B8 (Storage and Distribution), special industrial uses and industrial uses not in a use class remain in place at the Isle of Grain, this does allow some scope for this kind of facility in the future if it is deemed to be necessary. However, other more mainstream employment uses should be investigated to ensure that the Isle of Grain's potential as a strategic employment location is fully explored in the first instance.	Noted.
	Question 74	Kent Wildlife Trust	Debbie Salmon	As this is primarily a landscape issue it is beyond our remit however if either method were to be used the location should be of low biodiversity value with no protected sites or BAP habitats or species being affected.	Noted.
	Question 74	Dickens Country Protection Society	Chris Fribbins	No suitable locations remain. Would not support excavate and fill.	Noted.
	Question 74	Environment Agency	Jennifer Wilson	The Environment Agency's study into CD and E waste arisings suggests that additional landfill capacity will be required around the Medway area to deal with waste produced as a result of the construction of new housing to meet Government targets. It may therefore be appropriate to consider suitable sites where additional landfill capacity could be provided in future.	Noted.
	Question 74	Kent County Council	Richard Feasey	The potential for provision of additional landfill capacity for non-hazardous landfill should be assessed in those parts of the authority's area which have clay geology.	Noted and this has been undertaken.
	Question 74		Carl Kroon	London Clay void is most practical. Spoil clay for land raising on flood plains, use in pottery, sea defences.	Noted.
	Question 74			There is a need to have a representation of all elements of the recognised waste hierarchy in the Medway area. There will always be a need to have final disposal to land as part of that provision. This will be a critical resource that should, as far as practicable, be used for the residues of the reuse, recycle and recovery activities higher up in the hierarchy and for those irreducible wastes and hazardous wastes that cannot be further treated. To say landfill/landraise should not happen in Medway is a specious argument that simply ignores the realities of sustainable waste management.	Noted.
	Question 74	Medway Countryside Forum	David Murr	It is difficult to give a view on this without knowing what locations might be considered, and the details of any such proposals.	Noted.
	Question 74	Frindsbury and Wainscott Community Association	A Wade	Landfill locations will never be adequate even with recycling if excessive packaging - over use of paper e.g. newspapers - supplements containing superficial rubbish, plastics - is not nationally restricted.	Noted.
	Question 74		Dr D Brighton	Yes. Medway mudflats	The Thames and Medway Estuary areas are highly protected European designated conservation areas; subject to the Conservation (Naturals Habitats & Sea.) Regulations 1994. As amended in 2009. New landfill or landraise operations would be very likely to be entirely incompatible with the recognised conservation status of these areas..
	Question 74	RSPB	Fay Martin	The RSPB supports the waste management hierarchy: Reduce -Reuse - Recycle - Recover. On the basis of the above hierarchy the focus should be placed on achieving higher levels of waste reduction and recycling before other technologies such as energy recovery or ultimate disposal should be considered. In terms of the location of landfill facilities, the RSPB's view is that landfill on the Hoo Peninsula or Grain should only be considered as a last resort, and only if it can be shown that there will be no detrimental impact on the Thames Estuary & Marshes SPA and Ramsar sites or Medway Estuary & Marshes SPA and Ramsar sites.	Noted.
	Question 75			**Q75: Do you agree that a network of local waste transfer facilities should be encouraged?** Answers for question 75 (from questionnaire & website): 10 Yes/ Agree 1 No/ Disagree 1 Don't Know	
	Question 75	Viridor Waste Ltd	Mandeep Jutley	This option should be investigated further. Information on possible alternative options should be provided.	Noted.
	Question 75	Kent Wildlife Trust	Debbie Salmon	The Trust would support localised disposal of waste as this will limit emissions due to transporting waste to bigger facilities and damage to protected site via increase water traffic.	Noted.
	Question 75			We would encourage the management of waste as close to source as is practicable, in line with the proximity principle; this may favour the establishment of a local network of waste transfer facilities. However, we recognise that improved waste management and treatment of waste higher up the waste hierarchy can favour a smaller number of larger, more strategic sites with a wider catchment area. In either event we would wish to see waste facilities that are of high quality, designed and operated to high standards. Not only does this benefit site employees through improved working conditions and the local environment through less pollution, it also makes such facilities more publicly acceptable, broadening the range of potential sites and making them more likely	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				to receive planning permission.	
	Question 76			**Q76: Do you have any preferences as to where, if at all, the Hoath Way and Pier Road facilities should be relocated?** Answers for question 76 (from questionnaire & website): 1 Yes/ Agree 4 No/ Disagree 4 Don't Know	
	Question 76	tbh developments ltd & helvig ltd	tbh developments/helvig	Pier Road facilities can be re-located to the former Alloy Wheels site at Priory Road, Strood.	Noted but not centrally located.
	Question 76	Kent Wildlife Trust	Debbie Salmon	The Trust's only interest would be that these facilities are not situated on sites with biodiversity interest or on sites that would affect the biodiversity interest within the locality.	Noted.
	Question 76		Mike Walters	Grain and Hoo where you dug the sand out.	Noted.
	Question 76		Carl Kroon	They need to stay and others established.	Noted.
	Question 76		W Mann	Retain Hoath Way for current uses	Noted.
				Energy	
		Medway Renaissance	John Finlayson	LDF needs to underpin Medway being at the centre of an eco region. There should be a strong presumption in favour of the use of renewable technologies and the Merton Rule. De-centralised heating needs to be encouraged. District heating and a range of additional options should be a requirement of any power generating development. The EON feasibility study is nearing completion.	Noted but the government's commitment to the Eco-region concept is uncertain.
	4.294	ScottishPower	Chris Girdham	Government energy policy recognises that the production of electricity by gas generation is part of the long term mix. As a technology, gas generation is becoming cleaner, and has demonstrably lowered the UK's carbon emissions in recent years. Therefore the development of new generating infrastructure, which provides potential opportunities for Carbon Capture and Storage (CCS) and Combined Heat and Power (CHP), will make an important contribution towards meeting national objectives relating to securing our domestic energy supply and reducing carbon emissions. By 2010, gas imports could be meeting up to a third or more of the UK's total annual gas demand, potentially rising to around 80% by 2020 on the basis of existing policies. By 2020, around 80% of our fuels are likely to come from overseas. (Energy White Paper 2007). It should be recognised that the North Sea is one of several sources of natural gas. In order to address security of supply from less flexible and reliable parts of the world, the development of new gas storage infrastructure in the UK is an important part of addressing the security of supply issue and Scottish Power is progressing its plans for additional gas storage.	Noted.
	4.298	ScottishPower	Chris Girdham	TThe Energy Markets Report published by the Department of Energy and Climate Change (DECC) in December 2008 suggests that 'the UK will need investment in some 47GW of new capacity by 2020, about 57% of current total capacity and an average annual deployment for new capacity of roughly 4GW, which represents a significant challenge' (EMOR Paragraph 4.6.18) This latest Government estimate of the anticipated generating gap emphasises the urgent need for additional capacity.	Noted.
	4.299	ScottishPower	Chris Girdham	ScottishPower is at the forefront of Carbon Capture & Storage (CCS) development initiatives and is involved in the national, Government sponsored competition. The proposed Dam Head Creek 2 Combined Cycle Gas Turbine (CCGT) scheme would increase potential CCS compatible generating capacity in Kingsnorth/Medway. Its development would also be compatible with aspirations to develop a CCS cluster on the Hoo Peninsula, which in turn would lead to other potential benefits, placing Medway at the forefront of CCS innovation	Noted.
	4.300	ScottishPower	Chris Girdham	Government energy policy recognises that fossil powered energy generation will remain part of the energy infrastructure capacity mix. However both Combined Cycle Gas Turbine (CCGT) and new coal stations would require to be carbon capture ready (CCR) and have much lower emissions than older, conventional thermal generating plant.	Noted.
	4.300	CPRE Kent	Sean Furey	The CCS demonstration would only be for 400MWh peak output from a new power station, which in effect means 1 of 4 turbines at a new Kingsnorth power station. We are deeply concerned that the remainder of the plant would be allowed to have unabated emissions and if the CCS fails then we would be locked into burning 'dirty' coal for another 30-40 years, which is unnacceptable. CCS should be applied to all of the emissions from day one of a new plant, such as Kingsnorth, being operated.	This is a matter for the Secretary of State in determining the current planning application.
	4.301	Viridor Waste Ltd	Mandeep Jutley	In accordance with national and regional plannnig policy, this should be encouraged.	Noted.
	4.302	ScottishPower	Chris Girdham	The Climate Change Act 2008 imposes an obligation to ensure 'the net UK carbon account for the year 2050 is at least 80% lower than the 1990 baseline' and that the carbon budget, for the period including the year 2020, must be at least 26% lower than the 1990 baseline. However, in the April 2009 Budget, the Chancellor of the Exchequer announced the world's first ever carbon budget, which commits the UK to cut carbon emission by 34 per cent by 2020. This target is set out in the UK Low Carbon Transition Plan. In July 2009, the Government published their Renewable Energy Strategy. The Strategy was produced as a response to the binding renewable energy targets to 2020 set out in the new EU Energy Directive (COD/2008/0016). The Strategy recognises the need for an increase in the use of renewable energy to 15% in 2020. Whilst efforts continue to increase renewable energy capacity in the UK, low carbon generation from technologies including Carbon Capture Ready (CCR) Combined Cycle Gas Turbine (CCGT) will continue to make a major contribution to reducing emissions.	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	4.303	ScottishPower	Chris Girdham	Energy suppliers have a role to play in promoting domestic and commercial energy efficiency. ScottishPower has recently announced plans to assist low income households. The Savings Challenge campaign promotes energy efficiency and measures to reduce consumption. Scottish Power also has tariffs in place aimed at assisting those in fuel poverty. Measures include providing winter rebates for vulnerable customers.	Noted.
	4.306	London Thamesport (Hutchison Ports UK Ltd)	Nicholas Orbell	Medway has a particular situation on Isle of Grain, where it is proven by BP that the area is suitable for onshore wind renewables. Medway should recognise that such sites are comparatively scarce, and actively encourage similar renewable developments, protecting these from other less location-sensitive uses. There is a particular potential conflict with the microlight activity at Stoke airfield, and arguably the value attaching to this location for wind-renewables outweighs in economic and other benefits the amenty value. Such conflicts need to be carefully managed through this planning process, and may advocate appropriate assumptions being made where evidence exists that renewable development can be undertaken.	Noted.
	4.310	ScottishPower	Chris Girdham	It is recognised by Government that gas derived electricity generation is part of the long term energy supply mix. As a technology, particularly Combined Cycle Gas Turbine (CCGT) it is becoming cleaner and has demonstrably lowered the UK's carbon emissions. Therefore the development of new generating infrastructure designed to be carbon capture ready (CCR) and Combined Heat and Power (CHP) compatible, will address important national objectives relating to securing domestic energy supply and reducing carbon emissions; in turn such development will ultimately contribute to regional and local strategies seeking to reduce per capita carbon emissions. CCGT's reliance on pipeline fuel supply, negates the need for significant levels of HGV movements, further reducing the potential emissions.	Noted.
	4.312	London Thamesport (Hutchison Ports UK Ltd)	Nicholas Orbell	The BP application affirmed the suitablity of the estuary area for onshore wind projects. This form of development has merit in the context of energy development in the lower reaches of the Medway, and the sustainable energy proposals. More significantly, existing commercial landowners and occupiers, including London Thamesport, have sites that are capable of integrating onshore wind turbines within existing operations in a manner demonstrated by BP. Development of this nature on commercial sites would complement the Council's broader ambitions for sustainable energy.	Noted.
	4.312	ScottishPower	Chris Girdham	Wherever possible, new renewable energy development should be supported as an important component of the energy supply mix, as flexible back up supply for base load energy generation. However, PPS 22 recognises that renewable energy capacity can only be developed at locations where it is viable. Therefore the promotion of other forms of power generation, such as Combined Cycle Gas Turbine (CCGT), will continue to be major contributors to energy supply.	Noted.
	4.315	London Thamesport (Hutchison Ports UK Ltd)	Nicholas Orbell	The successful development of these renewables in larger commercial situations has been demonstrated in Europe, In particular, the use of large roof areas (as found on logistics and distribution buildings) for photovoltaic panels offers significant opportunity (provided the economic viability can be improved). The proposed policy should recognise that the current lack of fiscal support and other economic limitations on these technologies may change in the future, and should support and encourage this form of development.	Noted.
	4.316	ScottishPower	Chris Girdham	The sector's "national significance" is recognised in the South East Plan. The need to replace existing capacity arises from the need to meet national emission reduction objectives and as a result of the anticipated decommissioning of much of the UK's domestic nuclear generating capacity. Medway's older coal and oil powered generating capacity needs to comply with the Large Combustion Plants Directive. This may result in the need to reduce older plants' hours of operation, having potential consequential impacts on levels of power generation output. Ultimately, the replacement of older, conventional plant with new cleaner and more efficient plant will contribute to national objectives seeking security of supply and reductions in emissions. Notwithstanding the above, the locational advantages of the Kingsnorth/Hoo Peninsula together with the South East Plan's recognition of the sector's importance to the national and regional economy, support the principle of the area's further development for energy generation and related purposes.	Noted.
	4.317	London Thamesport (Hutchison Ports UK Ltd)	Nicholas Orbell	Please see comments in 4.312 above. Medway must recognise the need for related infrastructure development (power lines, substations etc).	Noted.
	4.317	ScottishPower	Chris Girdham	Wherever possible, new renewable energy development should be supported as an important component of the energy supply mix, as flexible carbon free back up supply for base load energy generation and as a form of energy generation that will demonstrably contribute to addressing the identified energy generation gap. However, PPS 22 recognises that new renewable energy capacity can only be developed at locations where it is viable. Therefore the promotion of other forms of power generation, such as Combined Cycle Gas Turbine (CCGT), will continue to be major contributors to energy supply with the potential to replace Medway's older coal and oil powered stations with lower carbon generating capacity. Due to existing operations and locational advantages, areas such as Kingsnorth/Hoo are of strategic importance for energy generation and deliver nationally important benefits. The importance of the energy sector in the Thames Gateway and the continued need to support it is recognised in the South East Plan. Therefore further energy generation and related activities, which may require provision for Carbon Capture and Storage (CCS), should not only be expected in Medway, regional policy requires that they are also supported. Potential synergies between energy development and related environmental technologies such as CCS should also be encouraged.	The Core Strategy supports both renewable and conventional energy generation.
	4.318	ScottishPower	Chris Girdham	There are opportunities to progress a Carbon Capture and Storage (CCS) cluster given the generating plant in the area. It is noted that SEEDA and Medway Council are facilitating discussion with power companies to explore the opportunities that could arise	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	4.319	ScottishPower	Chris Girdham	The principle of CHP use for residential and commercial use is supported. However, there does not appear to be any explicit policy or legislative requirement on developers to provide heating grids. We would question whether this is the 'role' of the Core Strategy and would suggest that the absence of a policy/legal basis makes such a proposed initiative unviable. If Medway were to adopt a policy that sought contributions towards establishing a CHP network, this should not be focussed on the suppliers of surplus heat, but the potential recipients. The principle of CHP use for residential and commercial use is supported. District heating, together with opportunities for other forms of renewable energy development, has the potential to deliver carbon reductions. However, other related initiatives including those that are proven and viable such as CCGT will continue to play an important part in securing these necessary reductions.	Noted.
	Question 77			**Q77: Should any future conventional power generating development in Medway be made conditioned to require the ability to provide district heating?** Answers for question 77 (from questionnaire & website): 9 Yes/ Agree 5 No/ Disagree 2 Don't Know	.
	Question 77	CPRE Kent	Brian Lloyd	Yes. However any future 'conventional' generating power will be conditional on the viability of CCS, which is uncertain. The sustainability of biomass is dependent on fuel source.	Noted.
	Question 77	Groundwork Kent & Medway	Simon Green	In principle, yes but it would be difficult to make this enforceable and positive incentives may be more effective.	Noted.
	Question 77	ScottishPower	Chris Girdham	No. This goes beyond Government advice and policy. There is no explicit policy basis for this and it is unnecessarily prohibitive. Opportunities to investigate how district heating provision could be related to new generating capacity should be progressed, on a case by case basis, only where it is viable to do so, giving due consideration to commercial, technical and environmental constraints.	It is understood that 'promotion' rather than 'requirement for' district heating is the proper role of the Medway Core Strategy policy.
	Question 77	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Although we can see the potential for this, we have concerns about the practicality and potential to harm the area if adopted by the bigger power stations. More appropriate for local power generation	Noted..
	Question 77	Dickens Country Protection Society	Chris Fribbins	District heating is only practical on the local level and unfortunately the power stations have been built away from urban centres - good to see some use of Grain heat recycling in the natural gas terminal. Power stations need to be more efficient	Noted.
	Question 77	Environment Agency	Jennifer Wilson	We welcome the recognition given by the authority of the importance of combined heat and power (CHP) in using energy resources more efficiently and reducing CO2 emission through conventional power generation. We are also pleased to see that the contribution waste management technologies (such as incineration, gasification and anaerobic digestion) can make to CHP has also been acknowledged. We believe that CHP has a central role to play in using our natural resources more wisely and reducing carbon emissions. We support the proposal that any future development of conventional power generating facilities should be conditional on CHP being provided. We would ask that the council be cautious of schemes which describe themselves as being CHP ready or CHP capable. There are numerous examples of schemes which claim to be CHP ready, but which in reality are not CHP, and may never become so. A classic example is the South East London Combined Heat and Power (SELCHP) Incinerator, opened in 1994 in Lewisham. Though its name suggests the use of CHP, the incinerator is in fact providing energy in the form of electricity only. A number of schemes have recently been sought planning approval on the basis of being CHP ready, however, we are concerned that once granted approval such schemes may never utilise CHP. Because of this uncertainty we would ask that such schemes should be deemed as not complying with the proposed policy.	Noted.
	Question 77	GVA Grimley Ltd	Sheery Sassoon	We support policies which encourage the use of efficient energy sources. However, we oppose to the wording of the policy on the basis that it does not take into consideration the individual site specific circumstances where it may not be possible to provide district heating. (Suggestion- Developments will be encouraged to provide connection points for district heating, where possible.)	Noted but no policy was included within the Issues and Options report.
	Question 77	Kent County Council	Richard Feasey	As indicated any conventional power generating development is likely to be of scale where the decision will rest with the Government rather than Medway. There is now a Government expectation that new power station development is designed to include combined heat and power capability notwithstanding whether the potential or viability exists for a district heat network at that point in time. Given the life of a power stations could be 40-50 years during which new opportunities may arise, the requirement should be a condition of development.	Noted..

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 77	The Peel Group	The Peel Group	Heat off-take from conventional power generation will play an important role in the UK meeting it's obligation to provide 15% of total energy consumption from renewable sources by 2020. The UK Renewable Energy Strategy (DECC, 2009) outlines that to contribute to achieving this figure that 12% of heat demand in 2020 could come from renewable sources with large potential for biomass heat, paragraph 2.25 states: "Analysis by independent consultants (published alongside this Strategy) looked at possible ways of achieving increased deployment of renewable heat by 2020 in the least-cost way for the overall economy. The analysis confirmed that there is a large cost-effective potential for biomass heat with significant potential in the non-domestic sector." Despite the Government encouraging the use of district heating from power generating stations there is no indication in national policy that it should be a mandatory requirement. Providing district heating through Combined Heat and Power (CHP) is not always a feasible option for power generating stations. The UK Biomass Strategy (DEFRA, 2007) recognises that for the system to be economical there needs to be consistent demand for the heat that in reality is not always present. Consequently, the strategy states the best sites for CHP are often industrial sites that are in continual operation. In certain cases for example, if a dedicated biomass plant was forced to provide district heating it may ultimately make the development unviable and result in a missed opportunity for carbon neutral electricity being produced. This would not be in accordance the Government agenda on climate change. A recent Government consultation paper, the Heat and Energy Saving Strategy (DECC, 2009), outlines that as the renewable heat is a newly emerging market that large consumers of heat are reluctant to commit or invest due to uncertainty over the security of supply and high financial risk for both parties (paragraph 7.28). Future incentives should change this although these measures have not yet been implemented. Peel Energy is in favour of an incentivised approach to encourage increased generation of renewable heat, such as the Governments forthcoming Renewable Heat Incentive, but does not believe that a 'conditioned' approach is appropriate.	The information is noted.
	Question 77		Goodman	Q77 & Q78 No. The heating and/or cooling requirement of businesses at the Kingsnorth Employment Area will not be known until specific occupiers have been identified. Therefore, in this example, a requirement for a district heating system would be inappropriate. The strategy for energy generation, including use of renewables, should simply accord with the adopted provisions of the SE Plan.	The energy efficiency and renewable energy policy promotes district heating schemes on the condition that they are feasible.
	Question 77	FWCA Frindsbury and Wainscott Community Association	J R Masey	In principle its good as it reduces waste energy. The problem is the practicability and cost of the district heating infrastructure and the potential of a stranded network, as D.H. infrastructure could last longer than the generating plant (Battersea!).	The energy efficiency and renewable energy policy promotes district heating schemes on the condition that they are feasible.
	Question 77		W Mann	Yes. New development at Kingsnorth should provide heating for Lodge Hill	Noted.
	Question 77		Dr D Brighton	No. District heating only for hosuing within 200m of Kingsnorth	Point is noted.
	Question 77	RSPB	Fay Martin	Q77 - 80: The RSPB supports the Government's goals set out in The White Paper to cut CO2 emissions by 80% by 2050. The Society considers that the Core Strategy can assist in meeting these targets by requiring developments to achieve BREEAM or Code for Sustainable Homes targets. We would welcome the inclusion of a policy that requires development to be designed according to the principles of passive solar design as this approach can deliver significant reductions in the energy demand of buildings. We would also welcome the inclusion of targets for on-site energy generation for residential, commercial and public buildings and consider that a minimum figure of 10% should be sought.	Noted.
	Question 78			**Q78: Should new development, over a minimum size, be required to install a heating grid?** **If yes, should this be applied universally in Medway or only in areas where connection to a larger grid can be reasonably demonstrated** Answers for question 78 (from questionnaire & website): 12 Yes/ Agree 4 No/ Disagree 3 Don't Know	
	Question 78	Groundwork Kent & Medway	Simon Green	Yes it should be in areas selected in terms of feasibility. A heating grid implies recirculation of the heating vehicle (probably hot water) and would advantageously utilise waste heat normally characterised as district heating. The most obvious source of waste heat will be the new power stations which can reasonably connect to Lodge Hill and Riverfront developments. Infrastructure costs will be high and related to location and routing of steam or hot water pipes (and return systems). In the right circumstances however the investment will be recouped by heating service charges to each housing unit. The grid can also provide heat to commercial premises so a similar condition could apply.	Noted.
	Question 78	ScottishPower	Chris Girdham	If this is accepted and provided that the purpose of any resulting policy is to require developers of major new housing/commercial developments to install grid infrastructure at the construction stage, the principle of this initiative is supported.	Noted.
	Question 78	CPRE Kent	Sean Furey	Yes: where there is a source of heat there should be a heating grid for new development, unless there is a more efficient option (such as in-house options or a localised renewable solution).	Noted.
	Question 78	Lafarge Cement UK	David Simms	Where it can be demonstrated that there is strong likelihood of the future implementation of a heating grid, the benefits of requiring installation of grids in anticipation of future implementation would be logical. However, it is unreasonable and inefficient to require the installation of grids where no realistic prospect exists for use to be made of it. A clear and effective strategy for planning and implementing proposals must be in place before any such requirement is established as a matter of policy.	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 78	Environment Agency	Jennifer Wilson	We support the proposal that new developments over a minimum size should be required to include a district heating grid. Such a policy would help to create the market for heat that energy generators look for when developing CHP schemes. We believe that this policy should be applied universally, and should not be constrained by the current potential to be part of a wider grid. The CHP schemes themselves need not necessarily be centralised energy generation, but could be decentralised district schemes, which may evolve to become part of a wider heat network.	Noted.
	Question 78	GVA Grimley Ltd	Sheery Sassoon	We support policies which encouraged developments to adopt sustainability measures. However, we oppose the current policy on the basis that it does not consider individual circumstances of development proposals where it may not be possible or viable to install a heating grid. (Suggestion- Developments will be encouraged to install a heating grid, where possible.)	The Medway Core Strategy promotes/supports rather than specifies such heating grid systems in new developments.
	Question 78	Kent County Council	Richard Feasey	There are different ways of meeting the obligation for low carbon energy solutions for new development. Installing a heating grid implies the provision of a district heating solution. The scale of development, density, mix of uses and ultimately heat load to be serviced must be factored in to ensure that it is a viable solution. There are other ways of meeting energy needs sustainability which could be around greater levels of insulation and micro technologies or other community scale solutions. Nonetheless the LDF should encourage consideration of district heat networks particularly as they could also benefit surrounding areas through network extension.	Noted.
	Question 78		Carl Kroon	Only where connection to a larger grid can be done.	Noted.
	Question 78	FWCA Frindsbury and Wainscott Community Association	J R Masey	Yes, only in areas where connection to a larger grid can be reasonably demonstrated. If district heating is only for new development it appears to be relying on commercial growth new development, as there is only requirement for 16,300 dwellings. Why mention 100,000 unless there are plans to retrofit to existing homes. Or is it to be offered to outside Council boundaries. Who would be the provider? As complex (elec/gas) utility ownership -generator, distributor, supplier. Legislation Issues.	Noted.
	Question 79			**Q79: Should there be a stronger presumption in favour of the use of renewables technologies, including wind, combined heat and power, solar and photovoltaics?** Answers for question 79 (from questionnaire & website): 24 Yes/ Agree 1 No/ Disagree 1 Don't Know	
	Question 79	CPRE Kent	Brian Lloyd	Combined Heat and Power is not a renewable technology per se, it is the use of low grade heat for heating after it has generated electricity via turbines. CHP can be driven by coal, oil, gas or biofuels so the fuel type needs careful consideration even though the overall efficiencies are much higher than electricity generation alone. Wind needs careful siting to be effective, with most micro-wind systems being ineffective in much of the South East where wind speeds are too low. Larger onshore wind turbines would have numerous site-specific issues to address. Solar Thermal, PV and PV-T should be actively promoted as our area has some of the best sunshine hours in the UK.	Noted.
	Question 79	Groundwork Kent & Medway	Simon Green	Yes, particularly wind, CHP and biomass. Solar should be increasingly encouraged but at present the technology is immature and not cost effective. It should be emphasised that biomass generation can enhance woodland management. The main reason woodland management is inadequate is that there is no sales outlet for arisings such as woodchip so no income from managing the wood which is costly. Coppicing is widely recognised as being beneficial to biodiversity but has largely ceased to happen. A positive policy towards woodland biomass in Medway could lead to more environmentally sustainable power generation and better woodland management. Biomass generators can often be located on a small scale in rural locations alongside farm buildings etc and the LDF should be positive about this. Biomass grown specifically on land otherwise needed for food growing has now been largely discredited and should not be encouraged in Medway.	Noted.
	Question 79	London Thamesport (Hutchison Ports UK Ltd)	Nicholas Orbell	The policies should recognise that the viability of renewables will change during the period of the next Plan, and encourage appropriate integration and development of these technologies through planning policy. As outlined in 4.3.2 above, the BP onshore wind project demonstrated the suitability of the Medway estuary for this particular form of development, and the significance of this should be recognised to both encourage and assist other commercial landowners to bring forward similar proposals to meet the broader renewable policy objectives and Central Government targets. Similarly, a policy approach that actively facilitates the integration and provision of renewable technologies within appropriate development proposals for commercial businesses, without being too prescriptive, should be adopted to promote this form of sustainable development as such technologies become more affordable and deliverable.	Noted.
	Question 79	ScottishPower	Chris Girdham	Support for any form of energy technology should reflect national and regional policy.	Noted.
	Question 79	CPRE Kent	Sean Furey	Yes. Feed in Tariffs and Renewable Obligation Certificates (ROC) can mean that business and homeowners can generate income and energy. Adding a solar thermal system to a new build home only costs an additional £1000, whereas it would cost around £3,500 to retrofit, it therefore makes sense for them to be mandatory so there is a level playing field for all developers across the authority.	Noted.
	Question 79	Kent Wildlife Trust	Debbie Salmon	There are a number of differing ecological issues surrounding different forms of renewable energy production. Wind Energy See Kent Wildlife Trust's wind farm policy sent by separate email Combined heat and power We support in principal methods of energy production that reduce carbon emissions. Solar and photovoltaics We support in principal methods of energy production that reduce carbon emissions	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 79	Dickens Country Protection Society	Chris Fribbins	Yes. Landscape issues need to be considered however.	Noted.
	Question 79	Natural England	Josh Nelson	Natural England agrees in a stronger presumption in favour of the use of renewable technologies; however, we would be keen to ensure that proposals for renewable energy projects are located so that designated nature conservation sites and the Kent Downs AONB are not adversely affected.	Noted.
	Question 79	Environment Agency	Jennifer Wilson	We support the proposed stronger presumption in favour of the use of renewables.	Noted.
	Question 79	GVA Grimley Ltd	Sheery Sassoon	We support policies which encourage the use of renewable technologies. We propose a flexible approach towards the use of renewable technologies and propose that the suitability for the provision of wind turbines, combined heat and power, solar and photovoltaics should be assessed in viability terms. To achieve the Council's objectives of incorporating renewable technologies, incentives should be offered to developers such as the provision of a flexible approach towards Section 106 contributions, affordable housing, scale and / or mix of developments. (Suggestion- Developments will be encouraged to incorporate renewable technologies wherever possible.)	Noted.
	Question 79	Kent County Council	Richard Feasey	Yes, it is now accepted that planning policy has an important role to play in bringing forward renewable energy solutions and increasing the take up of renewable technologies.	Noted.
	Question 79	The Peel Group	The Peel Group	Peel Energy strongly believes that Medway Council should hold a stronger presumption in favour of the use of renewable technologies, including but not limited to those listed. In addition to the renewable technologies the council has named, Peel Energy would like to see the same support for low-carbon technologies, such as fossil fuel use with carbon capture storage technology. A significant part of the Government meeting its objectives on how to tackle climate change is reliant on the increased use of renewable and low-carbon energy technology. In terms of the land use planning system, instruments have been put in place that encourages local planning authorities to look favourably upon such development. The principle documents that the council should have regard to when establishing Core Strategy policies are Planning Policy Statement 1: Planning and Climate Change (PPS1), and also Planning Policy Statement 22: Renewable Energy (PPS22). The key principles of PPS22 are based on renewable energy developments being located throughout England; development plans containing policies that promote and encourage rather than restrict the development of renewable energy sources; the wider economic and environmental benefits of renewable energy projects being given 'significant weight' and; local planning authorities not making assumptions about the technical and commercial feasibility of renewable energy projects. Peel energy requests that these form the underlining principles of Medway Council's emerging Core Strategy and its stance on renewable energy development. Peel has significant experience in sustainable development including use of renewable technologies such as tri-generation, CHP, wind farms, waste and biomass proposals. It is agreed there should be a presumption in favour of the use of renewable technologies in schemes. The Chatham Docks site provides a real opportunity for creating a high class sustainable community scheme potentially incorporating renewable technologies.	Noted.
	Question 79		Carl Kroon	Wind in Medway is not regular or of sufficient strength to warrant the use of domestic turbines.	Noted.
	Question 79	Frindsbury and Wainscott Community Association	A Wade	Yes. Solar provision for dwellings should be encouraged and funded if necessary.	Noted.
	Question 79		W Mann	Yes. Good long term objective, in short term may have to use more conventional sources	Noted.
	Question 79		Dr D Brighton	No. Nuclear and coal	Noted.
	Question 80			**Q80: The Merton Rule requires new development to generate at least 10% of its energy needs from on-site renewable energy equipment. Should a Merton Rule be introduced for Medway? If yes:** **• Should this be in addition to making provision for district heating?** **• What percentage of on-site renewable energy should be required as a minimum standard?** Answers for question 80 (from questionnaire & website): - Should a 'Merton Rule' be introduced for Medway? (13 Yes/ Agree; 2 No/ Disagree; 3 Don't Know) - Should this be in addition to making provision for district heating? (4 Yes/ Agree; 1 No/ Disagree; 3 Don't Know) - What percentage of on-site renewable energy should be required as a minimum standard? (6 for 15%, 3 for 10%)	
	Question 80	CPRE Kent	Brian Lloyd	Yes, we consider that it would be appropriate to introduce a 'Merton Rule' and we would suggest that this should be set at 16% in accordance with policy MRM13 of the South East Plan. In achieving this, we consider that solar thermal and solar PV (and PV-T) offer the best potential in Kent. Biomass boilers using locally coppiced wood is also another good option.	Noted.
	Question 80	Groundwork Kent & Medway	Simon Green	Yes. 15-20% would be a reasonable target to be waived if fully integrated into a district heating scheme. However the priority should be towards reduction of the heat requirements through insulation, heat exchangers etc. This is not new technology, it just needs applying. Those meeting a sufficiently high standard of energy input reduction could be excluded from on site generation.	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 80	London Thamesport (Hutchison Ports UK Ltd)	Nicholas Orbell	Please refer to response to Q79; the policy must recognise that the availability and viability of renewable technologies will change during the period, and a balance must be presented between the objective of encouraging integrated renewables and the cost of development now, and in the future. Furthermore, Medway has the opportunities for significant stand-alone renewable development (eg onshore wind) and must consider the integration of both major projects with more local schemes to achieve a cohesive policy.	Noted.
	Question 80		Steve Banfield	The Merton Rule seems totally inappropriate; unless you can justify the extra space and cost (this especially applies to option 1 - right near a huge power station (maybe) and also near a container ship natural gas distribution point).	Noted.
	Question 80	Barratt Strategic		Whilst Barratt Strategic supports the principle of providing for renewable energy sources on new developments, the standards should in their opinion be as per policy CC1 of the South East Plan i.e. 10%. In the context of the above, the council must appreciate that it is not always feasible to install district heating systems, and it would be inappropriate to require 10% renewables on top of a district heating system. As per our response to questions 4, 5 and 12, the council should be looking at how best to achieve the most from renewable sources of energy as set out in the Climate Change supplement to PPS1. The Core Strategy should seek to adopt a renewable energy strategy that looks to a minimum requirement in line with the RSS. Thereafter it should be for the development industry to choose what particular energy source would be most effective for their development, given the nature of the scheme, its location etc	Noted.
	Question 80	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Yes, also need to consider multiple applications in same area/site. Suggest increasing % of on-site renewable energy generation required.	Noted.
	Question 80	Trenport Investments Limited	C Hall	Trenport objects to this rule which it believes is far too crude an approach. A more flexible site by site approach should be applied to reflect the specific development proposals, the characteristics of the site itself and the characteristics of the surrounding area and the implications of applying the rule when considered against other considerations. For example are wind turbines and solar panels acceptable on development in a conservation area or next to a listed building or would they be effective on a well treed site or on a site surrounded by trees?	Noted.
	Question 80	Lafarge Cement UK	David Simms	The Merton Rule, when part of a considered policy approach, can provide an important mechanism for achieving development which is more sustainable. The policy should be considered as one aspect of an approach, and should not, for example, be an additional requirement to other policy requirements such as district heating. The extent of requirement should be consistent with Policy NRM11 of the South East Plan, and be set at 10%.	Noted.
	Question 80	Kent Wildlife Trust	Debbie Salmon	The Trust believes that the Merton rule should be introduced in Medway. We fully support any technology which limits the use of processes that emit CO2. The Trust would advocate that the highest percentage possible be achieved from renewable energy generated on site.	Noted.
	Question 80	Dickens Country Protection Society	Chris Fribbins	Yes, and look to increase the percentage of local generation and heating efficiency	Noted.
	Question 80	Wm Morrisons supermarkets plc	Wm Morrisons Supermarkets plc	Comments submitted by Peacock and Smith on behalf of WM Morrison Supermarkets PLC: It is acknowledged that a number of Local Authorities are seeking a percentage of onsite renewable energy generation in new development and in principle our client supports this approach. However, we consider that any such policy should incorporate an element of flexibility to allow for circumstances where it will not be viable or suitable to incorporate renewable energy equipment to reduce CO2 emissions by a given percentage. Paragraph 8 of PPS22 states that local planning authorities may include policies in Local Development Documents that require a percentage of energy requirements to come from onsite renewable energy generation, however this guidance is subject to the caveat that such policies: i) should ensure that a requirement to generate on-site renewable energy is only applied to developments where the installation of renewable energy generation equipment is viable given the type of development proposed, its location and design; ii) should not be framed in such a way as to place an undue burden on developers, for example, by specifying that all energy to be used in a development should come from on-site renewable generation. In our view the absence of any such flexibility conflicts with the intentions of Government guidance within PPS22 and its companion guide. Accordingly, our client requests that any such policy on renewable energy includes text to confirm that the percentage requirement will be subject to tests of viability and suitability.	Noted.
	Question 80	Natural England	Josh Nelson	Natural England would support the use of on-site renewable power generation in new development proposals to assist in achieving more carbon sustainable development to reduce the effects of climate change on species, habitats and landscapes.	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 80	Environment Agency	Jennifer Wilson	We would support the adoption of a 'Merton rule' for Medway, which should be in addition to provision made for district heating (as typically this will be from combustion of gas or other fossil fuels). A number of Local Authorities have gone beyond the 10% threshold set by Merton, with the Mayor of London, Barking & Dagenham and Three Rivers DC to mention a few adopting a target of 20%, Kirklees Council setting a target of 30% and other authorities setting targets of 15% (source Town & Country Planning Assoc 2006). We therefore suggest consideration be given to a target of between 20% to 30%. The Medway SOM report for waste seems a fair assessment of the current position. "Medway Waste Position: European and National policies and targets demand progressive increases in the proportion of waste recovered by way of recycling, composting and recovery of energy and to divert waste from landfill. The Defra Waste Strategy 2007 sets Government targets for the achievement of Landfill Directive diversion and sets out targets for the recycling and composting of household waste and the recovery of municipal waste. Central to the delivery of these recovery and diversion targets is the commitment from waste authorities and the waste industry to provide suitable waste management capacity, to explore new approaches to collection, separation and to secure increased community participation. To be successful, there must be economically sustainable markets for the recycled and composted material and investment in significant new infrastructure to enable collection, storage and transfer of such materials. Our data shows that communities in the Medway area are producing more waste per capita than the rest of the County and are behind on recycling and recovery targets. The net result is that more needs to be done in order to meet the Government's targets. Fly-tipping rates for the area are second highest in the county, further demonstrating the need for accessible legitimate recovery or disposal routes along with appropriate education and illegal disposal deterrent methods."	Noted.
	Question 80	GVA Grimley Ltd	Sheery Sassoon	We support the growth and development of renewable technologies. We consider that development proposals should seek to integrate renewable technologies as far as possible. We do not support the application of a target to securing renewable technologies but rather each scheme should be assessed on its merits with regard to site specific circumstances and viability. We propose that the borough should work within the guidance set out at regional and national level, subject to the viability of individual schemes. (Suggestion- Developments will be encouraged to incorporate renewable technologies wherever possible.)	Noted.
	Question 80	Kent County Council	Richard Feasey	A 'Merton Rule' style policy should be included in the LDF. The policy can be worded to the effect that district heating is one of the ways in which the obligation contained in the policy could be met. The general rule has seen LPAs just follow suit and adopt a standard 10% of energy requirement with 10 unit and 1000 sq.m thresholds. Its time this was moved on to a more challenging level consistent with the progression towards zero carbon buildings. Some LPAs have introduced a requirement for 15% and even 20%. Some thought should be given as to how this requirement overlaps with the Code for Sustainable Homes and BREEAM standards in the case of non-domestic buildings. There is no longer a need for thresholds for the application of this type of policy; a point has been reached where this needs to be integral to all new buildings.	Noted.
	Question 80		Carl Kroon	15%. There is a large number of 1900's properties in Medway that do not orient correctly for solar/PV and wood is no use. What is to become of these properties. The regulations regarding installation, double glazing for low income are deliberately indicative and for most households the problems of meeting energy regulations is a minefield. This needs to change. New build should be new. New look with new technology, new materials positioned to use wood and power, raised out off flood plain. UK has most expensive domestic power gas/electric in Europe yet we have gas fired, oil fired, coal, nuclear, wind and wave power. Why government incompetence. We have pioneered wave and wind power yet we don't use it.	Noted.
	Question 80	Open Spaces Society	Patricia Wilson	This seems a good idea, but I imagine options would have to be determined on a site by site basis. i.e wind energy may vary. Solar energy should make a worth-while contribution, but as the Government has signally failed to promote this over years we would start from a lower level.	Noted.
				Climate change	
		Medway Renaissance	John Finlayson	Issue of greenhouse gases needs to be tackled from all angles. Design of new buildings is one strand but the LDF should also promote mitigation e.g. reducing vehicular emissions, adoption through retrofitting existing buildings and the LDF should also provide the lead on behaviour change. General - Waste, Energy and Climate Change Waste, Energy and Climate change are the key components of sustainability. Corporately Medway is a signatory of the Nottingham Declaration on Climate Change. The LDF should be robust and forward thinking in tackling all sustainability issues in a co-ordinated manner with a major directional shift to "greening the city".	Noted..
		Environment Agency	Jennifer Wilson	Sea level rise is constantly being reviewed and predicted figures are liable to change frequently. Therefore the following statements in the following sections could become out of date. -4.323 - "although recent work has forecast that this will be less than previously thought"; and.... - 4.325 - "on the positive side sea level rises in Thames and Medway..."	Noted.
	4.326	ScottishPower	Chris Girdham	The Climate Change Act 2008 imposes an obligation to ensure 'the net UK carbon account for the year 2050 is at least 80% lower than the 1990 baseline' and that the carbon budget, for the period including the year 2020, must be at least 26% lower than the 1990 baseline. However, in the April 2009 Budget, the Chancellor of the Exchequer announced the world's first ever carbon budget, which commits the UK to cut carbon emission by 34 per cent by 2020. This target is set out in the UK Low Carbon Transition Plan. In July 2009, the Government published their Renewable Energy Strategy. The Strategy was produced as a response to the binding renewable energy targets to 2020 set out in the new EU Energy Directive (COD/2008/0016). The Strategy recognises the need for an increase in the use of renewable energy to 15% in 2020. Whilst efforts continue to increase renewable energy capacity in the UK, low carbon generation from technologies including carbon capture ready Combined Cycle Gas Turbine (CCGT) will continue to make a major contribution to reducing emissions.	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	4.329	Environment Agency	Jennifer Wilson	Flooding: There is no mention of a Strategic Flood Risk Assessment (SFRA). Medway have an SFRA but it requires updating as it was produced under PPG25 rather than PPS25. It is important that reference is made to this. The Issues and Option Report makes no reference to the existing SFRA. It should take account of the findings within the SFRA, bearing in mind that it requires updating to reflect changes in planning policy (PPS25)	It is referred to in the draft core strategy.
	4.333	NFU SE Region	John Archer	Contour ploughing is popularly presented as a way that farmers could help to prevent runoff if only they would take the trouble to do it. This is a simplistic argument. In fact, the Farm Practices Survey indicates that 71% of farmers already employ contour ploughing. The technique is less effective on heavy clay soils or on complex slopes, where ponding can occur particularly at low points, resulting in a break through the furrow and a more concentrated runoff problem. Some mechanised harvesting methods (for example potatoes) are not suited to contour ploughing. The same survey revealed that 57% of farmers use, or plan to use, minimum tillage rather than ploughing, which will reduce what problem there is. Most farmers already actively manage their land to control surace water runoff as part of agri-environment schemes, cross compliance and Catchment Sensitive Farming projects.	Noted.
	4.333	Environment Agency	Jennifer Wilson	The Authority refers to changing farming practices to reduce their impact on the environment and mitigate the effects of climate change, how would this be carried out by the Council? Is this something we can work together with along with the catchment sensitive farming initiatives as this will contribute to our goals?	The Council would be happy to work in partnership with the Agency on this matter but it cannot be addressed in detail in a core strategy.
	4.338	Environment Agency	Jennifer Wilson	Medway Council's "State of Medway Report: Water Supply" (November 2008) provides a good breakdown of the requirements relating specifically to water resources from several policy documents. We hope that this document is used, as it factually sets out the current situation within the district and identifies current supply options being discussed by the Water Companies. The strategy refers to 'overview & scrutiny task group' this group included Environment Agency representative, Nigel Hepworth, SEP Water Resource Team Leader.	Noted.
	Question 81			**Q81: Do you agree with the principle of protecting key green space corridors, networks and stepping stones, particularly in and around the main urban area to allow habitats to adapt to climate change?** Answers for question 81 (from questionnaire & website): 25 Yes/ Agree 1 No/ Disagree 0 Don't Know	
	Question 81	CPRE Kent	Brian Lloyd	Yes. These corridors and areas need to be clearly defined and in many cases habitat enhancement will be require to make them effective at allowing wildlife to thrive and migrate as necessary. The mechanism of protection needs to be defined, e.g. as Site of Nature Conservation Interest, as they may not qualify for SSSI status. Where possible, such corridors should be integrated with new and retrofitted Sustainable Urban Drainage (SuDS) and recreation and amenity (e.g. foot and cycle paths). However this needs proper design as there are some potential conflicts - e.g. disturbance caused by noise and street-lighting.	Noted.
	Question 81	Kent Wildlife Trust	Debbie Salmon	Nationally, regionally and locally, the Wildlife Trusts are focusing their work on landscape-scale restoration of wildlife habitats in order to create a coherent ecological network; see the Wildlife Trusts' document 'A living landscape – A call to restore the UK's battered ecosystems, for wildlife and people', which can be downloaded from http://www.wildlifetrusts.org/index.php?section=environment:livinglandscapes, and the regional version, 'A living landscape for the South East', from http://www.kentwildlifetrust.org.uk/pdfs/conservation/A_Living_Landscape_for_the_South_East.pdf. In the South East, work to develop the South East Biodiversity Strategy (http://strategy.sebiodiversity.org.uk/) has produced a detailed spatial framework of Biodiversity Opportunity Areas, which forms the basis of Kent Wildlife Trust's living landscape work in Kent and Medway. While corridors, networks and steppingstones are important to assist biodiversity in adapting to climate change, they are only part of the solution, and we would refer you to Defra's guidance on this issue, as set out in 'Conserving biodiversity in a changing climate: guidance on building capacity to adapt' (http://www.ukbap.org.uk/Library/BRIG/CBCCGuidance.pdf): 1 Conserve existing biodiversity 1a Conserve Protected Areas and other high-quality wildlife habitats 1b Conserve range and ecological variability of habitats and species 2 Reduce sources of harm not linked to climate 3 Develop ecologically resilient and varied landscapes 3a Conserve and enhance local variation within sites and habitats 3b Make space for the natural development of rivers and coasts 4 Establish ecological networks through habitat protection, restoration and creation 5 Make sound decisions based on analysis 5a Thoroughly analyse causes of change 5b Respond to changing conservation priorities 6 Integrate adaptation and mitigation measures into conservation management, planning and practice	Noted..
	Question 81	Natural England	Josh Nelson	Natural England agrees with and would support closely the Council in seeking to bring forward mechanisms and policies to address the challenges and opportunities disclosed in questions 81 – 86. As noted in our response to question 66, Natural England agrees strongly with the need to create and protect multi-functional green corridors, networks and stepping stones to assist species and habitat adaption to the effects of climate change. Natural England would recommend that the regional Biodiversity Opportunity mapping produced by the South East England Biodiversity Forum is used to inform policies on habitat creation and enhancement.	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 81	Environment Agency	Jennifer Wilson	Yes. Key issues surrounding this are the need to mitigate for the loss of intertidal habitat through coastal squeeze, and ensuring that biodiversity has the scope to move through the landscape in response to changing conditions, and that the landscape has the ability to adapt and continue to provide ecosystem services. The first stage of this is recognising what services are provided and the threats to these. We would recommend that a strategic green network is identified and that this is protected, through core strategy policies and potentially also through a Supplementary Planning Document, as part of adaptation to climate change and to give a clear direction to development now and in the future.	Noted.
	Question 81	Abbey Developments Ltd	Abbey Developments Ltd	Whilst we recognise the importance of protecting key green spaces from large scale 'significant' development we do however consider that this should mean that no development should take place adjacent to the existing urban areas within the green corridors. 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, biodiversity, 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 client's land to the east of Rainham lies adjacent to the existing urban area. The site does not contribute significantly to the ecology or biodiversity of the area and is not used for any agricultural purposes. The site does not extend beyond the existing built urban area and we consider that development on the site would better define the edge of the built up area. The land does not contribute to the separation of Rainham from Sittingbourne and we don't consider that its development would conflict with Policy KTG1 as set out in the South East Regional Spatial Strategy. As can be seen from the attached aerial photo, the site is bounded to the east by Meresborough Road 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 aim of maintaining a 'green swathe' between the two towns.	The Core Strategy gives priority to the development of previously developed land before Greenfield development and consequently urban extensions are not proposed. It also protects land to the east of Rainham as it seeks to avoid coalescence between Medway and Sittingbourne. The site has been rejected in the Strategic Land Availability Assessment.
	Question 81	University College for the Creative Arts at Rochester	David Hawkins	The University is working with The Carbon Trust to identify ways of reducing its carbon footprint.	Noted
	Question 81	The Peel Group	The Peel Group	Some Energy projects can co-exist with, or even enhance, habitats therefore the protection of key corridors, networks and stepping stones should not imply that all development should be restricted in these key areas. When considering the location of renewable energy projects, Paragraph 15 of PPS22 states: "Local landscape and local nature conservation designations should not be used in themselves to refuse planning permission for renewable energy developments. Planning applications for renewable energy developments in such areas should be assessed against criteria based policies set out in local development documents, including any criteria that are specific to the type of area concerned" The Core Strategy should give consideration to the fact renewable energy projects can only locate where the natural resource exists, and where economically feasible. Renewable energy projects should not have to satisfy sequential testing that other forms of development may be subjected to. These points are in accordance with national planning policy.	Noted..
	Question 81		Vivienne Parker	Encourage building of garages on the ground floor in properties below 10m above sea level to protect properties against flooding.	Noted.
	Question 81	NFU	Kevin Attwood	Climate change is not the main degradation cause, it is urban fringe issues. To that end policies to control or manage that effect would be more beneficial.	Noted.
	Question 81	RSPB	Fay Martin	Q81 and 85: Yes. Policy CC8 (Green Infrastructure) of the South East Plan recognises the potential broader role of open space in mitigating the impact of growth on sites of international nature conservation importance. This policy evolved partly in response to the Appropriate Assessment of the South East Plan, which identified a number of European Sites for which it was not possible to conclude no adverse effect due to increased recreational pressure associated with development under the South East Plan. Thames Estuary and Marshes, Medway Estuary and Marshes and the Swale SPA and Ramsar sites are listed among those European sites. The RSPB therefore supports the principle of protecting green infrastructure, particularly in and around urban areas. The society also supports the multi-functional role of these spaces, including as space for recreation, for urban cooling and as a biodiversity resource. We would also welcome the recognition of a broader definition of green infrastructure, to include features such as green roofs and walls, which have excellent insulation and cooling properties, can reduce rainwater runoff from roofs, and can help promote biodiversity in urban areas.	Green infrastructure is protected and promoted by policies on natural assets, landscape and countryside, open space and climate change.
	Question 82			**Q82: Do you agree with the principle of earmarking areas now for habitat creation over the long term to offset the consequences of coastal squeeze?** Answers for question 82 (from questionnaire & website): 19 Yes/ Agree 2 No/ Disagree 0 Don't Know	
	Question 82	CPRE Kent	Brian Lloyd	Yes. However regard should also be given to the loss of homes, businesses and agricultural land lost from managed re-alignment. These are currently exempt from all forms of compensation, however habitats are afforded greater legal protection because the of Habitats Directive regulations.	Noted. Whilst the flood risk chapter refers to areas of habitat creation, they are not defined in the policy because the Environment Agency has indicated that they may not be required for 50 years, well beyond the life of the Core Strategy.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 82		Lillian Harrison	The term 'earmarking' is hard to understand in terms of the Core Strategy. Do you mean that 'earmarking' equates to 'site allocations' in the Proposals Map? In which case, NO, it is far too early on to identify sites for habitat creation as such without considering wider sustainability/feasibility issues including landownership & economic matters regarding the areas being considered. It is wrong to single out wildlife interests as being the most important aspects of climate change to be considered by 'earmarking' at this stage in the plan process.	Noted. Whilst the flood risk chapter refers to areas of habitat creation, they are not defined in the policy because the Environment Agency has indicated that they may not be required for 50 years, well beyond the life of the Core Strategy.
	Question 82	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Concerned about implied loss of marshes in our area - these can be and should be protected.	Noted.
	Question 82	Kent Wildlife Trust	Debbie Salmon	Coastal squeeze is a major issue for the survival of our coastal habitats and creation of habitats is essential if the rich biodiversity currently present in Kent's coastal habitats and the seas around the County are to be conserved. However coastal squeeze is not the only threat to habitats and species and consideration will need to be given to other threats when planning the location and extent of connected habitats. • All habitats will need to be protected and buffered from the effects of recreational pressure. • Core sites need to be connected via extensive corridors of natural habitats to alleviate fragmentation and ensure flora and fauna can migrate as climate changes. • Access to natural habitat is required to ensure the increasingly large urban population do not become disassociated from the natural world. Evidence shows that contact with nature alleviates physical and mental health problems. • The maintenance, enhancement and extension of Biodiversity Action Plan habitats to ensure these habitats and the species that use them are preserved and enhanced for future generations. • Appropriate management of the created network needs to be ensured to create healthy well functioning ecosystems, as laid out in the Ecosystems Approach.	Noted.
	Question 82	Dickens Country Protection Society	Chris Fribbins	Yes, although care must be taken not to destroy one valuable habitat for another	Noted.
	Question 82	Natural England	Josh Nelson	As noted in our response to question 8, Natural England agrees that areas suitable for habitat creation to address potential habitat losses through coastal processes should be identified now and that measures to secure such areas are put in place. Natural England would recommend that the regional Biodiversity Opportunity mapping produced by the South East England Biodiversity Forum is used to inform policies on habitat creation and enhancement.	Noted. Whilst the flood risk chapter refers to areas of habitat creation, they are not defined in the policy because the Environment Agency has indicated that they may not be required for 50 years, well beyond the life of the Core Strategy.
	Question 82	Environment Agency	Jennifer Wilson	Key issues surrounding this are the need to mitigate for the loss of intertidal habitat through coastal squeeze, ensuring that biodiversity has the scope to move through the landscape in response to changing conditions, and that the landscape has the ability to adapt and continue to provide ecosystem services. The first stage of this is recognising what services are provided and the threats to these. We would recommend that a strategic green network is identified and that this is protected, through core strategy policies and potentially also through a Supplementary Planning Document, as part of adaptation to climate change and to give a clear direction to development now and in the future.	The core strategy includes a policy on the green grid. However, until agreement has been reached on habitat creation to offset coastal squeeze with the Environment Agency, under the auspices of the Thames Estuary 2100 project, no areas are being defined or safeguarded.
	Question 82	Kent County Council	Richard Feasey	Yes – see response to Question 8. . It is sensible to identify sites now. It should be noted that all those areas likely to be identified as potential new habitats or flood storage areas are likely to contain numerous archaeological sites and perhaps also historic structures. Depending on the nature of any works involved in habitat creation, and on the indirect impact of those works, all these sites could be affected. Similarly the use of areas as flood storage may well also impact on heritage assets. It will be essential to ensure that a strategy is employed such that damage to these sites is avoided as far as possible. The effects of habitat creation on the historic environment need to be assessed before locations are chosen.	Noted. Whilst the flood risk chapter refers to areas of habitat creation, they are not defined in the policy because the Environment Agency has indicated that they may not be required for 50 years, well beyond the life of the Core Strategy.
	Question 82	The Peel Group	The Peel Group	In line with our response to Question 81, Peel Energy believes any action in this regard needs careful consideration so as not to impose barriers to other national policies that are trying to reduce climate change.	Noted.
	Question 82	NFU	Kevin Attwood	A matter for the EA and private landowners not MC blighting private farmland with ill informed policy or prejudicing EA plans.	Noted.
	Question 82		Goodman & W Mann	Please see response to Q8.	Noted.
	Question 82	RSPB	Fay Martin	Yes. The RSPB is concerned that through sea level rises and increased sea erosion, large parts of the Thames Estuary could experience 'coastal squeeze', where the coastal margin is squeezed between the fixed landward boundary and the sea level. Any development on such a potentially dynamic area of coast could inhibit future sustainable coastal management, and prove costly to protect. The Society therefore supports the conclusion of the Thames Estuary 2100 Consultation Plan that land needs to be set aside for habitat creation to offset the effects of coastal squeeze. Although it is not possible at this stage to identify the scale of habitat creation required, we are happy to work with Medway Council to identify work that needs to be undertaken to investigate this issue further and to evaluate the sites that have been identified.	Noted.
	Question 83			**Q83: Do you agree with the principle of earmarking areas now for the storage of water to offset the effects of flash floods?** Answers for question 83 (from questionnaire & website): 21 Yes/ Agree 1 No/ Disagree	

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				0 Don't Know	
	Question 83	CPRE Kent	Brian Lloyd	Yes. A strategic approach to SUDS has been taken in the Ashford growth area and it is recommended that Medway take a similar view and have a specific SUDS Supplementary Planning Document (contact ABC for details). Good design is important as dry storage areas planted with amenity grass are of limited wildlife and amenity value. Where possible measures, such as reed beds, should be used to tackle diffuse urban pollution as well as attenuating runoff rates. In dense urban locations where there is insufficient space and storage tanks have to be used, there should to effort to ensure that a part of the stored water is retained for non-potable water uses as a way of reducing water demand (e.g. toilet flushing in commercial buildings).	The flooding policy includes a requirement for new development to provide SUDS in appropriate circumstances.
	Question 83	Kent Wildlife Trust	Debbie Salmon	Yes. The creation of wetland, ponds, the incorporation of SUDS containing natural habitat into development, the restoration of river corridors by development pulling back from the riverside and the preservation and connection of gardens and other green spaces in the urban environment will alleviate flash flooding as well as providing huge biodiversity gains.	The flooding policy includes a requirement for new development to provide SUDS in appropriate circumstances.
	Question 83	Environment Agency	Jennifer Wilson	Yes. We would support a proposal to provide storage areas to alleviate the consequences of flash flooding. Once areas are earmarked they should of course, be protected from development. Identifying these areas could form part of an updated Strategic Flood Risk Assessment (SFRA). In addition to this these areas may be valuable for biodiversity improvements and as contribution to habitat networks – i.e. forming wetlands with spare capacity for holding floodwaters. In addition, this would be making efficient use of a resource that is plentiful during times of flood, if this were to be used to supply water to the wetland areas in partnerships with organisations such as RSPB this would reduce the burden on them having to abstracted directly from sources at other times, currently most water already abstracted during winter under licence by the Environment Agency. These storage areas could be used to supply the councils own requirements for amenity purposes such as watering of parks and gardens especially with the proposed increase in green space this would be a sustainable method in irrigating the areas and reduce the pressure on public water supplies. Little reference in the document to Water Quality issues and ensuring development is fully integrated wastewater infrastructure, below are the following STW in the district with details of capacity: Main Sewage Treatment Works (STW): Motney Hill, Whitehall Creek north of Strood, Stoke & Grain on the Isle of Grain and Ham Hill at Snodland. Motney Hill discharges into the Medway Estuary, identified as having adverse affects on European Habitat Directive sites and is to have a PR09 National Environment Programme (NEP) scheme to restrict copper and ammonia. STW expected to reach volumetric capacity by 2020. White Hall STW will require an upgrade by 2020 - it currently has less than 10% flow capacity spare to its consent so SW will be planning to extend capacity through PR09 (as this is predicted 'growth' this will be in their programme, not NEP). Stoke &Grain has spare capacity at 2020. Ham Hill STW is in Tonbridge and Malling District but receives flows from Cuxton and Halling. Projected flow capacity problems by 2020 but also 'achievable' treatment levels. Southern Water Services will be planning to expand Ham Hill as necessary. The Water Framework Directive requires all water bodies to reach good ecological quality, and to not deteriorate in ecological quality, with development being an important way in which improvements and deterioration can occur. It is essential that the districts planning policies support this and take full opportunity to enhance and improve areas via development proposals. Currently groundwater quality for the Medway Chalk block has been assigned an over chemical category of 'poor status'.	Noted. No areas have been identified for flood storage although the flooding policy protects the flood plain from development.
	Question 83	The Peel Group	The Peel Group	In line with our responses to Questions 81 and 82, Peel Energy believes that if the Council believe it to necessary to earmarking areas for this purpose then careful consideration should be given to the forms of development that will be permitted in the proposed designated area. Peel Energy requests that the Council gives significant weight to the recent consultation document produced by the Department for Communities and Local Government that proposed changes to Planning Policy Statement 25: Flood Risk (PPS25). The proposed changes state that wind turbines should be classified as â€˜essential infrastructureâ€™ and as such should be permitted in the functional flood plain without having to satisfy a sequential test.	Noted.
	Question 84			**Q84: Do you agree with the principle of earmarking areas now for buffers around our more significant areas of nature conservation importance?** Answers for question 84 (from questionnaire & website): 21 Yes/ Agree 4 No/ Disagree 0 Don't Know	
	Question 84	CPRE Kent	Brian Lloyd	Yes. This is important to ensure that the quality of those areas of nature conservation are properly protected.	Noted.
	Question 84		Lillian Harrison	NO. (The meaning of 'earmarking' is unclear ...does this equate to 'safeguarding' or 'protecting'?). Nor is there any definition of 'our more significant areas of nature conservation'. Does this question relate to international/national or locally designated areas etc etc? PPS9 doe not require any such blanket protection and to adopt such a policy now would be contrary to national policy on this matter and would therefore be likely to be found to be 'unsound' at EIP.	Noted.
	Question 84		Mari-Anne Harstad	Buffer zones around significant areas fo nature conservation should be created/maintained.	Noted..
	Question 84	Kent Wildlife Trust	Debbie Salmon	This is of paramount importance if areas of nature conservation importance are to be preserved from the threats mentioned above. (See previous responses for further details on the buffering of protected sites)	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 84	Dickens Country Protection Society	Chris Fribbins	Buffer zones are essential to protect some of our areas.	Noted.
	Question 84	Natural England	Josh Nelson	Natural England would agree with earmarking areas at this stage for buffers around significant areas of nature conservation interest - both to allow for the effects of climate change but also to help address potential development and recreational pressures on nationally and internationally important nature conservation interests.	Noted.
	Question 84	Environment Agency	Jennifer Wilson	Yes, however it must be clear what will be allowed or required in these areas. We will always seek biodiversity enhancements to be incorporated within development, and will object to development where this will have a detrimental impact on biodiversity and in particular aquatic habitats and species. It should be acknowledged that the requirements for protection of sites of nature conservation importance will vary from site to site, and that these may not be immediately obvious (e.g. protecting the catchment area of a wetland site rather than just the immediate surroundings). It should also be acknowledged that in some cases new development will be an improvement to the current situation through improved water management or corridors for wildlife. Therefore this approach should be carefully considered prior to implementation.	Noted.
	Question 84	The Peel Group	The Peel Group	Peel Energy do not agree that specific protection should be afforded. We do not believe buffers are an appropriate mechanism with regard to all development. Peel Energy agrees that areas of nature conservation importance should be protected from inappropriate development. However, in setting Core Strategy policies the council should make reference to PPS22 and the approach to renewable energy developments and buffer zones. Paragraph 13 states: Regional planning bodies and local planning authorities should not create buffer zones around international or nationally designated areas and apply policies to these zones that prevent the development of renewable energy projects. It follows that if international or international designated sites should not have buffer zones associated with them, locally designated areas should not either.	Noted
	Question 84	NFU	Kevin Attwood	No. Better management of those assets should come first. Again a policy thought which has no basis in government guidance and has the potential to affect landowners engaged in agriculture.	Noted.
	Question 84	RSPB	Fay Martin	Yes. The RSPB supports the proposal to earmark areas for buffers around areas of nature conservation importance as part of an overall mitigation strategy to offset increased recreational disturbance on Natura 2000 sites. This approach is supported by Para 9.20, Policy NRM5 of the South East Plan which states: 'Where necessary, local planning authorities will need to identify opportunities for avoidance and mitigation when testing proposed plans and projects, including the options for the spatial distribution of housing allocations. In some circumstances, this may require an approach to be developed and implemented across administrative boundaries.'	Noted.
	Question 84	Open Spaces Society	Patricia Wilson	Buffers essential, larger zones are needed than are estimated, especially where devise development nearby is involved where green open space may easily become debased.	Noted.
	Question 85			**Q85: Do you agree that specific protection should be afforded to urban green spaces and significant garden areas to offset heat island effects and manage surface water run off?** Answers for question 85 (from questionnaire & website): 23 Yes/ Agree 0 No/ Disagree 1 Don't Know	
	Question 85	CPRE Kent	Brian Lloyd	Yes. However it needs to be clear how this protection would work and what weight it would have when it comes to assessing an incoming planning application.	Noted.
	Question 85		Mari-Anne Harstad	Yes and the serious flooding in the UK over the past few years demonstrates this is essential.	Noted.
	Question 85	Kent Wildlife Trust	Debbie Salmon	Yes (See Response for Question 83 for further details).	Noted.
	Question 85	Dickens Country Protection Society	Chris Fribbins	Yes - these can be significant areas of habitat creation	Noted.
	Question 85	Natural England	Josh Nelson	Natural England would agree that specific protection should be given to urban green spaces to provide cooling islands to assist climate change adaption strategies.	Noted.
	Question 85	The Peel Group	The Peel Group	Peel is of the view that changes to the Town and Country Planning (General Permitted Development) Order 1995 already go some way towards reducing the potential for the loss of urban green space, in that permission must now be sought for the hard surfacing of front garden areas.	Noted.
	Question 85	Open Spaces Society	Patricia Wilson	Unfortunate that page 89 illustrates just what the council is preaching but is shown not to be practising i.e. reducing Strood Town Centre to an almost unrelieved area of hand-surfacing. Of particular import is the protection of 'significant garden areas' especially given the steep hillsides throughout the conurbation. To what extent can the Council's planners exercise control over hard surfacing of garden areas for car-parking? I think the council misses a real strategy for individual household endeavour in matters of climate/water conservation/garden waste; they could promote installation of water-butts and of composting-bins; if gardens were redundant use for communal gardening and/or allotments could be promoted. Where are roof gardens promoted for heat insulation? Where are semi-basements ..cool…for	Planning permission is now required for hard surfacing of front gardens. Some of these issues are addressed in the climate change policy of the Core Strategy.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				utility rooms considered? Such a strategy would involve public participation.	
	Question 86			**Q86: Do you support the principle of more active environmental management being built into new developments to reduce resource consumption and limit heat island effects?** Answers for question 86 (from questionnaire & website): 20 Yes/ Agree 1 No/ Disagree 1 Don't Know	
	Question 86	CPRE Kent	Brian Lloyd	Yes. Medway should try to lead the way in this regard. The areas of new development and redevelopment give an opportunity for these concepts to inform the urban design as well as the individual building architecture and systems. Of key importance are: - minimised water use - minimise pollution risk and diffuse pollution (e.g. from runoff, processes and foul-water misconnections) - replacement of combined sewers with separate foul and surface runoff. - minimised electricity and energy use - encourage efficient, low resource use, low waste generation behaviour, such as recycling, walking and cycling etc. - use passive adaptation technologies in preference to active measures, such as air conditioning. To assist in this, the LDF should set out its requirements on applying the Code for Sustainable Homes and the BREEAM standard for non-residential development. We would draw your attention to paragraphs 9.33-9.68 and Policy CS10 of the adopted Ashford Core Strategy in this regard, though in the light of the more recent Climate Change legislation we consider that more ambitious targets need to be set than is the case in Ashford. We consider that Code Level 4 should be set as the minimum starting point for all residential developments, rising to Code Level 6 by 2016 in accordance with Government's intentions. For BREEAM, the minimum standard sought should be excellent.	Noted.
	Question 86	London Thamesport (Hutchison Ports UK Ltd)	Nicholas Orbell	The appropriate use of environmental measures to balance heat and cooling needs is well proven, and should be encouraged in developments. The integrated use of renewable technologies must be considered in the same context to achieve similar aims, recognising that both the technologies and their economic viability will change during the period of the policy.	Noted.
	Question 86	Barratt Strategic		Whilst Barratt Strategic supports the principle of providing more active environmental management techniques into new developments to reduce resource consumption and limit heat island effects, the cost of providing for this have to be balanced against other competing demands.	Noted.
	Question 86	Kent Wildlife Trust	Debbie Salmon	The Trust fully supports active environmental management in new development. The addition of street trees living roofs and living walls have been proved to have a cooling effect on the urban environments. Tree cool the air thus reducing the heat island effect and living roofs and walls cool building in summer and insulate them in winter, thus saving on heating and air conditioning costs and reducing CO2 emissions..	Noted.
	Question 86	Natural England	Josh Nelson	Natural England would support an emphasis on designing in environmentally sustainable building techniques in new developments as a proportionate response to assist climate change adaption strategies.	Noted.
	Question 86	FWCA Frindsbury and Wainscott Community Association	J R Masey	Should be a limit on block paving in gardens.	Noted.
	Question 87			**Q87: Would you like to propose any additional strategies that should be considered in relation to climate change effects in Medway?** Answers for question 87 (from questionnaire & website): 11 Yes/ Agree 3 No/ Disagree 1 Don't Know	
	Question 87	CPRE Kent	Brian Lloyd	The outline challenges and responses corresponds well to the recommendations set out in our 'Tomorrow's Kent' report, which is encouraging - see http://www.cprekent.org.uk/publications/Technical%20Report/tomorrowskent.pdf. A major challenge is how can the LDF, and other policies from Medway Council, encourage the retro-fit of water efficiency, energy efficiency, SUDS, micro-renewable energy generation etc into existing housing and commercial building stock. The council should set out a strategy for doing this.	Noted. The Core Strategy recognises that retrofitting is expensive and difficult to achieve. However programmes are in place to upgrade the publicly owned stock and housing design policy supports retrofitting in appropriate cases..
	Question 87	Kent Wildlife Trust	Debbie Salmon	The Trust would be delighted to discuss any of the issues contained within this response in more detail and work closely with Medway on the formulation of your mapping and policy.	Noted.
	Question 87	Environment Agency	Jennifer Wilson	Yes. The SFRA will need to be updated to take account of PPS25 (previous SFRA was produced under PPG225).	Noted. The Strategic Flood Risk Assessment is being revised.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 87	Kent County Council	Richard Feasey	Yes As above it should link in to projects such at the BRANCH Project and the Wildlife Trust Living Landscapes. Additional comments - When ear marking areas for protection, buffers or habitat creation cross boundary (both district and county) should be considered. The impacts across a wider area should be considered when looking at the impacts of climate change.	Noted.
	Question 87		Carl Kroon	Use the heat storage in Medway like radiators. Council to maintain open areas. The use of more Uk heat tolerant trees for shade and to be maintained. The sun denying use of solar or PV. Collection of rainwater runoff.	Noted.
	Question 87	Medway Countryside Forum	David Murr	Our Forum has expressed opposition to excessive development on the grounds that it is damaging to both urban and rural environments. There are also strong concerns about the effect on natural resources, including damage to water environments by over abstraction. These effects may be aggravated by climate changes.	Noted.
	Question 87	FWCA Frindsbury and Wainscott Community Association	J R Masey	Drains should be checked more often, to help deal with flooding.	Noted.
	Question 87	Frindsbury and Wainscott Community Association	A Wade	.- Loss of garden space for parking space Should be discouraged. - Inadequate drainage especially in new developments - More garage facilities in new designs - not sufficient Green space	Noted.
	Question 87		W Mann	Yes. On shore wind farms - Tidal generation using the Medway's high tidal range (this was proposed as part of a rail crossing of the outer estuary, but could be carried out as an independent project)	Whilst supporting renewable energy the Core Strategy recognises the sensitivity of locating wind farms on the Hoo Peninsula and does not identify areas where these might be located. There are no proposals for tidal power generation.
	Question 87		Dr D Brighton	Yes. Check seawall heights for sea level rise. Is Water storage adequate for warmer dense population?	Thames Estuary 2100 is studying the future of sea defences and flood storage.
				Lodge Hill, Chattenden	
				This development should be actively supported to be the showcase for development to 2026.	Noted
			Alastair Blair	Lodge Hill is already a site of housing. Technique for building here will overcome any physical difficulties. This development should be activity supported.	Noted.
	4.443	Environment Agency	Jennifer Wilson	It has been identified that water resource is an 'issue', stating that the Code for Sustainable Homes will be set at level 6. Will this level be made policy and applied to all new developments within the district? Under 'Greening the Gateway' does this development have the same aspirations of being 'water neutral' like the Thames Gateway developments?	The Sustainable Homes Code is a national requirement and does not need to be repeated in the core strategy. The objective of water neutrality id being advanced through the detailed planning of the settlement.
	4.443	University College for the Creative Arts at Rochester	David Hawkins	For para. 4.443 -4.460. This section should state that part of the site is suitable for higher education, in accordance with the relevant planning policy documents.	Noted.
	4.447		Lynn Ballard	There is a case for reviewing the assumption that the scale of development at Lodge Hill/Chattenden should be limited to 5,000 houses in the light of changes to the economic climate and to national and regional housing targets that have occurred since a new settlement of this size was first proposed at Lodge Hill, almost 15 years ago. The recent appointment of Land Securities, who are looking afresh at development delivery in active consultation with the local community, provides an opportunity to re-assess how the most appropriate size of settlement to meet the aims of adequate provision of houses, jobs, social and community facilities and services and other infrastructure can be attained. Given that the planners of new rural settlements, such as Northstowe in Cambridgeshire have found that they need to build in excess of 5,000 houses to support a range of employment and community facilities and services, the release of a limited amount of adjacent greenfield land that relates sensibly to the Lodge Hill development should be considered in the early stages of the masterplanning process. There is insufficient evidence to justify confining the new settlement solely to the defence estate particularly when decisions about new access roads and the economic/employment role that Lodge Hill should play in the local area.	The policy on Lodge Hill / Chattenden includes details of the mix of uses which the development will provide. This is based upon work carried out by Land Securities and included in the Master Plan and reflects a balance of uses which could be supported by a settlement of about 5000 dwellings. Medway Council does not consider that a larger settlement is necessary to support an adequate range of uses and facilities.
	4.447		Jean Jones	There is a case for reviewing the assumption that the scale of development at Lodge Hill/Chattenden should be limited to 5,000 houses in the light of changes to the economic climate and to national and regional housing targets that have occurred since a new settlement of this size was first proposed at Lodge Hill, almost 15 years ago. The recent appointment of Land Securities, who are looking afresh at development delivery in active consultation with the local community, provides an opportunity to re-assess how the most appropriate size of settlement to meet the aims of adequate provision of houses, jobs, social and community facilities and services and other infrastructure can be attained. Given that the planners of new rural settlements, such as Northstowe in Cambridgeshire have found that they need to build in excess of 5,000 houses to support a range of employment and community facilities and services, the release of a limited amount of adjacent greenfield land that relates sensibly to the Lodge Hill development should be considered in the early stages of the masterplanning process. There is insufficient evidence to justify confining the new settlement solely to the defence estate particularly when decisions about new access roads and the economic/employment role that Lodge Hill should play in the local area.	The policy on Lodge Hill / Chattenden includes details of the mix of uses which the development will provide. This is based upon work carried out by Land Securities and included in the Master Plan and reflects a balance of uses which could be supported by a settlement of about 5000 dwellings. Medway Council does not consider that a larger settlement is necessary to support an adequate range of uses and facilities.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	4.448	tbh developments ltd & helvig ltd	tbh developments/helvig	The statement in the second bullet point needs to be justified.	The second bullet point of paragraph 4.448 of the Issues and Options report states that Lodge Hill would complement rather than compete with the well established regeneration strategy for the urban area. The justification for this statement is set out in the third bullet point. This states that it would provide a very different location to the urban waterfront and town centre sites and be more suited to a variety of housing types, including family housing, so providing choice and addressing the housing market as a whole. In other words, there will be a higher concentration of flats and fewer family houses on the higher density sites in the urban area than at Lodge Hill where a more balanced mix of housing types is expected.
	4.449		Lynn Ballard & Jean Jones	There appeared to be a consensus amongst the local people who attended one of Land Securities-Movement-workshops held in Lodge Hill that a new access road to the Lodge Hill development should be constructed as close as possible to the Four Elms Hill A228 roundabout and that construction traffic and vehicles accessing the new settlement should not be directed to use to the existing Chattenden Lane. The impact of the new settlement on existing properties should be considered at an early stage of the masterplanning process. Established properties on the east side of Chattenden Lane and on Four Elms Hill do not form part of the development site but will be affected in the construction phase and need to be taken into consideration now to ensure that they do not become isolated from the new settlement by virtue of the new transport and rights of way network.	This issue will be addressed at the detailed planning stage when the alignment of the access roads has been determined.
	4.458		Lynn Ballard & Jean Jones	It is not too early in the process to consider options for the role that the new settlement could play in the economic growth of the Medway area. The allocation of employment land for different types of business/retail use should be considered at this early stage to demonstrate how much land would be required, where it should be located and the access arrangements that would need to be put in place. The early economic roles of Lodge Hill will be instrumental in shaping its long-term future. It will influence the skills and aspirations of the people who will live there.	The type and location of employment and retail land is addressed in the Lodge Hill policy and master plan.
	4.459		Lynn Ballard & Jean Jones	The ancient woodland that surrounds the development site needs to be protected and actively managed. These sensitive sites need to have green buffers around them and additional green spaces need to be created to provide for general outdoor recreation.	Noted.
	Question 88			**Q88: Is the intended development programme of 4,500 dwellings constructed between 2012 and 2026, for the Lodge Hill development realistic and achievable, bearing in mind its proposed contribution towards meeting the requirements set out in the South East Plan?** Answers for question 88 (from questionnaire & website): 11 Yes/ Agree 9 No/ Disagree 1 Don't Know	
	Question 88	CPRE Kent	Brian Lloyd	No. The delivery of 4,500 homes plus the necessary supporting infrastructure over the period 2012 to 2026 seems very optimistic. This would mean an average of 321 dwellings being completed every year - from day 1. There will be a significant planning lead-in time. The Core Strategy will not be adopted until March/April 2011; the Chattenden Area Action Plan will not be adopted until March/April 2012; the Master Plan can only be adopted after that date, and then planning permission will have to be sought and the necessary S106 agreement made. Once planning permission is granted, there is likely to be significant preparation works, including undoubtedly some upfront infrastructure. Given this, it is extremely unlikely that residential development will commence in 2012 and when it does commence it will not be at a rate of 321 homes a year from year 1. Therefore, we consider that the expected delivery from this site should be reduced for the Core Strategy period. See also our comments on question 96.	The Council is no longer pursuing an area action plan for Chattenden and is replacing it will a strategic allocation. This will facilitate an early submission of a planning application. Land Securities are aiming to engage with several housing development companies to carry out simultaneous development on site.
	Question 88		Lynn Ballard	The development programme should start as soon as possible in order to meet South East Plan housing targets and to reduce the uncertainty for home owners whose properties are being blighted by the prospect of a new settlement adjacent to them. A first priority should be the construction of a new access road close to the Four Elms Hill roundabout to protect Chattenden Lane from increased traffic. This would open up the area neighbouring the school and church to accommodate the first phase of the development and would allow consideration of adjacent windfall sites.	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 88	Barratt Strategic		The Core Strategy suggests that development will not start at Chattenden until 2012 at the earliest. Notwithstanding the Core Strategy maintains that 4500 units will be delivered by 2026 i.e. within 14 years. This would equate to a build rate of 321 units a year. Independent research by the University of Glasgow on Factors Affecting Housing Build-out Rates for CLG Housing Markets and Planning Analysis Expert Panel (Feb 08) advises at para 2.5 that:- "Most builders generally appear to set a target of between 40 and 80 units built and sold from each outlet annually. One volume builder thought that annual rates of 150-200 would not impose significant inefficiencies. However, he added that it would be impossible to sell houses at this rate without building in a well-defined urban market and offering a range of well-differentiated products" Even with 3 developers operating at maximum the site is only likely to deliver 240 units a year (80x3). This build rate will only be achieved once certain clearance works have taken place, any necessary infrastructure is in pace and any ecological mitigation completed, which is not in our opinion likely to occur as soon as the site is free for development. The preliminary works could delay commencement of build works for over a year. In our opinion, and having regard to the above we would suggest that the site is more likely to deliver a maximum of 3000 units by 2026, the residual 2000 being delivered by 2036. It is totally unrealistic to expect the Chattenden site to deliver 4500 units by 2026 It is on this basis and given the deliverability of the regeneration sites that we have, in answer to question 96 suggested an alternative strategic option – 3000 units at Chattenden by 2026 (with the residual 2000 being delivered by 2036), and 1500 units being delivered on a reduced extended Hoo site (encompassing Hoo, St Werburgh, and the nearby villages of High Halstow and Cliffe Woods).	Sufficient sites have been identified in the strategic Land Availability Assessment to make up for any shortfall in delivery rates at Lodge Hill.
	Question 88	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Yes it is achievable but several issues remain - impact on local village facilities and more important road access to and from the location.	Noted.
	Question 88	Trenport Investments Limited	C Hall	4,500 dwellings in a 14 year period would mean an average of 321 dwellings per year, although the number would be likely to be significantly less at the start, during the development start up period. This number may be achievable during a boom period but would be unlikely to be achieved during times of economic downturn, as at present. There is inevitably likely to be another downturn in the 14 year period bearing in mind the cyclical nature of the property market. Overall we consider that the development programme is too optimistic and this number of dwellings is unlikely to be achieved. The policy of promoting only Lodge Hill is effectively putting all the eggs in one basket, which is a risky strategy. It would also effectively put all of the housing in the control of one landowner / developer which is also risky. The required number of dwellings would 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 would compliment the proposals for Lodge Hill would be Trenports proposals for Cliffe.	A wide range of sites and a substantial surplus of housing land has been identified in the Strategic Land Availability Assessment to make up for any shortfall in delivery at Lodge Hill.
	Question 88	Kent Wildlife Trust	Debbie Salmon	The Trust is concerned that, within the issues to be addressed within paragraph 4.449, the protection, enhancement and extension of Chattenden Woods SSSI have not been identified. For the Trust to be satisfied that 5000 houses can be provided on this site, there will need to be significant mitigation to ensure that the SSSI is protected from harm. As a nationally designated site Chattenden Woods SSSI is a major core site within the Green Infrastructure and will need to be connected into the larger network, buffered with extensive woodland corridors extending through the development. The protection of the SSSI is seen as a very important issue and we are disappointed that this is not given more significance within the document. One of the major threats to ancient woodland is trampling. Constant access destroys the important ground flora present on such sites, and can be a significant cause of disturbance to nesting birds.. For these reasons the Trust would expect to see effective management of access to the woodland, with alternative woodland walks being provided and possibly a wardening service to deter residents from using the SSSI.	The issue of the protection of the SSSI is being addressed with Land Securities as the planning of the site progresses. Policies in the Core Strategy allow for mitigation or compensation if adverse impact occurs.
	Question 88	Dickens Country Protection Society	Chris Fribbins	Yes, although big problem of access has not yet been resolved	Noted.
	Question 88	Natural England	Josh Nelson	Development at lodge Hill, as presently envisaged, would involve the provision of 4,500 new dwellings in close proximity to the nearby internationally protected Thames and Medway Estuary and Marshes SPA and Ramsar Sites and the SSSI at Chattenden Woods. This number of dwellings could have the potential for significant recreational and other human pressures on the vulnerable nature conservation interests. Achievable delivery of this number of houses would need to show that there would not be an adverse effect on the conservation integrity of the nearby internationally protected sites and that the interest features of the Chattenden Woods would not be damaged. As the Issues and Options report indicates at paragraph 4.21, the projected total of houses for the South East Plan period is in excess of 3,000 over the plan periods required provision. We would request the Council give careful consideration to whether the proposed Lodge Hill redevelopment area can sustain the number of projected dwellings considering the nearby vulnerable nationally and internationally protected nature conservation sites. We would also request that the Council gives careful consideration as to whether the landscape could absorb a development of a size and scale that 4,500 dwellings would entail without a significant detrimental effect on the local landscape character and resource.	The impact on protected sites and landscape is being addressed with Land Securities as the planning of the site progresses. Policies in the Core Strategy allow for mitigation or compensation if adverse impact occurs.
	Question 88		Jean Jones	The development programme should start as soon as possible in order to meet South East Plan housing targets and to reduce the uncertainty for home owners whose properties are being blighted by the prospect of a new settlement adjacent to them. A first priority should be the construction of a new access road close to the Four Elms Hill roundabout to protect Chattenden Lane from increased traffic. This would open up the area neighbouring the school and church to accommodate the first phase of the development and would allow consideration of adjacent windfall sites.	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 88	FWCA Frindsbury and Wainscott Community Association	J R Masey	Would prefer less homes and more employment.	The Lodge Hill policy in the Core Strategy seeks a balance between housing and employment provision.
	Question 88	Frindsbury and Wainscott Community Association	A Wade	No. The projected figure of 4500 dwellings is not sustainable. It will not protect the sensitive ecological balance i.e. SSSIs and habitat. The numbers should be halved and even then it would present many problems. To achieve this figure by 2026, 320 dwellings would need to be constructed annually. Given the sensitivity of the site - access problems, the impact on the surrounding area and open space issues we do not believe this to be acceptable or even possible unless planning restraints and consultant advice is ignored. We are not in favour of massive development in Medway.	Noted.
	Question 88	RSPB	Fay Martin	No. The Medway Broad Spatial Options Map set out in Chapter 5 of the Core Strategy – Issues and Options Report illustrates the broad location of Lodge hill, Chattenden. At present however the precise boundaries of the site are not known however the broad location of Lodge Hill, Chattenden indicates that site is potentially within 3km of the Medway Estuary & Marshes SPA. The introduction of up to 5000 addition homes in this location could significantly increase recreational pressure on the European Sites. We recommend that Medway liaise with Natural England in respect of the specialist work that is being undertaken to investigate the existing and predicted recreational pressures on the internationally designated sites. We also strongly recommend this matter be thoroughly appraised in the AA of the Core Strategy and we would welcome the opportunity to comment further on this matter prior to the publication of that document.. Paragraph 4.446 of the Core Strategy – Issues and Options Report states that the Lodge Hill site includes Chattenden Woods SSSSI. Paragraph 8 of PPS9 prescribes that “where a proposed development on land within or outside a SSSI is likely to have an adverse effect on an SSSI (either individually or in combination with other developments), planning permission should not normally be granted”. Paragraph 8 continues “Local authorities should use conditions and/or planning obligations to mitigate the harmful aspects of the development and where possible, to ensure the conservation and enhancement of the site’s biodiversity or geological interest”. The requirements of PPS9 should be taken into account when formulating the Lodge Hill proposals. We would welcome the opportunity to comment further when more details are available of the location and extent of the proposed development.	The precise boundaries of the Lodge Hill site are now known. Medway Council is currently discussing the scope and extent of the appropriate assessment with Natural England, the Environment Agency and adjoining authorities prior to preparing a screening document and appointing a consultant to carry out the assessment. The requirements of PPS9 are being taken into account as the planning of the site progresses.
	Question 88	Open Spaces Society	Patricia Wilson	If built development is to be concentrated on the previously developed areas of the site we think that 4500 dwellings is an unrealistically high number to be realised. (See Housing, Q16. We would hope that all the standards outlined that question would be adopted at Lodge Hill. We fear that it will militate against provision of adequate buffer zones especially far the Chattenden Woods SSSI.	Noted.
	Question 89			**Q89: What tests do you consider should be used to assess proposed transport and access solutions for the development?** Answers for question 89 (from questionnaire & website): 0 Yes/ Agree 0 No/ Disagree 9 Don't Know	
	Question 89	CPRE Kent	Brian Lloyd	It is unclear what is meant by 'tests', but the objective should be to deliver a development that fully embraces sustainable means of transport as a priority and that reliance on the private motor car is minimised.	Noted.
	Question 89		Lynn Ballard	The transport model should be tested on the following factors: 1. Impact of proposed transport and access solutions on existing traffic and residents – can these improve traffic flow, ease congestion, improve safety, persuade people to walk, cycle or use public transport? 2. Deliverability – are potential access routes on land that it is in the ownership/control of Defence Estates or other public bodies. If not, are private owners on potential access routes willing to sell their land/properties? 3. Value for money – e.g., will developers be persuaded to contribute to the cost of the transport and access solutions? 4. Realistic – e.g., will people co-operate to reduce car dependence and will alternatives be managed effectively to ensure that they are used consistently in preference to car travel? 5. Carbon reduction – feasibility of a new rail link to Gravesend using the existing railway line to the Isle of Grain.	Noted. At a strategic level, the impact of development at Lodge Hill upon the wider highway system is being assessed using Medway’s SATURN computer model in conjunction with other development proposed in the Core Strategy.
	Question 89		Mari-Anne Harstad	The wording 'test' is unclear to me. The current usage and availability of transport in and around Chattenden and the Hoo Peninsula need to be much improved so more innovative solutions need to be available. If 'tests' refer to a technical term of assessing suitability then I think we should look for good practice examples in Europe where they are far more advanced in this area.	Noted.
	Question 89		Jean Jones	The transport model should be tested on the following factors: 1. Impact of proposed transport and access solutions on existing traffic and residents – can these improve traffic flow, ease congestion, improve safety, persuade people to walk, cycle or use public transport? 2. Deliverability – are potential access routes on land that it is in the ownership/control of Defence Estates or other public bodies. If not, are private owners on potential access routes willing to sell their land/properties? 3. Value for money – e.g., will developers be persuaded to contribute to the cost of the transport and access solutions? 4. Realistic – e.g., will people co-operate to reduce car dependence and will alternatives be managed effectively to ensure that they are used consistently in preference to car travel? 5. Carbon reduction – feasibility of a new rail link to Gravesend using the existing railway line to the Isle of Grain.	Noted. At a strategic level, the impact of development at Lodge Hill upon the wider highway system is being assessed using Medway’s SATURN computer model in conjunction with other development proposed in the Core Strategy.

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	Question 89	Kent County Council	Richard Feasey	The development needs to have a public transport system in place very early on to ensure that significant traffic movement between the development and Gravesham are not created. In general the Medway Towns, do not have a significant amount of parking associated with their railway stations and this is compounded by Lodge Hill by the existing poor public transport links. Therefore there is the risk of significant migration to Gravesham to access the rail system, if new public transport linking the site to more proximate railway stations is not incorporated.	Noted.
	Question 89		I.H. Smith	up-to-date road survey	This will form part of the comprehensive Transport Assessment for the development.
	Question 89	FWCA Frindsbury and Wainscott Community Association	J R Masey	Traffic Impact Study carried out. Access from Four Elms roundabout across Woodfield Road to Low Chat Road for developers, and used for main access afterwards, along with Chattenden Lane and Dux Court Rd which hopefully will stay as a lane, any farmland lost should be compensated to farmer. Maybe a station so the Grain line could be utilised for passenger also.	Noted.
	Question 90			**Q90: What headline sustainability principles should be applied in planning the settlement?** Answers for question 90 (from questionnaire & website): 3 Yes/ Agree 0 No/ Disagree 6 Don't Know	
	Question 90	CPRE Kent	Brian Lloyd	It would be appropriate for the development to accord with the sustainability principles being developed for eco-towns, as presented in the eco-town supplement to PPS1.	Noted.
	Question 90	Groundwork Kent & Medway	Simon Green	Low energy requirement due to maximum insulation, use of heat exchangers etc. District heating from nearby power stations essential. Integrated on site generation by affordable and visually attractive renewable energy. Designed to maximise public transport routes around the development and to nearby urban areas (maybe a terminus of proposed Fastrack). Integrated cycle/pedestrian routes. High quality design inside and out. Consider inclusion of cohousing schemes which enable shared used of some facilities. Investigate potential passenger services on adjacent freight railway. Look at examples of best practice throughout Europe and emulate.	Noted.
	Question 90	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Waste minimisation, recycling, local energy generation, sustainable community - schools, shops, doctors etc.	Noted.
	Question 90		Mari-Anne Harstad	Direction should be taken from the EU Sustainable Developmentt Strategy, Leipzig Charter and Bristol Accord. Create local jobs for local people, find innovative transport/accessibility/mobilty solutions and implement them in such a way that everybody can benefit.	Noted.
	Question 90	Kent Wildlife Trust	Debbie Salmon	• Protection and buffering of Chattenden Woods SSSI. • A fully connected, multifunctional Green Infrastructure throughout all open spaces, housing and employment areas. • Reduction of emissions from cars and households to the lowest possible levels. • A public transport system and a fully connected pedestrian and cycle network to reduce emission to the minimum. • A full appraisal of impacts on European sites both individually and in combination within the Core Strategy AA.	Noted.
	Question 90	Dickens Country Protection Society	Chris Fribbins	Maximise energy efficiency. Be self sustaining wherever possible (limit need to travel), Quality public transport links (including rail or other rail station links).	Noted.
	Question 90	Natural England	Josh Nelson	The Council should use any Lodge Hill development as an exemplar for sustainable development considering its location in the Thames Gateway Eco region. In light of Natural England's concerns over the ability for species, habitats and landscapes to adapt to the effects of climate change, we would urge the Council to consider requiring energy saving and reduction technologies and measures incorporated to a standard over and above the usual required planning and building regulation control standards. We would also suggest that the Council requires a significant proportion of on-site renewable energy generation for the same reasons. In order to promote a sustainable balanced mixed community, Natural England would like to see sufficient retail and employment services provided on site to reduce use of the private car and thereby contribute to carbon reduction. With a development of anything like the scale proposed, Natural England would wish to see extensive on-site provision of high quality, multi-functional green infrastructure as a guiding sustainable development principle. We would refer the Council to the South East Green Infrastructure Framework for guiding principles. Considering the nearby designated nature conservation sites and their vulnerability to recreational and other human disturbance, the nature and extent of on-site green infrastructure planning and provision would be a vital tool in reducing the potential for significant effects to be caused to protected nature conservation interests.	Noted.
	Question 90	Kent County Council	Richard Feasey	Code for Sustainable Homes -water and energy efficient measures should be incorporated. Good access to public transport and walking and cycling routes.	Noted.
	Question 90		Vivienne Parker	Insulation standards on ALL buildings to at least grade, provision of at least 2 wind turbines nearby, local shopping parade with a school/church/community hall/doctors surgery. Rerouting of the bus service to take in the new development. Creation of nearby allotments.	Noted.
	Question 90		I.H. Smith	None as the development should not take place. The council is grab, with no concern for existing residents and their needs,.	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 90	FWCA Frindsbury and Wainscott Community Association	J R Masey	Protection of woodlands essential, with such a large development planned no way should development merge with High Halstow and Cliffe Woods.	Noted.
	Question 91			**Q91: Do you have any preferences as to the economic role that the new settlement could fulfil?** Answers for question 91 (from questionnaire & website): 0 Yes/ Agree 5 No/ Disagree 4 Don't Know	
	Question 91	CPRE Kent	Brian Lloyd	See response to question 33.	
	Question 91		Lynn Ballard	In the Economy section, it is noted that Medway is currently underrepresented in relation to managerial and professional jobs, that there is a predominance of micro businesses with potential to grow, that there is scope to encourage graduates to start businesses in the area and that there is a shortage of grow-on space for businesses as they expand. There is an opportunity for the new settlement at Lodge Hill to be an aspirational place, particularly in terms of employment. It could respond to the deficiencies mentioned above whilst not competing with other business parks in the Medway area. In para. 4.64, mention is made of the attractiveness of the Isle of Grain for environmental and construction products businesses but that its remote location has been a barrier to investors. There is an opportunity to capitalise on the proximity of the new settlement at Lodge Hill to develop businesses that are aligned to, and support these sectors. This would give new residents of Lodge Hill a choice to work locally in higher skilled and potentially higher paid jobs that could compare favourably to commuting to London.	Noted. The policy on Lodge Hill seeks to create a new focus for higher value economic activity.
	Question 91	Barratt Strategic		As per our response to question 33, whilst there are some merits in identifying part of the new settlement at Chattenden as a strategic employment location (ala Kings Hill) we do have some reservations about the effects this would have on the economic regeneration of the main urban areas, especially when access to these areas is seen as one of the impediments to regeneration. Providing a highly accessible strategic employment centre outside the main urban areas is bound to act as a counter draw and thus have the ability to prejudice the council's long term economic regeneration aspirations. Furthermore such a strategy is in our view less sustainable than concentrating the main employment locations within the urban area and leaving the employment provision proposed at Chattenden as that which would serve a local need	Noted.
	Question 91	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Potential to provide many larger more efficient retail and other facilities, but impact on other villages need to be assessed.	Noted.
	Question 91	tbh developments ltd & helvig ltd	tbh developments/helvig	It is unacceptable that any evaluation of the Lodge Hill, Chattenden new settlement should identify a potential employment area of 25 hectares before the economic role of the new settlement has been determined. An employment zone of 25 hectares would be of strategic significance within the Kent Thames Gateway not only in Medway. Such an area would certainly not function just as local employment area for the new settlement. The employment function of the new settlement and the timing of the development of employment land at the new settlement need to be considered and agreed in the context of the overall housing, economic development and employment strategy for Medway up to 2026, taking into account the current availability of employment land and employment land committments such as land adjacent to Rochester Airfield. The evidence base is not yet available to allow these employment land issuse to be considered.	Noted
	Question 91		Mari-Anne Harstad	Eco tourism, new 'green' technologies, specialist education (wildlife/nature, biodiversity reserach & management, science, land management), life skills training (parenting, family constellation work), new comprehensive and greener recycling & waste management research.	Noted.
	Question 91	Kent Wildlife Trust	Debbie Salmon	The Trust has no preference to as to the economic roles providing there are no impacts on European sites, the SSSI and biodiversity in general.	Noted.
	Question 91		Jean Jones	In the Economy section, it is noted that Medway is currently underrepresented in relation to managerial and professional jobs, that there is a predominance of micro businesses with potential to grow, that there is scope to encourage graduates to start businesses in the area and that there is a shortage of grow-on space for businesses as they expand. There is an opportunity for the new settlement at Lodge Hill to be an aspirational place, particularly in terms of employment. It could respond to the deficiencies mentioned above whilst not competing with other business parks in the Medway area. In para. 4.64, mention is made of the attractiveness of the Isle of Grain for environmental and construction products businesses but that its remote location has been a barrier to investors. There is an opportunity to capitalise on the proximity of the new settlement at Lodge Hill to develop businesses that are aligned to, and support these sectors. This would give new residents of Lodge Hill a choice to work locally in higher skilled and potentially higher paid jobs that could compare favourably to commuting to London.	Noted. The policy for Lodge Hill seeks to create a new focus for higher value economic activity.
	Question 91	University College for the Creative Arts at Rochester	David Hawkins	This section should state that part of the site is suitable for higher education, in accordance with the relevant planning policy documents	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 91	FWCA Frindsbury and Wainscott Community Association	J R Masey	Employment, such as to allow less commuting to be necessary.	Noted.
	Question 92			**Q92: Do you agree that the new settlement should contribute towards a wider green vision or strategy for the Hoo Peninsula and the Isle of Grain?** Answers for question 92 (from questionnaire & website): 18 Yes/ Agree 2 No/ Disagree 0 Don't Know	
	Question 92	CPRE Kent	Brian Lloyd	Yes, the development would provide the opportunity to do this and we would welcome further details on this.	The wider green strategy is addressed in the open space, green grid and public realm policy in the Core Strategy.
	Question 92	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	On balance, yes, as new significant development - but issues remain	Noted.
	Question 92	Trenport Investments Limited	C Hall	Yes. Bearing in mind the scale of development proposed the proposals should contribute towards a greener vision for the Hoo Peninsula and the Isle of Grain.	Noted.
	Question 92	Dickens Country Protection Society	Chris Fribbins	By definition this will reduce the amount of green space, so compensatory management of the local environment will be needed.	Noted.
	Question 93			**Q93: Have you any suggestions/proposals that should feature in the delivery strategy for the new settlement and that can help achieve the timely provision of necessary infrastructure and services?** Answers for question 93 (from questionnaire & website): 2 Yes/ Agree 3 No/ Disagree 2 Don't Know	
	Question 93	CPRE Kent	Brian Lloyd	The details of the proposed development are not yet known, so it is difficult to comment on the delivery strategy. However, the priority should be to ensure that essential infrastructure is provided up front as far as possible particularly those necessary to provide access.	Noted.
	Question 93	ScottishPower	Chris Girdham	Potential synergies with energy generation should be identified within any new settlement delivery strategy. Energy consumption requirements should be shared with energy providers and Combined Heat and Power (CHP) needs and capacity should be determined where possible.	Noted.
	Question 93		Mari-Anne Harstad	Begin to use the site immediately, allow the local and existing communities in the area access to the fishing lakes, historical buildings and green space. This site has long been out of bounds for many Medway residents, it should be opend up for all to visit so people can begin to understand the site and its meaning before it is 'transformed' into something else. There is already a strong community in the Chattenden area and some groups could make use of the site through new or old buildings at a much earlier stage then is presently thought, for example churches for religious groups.	Noted.
	Question 93	Kent Wildlife Trust	Debbie Salmon	The Green Infrastructure the buffering and management of Chattenden Woods SSSI and habitat creation in open spaces should be created as soon as possible to enable habitats to become mature and to provide good habitat for species that may need to be translocated. Finances for management and monitoring of the SSSI and the Green Infrastructure will should be sought from developers.	Noted.
	Question 93	FWCA Frindsbury and Wainscott Community Association	J R Masey	Suggest employment site developed first.	Noted.
	Question 93		W Mann	Implement as proposed but consider Lodge Hill, Kingsnorth and Grain as part of the same project. Together they present a significant population and commercial need, and a significant opportunity toward implementing Q92 successfully. On the back of all 3 sites it should be possible to justify and fund significant improvements to road and rail links, and also implement a wider green vision.	Both Kingsnorth and the Isle of Grain already have planning permission for substantial development and are therefore a number of years ahead of Lodge Hill in their development timetable.
				5. Spatial Choices or Options	

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
		University College for the Creative Arts at Rochester	David Hawkins	a. This is the only part of the document that sets out both the issue, and options designed to deal with that issue. b. Issues are presented in the other sections of the document - for example, on housing, on transport, on the economy, on education and skills etc -but different options designed to deal with those options are not explicitly set out. c. This is disappointing, as central government guidance indicates that options should be clearly presented.	Noted.
		Kent County Council	Richard Feasey	The preference within the strategic spatial options for a new settlement at Lodge Hill Chattenden is noted and supported as consistent with preceding strategic policy for Medway. If the alternative spatial options were to be pursued there would be cross boundary implications to consider e.g. in relation to service provision that would require inter authority working e.g. between Kent and Medway Education Authorities .Comments below relate specifically to those options of urban expansion sites that are situated close to the County border, i.e. - Option 3 Capstone Urban Extension - Option 4 East of Rainham Extension - Option 5 North of Rainham Extension (to a lesser extent) Substantial new housing developments in these locations will require additional new schools to serve the increased population. The generation of new pupils and the provision of pupil places at new schools will, in turn, have a knock on effect on local existing schools. Education arrangements and provisions to meet forecast demand will have to be managed carefully by both authorities working together and accommodated by provisions within the Medway LDF documents to ensure that the provision of new pupil places is not to the detriment of the existing schools. Substantiating documents from KCC include all of the usual relevant planning policy documents plus KCC's Service Provider Statement.	Given that the Core Strategy is pursuing the Lodge Hill option, the cross border issues in relation to development at Capstone Valley and Rainham will not arise.
	5.18		Wendy Lane	Gravesham BC understand the clear rationale for the development of Lodge Hill as a primarily PDL site identified within RPG9a. However it is difficult to comment on the optimum / maximum size for the new settlement without more information about the potential infrastructure requirements. Transport impacts on the M2 / A289 junction which is within Gravesham not Medway incl. potential commuters to Ebbsfleet is a key issue for us. Also would need to know likely impacts on the A226 as well as impact from new rail users at Higham. Impacts during the construction phase is also fundamental and we look forward to closer working on this in the future.	Noted.
				The Options	
	5.21		Lynn Ballard & Jean Jones	The option to develop a freestanding settlement focussed on the defence estate and where appropriate, on adjacent land in the existing village situated on Four Elms Hill and Chattenden Lane is supported.	The Lodge Hill option does not include development on adjacent land on Four Elms Hill.
	5.25			The Council received 43 letters & 350 signatures from local residents to oppose option 3-Capstone urban extension.	Noted.
	5.26	Maidstone Borough Council	Darren Bridgett	Maidstone Borough Council does not support this option and does not support any development proposed in relation to this option that is within the Maidstone administrative area. Policy AOSR7 of the South East Plan 2009 directs the Maidstone local development framework to "avoid coalescence between Maidstone and the Medway towns conurbation", which development here would undoubtedly do. In addition, the supporting text to this policy requires an indicative 90% of new housing in Maidstone (11080 dwellings 2006-2026) to be developed in or adjacent to the town. The section of the Capstone Valley that is within the Maidstone administrative boundary is not an appropriate location for rural housing, and would not provide a sustainable type of settlement, or support the needs of the Borough's rural population. The 10% of new housing in Maidstone Borough that is directed towards the rural area will go towards established settlements that already serve a functioning role in this area.	Noted.
	5.29	Upchurch Parish Council	John Catford	Strongly oppose this option which erodes the Medway Swale gap.	Noted.
				Evaluation of the Options	
	Table 11		Alastair Blair	Do not biuld on this land. It is an area of natural beauty	
	Option number 5		Steve Banfield	Although I like the sentiment about Option 5 assessment 5, it is not quite right due to the size of Hempstead Valley. It does have a severe problem with roads cutting into the present lanes, though (to allow access to the shopping complex.)	
	Question 94			**Q94: Have the right options been considered? Are there any other options you think should be considered?** Answers for question 94 (from questionnaire & website): 5 Yes/ Agree 2 No/ Disagree 3 Don't Know	
	Question 94	CPRE Kent	Brian Lloyd	We are not aware of any other options.	Noted.
	Question 94	Viridor Waste Ltd	Mandeep Jutley	The options section only relate to the new settlement. It would be helpful to have sight for the various options for the other topics being addressed in the Core Strategy.	The Core Strategy addresses the issue of Options and Alternatives.
	Question 94	Barratt Strategic		As indicated in our response to question 96, we feel there is an alternative option that should be tested. This would comprise a reduced scale of development at Chattenden, as we only believe it can deliver 3000 units maximum during the current plan period. The residual 2000 should be carried over to the next plan period. In addition to the above a reduced scale of development equivalent to a mini extended Hoo should be assessed. This could provide for 1500 units in and around Hoo, St Werburgh, High Halstow and Cliffe Woods.	Medway Council considers that 4,600 dwellings can be delivered at Lodge Hill by 2026 and if this target is not achieved, there are sufficient residential sites identified to meet overall requirements without the need for the release of land at Hoo St.Werburgh, High Halstow and Cliffe Woods.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 94	Trenport Investments Limited	C Hall	No. The right options have not all been considered. A further option which should be considered is the option of expansion of the village of Cliffe, as proposed by Trenport. 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.	The release of greenfield land at Cliffe for development is not required to meet Medway's housing requirements.
	Question 94	Kent Wildlife Trust	Debbie Salmon	In order to express an opinion we would need to see more detailed environmental impact assessment. We would expect the choice of spatial options to reflect the principles of sustainable development, and particularly the protection and enhancement of biodiversity.	Noted.
	Question 94	Dickens Country Protection Society	Chris Fribbins	Reluctantly support the option of Lodge Hill as opposed to extension of other villages and coalessence of Hoo and Chattenden	Noted.
	Question 94	BAE Systems	BAE Systems	Representations made by CB Richard Ellis on behalf of BAE Systems. Answer of Q94-96: Whilst we do not dispute the merits of Lodge Hill being brought forward as a strategic housing allocation we do believe that a flexible and distributed supply of housing should be provided. A scheme as ambitious to deliver as Lodge Hill will be subject to many variables and will probably be delivered at the tail-end of the plan period. Other sites should be allocated in order to spread the housing requirement and meet the 5 year supply. Paragraph 4.46 of PPS 12 states that a, 'strategy is unlikely to be effective if it cannot deal with changing circumstances. Core strategies should look over a long time frame – 15 years usually but more if necessary. In the arena of the built and natural environment many issues may change over this time. Plans should be able to show how they will handle contingencies: it may not always be possible to have maximum certainty about the deliverability of the strategy. In these cases the core strategy should show what alternative strategies have been prepared to handle this uncertainty and what would trigger their use. Authorities should not necessarily rely on a review of the plan as a means of handling uncertainty.' Paragraph 52 of PPS3 states that, 'The Government's objective is to ensure that the planning system delivers a flexible, responsive supply of land. Reflecting the principles of 'Plan, Monitor, Manage', Local Planning Authorities and Regional Planning Bodies should develop policies and implementation strategies to ensure that sufficient, suitable land is available to achieve their housing and previously-developed land delivery objectives.' Local Planning Authorities should identify sufficient specific deliverable sites to deliver housing in the first five years. To be considered deliverable, sites should, at the point of adoption of the relevant Local Development Document: – Be Available – the site is available now; – Be Suitable – the site offers a suitable location for development now and would contribute to the creation of sustainable, mixed communities; and – Be Achievable – there is a reasonable prospect that housing will be delivered on the site within five years. Short term housing sites should also be identified in addition to Lodge Hill. Conclusions Hoo St Werburgh falls within the Kent Thames Gateway Sub-region, as defined on the Key Diagram that accompanies The South East Plan: The Regional Spatial Strategy for the South East of England (RSS, May 2009). As such it is located within a Growth Area which, under Policy H2, is identified for accelerated housing delivery. The policy further provides scope to identify additional sources of supply by encouraging opportunities on suitable previously developed sites. This includes appropriate opportunities for change of use of non-residential sites to secure either mixed use residential development or residential development. It also highlights the need to address any backlog of unmet housing needs within the housing market areas they relate to, in the first 10 years of the Plan. RSS Policy KTG1 seeks to greatly increase the supply of new housing, and affordable housing in particular, in Kent Thames Gateway. The Council's Annual Monitoring Report (AMR, 2008) states that housing completions fell below the Structure Plan target of 780 pa. Even more significantly, the AMR housing trajectory is based on the Kent and Medway Structure Plan target of 11,500 units to 2016. This policy expired on 6th July 2009 and has been superseded by RSS Policy H1. This specifies a housing target of 16,300 additional units across Medway to 2026, or 815 units pa. This would suggest that the Council is going to struggle to meet its housing target going forward. While we are aware that the Council expects to make up the current shortfall in its housing trajectory, most notably for years 5-15, with LDF allocations, the shortfall is substantial with only 8,374 units presently identified. Given that the BAE Systems Sports and Social Club site is available and deliverable within the Plan period and is not reliant upon infrastructure delivery, in this respect it offers a logical opportunity to boost the Council's housing delivery. The BAE Systems Sports and Social Club site is clearly an exceptional case. While it is allocated as open space, it is privately owned and the Club's closure is both imminent and inevitable. Efforts to secure planning permission to retain the facilities have not been supported by the Council. Rather than abandon the site and leave it unused, it is logical to reallocate the site for alternative use, namely residential. The site is partially brownfield and it is clear from the AMR (2008) that the Council is flexible in its approach to development on previously developed land. Moreover, Medway has a significant housing shortfall to make up, and the BAES site is suitable, achievable, and deliverable for residential development.	The Strategic Land Availability Assessment (SLAA) demonstrates that a wide variety of housing sites, distributed around the urban areas and Chattenden, have been identified to meet Medway's housing requirements. The BAE Systems Sports and Social site has been rejected in the SLAA.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 94		Peel Investments (Intermediate) Ltd	Peel Investments (Intermediate) Limited do not consider that the right options have been considered. The Wooley's Orchard site falls within the Rainham North Urban Extension Area option. Whilst significant growth in this area may not be preferable to the Chattenden Barracks development, this should not preclude the ability of small urban extensions to come forward where these are well related to existing residential areas, infrastructure and services. The Wooley's Orchard site meets these criteria and it should be considered as a potential location for small scale urban expansion. The Core Strategy Issues and Options report only considers large scale alternatives to the Lodge Hill Chattenden Barracks proposal, which the Council already identify is their preferred option, and not how development could be disaggregated across a number of smaller sites to minimise the impact and maximise sustainability. In the context of the analysis contained within the Core Strategy Issues and Options report, the Rainham North Urban Extension Area may be portrayed as a poor substitute for Lodge Hill. However, at a site specific level certain sites may be suitable for development and should not be ruled out on the basis of the broad and overall analysis contained within the report, but on site specific factors identified through the SLAA. For example whilst the Rainham North Urban Extension Area is appraised as high negative impact on 'integration with urban with existing urban form' and on 'impact on natural assets', the Wooley's Orchard site as a standalone opportunity would score much better than the area as a whole, because it is bounded by existing residential areas and well integrated with the Rainham Urban Area. The site is also not in agricultural use nor has much potential for agriculture use and as such would have less impact on natural assets. The Core Strategy Issues and Options fails to recognize the role that these sites could play and the role the SLAA has in identifying and assessing these individual sites.	The Woolley's Orchard site has been assessed and rejected in the Strategic Land Availability Assessment. The SLAA shows that a substantial number of small sites have been identified throughout the urban area.
	Question 94	RSPB	Fay Martin	No. Although the RSPB does not have a specific geographic preference for the location of residential development, we would support a constraints based approach to identifying the most appropriate locations for development. PPS3 highlights the importance of constraints "such as physical access restrictions, contamination, stability, flood risk, the need to protect natural resources e.g. water and biodiversity and complex land ownership issues". The RSPB therefore recommends that the precise location of future development in the Medway area be considered in light of its relationship to nature conservation designations and flood risk.	Noted
	Question 95			**Q95: Do you agree with the appraisal of the options? If not please give your reasons** Answers for question 95 (from questionnaire & website): 10 Yes/ Agree 5 No/ Disagree 2 Don't Know	
	Question 95	CPRE Kent	Brian Lloyd	The assessments seem generally reasonable and highlight serious concerns with options 2 to 5. Consequently we strongly support the Council in rejecting them. Option 1 (Lodge Hill) receives a generally favourable assessment, though we consider that its full impact will not be known until further detailed assessments have been undertaken.	Noted.
	Question 95	Groundwork Kent & Medway	Simon Green	Yes. We would particularly concur with the Council's opposition to Capstone Valley and Rainham North. Both these areas are of very high landscape and nature conservation value and are greenfield sites. They provide essential links to the open countryside to the south and the estuary to the north and development would block wildlife corridors isolating locations such as Darland Banks, Capstone Country Park etc. These areas are also important green lungs and amenity leisure and recreation areas for the dense housing areas that are adjacent to them. The transport access problems cannot be overcome.	Noted.
	Question 95	Barratt Strategic		Barratt Strategic do not agree with the councils appraisal of an extended Hoo. 1 Conformity with the South East Plan:- The contention that an extended Hoo would fail to respect or enhance the character and distinctiveness of existing settlements is in Barratt Strategic's opinion wholly subjective. Developers are capable of designing urban extensions that have regard to/complement existing settlements. Further more the landscape strategy adopted within urban extensions can also draw from and complement the surrounding landscape. Thus there is no reason why an extended Hoo would conflict with the aims and objectives of policy CC6 of the South East Plan. Similarly we do not see why it would be difficult to assimilate an extended Hoo, especially a reduced extended Hoo as set out in our response to question 96, with existing communities. If taken forward in conjunction with a reduced Chattenden (see response to question 86) an extended Hoo (also reduced) would in our opinion comply with KTG1 of the South East Plan. The priority would be brown field development. In fact even as a replacement to Chattenden, the scale of urban regeneration proposed within Medway would mean that the majority of development was brown field. 2 Impacts on Natural Assets:- If, as we suggest in our response to que 96, the council work with the developers with an interest in the Extended Hoo area, they should be able to formulate a development strategy that has the least impact on the local areas of ecological interest. 3 Transport Impacts:- The potential scale of development being proposed at an Extended Hoo should enable a collaborative approach to be taken to local highway improvements and enhanced public transport links. If, as we suggest in our response to que 96, a reduced level of development is bought forward at Hoo, and it is acknowledged that only 3000 units will be developed at Chattenden over the course of the plan period a coordinated strategy to highway improvements in the area, and enhanced public transport services can be formulated. In addition to the above we would like to point out that the assessment set out in the Core Strategy Issues and Options conflicts starkly with para 5.4.10 of the current Local Plan where in Hoo is described as having a good frequency of bus serves to the urban area and beyond. 4 Integration with the existing urban form:- As indicated above developers are capable of designing urban extensions that have regard to/complement existing settlements. Additional development within an extended Hoo (including Hoo, St Werburgh, High Halstow and Cliffe Woods), would bring about enhanced services, and new employment opportunities. Again these opportunities could be designed into a development brief to be compiled by the council in consultation with the developers with an interest in the area to ensure that the infrastructure associated with/required as a result of the development of this area is delivered in a timely and organized fashion. In addition to the above we would like to point out that the assessment set out in the Core Strategy Issues and Options conflicts starkly with para 5.4.10 of the current Local Plan where in	1. Given the scale of development considered in the option i.e. about 5000 dwellings, the character and distinctiveness of Hoo would inevitably change, as a substantial expansion would occur. The Council does not accept that a reduced level of development at Lodge Hill up to 2026 will occur and even if housing development proved to be slower then expected, sufficient residential sites have been identified in the Strategic Land Availability Assessment to meet requirements without development at Hoo. 2. Even if the impact on areas of ecological interest could be minimised, the M.A.F.F. agricultural land classification maps show that Hoo, High Halstow and Cliffe Woods are all surrounded by top grade agricultural land. 3. In the absence of a traffic impact study, the concerns expressed in relation to the expanded Hoo option, still remain. 4. Expansion of the scale proposed, would radically alter the existing character of all three settlements. Whilst it is accepted that improved service facilities and employment opportunities could occur. 5. Noted 6. Noted. Development at the three settlements would all be on Greenfield land whereas the majority of development

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				Hoo is described as having a wide range of social and community facilities. 5 Effective use of existing infrastructure/need for new infrastructure: ' whilst new investment may be needed to accommodate the scale of development proposed, and the introduction of this infrastructure might cause some disruption to existing networks, infrastructure upgrades are completed all over the country to accommodate new development. This is not s new issue and not insurmountable. 6 Accessibility to Existing Services:- Whilst an extended Hoo might perform poorly now compared to the proposed urban extensions, the comparison should have regard to the situation when development is completed and services/facilities are in place. As set out above a development brief compiled by the council in consultation with the developers with an interest in the area could ensure that the infrastructure associated with/required as a result of the development of this area is delivered in a timely and organized fashion. Issues 7-9- see comments above. Overall we do not feel the impacts upon the area are as sever or negative as proposed by the council. Many of the issues are capable of being addressed during the course of design process and thus are capable of mitigation. In the context of the above we note that the initial sustainability appraisal (July 2009) indicates at para 3.56 that the main impacts from this solution on the natural environment would be in terms of encroachment onto green field land. This however is inevitable with any development not on previously developed land. As far as highway impact is concerned the initial sustainability appraisal (July 2009 indicates at para 3.54 that there would be limited impact on traffic congestion and travel choice due to the proximity to the existing road network. The initial sustainability appraisal (July 2009) also indicates that this solution would make a positive contribution to the economic competitiveness of the area, maintaining and developing the workforce, as well as improving educational achievements, beginning in the short term and continuing into the medium and longer term. There may also be some potential for some benefit from this solution to conserving and enhancing the historic environment and other material assets of the area. Furthermore we note that the initial sustainability appraisal indicates at para 3.51 that the development of an extended Hoo would still preserve the space between the villages that would make up the extended Hoo area. To conclude Barratt Strategic feel that the councils assessment of the extended Hoo site is flawed. We do not feel the impacts upon the area are as sever or negative as proposed by the council. Many of the issues are capable of being addressed during the course of design process and thus are capable of mitigation. The initial sustainability appraisal is a lot less critical of the effects of development in this area, and we would suggest the council review their position having regard to the above.	at Lodge Hill would be on previously developed land.
	Question 95	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	In so far as it concentrates development on a new community in place of significant other new areas, expansion of current settlements and joining built up areas - this is supported as the least, worse, option.	Noted.
	Question 95	Trenport Investments Limited	C Hall	No we disagree with the appraisal of the options. We would make the general comment that the assessment seems to be biased in favour of Lodge Hill. For example the answers to questions 6 in the appraisal (re: proximity to existing services) for Hoo Expansion and Lodge Hill get very similar comments but Hoo Expansion has existing services whereas Lodge Hill does not, so there should be a clear distinction in favour of Hoo. However, the summary assessment gives the impression that the opposite is the case. Also there is no assessment of the impact of the options on existing services. With the same examples Hoo Expansion may help support existing rural services, whereas Lodge Hill may compete with them leading to a decline, and making the existing villages less sustainable as custom is drawn away from them.	Noted. Medway Council has given the greatest weight to the national policy of giving priority to the development of previously developed land, compared with the other assessment criteria.
	Question 95	Kent Wildlife Trust	Debbie Salmon	Within the appraisal more importance needs to be given to international, national and local wildlife sites and their protection	Considerable importance has been given to the protection of wildlife sites in the Core Strategy.
	Question 95	RSPB	Fay Martin	No. We recognise that the Sustainability Appraisal of the Core Strategy has evaluated the housing options and has concluded that "In terms of the spatial options being used to accommodate housing, there are similarities between Lodge Hill, Chattenden and the Extended Hoo options in that they would have a beneficial effect on social, economic and also environmental objectives". This statement is of significant concern given that Hoo is presently less than 500 metres from the Medway Estuary & Marshes SPA and the Lodge Hill, Chattenden site is potentially within 3km. The introduction of up to 5000 addition homes in either of these locations could significantly increase recreational pressure on the European Sites. Without having undertaken technical studies to investigate the existing and potential future recreational pressure on the European Sites, it is not clear how the conclusion of the SA/SEA has been reached. We recommend that as part of the appraisal of housing options, Medway should liaise with Natural England in respect of the specialist work that is being undertaken to investigate the existing and predicted recreational pressures on the internationally designated sites. We also strongly recommend that the above matters be thoroughly appraised in the AA of the Core Strategy and we would welcome the opportunity to comment further on this matter prior to the publication of that document.	Noted.
	Question 96			**Q96: Do you support the option, endorsed by the Council, for a new settlement at Lodge Hill?** **If not, which of the following alternatives do you support?** **• Greater Hoo** **• Capstone urban extension** **• East of Rainham urban extension** **• North of Rainham urban extension** Answers for question 96 (from questionnaire & website): - Do you support the option, endorsed by the Council, for a new settlement at Lodge Hill? (21 Yes/ Agree; 3 No/ Disagree; 1 Don't Know) - If not, which of the following alternatives do you support? - Greater Hoo (1 for support, 2 not support) - Capstone urban extension (The Council received 43 letters & 350 signatures from local residents to oppose option 3-	

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				Capstone urban extension.) - East of Rainham urban extension (2 not support) - North of Rainham urban extension (4 support & 2 not support)	
	Question 96	CPRE Kent	Brian Lloyd	We consider that a mixed-use development at Lodge Hill focused on previously-developed land is preferable to making major greenfield land releases. However, there are a number of major issues relating to the site that will need to be considered through the Core Strategy including the scale and mix of development; the integration of development into the existing transport network; the potential impact on the nearby rural communities; and the need to retain greenspace and biodiversity. It will also be necessary for the Core Strategy to set out the specific requirements for the site, and how they will be delivered. In particular, we do not consider that the planning of the site should be driven by setting a target for a specific amount of development (either residential or employment). Rather, the amount and type of development considered appropriate should be a product of the site assessments and the delivery of key sustainability and eco targets. The sites presents a unique opportunity to provide a high quality and environmentally sensitive development, and this opportunity should not be squandered for the sake of maximum development return.	The issues raised have been addressed in a masterplan, which is part of the evidence base. It is necessary to identify an approximate level of development from the outset but as the masterplan has been developed the implications in terms of density and layout have emerged. Each phase of development will be subject to the normal development management process and will need to meet the environmental requirements policy.
	Question 96		Lynn Ballard	Yes, I support the option endorsed by the Council for a new free-standing mixed-use settlement at Lodge Hill of an appropriate size that could also provide Chattenden with much needed services and facilities as it is currently starved of locally accessible retail, leisure, health, community and employment opportunities.	Noted.
	Question 96	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Support Lodge Hill as least worst option. Still have concerns about additional housing and the practicalities of bring new employment to the area. The scope of S106 may need to be extended to allow more contribution to local village facilities - as outlined by a new Rural Issues strategy.	Noted.
	Question 96	Trenport Investments Limited	C Hall	No. Trenport does not support the option for a new settlement at Lodge Hill. The Expanded Hoo option, modified to include Cliffe, is supported, for the reasons given in respect of questions 52 and 94. Alternatively a new option involving the expansion of key rural service centres, including Cliffe, is suggested and supported.	The Council is required to consider the overall sustainability of development. Therefore, development that is likely to generate significant new traffic movements to jobs and facilities some distance from it, is unlikely to be supported. The release of greenfield land at Cliffe for development is not required to meet Medway's housing requirements.
	Question 96	Kent Wildlife Trust	Debbie Salmon	Lodge Hill This site is very near to Chattenden Woods SSSI. Consideration will need to be given to its protection from construction and recreational pressure. The Impact on the Thames Estuary and the Medway Estuary and Marshes SPAs and other European sites from recreational impact will need to be considered within the AA for the Core Strategy. (See questions 88-93 for further details) Greater Hoo The Trust would have a number of reservations regarding this proposed extension including:- • The site's proximity to the Medway Estuary and Marshes SPA • The impacts on the SPA from recreational pressure. • The site's proximity to two important ancient woodland SSSI namely Northward Hill and Chattenden Woods • Connectivity within this area will be severed with important open corridors that could be enhanced for wildlife being destroyed between the three villages. Capstone Urban Expansion The Trust would be very concerned if this option were to be chosen as this would go against the ethos of Green Infrastructure creation. The proposed extension would sever an important green corridor, coalescing Gillingham and Chatham and impacting on the permeability for wildlife within the area. Within the proposed expansion there are also a number of important Local wildlife sites that benefit from the openness of the countryside. These are ME04 Darland Banks and adjacent woodland, ME06 Luton Banks, ME11 Hook Wood and ME20 South Wood. Capstone Country Park is also within the area (this information is the subject on an earlier report submitted to Medway Council as background information by Kent Wildlife Trust). For the above reasons the Trust would object to this extension. East of Rainham urban extension and North of Rainham urban extension Within this area there are a number of designated sites that would be affected by both proposed expansions. The Medway Estuary and Marshes SPA is extremely close to both areas. This extension is probably the closest of the options to the European sites and would leave little space for any buffering. It is therefore likely that 5000 houses in this locality would be unviable as impacts on the SPA would be too great. There are also a number of important designated sites within the area with SW43 Yaugher Woods LWS and Queensdown Warren SSSI. These sites would need to be protected and buffered within the development and linked into the larger Green Infrastructure. There are a number of old orchard sites within the area that would also need protection.	Noted.
	Question 96	Church in Society	Helen Perry	I would like to support the Lodge Hill Chattenden Option because of the use of Brownfield land. Having attended Land Securities consultations, I believe the project to be realistic and achieveble. As you have mentioned, transport is an issue with the site, as is other infrastructure - the local churches on the Peninsular have told me there is an issue with water supply and GP's. Community facilities should be included from the beginning of the development where possible, to ensure residents do not feel cut off and isolated. The Diocese wish to be involved with this provision in a creative way.	Noted. The involvement of the Church in Society can be encompassed in the implementation of the scheme.
	Question 96		Jean Jones	Yes, we support the option endorsed by the Council for a new free-standing mixed-use settlement at Lodge Hill of an appropriate size that could also provide Chattenden with much needed services and facilities as it is currently starved of locally accessible retail, leisure, health, community and employment opportunities.	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 96		Susan Webber	East and North of Rainham Options would have too significant an impact visually on the landscape and on best agricultural land. Use of Greenfield sites in visually prominent location is not supported. The use of Brownfield sites is a sustainable way of building housing development and makes the best use of redundant previously developed land. East and North of Rainham should be designed to protect this land from future development to protect the landscape and prevent the closing of the gap between Rainham and Sittingbourne. I agree with the reasons set out in para. 4.448 why the Lodge Hill site is the most appropriate location for future development.	The landscape and countryside policy of the Core Strategy safeguards land to the north and east of Rainham from development.
	Question 96		Vivienne Parker	North and East of Rainham are both areas that will be at increased risk of flooding due to climate change. Parts of greater Hoo will also be subject to flooding in 25 years' time.	Noted. The Core Strategy is only proposing the Lodge Hill option.
	Question 96	City of Rochester Society	John Liddiard	Support North of Rainham urban extension. Closer to existing urban area. Better located to other transport and community facilities. More sustainable than other options Past decisions have seen a ridiculous scattergun approach with options being promoted on the Hoo Peninsular – miles from other community facilities and employment facilities. With no realistic improvements to public transport available.	The Lodge Hill development will be of such a scale as to include community facilities, employment opportunities and improved pubic transport. Existing employment opportunities are located nearby at Kingsnorth, Hoo and Medway City Estate.
	Question 96			Support. Other earmarked areas as Rochester Riverside should be moved forward together with Lodge Hill	Noted
	Question 96		Alastair Blair	Support with Lodge Hill option and disagree with all other options. Lodge Hill provides sufficient area to provide housing numbers to fulfil the requirements set under Thames Gateway. Other already agreed development need to be moved forward also.	Noted
	Question 96		John Hill	It will not infringe on completely unspoilt rural land. But I do hope that roadways etc. will be less urban in appearance with a varied mix of materials and not so much standard concrete kerbing etc.	Noted..
	Question 96		Carl Kroon	Has required space. Will have been previously used -not new green. An additional community in the area.	Noted.
	Question 96	Medway Countryside Forum	David Murr	Yes. We are very strongly opposed to all other alternative options. It is noted that the proposed urban extensions put forward by developers in response to the Strategic Land Availability Assessment affect currently designated areas of local landscape importance, which have previously come under persistent attack. This in our view reinforces the case for the retention of the ALLI designations as the first line of protection for our local protection.	Noted.
	Question 96	FWCA Frindsbury and Wainscott Community Association	J R Masey	In supporting the settlement at Lodge Hill (although not the number of dwellings) would hope to save some of the other areas from development, especially Capstone.	Noted.
	Question 96		Mann	Yes. Lodge Hill – will require minimum take of farmland - will have minimum visual impact as is in a valley - will be close to new employment opportunities at Kingsnorth and Grain - could use Kingsnorth to provide neighbourhood heating - would need better road links but these would also be used by current and proposed industrial sites/power stations/docks at both Kingsnorth and Grain - could develop good rail links to Gravesham, London and high speed main line as well as to Medway Other sites would merely add to current urban sprawl and would increase local traffic, increase pressure on facilities with none of the positives.	Noted.
	Question 96		Dr D Brighton	Yes. Poor farming land. Room for industrial development	Noted.

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Medway Local Development Framework

Schedule of Letter Responses to the Issues and Options Report 2009

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
File name	**Overall**				
1.		Cemex Operations Ltd	Cemex Operations Ltd	http://medway-consult.limehouse.co.uk/file/1043616 The CEMEX site at Halling (former cement works) benefits from an outline planning permission for a mixed-use scheme of 550 dwellings, 3000sqm of employment floor space and associated open space. In relation to the list of regeneration sites on page 25, the table ought to be amended to include identified regeneration sites of significant size 'outside' of the Kent Thames Gateway Area. The 'former Cement Works Site' at Halling should be listed as one of those regeneration sites for circa 700 units. It is the major established regeneration opportunity in the area of Medway outside of the Kent Thames Gateway. Q.15 The LPA should have a flexible approach on issues such as housing numbers, density, mix of units, mix of uses and the extent of site boundaries is key to ensuring that sites are actually delivered. This flexible approach should be applied to all sites that are acceptable for development in principle, and not solely urban regeneration sites. Q.68 All strategic projects of this nature should be identified within the Core Strategy. A number of projects are already listed (para. 4.217) and a further area within CEMEX's ownership should also be considered. This being the existing lake and lake edge underneath and to the south of existing powerlines. This is the major component of an area proposed to enhance wildlife conservation in the permitted Outline scheme. It is also considered that a further significant area of land in between the railway line and the river edge that is previously used industrial land could be delivered as a wildlife/public resource.	Noted. The table in the Issues and Options document has not been carried forward into the Core Strategy. Instead, all relevant sites are included in the Strategic Land Availability Assessment, which informs the strategy. The degree of flexibility taken to the development of individual sites will be measured against the policies set out in the Core Strategy when proposals are considered. These sites will be identified in a subsequent development management/site allocations development plan document.
2.			Brian Kingsley Smith	http://medway-consult.limehouse.co.uk/file/996573 The Consultation is unsound and will result in the Core Strategy being rejected because there is no earlier stage at which it can be independently assessed. We urge the Council to replace the Consultation document with one which is sound. The necessary evidence base does not exist and therefore neither the Council nor consultees can identify the fundamental challenges facing Medway Issues ignored by the Consultation include: transport problems, 'the impact of the Lower Thames Crossing, the impact of commuting, options for a wide range of sites to provide employment appropriate to the existing residents in addition to attraction of new high quality jobs and reduction of commuting, the future of Chatham as a regional shopping centre concentrating development at the regeneration sites which are admitted to be dependent on further public funding, failure to acknowledge the local issues of poverty and deprivation . Medway has therefore at last come to the inevitable collapse in its previous policies. The consultation fails to address the fundamental social, economic and infrastructure issues. The consultation is fatally infected by the absurd belief that "the existing strategy" has succeeded and that no alternative should be considered. Q.15 is fundamental to the consultation but is brief and inadequately prefaced Q88-Q96 wrongly predicate not only that development at Chattenden is appropriate but that it is exclusive of others.	The basis for this comment is not understood. The Issues & Options report is not a core strategy. The evidence base is constantly being updated and is considered to be comprehensive. Generally, these issues have been addressed in the Core Strategy although there are no proposals currently for a Lower Thames Crossing. Noted but not accepted. Noted. View noted. The development of Lodge Hill/Chattenden is the only strategic option that meets the requirements of PPS3 to give priority to the development of

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				The Issues and Options report is an unsatisfactory basis for consulting to enable the Council to determine the content of its Core Strategy. If the Core Strategy follows the direction set out thus far, it is likely to be found unsound. In view of the way in which the previous Core Strategy had to be withdrawn, faced with a certainty of being found unsound, it would be a blow to the future of Medway if this new Core Strategy were to be rejected. Medway's problems, especially those relating to the economy and jobs, transport, and social deprivation, require planning solutions that are realistic and practical, and soon. The Council's failure to provide such solutions so far must cast serious doubts on the ability of its existing planning strategy to deliver and therefore makes it essential that there should be an objective and thorough testing of those matters and of sensible alternatives not constrained by irrational criteria. The Issues and Options paper does not meet those requirements and needs to be reconsidered as these comments indicate.	housing on previously developed land, whilst taking into account the need to consider the opportunity for development on surplus public sector land. Views noted.
3.		RACC	Harry Deakin	http://medway-consult.limehouse.co.uk/file/932110 The South East Plan contains a specific policy for protecting and supporting small airports. The RSS reflects the protection and support previously given by the Kent and Medway Structure Plan and Medway Council's own policies. Issues and Options contains no such reference. The Airport has a master plan which has been provided to Medway Council - RACC objects to this omission which requires correction in the Core Strategy. Reference should be made to Rochester Airport rather than just 'Rochester airfield'. The Council and its consultants have failed to engage with RAplc (and also RACC) as stakeholders concerned with one of Medway's major assets. Medway is intended to play a key role in the region and especially in Thames Gateway, but the Issues and Questions under this heading ignore RA. RA needs to be considered more broadly in report in context of regenerating the economy, new large sites for business and industry etc. Para. 4.55 has a short reference to RA which makes no effort to describe the airport's role or its potential. It is true that current use is mainly recreational, but business flying is an important element, which would increase significantly if improved facilities and an all-weather runway are provided. What is meant by "amateur" pilot training? Para 4.56 - gives equal prominence to a local microlight facility detracting from RA's importance. It is clear that with Transport, as with the Economic Strategy, the consultants concerned were not adequately briefed about the airport and had no consultation with RAplc or RACC. The issue of Medway's Economy needs to receive adequate and realistic treatment as the single biggest issue for Medway. RA is able to play a part in reviving the town's economy. The identification of the airport area as a key element in all the options to provide additional business and industry sites makes it necessary to ensure that the airport's own operational area and airspace remains adequate. That is not yet clear from the Issues and Options report, nor from the ERS report on the Economic Strategy. Para.4.60, which records the importance of BAe Systems, needs supplementing to point out that BAe's presence is helped by having the airport adjoining its site. Choices made from the issues and options impinge on RA's ability to operate the airport successfully and safely. RACC has serious doubts about the way the spatial choices have been approached. The current strategy, is untested so there is no basis of objective and clear assessment against which the alternatives put forward can be compared. The report states that there is no obvious need to identify an alternative strategy (but several are examined nevertheless). That conclusion rests upon the view in the report that the Current Strategy has been operating for some years, endorsed by a sequence of plans at regional and Kent levels, and provides capacity for the development intended. The Current Strategy's main features are a focus on regenerating urban sites plus the Chattenden-Lodge Hill site. The report acknowledges however that there are problems, slow or no delivery of development being a major one. Another, acknowledged by the ERS study for the Economic Strategy, is that the focus on using brownfield urban land for housing has made sites for industry and business scarce and expensive. With such core questions unanswered it would seem unsatisfactory to simply take the Current Strategy as a "given".	The South East Plan has now been revoked. The Core Strategy does not propose any alternative uses for Rochester Airport. Noted but this is the purpose of the Issues and Options stage. Noted and addressed in the draft core strategy. Noted. View noted. Noted but it is not clear which consultants are being referred to. Noted. Noted. Noted. Views noted. A sufficient surplus of both housing and employment land has been identified in the Strategic Land Availability Assessment to offset the potential slow delivery on sites.

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				All the alternative options are made subject to testing against criteria heavily influenced by that fact, rather than being compared on a like-for like basis. The heavy bias of the report in favour of the Current Strategy has implications for the airport. Traffic generation in the centre is likely to exacerbate congestion problems. The concentration on urban brownfield sites for housing creates pressures for higher densities and consequent cramming of development. RAplc and RACC are already suffering the consequences in a development proposed close to the airport where high density has produced a proposal for residential building which may not prejudice the airport's protected airspace but if permitted would introduce sensitive uses to an area affected by both road and aircraft noise at levels unacceptable under Government policy, and a potential threat to the airport's future. RACC therefore makes objection to the Issues and Options report in the above respects. It hopes however that the Council will use the opportunity of this consultation to engage in discussions with RACC and RAplc, remedying a failure to do so in the run up to the report, and which could produce better understanding and the possibility of resolving matters so as to avoid the need to pursue difficult and time-consuming issues at an Examination into the Core Strategy in due course.	View noted. Noted. Noted and the Council is committed to continuous engagement.
	Preface				
4.	Question 1	Broomhill Gospel Hall Trust	Broomhill Gospel Hall Trust	See attached comment (pdf file) from John Devine on behalf of the Broomhill Gospel Hall Trust http://medway-consult.limehouse.co.uk/file/947883 The Trust regard the provision of places of worship as a matter of infrastructure, which is not taken account of in the consultation document. Having identified, some 50 such places on a map in the 'State of Medway Report', and we believe there are more, we are surprised that there is no vision or section dealing with this important aspect of human life. The statements of the Sustainable Community Strategy do not deal with the subject of worship and therefore do not guide the proposed core strategy nor its sustainability appraisal. Thus there is a lack in these documents, which should be repaired. The LDF should consider the following: The role of the voluntary sector in general and faith communities in particular in supporting the quality-of-life in the district, tackling social exclusion and inequalities including crime and fear of crime. The need to promote truly sustainable communities and to encourage diversity and equality in planning. We draw attention to "Diversity and Equality in Planning"2005 ODPM as noted in PPS1. The need to ensure provision for the voluntary sector including faith communities and their need for space to operate, and specifically to ensure the recognition of places of worship as part of the infrastructure for sustainable communities throughout including its growth areas. To provide for the people as a whole in both urban and rural locations and to make a positive contribution to improved social capital. We submit that the social dimension to spatial planning is particularly important at the current time of recession allied with unemployment and deprivation. We suggest that the new local development framework should promote vigorously a more inclusive society recognizing shared values and issues but not forgetting the distinct needs of different groups. We note that it is not the policy of the council to develop East Rainham. However, we have generally moved towards the east and feel that development should be first considered in this area, which scores well as an attractive family area. We have noticed that Medway and Swale now have authority to combine actions to take account of cross border actualities with Dartford and Gravesham in a multi area agreement. We believe that this will improve the provision of infrastructure.	The provision of places of worship will, if necessary, be considered in a subsequent development management/site allocations development plan document. View noted. This is addressed in the draft core strategy. Noted. Noted. Noted. Noted. Noted. Noted but also needs to be assessed against other factors as well. Noted.
5.	Question 1	Bourne Leisure Ltd	Bourne Leisure Ltd	See attached comment (pdf file) from Nathaniel Lichfield & Partners on behalf of Bourne Leisure Ltd. http://medway-consult.limehouse.co.uk/file/947817 Questions 1,2 and 3	

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				5. NLP Core Strategy Issues and Options Report, July 2009 On behalf of our client, Bourne Leisure Ltd., we set out below details of our client's operations and their key observations on the emerging Medway Core Strategy. Our client's detailed comments on the above consultation document are set out in the attached response to the questionnaire and associated Appendices, which expand on national and regional policies for tourism and leisure generally (Appendix 1) and the economic benefits of tourism (Appendix 2). Typical enhancements carried out by Bourne Leisure on its holiday parks are shown on Appendix 3.	Noted
				<u>Background</u> By way of background, Bourne Leisure is the UK's leading operator of holiday centres, with more than 50 holiday sites in the UK, in the form of (i) holiday parks; (ii) family entertainment resorts; and (iii) hotels and holiday resorts. These are managed by a number of subsidiary companies which include Haven, Butlins and Warner. Within Medway, Bourne Leisure owns the Allhallows Holiday Park, which comprises a mix of static caravans and holiday chalets, which provide a valuable tourism resource. Holidaymakers at Allhallows Holiday Park stay for a total of 116,000 bed nights per year; together with caravan owners at the park, this figure increase to some 400,000 bed nights per year. This very high number of staying guests is obviously already making very significant contributions to the economy, supporting both direct and indirect employment in the Borough and further afield and likewise supporting companies that are suppliers to Bourne Leisure.	Noted
				For Bourne Leisure's operation to attract customers and to respond to changing market conditions, the Company needs to invest regularly in order to improve the product to meet increasing customer expectations. In 2007, the Company invested some £91 million on improving facilities and accommodation generally on its sites. In 2008, Bourne Leisure spent £103.7 million on its sites. Bourne Leisure is currently seeking to implement improvements to the Allhallows Holiday Park.	Noted
				In some cases, improvements necessitate the expansion of sites, to facilitate the provision of new facilities and to meet higher amenity standards, whilst taking into account the specific environmental constraints imposed by a site's location. It may also be necessary to extend the site to improve the quality of the accommodation and/ or to increase the range of facilities provided in order to extend the season.	Noted
				As many of Bourne Leisure's sites are located in rural and /or coastal areas, incorporating or adjacent to environmentally and ecologically sensitive sites., Bourne Leisure has significant experience of operating within and adjacent to sensitive environmental locations and takes the need for their protection and enhancement fully into account in day to day operations and when drawing up development proposals for its sites. It is vitally important that emerging development planning policies allow fully for these changes to take place, with economic benefits being properly balanced with environmental issues in the drafting of policies.	Noted
				<u>The Medway Core strategy Issues and Options Report, July 2009</u> As set out in the attached response to the Questionnaire and the accompanying appendices, Bourne Leisure considers that specific recognition should be given to the importance of tourism to the Borough and the need to enhance the tourism role of Medway. In particular, the Company considers that policy support should be given to the enhancement of existing tourism facilities and accommodation in order to ensure Medway remains an important tourism destination.	These points are addressed in the tourism policy of the core strategy.
				As background to the Issues and Options Report, we note that The State of Medway Report: Retail, Leisure and Culture, August 2009 recognises the importance of tourism to Medway and the fact that" tourism employs over 5,000 local people and is worth in the region of £250 million annually to the local economy". Moreover, point 1 of paragraph 8.1 also note that: "*National and international forecasters project continued growth in the tourism economy. Medway has the potential for significant further growth in its local tourist economy.*.""	Noted.
				These attributes should be fully recognised in the Core Strategy, which should also, in its Vision, refer to the Council's objective of 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).	The role of tourism is recognised in the Vision for Medway in the core strategy.
				The Core Strategy Issues and Options report (paragraph 4.205) then recognises that the tourism potential of the Borough is constrained by insufficient accommodation. At present, Medway is seen as a day visit destination, with 84% of visitors being day visitors (page 41 of the State of Medway Report). It will clearly be important to encourage more staying visitors, and to provide for a range of high quality visitor accommodation, including holiday parks, if there is to be significant further growth in its local tourist economy.	This is addressed in the tourism policy.
				The focus of our comments on the Medway Core Strategy Issues and Options Report is, therefore, in respect of: • Recognising the importance of tourism to the future prosperity of Medway; • Encouraging development which improves the quality of the tourism experience and which will result in attracting more staying visitors and/ or extending the tourist season; and Enabling improvements in the quality of visitor accommodation to support the Council's objective to develop Medway as a city of culture, tourism, learning and technology, particularly in relation to enhancing existing holiday parks.	These are addressed in the tourism policy.
				On this last objective, policies within the Medway Core Strategy should specifically promote and support the development and enhancement of existing holiday parks, where this results in improvements to the layout, standards and overall appearance of a park. Bourne Leisure considers that the policy approach within the local development framework should be a balanced one, which seeks to balance environmental and economic and social considerations. Moreover, major operators should be encouraged to prepare and agree master plans for their sites/ landholdings, particularly where this world result in long term benefits to the landowner, Council, local residents and local economy.	Whilst not specifically referring to existing holiday parks, the application of the tourism policy, which includes promotion and enhancement, will apply equally to them as to other aspects of tourism.

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				We trust that the above comments will be of assistance in preparing the Core Strategy and other LDDs. Please do not hesitate to contact me or my colleague Frances Young, should you require any clarification of the points made. We would also be grateful if you could keep us informed of progress on the development of the local development framework, in terms of any forthcoming consultations on emerging LDDs.	Noted.
				Response to Questionnaire by Bourne Leisure Ltd.	
				General In regard to Questions 1, 2 and 3, which ask whether the right issues have been identified and what else should be included in the Core Strategy, Bourne Leisure considers that specific recognition should be given to the importance of tourism to the Borough and the need to enhance its tourism role.	Noted.
				Core Strategy policies should support the development of tourism per se, and tackle the issues relating to tourist economy growth inter alia by supporting the development of new tourism accommodation and facilities and the enhancement of existing provision.	Noted.
				In addition, the Vision and strategic objectives of the Core Strategy should specifically refer to the enhanced role of Medway as an important tourism destination, where improvements to the quality of tourist-related facilities and accommodation will be encouraged in order to extend the tourist season and attract additional tourism-related expenditure.	The vision specifically refers to tourism and in the strategic objectives, tourism is encompassed by the aim to substantially improve the performance of the local economy.
				A more detailed response on tourism issues is set out below in relation to leisure, culture and tourism, and in the accompanying appendices.	Noted.
				Housing In relation to the questions posed in regard to housing (Questions 15 to 21), Bourne Leisure considers that it will be important for the provision of high quality permanent residential accommodation to be supported throughout the Borough and for opportunities for affordable housing to be identified. The Council should identify appropriate housing sites in consultation with key landowners.	Noted.
				Transport **Q22. Have the correct transport issues been addressed? If not, which further issues should be considered?** Bourne Leisure notes that paragraphs 4.43-4.56 of the consultation document highlight the key transport issues in the Borough. Whilst Bourne Leisure supports the promotion of public transport use, walking and cycling, it should be noted that in regard to tourism uses, there is often no feasible alternative option available other than the private car for reaching more remote areas. In regard to tourism uses, unlike "regular" trips, for example to work, where alternative modes of transport generally do exist, a leisure trip is relatively unusual and infrequent. Moreover, research suggests that leisure trips often result in higher car occupancy (a family day out).	Noted.
				Bourne Leisure therefore considers that a reference should be made within the Core Strategy to the need for transport policies to promote non-car modes of transport where possible, but recognise the reality of car based access, particularly in terms of tourism-related transport.	Noted.
				Leisure, Culture and Tourism Bourne Leisure wishes to comment on a number of tourism issues, which are not reflected in questions 64 & 65, (which specifically refer to hotel development and the marketing of major tourist attractions), namely the need to recognise the importance of tourism to the Borough; the economic of tourism; and the need to enhance the accommodation base of the Borough. In addition, additional information is provided at the attached Appendices, in terms of relevant national, regional and local planning policy (Appendix 1); the economic benefits of tourism (Appendix 2); and examples of enhancements carried out by Bourne Leisure on its holiday parks (Appendix 3).	These are addressed in the tousism policy.
				The Importance of Tourism Bourne Leisure considers that the importance of tourism to the Borough should be fully recognised throughout the Core Strategy.	Noted.
				Whilst Bourne Leisure supports paragraph 4.204 of the issues and Options Report which recognises the" many and varied tourist assets" within Medway, the company considers that the section on issues and choices (page 61) which deals specifically with tourism should fully identify and recognise the potential to further develop tourism within Medway, including the scope to enhance existing tourist accommodation. This would reflect Section 8 of the State of Medway Report: Retail, Leisure and Culture, August 2009.	Noted.
				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 "tourism employs over 5,000 local people and is worth in the region of £250 million annually to the local economy". Moreover, tourism is seen as contribution to the well-being of local residents. Point 1 of paragraph 8.1 also states: "National and international forecasters project continued growth in the tourism economy. Medway has the potential for significant further growth in its local tourist economy.."	Noted.
				These attributes should be fully recognised in the Core Strategy, which should also, in its Vision, refer to the Council's objective of 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).	Noted.
				Moreover, it is noted that the notes of the LDF Leisure, Culture and Tourism Stakeholder Workshop (23 March 2009) refer to the fact that "Council's recent Economic Study stated that tourism should be given more importance" (page 3).	Noted.

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				Recognition of the importance of tourism would accord with national and regional guidance, as detailed at Appendix 1.	Noted.
				Economic Benefits of Tourism The report" The Economic Impact of Tourism on Medway 2006", by Tourism South East identifies at paragraph 1.1 that in 2006 there were 1.934.401 staying visitor nights and that in total £191, 544, 615 was spent by all visitors on their trip. The report also identifies that tourism activity generated over £215 million expenditure, of which £204 million directly benefited local businesses (paragraph 1.3). Moreover, spending by these businesses on local supplies and spending by employers in the local area is estimated to have generated a further £61 million. Overall, tourism expenditure supported 8% of local employment.	Noted.
				On the basis of these calculations, 116,000 staying visitor nights at Allhallows Holiday Park would equate to 6% of total staying visitors and contribute some £12.25 million to the local economy.	Noted.
				In addition, as recognised at point 10 of paragraph 8.1, *"the 2012 Olympics present Medway with significant boost in terms of attracting the tourism and cultural investment is requires and will be a further catalyst to develop Medway as a genuine city break tourism destination"*.	Noted.
				Specific policies within the Core Strategy should recognise the economic benefits of tourism and support proposals for tourism development/ enhancement which help to support further tourism investment.	Noted.
				Additional information on the economic benefits of tourism is set out at Appendix 2.	Noted.
				Tourism Accommodation Paragraph 4.205 of the Medway Core Strategy Issues and Options consultation document states that "realising the considerable tourism potential (of Medway) is hampered by four main factors", which include a shortage of hotel bedrooms. No reference is made to other forms of tourism accommodation in the consultation document.	Noted
				Paragraph 4.206 then states, " notwithstanding these difficulties potential is still considerable and the already substantial economic benefits to the area as a whole could be greatly increased".	Noted.
				Bourne Leisure notes that the State of Medway Report: Retail, Leisure and Culture, August 2009 refers to the current performance of hotels as being not particularly strong (paragraphs 7.21 to 7.25), although we note that other sectors of tourism accommodation, including holiday parks, are not specifically referred to in the report.	Noted.
				In view of the fact that existing hotel accommodation is not performing well and that Medway is currently seen as a day visit destination (page 41 of the State of Medway Report), with 87% of visitors being day visitors, but that the potential to develop it further as a tourism destination is recognised, there is a clear need to support a range of high quality accommodation, including holiday parks. This should be clearly recognised in the Core Strategy and supported through appropriately worded policies.	Whilst not specifically referring to existing holiday parks, the application of the tourism policy, which includes promotion and enhancement, will apply equally to them as to other aspects of tourism.
				In regard to paragraph 4.212 of the consultation document, which suggests that development of the tourism sector is linked to the need for town centre regeneration, the Company considers that reference should also be made to the need to provide a range of high quality visitor accommodation, including caravan and holiday parks, throughout the area.	Compared with tourist facilities in the urban areas, the expansion of holiday parks in the rural area is more likely to come into conflict with environmental protection policies. The tourism policy supports sustainable tourism development and to maintain and where possible, enhance Medway's natural and built environment. If holiday park development can meet these requirements, it will be supported.
				In conclusion, Bourne Leisure considers that the Core Strategy should contain a general policy which encourages the enhancement of Medway as a tourism destination and supports proposals which improve the quality of existing tourist facilities and accommodation; and encourages new facilities and accommodation, particularly where this helps to extend the season and attracts higher spending guests.	These points are addressed in the tourism policy.
				In addition, and specifically in relation to holiday parks, the Core Strategy should incorporate a policy which states: Proposals to retain and enhance existing holiday parks, including their expansion, will be supported where this results in improved accommodation and facilities, improvements to the layout and appearance of the site and its setting and helps to extend the visitor season.	A specific policy on holiday parks is not considered to be necessary.
				This would be in accord with paragraph 14.31 of the South East Plan (see Appendix 1) which recognises the increased demand for improvements to many existing holiday and caravan parks and suggests that local planning authorities should consider applications to upgrade such sites favourably.	The South East Plan was revoked on 6 July 2010. However, the principle of improvement to existing tourist accommodation and facilities is recognised in the tourism policy.
				Climate Change Q87. Would you like to propose any additional strategies that should be considered in relation to climate change effects in Medway.	

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				Bourne Leisure considers that it will be important for the specific characteristics and vulnerability of particular uses to be taken into account when considering the effects of climate change, for example, certain tourism uses need to be, or to remain located adjacent to water. In addition, it will be important for consideration to be given to whether the residual risks of flooding to people and property are acceptable and can be satisfactorily managed; and whether the development makes a positive contribution to reducing or managing flood risk. In particular, the Company considers that in regard to the consolidation and expansion of existing tourism accommodation and holiday park sites within flood risk areas, that only the extent of the new development site within or adjacent to the existing holiday park, and not the whole site, should have to be assessed sequentially.	Noted.
				Appendix 1: Leisure, Culture and Tourism National Planning Policy The inclusion of specific policies within the Medway Core Strategy to support tourism generally and to enhance tourist accommodation in particular, would be in accord with national planning guidance.	Noted.
				The CLG Good Practice Guide on Planning for Tourism (May, 2006) emphasises the crucial importance of tourism to the economic, social and environmental well-being of the whole country (paragraph 1.1) and recognises that tourism can act as a focus for regeneration; provide a catalyst for growth in an area; provide opportunities for retraining for the resident workforce; and help to maintain and expand underused sports and recreation facilities.	Noted.
				Paragraph 19 of Annex A of the DCLG Good Practice Guide on Planning for Tourism (may 2006) acknowledges that holiday, touring caravan and chalet parks accommodate some 22% of all holiday bed nights nationally.	Noted.
				In addition, paragraph 34 of PPS7: Sustainable Development in rural areas (2004) states that local planning authorities should recognise that: "*tourism and leisure activities are vital to many rural economies. As well as sustaining many rural businesses, these industries are a significant source of employment and help to support the prosperity of county towns and villages…*"	Noted.
				moreover, paragraph 39 of PPS7 notes that in considering development proposals for static holiday and touring caravan parks and holiday chalet developments, planning authorities should: …Where appropriate (e.g. in popular holiday areas) set out policies in LDDs on the provision of new holiday and touring caravan sites and chalet developments, and on the expansion and improvement of existing sites and developments (e.g. to improve layouts and provide better landscaping);…	This can appropriately be addressed in a subsequent development management and site allocations document. The principles of new site provision and existing site improvements are established in the core strategy.
				However, a key issue identified in the House of Comments Report on Tourism was that "raising the quality of accommodation is essential to improving the industry" (paragraph 110 of the House of Commons Culture Media and Sports Committee report on tourism, June 2008).	Noted.
				Regional Planning Guidance In terms of regional guidance, the South East RSS (May 2009) recognises that: " South East England comprises the largest tourism market in the UK, outside Greater London" (paragraph 14.1).	The South East Plan was revoked on 6 July 2010. However, where appropriate, the core strategy can carry forward proposals which are particularly appropriate to Medway, provided that they can be supported by Medway's own evidence base.
				and the South East is: " a unique visitor destination with significant untapped potential for further tourism related growth" (paragraph 14.2).	The South East Plan was revoked on 6 July 2010.
				Paragraph 14.5 of the South east Plan then states: "at the local level it is important to establish a comprehensive, long-term vision for the role of tourism and related activities within a locality. This vision needs to be significantly explicit and embedded in the …local development framework in order to signal investment and decision".	The South East Plan was revoked on 6 July 2010.
				Bourne Leisure would emphasise the need to incorporate this approach into the Medway Core Strategy, and considers that Core Strategy policies should reflect the clear opportunities available to develop the tourism potential in Medway. Moreover, tourism policies should reflect Policy TSR2: Rural Tourism of the South East Plan, which encourages local planning authorities to support proposals which seek to develop tourism opportunities associated with all types of rural development initiatives, and paragraph 14.17, which notes that: "tourism, recreation and leisure activity in rural areas can bring significant economic, social and environmental benefits…"	This approach has been incorporated into the core strategy.
				Specifically in relation to tourist accommodation, Core Strategy policies should accord with Policy TSR5, which states that:	The South East Plan was revoked on 6 July 2010.
				"(i) In formulating planning policies and marking decisions local planning authorities should: "…facilitate the upgrading and enhancement of exciting un-serviced accommodation including extensions where this will not harm landscape quality or identified environmental assets…";and	The South East Plan was revoked on 6 July 2010.
				paragraph 14.26, which recognises the increasingly demanding and sophisticated nature of the visitor accommodation sector and states that: " local development framework policies for visitor accommodation should be based nature upon a thorough understanding of the needs and characteristics of the many different accommodation subsectors.	The South East Plan was revoked on 6 July 2010.

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				Bourne Leisure then draws attention to paragraph 4.5.27 of the South East Plan, which states that: Policies should be built on a ongoing dialogue between local authority planners and representatives of the accommodation industry..”	The South East Plan was revoked on 6 July 2010.
				Any detailed tourism policies should also reflect paragraph 14.30 of the South East Plan, which states that: “Unserviced accommodation (e.g. camping and caravan sites, holiday parks, self catering units, farmhouses and youth hostels) is a popular and vital component of the leisure accommodation offer in the region and provides a particularly valuable role I supporting longer stay/ higher value rural tourism accommodation”; and	The South East Plan was revoked on 6 July 2010.
				paragraph 14:31 of the SE plan which states: “As visitor expectations change, it is likely that there will be increased demand for improvements to many existing holiday and caravan parks throughout the region, notably in coastal areas. Significant expansion of existing sites may be required to facilitate the provision of new facilities and meet higher amenity standards. Applications to upgrade facilities should be considered favourably by local authorities where there is evidence of existing or untapped demand, subject to environmental policies set out elsewhere in this Plan”.	The South East Plan was revoked on 6 July 2010.
				Local Planning Policy Paragraph 4.5.25 of the adopted Medway local plan (2003) recognises the valuable contribution that new tourist attractions and facilities can make to the local economy and identifies a need for additional facilities: paragraph 4.5.32 states that: “there is a need for additional facilities to take advantage of Medway’s strategic location between London and Europe..”	Noted.
				Existing Policy ED15: Self-Catering Accommodation states: “Proposals for new facilities will be permitted provided it can be demonstrated that: (i) the scale of development would not adversely affect local amenity, nature conservation interest or be an intrusive element in the surrounding landscape; (ii) the local highway network is capable of supporting the scale of development proposed; and (iii) the facilities associated with the development are of a design and scale in keeping with the locality”.	This can appropriately be addressed in a subsequent development management and site allocations document. The principles of new site provision and existing site improvements are established in the core strategy.
				Bourne Leisure considers that this support for the enhancement of existing holiday park accommodation should be continued in the Core Strategy. Moreover, a recent Medway Council committee report (June 2009) in relation to Allhallows Holiday Park recognised the benefits that holiday parks could bring. It stated: “Holiday parks are the largest provider of rural tourism bed spaces. Tourism can bring many broader benefits that will contribute to the economic and social well being of local communities as well as to individuals. The revenue generated by tourism can help to support and enhance local services and facilities such as shops and pubs, particularly rural areas. It can also underpin the quality of the local environment and facilitate further enjoyment of it by residents and visitors.”	This can appropriately be addressed in a subsequent development management and site allocations document. The principles of new site provision and existing site improvements are established in the core strategy.
				Appendix 2: The Economic Benefits of Tourism The benefits of tourism are also recognised by Visit Britain, which has estimated that the value of the tourism industry to the UK economy in 2006 was £85.6 billion a year (reported in the Report of the House of Commons Culture, Media and Sport Committee on Tourism, June 2008). Moreover, it is anticipated that over the next few years there will be increasing demand for holidays within the UK, influenced by such factors as the higher cost of flying, a tighter economy and people looking for “value for money” holidays.	Noted.
				The economic benefits of tourism are also fully recognised in the DCMS strategy “Winning: A Tourism Strategy for 2012 and beyond”, July 2997, which sets out the strategies for realising the potential tourism benefits of the Games and cites a £2.1 billion boost in tourism revenues as a result of the 2012 Games (page 6, Executive Summary). It also stresses that; “it is vital that we use the challenge of the 2012 Games to improve the quality of our tourist “facilities” (page 12, Executive Summary) and emphasises the exceptional opportunity to greatly improve the quality of the UK’s accommodation and visitor attractions (page 56 of the Strategy).	Noted.
				Bourne Leisure considers that the supporting text to tourism policies in the Medway Core Strategy should fully recognise the economic benefits of tourism.	Noted.
6.		SEEDA	Ian Mawer	http://medway-consult.limehouse.co.uk/file/993301 The Regional Economic Strategy (RES) identifies Medway as forming part of the Thames Gateway Kent Diamond for Investment and growth where the concentrations of people, employment, transport and leisure give the potential to be an economic catalyst for the region as a whole, SEEDA recognises the valuable role that the Core Strategy will play in ensuring that Medway is able to realise its economic potential through sustainable prosperity.	Noted.
				Section 3 of the report considers conformity with national and regional Policy. SEEDA considers that as part of the broader regional strategy, the headline targets of the RES could usefully be referred to in the Core Strategy.	The South East Plan was revoked on July 2010 and the core strategy will no longer refer to it.
				Overall, we consider that the document is asking appropriate questions to guide the development of the Core Strategy. However, some aspects of the Core Strategy are very locationally specific, and may be better addressed in subsequent DPD’s such as Area Action Plans and Site Allocations DPD’s.	Noted.
				Question 10 – Promoting Higher education The RES highlights the importance of education-led regeneration as a Transformational Target and SEEDA supports the aspiration to improve the HE and FE offer within Medway and the wider Medway/East Kent sub-region. Increasing the proportion of the working age population holding a degree or better (NVQ4 and 5) from 27% to 40%, will result in a productivity gain of 3%, an increase in the regional employment rate of 0.75% and a net annual increase in the region’s GVA of £3 billion. Supporting the development of a HE/FE cluster	Noted.

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				would complement RES Target 6 'to maximise the number of people ready for employment at all skill levels, and ensure they are continually equipped to progress in the labour market' and Coastal South East Priority 8 to 'raise educational attainment and aspirations, including a comprehensive approach to enterprise education and improved access to higher and further education'.	
				We welcome the recognition of the need to improve opportunities for business start-ups linked to the universities (paragraph 4.6.1). This complements RES Target 5 to increase the business stock by 35% by 2016 and Coastal Priority 3 to support enterprise and stimulate the creation of a wide variety of businesses. SEEDA considers that incubator units should form an integral part of permissions for employment sites where appropriate.	Noted.
				Question 15 – Urban regeneration While we recognise the very real challenges faced by local authorities and developers in delivering regeneration in the current economic environment, we consider that the Core Strategy, being the long-term strategic document for Medway should take a long-term and flexible approach and maintain the objective to realise regeneration aspirations for the area. SEEDA continues to support an average annual increase in GVA per capita of at least 3%.	Noted.
				Questions 18, 19 & 20 – Housing RES Target 9 seeks to 'Ensure sufficient and affordable housing….space of the right quality, size and type to meet the needs of the region and support its competitiveness'. SEEDA therefore considers that these questions ask the right questions, and must be informed by the Council's evidence base, particularly the SHLAA and demographic projections.	Noted.
				Question 29 – five strategic priorities SEEDA is broadly supportive of the five strategic priorities proposed in the draft Medway Economic Strategy. We particularly welcome support for development of specific sectors including creative industries, environmental technologies and building products / construction plus. SEEDA is eager to see genuine transformational opportunities come to fruition, and we support the development of key sector consortia including South East Media Network and South East Centre for the Built Environment (see Action 3.1 of the RES).	Noted.
				The approach to identify appropriate employment sites seems sensible, and will of course need to be fully evidenced through the ELR and SHLAA.	Noted.
	Question 1			We consider that the identification of strategic employment sites such as Kingsnorth and Grain is appropriate within the Core Strategy, and welcome consideration of promotion of sites for specific business sectors to deliver physical and economic regeneration. Such proposals should be properly evidenced and where possible, linkages made between job creation and the skills priorities for the Borough. Priority 4 for the Coastal South East seeks to 'ensure that efficient employment land is provided through redevelopment of brownfield land and refurbishment of existing stock, to provide new and flexible employment space'.	Noted.
	4. Issues and Choices				
7.		Land Securities Group Plc	Land Securities Group Plc	http://medway-consult.limehouse.co.uk/file/993797 1. These representations are made by CB Richard Ellis on behalf of Land Securities Group Plc. Land Securities Group Plc has been selected as the Land Sale Delivery Partner responsible for the development and sale of approximately 320 hectares of Ministry of Defence land at Lodge Hill. In accordance with the requirements of PPS12, Medway Council has engaged at an early stage in the Core Strategy process with Land Securities, as one of a number of key stakeholders within the Borough. This engagement has been welcomed by Land Securities, who supports the principle of the Council's emerging spatial strategy.	Noted
				2. These representations are made in order to seek to inform the Council's approach on its spatial options, with particular reference to Lodge Hill, and to seek to ensure that any issues are considered at an early stage in the Plan-making process (as encouraged in PPS12).	Noted
				3. CB Richard Ellis, on behalf of Land Securities Group Plc, has also submitted representations in respect of the Sustainability Appraisal. These representations (to theCore Strategy Issues and Options report) are not repeated in the representations made to the Sustainability Appraisal; we trust that the Council will amend the Sustainability Appraisal as appropriate and relevant, to reflect any changes made to the Core Strategy. Executive Summary and Introduction	Noted
				4. Reference is made in the third paragraph on page 4 and paragraph 1.10 (Introduction) to an Area Action Plan being produced in due course in respect of Lodge Hill. This reflects the strategy set out in the current adopted Local Development Scheme (LDS). In light of the revised version of PPS12, the recent feedback provided to Medway Council by the Planning Inspectorate, and the subsequent discussions that the Council has had with Land Securities, we consider that as the Core Strategy progresses, it is amended to reflect any relevant amendments that are subsequently made to the LDS.	Noted
				Section 3: Conformity with National and Regional Policies 5. In the context of the regional policy approach to affordable housing, Paragraph 3.16 refers to sub-regional Policy KTG4 of the South East Plan (SEP) which applies an indicative target of 30% of all new dwellings for affordable housing within the Thames Gateway. To avoid ambiguity, we consider that the Core Strategy should also acknowledge the supporting text at paragraph 19.13 of the SEP which states that 30% affordable housing is the maximum judged practical in the sub-region. The Core Strategy should also reflect the flexibility provided for within PPS3 (paragraph 29) in terms of the ability to set different proportions, sizes and types of affordable housing to be sought for a series of site-size thresholds over the Plan period.	The South East Plan was revoked on 6 July 2010 and the core strategy affordable housing policy is now based upon the recommendations in the Medway Strategic Housing Market Assessment, 2010.
				Section 4: Issues and Choices 6. A number of 'main findings' are set out within this section of the report. Paragraph 4.5 refers to the nature of the housing market, with reference to the Housing Market Assessment (2005) produced by DTZ. We presume that these findings will be updated with those of the emerging Strategic Housing Market Assessment (SHMA), which we understand is nearing completion. This will ensure that these	Noted

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				particular findings are based on evidence which is as up-to-date as practical (PPS12, paragraph 4.37).	
				7. Reference is made at Paragraph 4.20 to the needs of increasing numbers of smaller households, and the need for higher quality solutions. Paragraph 4.34 refers to, inter alia, the shortage of larger house types. We consider that Medway Council may wish to consider expanding upon these statements to avoid any perception of inconsistency with one another.	Evidence supporting both statements is contained in the State of Medway Housing Report, November, 2009
				Section 4: Questions 13 and 14 8. Question 13 relates to whether we agree with the forecasts for population change as described in the Issues and Options report. Population projections are sensitive to minor changes in methodology and unpredicted changes in trends, e.g. migration or birth rate. The sharp downturn in house-building has had an impact on the ability to forecast the timing of new housing, particularly in areas such as Medway with high housing capacity. We therefore consider that it would probably be sensible for the Council to refer both to its own internal projections and the official Government ONS projections which would give a range against which to plan. This can be monitored over the Plan period.	The Council is confident with its own population projections and considers the use of a single projection clarifies the process of plan making
				9. Question 14 relates to whether there are any other demographic factors that should be taken into account. We consider that the size of the labour force in Medway is an important issue both in planning for the local economy and transport and commuting. Those population forecasts which have been produced which break down population by age bands (e.g. ONS) show only minor growth in the labour force despite higher overall rises in population than Medway Council is projecting. The evidence base for the final Core Strategy needs to contain a thorough assessment of potential labour force growth and change.	The Medway Strategic Housing Market Assessment 2010, has been used to inform the housing chapter.
				Section 4: Issues and Choices – Housing 10. PPS3 sets out, amongst other things, the approach to delivering a flexible supply of land for housing. Paragraph 54 of PPS3 states that LPAs should draw on information from the SHLAA or other relevant evidence, and should *'identify sufficient specific deliverable sites to deliver housing in the first five years. To be considered deliverable, sites should, at the point of adoption of the relevant Local Development Document:* • *Be available – the site is available now;* • *Be suitable – the site offers a suitable location for development now and would contribute to the creation of sustainable, mixed communities;* • *Be achievable – there is a reasonable prospect that housing will be delivered on the site within five years'*.	Noted.
				11. Paragraph 55 of PPS3 refers, inter alia, to the need for LPAs to identify a further supply of specific, developable sites for years 6-10 and, where possible, for years 11-15, and for LPAs to illustrate the expected rate of housing delivery through a housing trajectory for the Plan period.	Noted
				12. In determining how much land is required, PPS3 states that LPAs should not include sites for which they have granted planning permission unless they can demonstrate, based upon robust evidence, that the sites are developable and are likely to contribute to housing delivery at the point envisaged (PPS3, paragraph 58).	Noted
				13. PPS12 states that Core Strategies should, amongst other things, include strategic objectives and a delivery strategy for achieving those objectives, which should include how much development is intended to happen where, when and by what means it will be delivered (PPS12, paragraph 4.1). Paragraph 4.36 of PPS12 requires Core Strategies to be founded on a robust and credible evidence base; paragraph 4.44 requires them to be effective, which means they must be (inter alia) deliverable. Paragraph 4.45 articulates what is meant by deliverability, and states that *'Core Strategies should show how the vision, objectives and strategy for the area will be delivered and by whom, and when'*.	Noted
				14. In the interests of the robustness of the emerging Core Strategy, in the context of paragraphs 10-13 above, Medway Council may wish to consider the following comments: The table states that the number of units with planning permission 2009-2026 amount to 7,850 units, based on Volume 2 Section 7 of the AMR (2008). Fundamentally, the Council should only rely upon existing planning permissions, as a component of housing land supply if – as required by PPS3 – it can demonstrate, based upon robust evidence, that the sites are developable and are likely to contribute to housing delivery at the point envisaged. Detailed evidence to meet the requirements of PPS3 and PPS12 is required, as well as a housing trajectory to illustrate when these are expected to be delivered within the Plan period;	The Strategic Land Availability Assessment has confirmed its findings with the owners/developers of the sites within the document.
				With reference to the above point, we are concerned that the Council's definition of existing planning permissions includes resolutions to grant planning permission where they are subject to either a S106 Agreement which have not yet been signed or to referral to the SoS. This is also explained on page 31 of the AMR. Taking a pragmatic approach, we would suggest that the same approach referred to above applies, i.e. detailed evidence to meet the requirements of PPS3 and PPS12 is required, as well as a housing trajectory to illustrate when these are expected to be delivered within the Plan period;	The SLAA contains a housing trajectory based upon the expected delivery of each site.
				Again with reference to the above, and to the specific reference to 7,850 units, having reviewed Volume 2 Section 7 of the AMR (2008) we are not clear how this figure has been derived. Further clarification on this would be helpful;	This figure has now been updated using the 2009, AMR.
				The table refers to capacity for 574 units on allocations not yet started. We consider that the same approach is required to establish the deliverability of these allocations and when in the Plan period they are expected to be delivered. Clarification is also sought on the location and nature of these sites. Detailed evidence to meet the requirements of PPS3 and PPS12 is required, as well as a housing trajectory to illustrate when these are expected to be delivered within the Plan period. This also applies to the second bullet point within Paragraph 4.22;	These sites have been addressed in the Medway Strategic Land Availability Assessment and the owners/developers have been contacted to confirm that they agree with the council's assessment. A housing trajectory has been prepared as part of the assessment.
				For the avoidance of doubt, the capacity of 4,500 units for Lodge Hill referred to in the table is based on current assumptions reflecting	The SLAA and the Core Strategy now

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				market absorption rates and what could be delivered within the Plan period (although as explained in footnote 21 on page 25 of the Issues and Options report, the capacity of the site is in the region of c. 5,000 units). his figure is subject to ongoing testing but nevertheless reflects the minimum site capacity within the Plan period.	assume that, on the advice of Land Securities, 4600 dwellings will be completed my 2026 and a further 400 will be completed thereafter.
				15. Paragraphs 4.23 and 4.35 of the Issues and Options report highlight the uncertainties associated with deliverability, and reinforce the need for detailed evidence to inform the extent to which they should form part of the Council's approach to housing land supply.	These sites have been addressed in the Medway Strategic Land Availability Assessment and the owners/developers have been contacted to confirm that they agree with the council's assessment. A housing trajectory has been prepared as part of the assessment.
				16. Paragraph 4.41 states that there is strong evidence to suggest that more provision needs to be made for larger housing types, including detached properties. This is consistent with the residential market demand evidence being produced on a site-specific basis in respect of Lodge Hill. However, we consider that Medway Council may wish to consider expanding upon this statement to ensure that it is fully explained in the context of other references within the Issues and Options report to housing needs (e.g. Paragraph 4.20).	A breakdown of housing types is contained in the state of Medway Housing report, November 2008.
				Section 4: Question 15 17. Question 15 queries whether the emphasis on urban regeneration should be retained in terms of housing provision, given the difficulties of bringing sites forward in an economic downturn.	Noted.
				18. The principle of focussing development on previously developed land is well enshrined within national planning policy. Section 24 of the Planning and Compulsory Purchase Act 2004 requires Local Development Documents to be in 'general conformity' with the RSS – which in this case is the SEP. The adopted Kent Thames Gateway sub-regional SEP Policy KTG1 relates to the Core Strategy. In terms of policies and programmes, Criterion (i) requires, as a first priority, making full use of previously developed land before Greenfield sites, except where there are clear planning advantages from the development of an urban extension that improves the form, functioning and environment of existing settlements or a new community. Supporting paragraph 19.5 states that the main locational effects of the Core Strategy and related policies will be concentrations of new dwellings, employment and services at major regeneration locations including *'within the Medway urban area at riverside sites, and to the north on Ministry of Defence land at Chattenden'*.	The South East Plan was revoked on 6th July 2010. However, paragraph 36 of PPS3 gives priority to development on previously developed land.
				19. We fully support the Council's proposed housing strategy predicated on urban regeneration and previously developed land. However, we consider that it is critical to produce detailed evidence in accordance with the requirements of PPS3 and PPS12 to establish the extent to which they are deliverable within the Plan period, and if they are, when they are expected to be delivered. In terms of the difficulties of bringing sites forward in an economic downturn, the feedback we are beginning to get from PINs and through researching the approach being taken elsewhere, highlights the need to take into account the effects of the recession in terms of short term delivery, which needs to be reflected within the Council's housing trajectory.	The Medway SLAA has identified a surplus of 3000 dwellings over its requirement up to 2026, which could help to offset any slippage in sites coming forward due to the recession.
				Section 4: Question 16 and Paragraph 4.26 20. Paragraph 4.26 relates to internal living space standards, and Question 16 queries whether minimum internal space standards should be introduced with an explicit requirement for higher quality design established. We consider that the Core Strategy should not include explicit minimum internal space standards; given the uncertainty of the market, flexibility on space standards will be critical. The approach to unit sizes should be determined by other factors, not least design quality.	Medway Council is currently preparing a supplementary planning document on internal space standards.
				Section 4: Question 20 21. Question 20 queries whether specific provision should be made for high quality detached housing. We consider that there should be a general requirement within the LDF documents relating to high quality. The approach to the type of housing to be provided should be based on identified need and market demand, and should have regard to a a range of site-specific considerations (an urban site might be less suited to family housing by comparison with less central locations). We also consider that the reference should be to 'family' housing rather than to 'detached' housing. The redevelopment of Lodge Hill presents an excellent opportunity to make a significant contribution to the Borough's stock of family housing as part of a balanced and sustainable new settlement, differentiated from the housing type offer in more central, urban locations.	The Government has now deleted the minimum density requirements from PPS3 and this will make it easier for developers to bring forward schemes for detached dwellings on appropriate sites.
				Section 4: Issues and Choices – Transport Section 4: Question 24 22. Question 24 asks how public transport capacity can be increased to tackle the additional demands that will arise from the regeneration of the area, and whether this should include greater priority for buses if linked to substantial service improvements. There are a wide range of public transport solutions which could be provided to increase the capacity of these more sustainable modes, ranging from buses to Ultra Light Rail, Light Rail, cable car systems and railways. However, an increased and improved bus system for Medway will provide a significant reduction in the level of congestion and unlike rail or metro systems, buses do not require considerable infrastructure and therefore can quickly boost the supply of public transport.	Noted. The transport policy supports the improvement of bus services and does not propose any costly new transport infrastructure.
				23. It is anticipated that congestion within Medway will become more acute in the future. We consider that it is therefore very important that the free flow of buses through the existing network is given primary consideration. This can be achieved by creating new road space or giving over existing road space for bus priority measures.	Noted. This is proposed in the transport policy.
				Section 4: Issues and Choices – Economy	

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				Section 4: Paragraph 4.69 24. We broadly agree with the site assessment from paragraph 4.64 to paragraph 4.68, and note that the logical conclusion to be drawn from this is that there are a large number of designated sites but limited market demand at present either for large 'bad neighbour' employment sites on Grain, or for high density offices in the core urban area. Our conclusion has been that economic growth is not constrained by a lack of land, but by a lack of demand in growth sectors.	Planning permission has now been granted for about 450,000 sq m of floor space for B2, B8 and other uses on the Isle of Grain.
				25. In our view, the Economic Development Strategy (EDS) to date hasn't demonstrated that there is a projected lack of land designated for employment uses either on the demand side (projected sectoral growth in Medway) or the supply side (see our comment in relation to Question 14). We have therefore not seen the evidence that a review of mixed use sites is required. We agree that further work is required in terms of the evidence on supply and demand, to enable the Council to quantify the range and type of sites required, and therefore to inform the Council's approach to allocating land and to compare to identified site capacity.	Given that the economic chapter has identified sufficient employment the Council is proceeding with the proposals on its regeneration sites and is not reviewing their mix of uses
				26. Paragraph 4.73 relates specifically to Lodge Hill, and raises the proposition of it becoming a new focus for economic activity that meets more than just the needs of its residents, recognising that this would need to be balanced with other, more established opportunities in the area if the focus is not to be diverted away from the main urban area.	Noted.
				27. Lodge Hill presents an opportunity to gradually establish a vibrant community in which people will want to live and work, from small business enterprise units for one or two person businesses, right up to large offices, which could become viable when the whole development is properly established. Employment uses can be effectively pepper-potted in logical locations and phases throughout the scheme, naturally emerging alongside the character of the place and its inhabitants. The development must be simultaneously self-contained and outward-reaching.	Noted.
				28. Through the redevelopment of Lodge Hill, Land Securities will seek to maximise local economic benefits, minimise travel to work distances by promoting home-working and providing facilities to support home-working, which will become increasingly significant (particularly in rural and semi-rural locations) over the Plan period, linking residents with jobs within the development, and encouraging employers to employ Medway residents.	Noted.
				29. More detailed information will be provided in the Economic study which Land Securities is producing as part of the Evidence Base for Lodge Hill.	Noted.
				Section 4: Question 33 30. Question 33 questions whether the new settlement at Lodge Hill, Chattenden should be identified as an employment location meeting more than purely local needs. In the context of emerging policy, particularly draft PPS4, we believe that the LDF should take a broader approach to Lodge Hill and focus more broadly on its potential economic role as a prosperous community' rather than narrowly as an employment location. In this context it would be inappropriate to apply an 'employment land' or 'employment location' a designation on the site, but instead identify the types of uses which would be appropriate toits role as a mixed use community. These are listed above in relation to our response on paragraph 4.73 of the Issues and Options report.	Noted The Core Strategy recognises Lodge Hill/Chattenden as a community rather then merely an employment location. However, it is still necessary to identify the amount of employment to be provided.
				Section 4: Issues and Choices – Education and Skills Section 4: Questions 37, 39 and 40 31. With reference to the Education and Skills section of the Issues and Options report, we strongly endorse the approach to education and skills which has been pursued so effectively by Medway Council and its partners. We believe that success in this area will be key to Medway's future prosperity and Land Securities is keen to work with Higher and Further Education Institutions to ensure that Lodge Hill can be part of this.	Noted.
				32. In relation to specific questions, we would agree with the proposition in Question 37 that Universities at Medway be further promoted to create a higher education centre of regional or national significance. In relation to Question 39, Land Securities would be happy to work with Mid-Kent College, as its development moves forward, to promote construction opportunities arising from its site.	Noted.
				33. In relation to schools in Question 40, we endorse their role as community hubs and have been impressed with the exemplar schools in Medway that we have visited who are already doing this. This approach was strongly supported by both the community and public service providers in Land Securities' recent consultation exercises at Lodge Hill, and will form a key part of the emerging masterplan for the site.	Noted.
				Section 4: Issues and Choices – Retailing and Town Centres 34. The requirement for a retail capacity study derives from the need for local planning authorities to prepare and maintain up-to-date information on the characteristics of their area to enable the preparation of a sound spatial plan.	A retail study of Medway was completed by consultants in 2009 and underpins the retail policy in the economic chapter
				35. PPS6 highlights the importance of undertaking studies for retail and leisure uses to aid in the establishment of a robust and credible evidence base which underpins the development of planning policy. NLP acknowledge that such assessments should provide broad guidance on the likely levels of capacity and that projections should not be considered as maximum/minimum limits. The NLP study is therefore welcomed and considered up-to-date.	Noted.
				36. However, PPS6 also recognises the importance of ensuring that such assessments are regularly updated i.e. every 5 years to reflect changes in floorspace provision, housing and employment allocations and changes in the economy. We would therefore wish to see regular updates throughout the life of the emerging Plan to ensure that retail and leisure provision are accurately reflected and regard is had to the development of Lodge Hill as a new centre.	Noted.
				38. 37. We consider that the next stage of the Core Strategy should reflect the further work on the Borough-wide retail evidence base	The Lodge Hill policy makes provision for

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				which we understand is to be undertaken to reflect the approach set out in draft PPS4. Although draft PPS4 makes clear that it is the final version of the document which should be taken into account in the LDF process, in our view, many of the principles enshrined in the draft version exist in the current version of PPS6, but have been expanded upon and clarified. Future work should therefore consider the economic and retail role of Lodge Hill as a key component of the Council's preferred spatial option for accommodating its growth requirements set out in the SEP.Paragraph 4.158 relates specifically to retail provision as part of a new settlement at Lodge Hill. The exact scale of retail and associated uses will be informed by the scale and mix of uses proposed for this strategic allocation, recognising the Government's objectives of enhancing consumer choice by making provision for a range of shopping, leisure and local services, which allow genuine choice to meet the needs of the entire community. Furthermore, the Government seeks to promote social inclusion, ensuring that communities have access to a range of main town centre uses, and that deficiencies in provision in areas with poor access to facilities are remedied.	5,200 sq.m. of retail development.
				39. NLP also acknowledge (Medway Retail study 2009, paragraph 16.8) the potential requirement to provide new convenience facilities to serve major new residential development. The retail component within the emerging masterplan for Lodge Hill is small by comparison with the scale of the overall mixed use development, with housing and employment constituting the majority of floorspace. A significant proportion of the proposal will be self supporting whereby expenditure is generated by residents/workers/visitors resulting in minimal impact on existing centres in the immediate vicinity. Furthermore, the retail proposal will provide a sustainable solution, meeting the daily needs of residents without detracting from the vitality and viability of nearby centres and reducing the need to travel.	Noted.
				40. We consider reference in Paragraph 4.158 on phasing to be premature and not appropriate at this stage of the planning process. It is pertinent to note that it is not the role of the planning system to prevent competition. The role of the centre can inform the scale of retail development considered acceptable at Lodge Hill and it would be inappropriate to prejudice the development of a new centre on the premise that it might impact upon lower order rural settlements.	The policy on Lodge Hill includes retail phasing figures based upon information provided by Land Securities. The retail policy seeks to maintain and enhance the vitality and viability of both urban and rural retail centres.
				Section 4: Question 53 41. Question 53 seeks feedback on what retail function the new settlement at Lodge Hill should have, and on whether the retail development should be carefully phased to limit the impact on nearby rural settlements.	Noted.
				42. PPS6 sets out a number of principles, including enhancing consumer choice and delivering more sustainable patterns of development. In promoting centres, PPS6 requires local planning authorities to consider the network of centres and their relationship in the hierarchy. It recognises that local planning authorities should consider a more balanced network of centres. Areas where significant growth is expected are recognized circumstances where such new centres should be promoted. This is reflected further in the SEP (SEP sub-regional Policy KTG5, which relates to the role of the retail centres), which recognises that retail and service centres will be developed in conjunction with the development of major new neighbourhoods. The NLP study informs the Council's retail evidence base; it acknowledges the potential requirement to provide new convenience facilities to serve major new residential development, and recognises that this will contribute to ensuring residents and workers have access to facilities.	The South East Plan was revoked on the 6th July 2010.
				43. We consider that the function of the retail component of Lodge Hill should be of an appropriate scale which is proportionate to the role, needs and demands of a new settlement, and should accommodate the quantum of development that is required to create the critical mass needed to sustain the development. It should also enhance existing retail provision within the Peninsula to extend the benefits beyond the site, to the existing community.	The level of retail provision at Lodge Hill has now been agreed with Land Securities.
				44. On the issue of 'phasing' and 'impact', it is pertinent to note that it is not the role of the planning system to prevent competition. The role of the centre can inform the scale of retail development considered acceptable at Lodge Hill and it would be inappropriate to prejudice the development of a new centre on the premise that it might impact upon lower order rural settlements.	Noted.
				Section 4: Issues and Choices – Community and Social Infrastructure 45. Land Securities has been consulting widely on the potential community and social infrastructure provision at Lodge Hill, which has raised similar issues to those identified in the Issues and Options report. The theme of clustering facilities at a neighbourhood level is clearly a good one both for place-making and in terms of reducing the need to travel. The evolving masterplan for Lodge Hill adopts this approach, seeking to maximise facilities available within walking distance of people's homes. This can also be linked with the use of schools as community hubs.	Noted.
				Section 4: Issues and Choices – Leisure, Culture and Tourism 46. Paragraph 4.205 refers, amongst other things, to there being a shortage of hotel bedrooms particularly catering for the middle and upper segments of the market. The emerging masterplan relating to Lodge Hill has the opportunity to accommodate a middle/upper segment hotel (for which there is current demand in the area) which could have linkages with the existing leisure amenities in close proximity to the site. This could be included within a reasonably early phase of development, since it could contribute to the 'place-making' that is so important to new schemes. Small retail units could be attached to this hub, which should also offer some conference and gym facilities for users from the village and outside, on a membership basis. There is also demand for a 2-3 star commercial hotel, which may be located within the Chattenden Barracks part of the site, where the road frontage is an advantage.	Two hotels have been included in the policy for Lodge Hill.
				Section 4: Question 58 47. Question 58 asks whether further sports hall provision should be made and if so, whether this should be in stand-alone locations, in conjunction with secondary schools or a combination of both. We consider that the location of new sports hall provision should be determined by where there is a deficiency/need. We support the principle of colocating/ sharing these facilities with secondary schools or indeed other community uses to create a community hub, as well as uses which are active throughout the day and evening. This is a key development principle underpinning the evolving masterplan for Lodge Hill.	Noted.

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				Section 4: Question 64 48. Question 64 queries whether, given the dispersed pattern of hotel development, future provision should be restricted to more central sites. PPS6 relates to planning for town centres, and defines hotels as a town centre use. It sets out the approach in terms of the preparation of planning policy, which includes a sequential approach to site selection with the first priority being on central locations. Therefore focussing on more central sites would be consistent with the current version of PPS6.	Noted.
				49. However, draft PPS4 sets out the considerations for site selection and land assembly for town centre uses, based on identified need, appropriateness of scale, the sequential approach, the impact of development and accessibility. It then states that after addressing these considerations *'planning authorities should also consider the degree to which other considerations such as any physical regeneration benefits of developing on previously developed sites; employment opportunities; increased investment in an area; social inclusion and other specific local circumstances, may be material to the choice of appropriate locations for development'* (Draft PPS4, paragraph EC7.1).	Noted. The tourism policy encourages the development of new hotels in locations that complement regeneration opportunities.
				50. Draft PPS4 states that LPAs, through their LDFs, should in their Core Strategies set out a spatial vision and strategy for the management and growth of the centres in their area over the Plan period. It states that as part of the vision and strategy they should (inter alia): *'Define a network and hierarchy of lower order centres (those not identified in the Regional Spatial Strategy) to meet the needs of their catchments and ensure that people's everyday needs are met locally;* *Make choices about which centres will accommodate any identified growth; addressing deficiencies in the network by promoting centres to function at a higher level in the hierarchy or designating new centres of an appropriate scale in identified areas of deficiency or significant growth such as in identified growth areas and proposed ecotowns…'*(our emphasis, Draft PPS4, paragraph EC5.1).	Noted.
				51. Sub-regional Policy KTG5 of the SEP states that a network of retail and service centres will be developed in which, inter alia, LDDs will make provision for local and district facilities in appropriate town centres in conjunction with the development of major new neighbourhoods.	The South East Plan was revoked on the 6th July 2010.
				52. We consider that the Council's approach to hotel provision should reflect the approach set out in draft PPS4, particularly in terms of the flexibility provided for within paragraph EC7.1. We consider that this is essential for hotel development, given that many hotel offers are not suited to central locations.	Noted. The tourism policy encourages the development of new hotels in locations that complement regeneration opportunities.
				53. Lodge Hill is proposed as a new settlement within the Issues and Options report. We understand that further work on the Borough-wide retail evidence base will be prepared which will reflect the approach set out in draft PPS4, and will consider the retail role and impact of Lodge Hill as a key component of the Council's preferred spatial option for accommodating its growth requirements set out in the SEP. This should also inform the identification of an appropriate scale of 'town centre' uses as part of the development. The proposed new settlement at Lodge Hill provides an exciting opportunity to contribute to the provision of hotels in the Borough, particularly in terms of the middle and upper segments of the market which are currently identified in the Issues and Options report as having a shortage of bedrooms. The evolving masterplan currently makes provision for two hotels. We consider that hotel development as part of the evolving masterplan for Lodge Hill is appropriate and would be entirely consistent with the references at paragraph EC7.1 of draft PPS4, referred to above.	Noted.
				Section 4: Issues and Choices – Landscape, Wildlife, Countryside and Open Space 54. Paragraphs 4.222 to 4.225 relate to local landscape designations. Reference is made to the relevant parts of PPS7 in terms of the circumstances in which local landscape designations may be maintained. Paragraph 4.223 sets out the concern that criteria based policy cannot adequately substitute the current designations and as such (in Paragraphs 4.224 and 4.225) the Council sets out a new approach of Integrated Countryside Management. Paragraph 4.230 is also relevant.	
				55. In progressing the Core Strategy, we consider that it will be important for the Council to be consistent with the approach set out in PPS7, specifically: *'When reviewing their local area wide development plans and LDDs, planning authorities should rigorously consider the justification for retaining existing local landscape designations. They should ensure that such designations are based on a formal and robust assessment of the qualities of the landscape concerned'* (PPS7, paragraph 25). If the Council pursues the Integrated Countryside Management approach – or indeed any other non-criteria based approach – the justification for this should be clearly identified.	Noted.
				56. We think that in the context of Paragraph 4.214, the Core Strategy should also make reference to the Hoo Peninsula Green Cluster Studies.	Reference has been made in the landscape policy to the Hoo Peninsula Green Clusters Study.
				Section 4: Issues and Choices – Energy 57. Paragraph 4.318 refers, amongst other things, to there being an 'exceptional opportunity' to re-use waste heat through a district heating grid. We consider that this needs to be tempered within the Core Strategy; whilst we acknowledge the significant scale of a *potential* opportunity, the extent to which it is a *real* opportunity should be determined based on evidence which shows that it is technically possible, commercially proven and feasible. This also applies to the reference to 'good opportunity' for district heating within Paragraph 4.320.	The Lodge Hill policy requires design solutions to have regard to the potential for a comprehensive heating grid and other measures to minimise the carbon footprint.
				58. Paragraph 4.319 states that an essential first step would be to require new developments to install a heating grid and this is a role for the Core Strategy. We consider that the 'requirement' should be replaced with identification of what criteria/objectives are required to be met (e.g. carbon reduction), and the policy approach should not focus on the technical solution for achieving this. The policy	The promotion of a large scale district heating systems in the Energy Efficiency Policy is dependant on feasibility.

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				approach should provide flexibility to enable technically and commercially feasible solutions to be identified to meet the policy criteria/objectives.	
				Section 4: Questions 77 to 80 59. Question 77 asks whether any future conventional power generating development in Medway should be conditioned to require the ability to provide district heating. If conventional power generation is to include Carbon Capture at the Power Station it is questionable that to include a mandatory requirement to fund a district heating area-wide network is appropriate, without confirmation that such a proposal is an economic proposition to the potential customer base. It should only be provided where it is demonstrated to be technically and commercially feasible compared to other options. We note that any opportunity to exploit waste heat from Kingsnorth would be conditional on, inter alia, commercial viability. Space heating costs for end users need to remain competitive, not least because of the issues associated with fuel poverty.	The policy on conventional energy generation supports the development of additional power generation subject to proposals being addressed for their potential to re-use waste heat. There is therefore no compulsion.
				60. Question 78 asks whether new development, over a minimum size, should be required to install a heating grid, and if so, whether this should be applied universally in Medway or only in areas where connection to a larger grid can be reasonably demonstrated. New developments should not be required to install district heating systems by default if they are over a minimum size. If, for example, Medway had an infrastructure network for waste heat from a Power Station there still remains issues of responsibility for the on-site ownership and maintenance of the infrastructure and pipe work. The owners and operators of the off-site district grid may also need to own the on-site mains to the boundary of properties. As in Southampton, the choice as to whether the Geothermal source of district heating grid is selected as an energy source is left to market conditions and competition between the utilities. Fundamentally, whilst district heating can be an excellent means by which to meet the energy demands of new development efficiently, it must be demonstrated to be feasible, and compared to other low/zero carbon options such as solar water heating and ground source heat pumps.	There is no compulsion in the Core Strategy to install heating grids.
				61. Question 79 asks whether there should be a stronger presumption in favour of the use of renewable technologies, including wind, combined heat and power, solar and photovoltaics. We consider that there should be flexibility in the approach to the type of technology used to achieve the carbon reductions specified. The use of renewables should be considered where conditions are favourable, for example installing wind turbines where wind speeds are sufficiently high. If greater carbon emission reductions can be achieved through the use of low carbon emission technologies such as gas-fired CHP rather than renewables, this should be taken into account. The overriding consideration is ensuring the carbon reduction target is achieved, and not being prescriptive as to the technology utilised to achieve this.	The energy efficiency policy requires 20% of on-site energy loading on certain sites to be delivered from renewable energy.
				62. Question 80 asks whether a 'Merton Rule' should be introduced for Medway, and if so, whether this should be in addition to making provision for district heating and what percentage of on-site renewable energy should be required as a minimum standard. We consider that this has essentially been superseded by the Government proposals to drive the reduction in Co2 through the new standards under the Building Regulations. As referred to above, the means of achieving the end goal should not be prescriptive, more of a performance specification approach. This has the advantage of policy not becoming outdated or inappropriate as changes in the energy markets and technologies improve.	Noted.
				63. Furthermore, implementing a 'Merton Rule' for Medway may be incompatible with a provision for district heating, particularly if it is sourced from a conventional power generating development. In some instances, it may be preferable to forgo a minimum renewable energy requirement for a higher carbon emission reduction from a low carbon source. It should be noted that following the national timetable for the implementation of the national timetable for the Code for Sustainable Homes, there will be minimum carbon emission reductions to be met, and an element of low/zero carbon technology will have to be present in order to achieve this.	Noted.
				Section 4: Issues and Choices – Climate Change Section 4: Questions 81, 82 and 85 64. With respect to Questions 81, 82 and 85, there is published data available which provides guidance on habitat creation, habitat networks and corridors, and creation and protection of urban green spaces. We support the principles set out in these questions, which we consider should be reflected within the Core Strategy as broad criteria, with flexibility to enable the precise means of protection to be determined on a site-specific basis. This approach would avoid a more arbitrary approach based on imposing Borough-wide protection on all relevant land/sites within the Borough. At the appropriate time, we would be happy to discuss this in the context of Lodge Hill in terms of how the considerations set out in these questions can be addressed.	Noted.
				Section 4: Question 84 65. Question 84 asks whether we agree with the principle of earmarking areas now for buffers around our more significant areas of nature conservation importance. We support the principle of buffers, but we consider that these should only be identified in the context of nationally significant landscape designations (such as SSSIs). We consider that the width and nature of the buffer zone should be determined on a site and development specific basis, through consultation with a professional ecologist and Natural England in each case. The relevant policies within the Core Strategy should only set out the generic criteria. Section 4: Issues and Choices – Lodge Hill, Chattenden	There is no provision for buffer zones in the Core Strategy due to the number of important wildlife sites and the difficulties in determining the extent of the zones. Consequently, buffering will be addressed on a site by site basis.
				66. Paragraph 4.446 refers to the defence estate comprising around 400 hectares in total, of which 325 hectares will become the responsibility of Land Securities. We would suggest that references to the site in the Core Strategy should refer to the site area as 'approximate'. In terms of the other references within the paragraph, we consider that the references don't quite reflect Land Securities' current thinking/information; we would be happy to provide the Council with data to feed into the Core Strategy evidence base to clarify the relevant figures, and to enable these to be updated as the Core Strategy progresses.	As Lodge Hill will be a strategic allocation in the Core Strategy, the precise area can be calculated. The document refers to the development site extending to some 256 hectares
				67. Paragraph 4.447 states, inter alia, that the site *'has been assessed as sufficient to accommodate around 5,000 homes and 20-25*	The current assessment amounts to 5000

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				hectares of employment land'. We consider that it is critical that the Core Strategy positively acknowledges that this was based on a previous assessment (and not on the current work being undertaken by Land Securities and its consultant team) which was less extensive by comparison with the work now being undertaken and required in response to the revised version of PPS12. The quantum of development that can be accommodated on site is being determined by the site-specific evidence base. We also consider that the reference to 70,000 sq m of employment within the Sustainability Appraisal is arbitrary; the approach to the quantum of employment floorspace should be based on the approach expressed elsewhere within these representations.	dwellings and a minimum of 43,000 sq m. of employment land.
				68. Paragraph 4.448 sets out the reasons why the Council has supported the principle of development at Lodge Hill. We consider that it would be worthwhile placing these reasons within the context of the requirements of sub-regional Policy KTG1 of the SEP, and the need for the Core Strategy to be in general conformity with the RSS. With reference to the last bullet point, we can confirm that based on extensive work completed to date to inform the evolution of the masterplan for Lodge Hill, we do not envisage any constraints to the delivery of development. This is consistent with Paragraph 4.450 of the Issues and Options report.	Noted.
				69. Paragraph 4.454 and 4.460 refer to the need for a realistic and deliverable programme/plan. We can confirm that this will be a key component of the site-specific evidence base	The Lodge Hill chapter includes a development programme
				70. Paragraph 4.455 relates to the SATURN transport model. Access is a potentially significant constraint and both the Council and the Highways Agency will need to be satisfied that appropriate solutions have been fully tested and can be delivered. Use of the Council's high level SATURN transport model, which has been validated with the Highways Agency, will be an important part of this process.	Noted.
				71. Paragraph 4.456 relates to sustainability standards. We consider that the Core Strategy should reflect the Code for Sustainable Homes national timetable more fully, to include that relating to the period up to 2016 (i.e. 2010 onwards – Code Level 3, and 2013 onwards – Code Level 4).	Noted.
				Section 4: Question 88 72. Question 88 queries whether the intended development programme for the Lodge Hill development is realistic and achievable, bearing in mind its proposed contribution towards meeting the requirements set out in the SEP. Land Securities and its consultant team has – and continues to – undertake extensive technical and design work to inform the evolution of the masterplan for Lodge Hill, which will inform the Council's evidence base relating to the identification of the site as a strategic allocation within the Core Strategy. The approach to the site-specific evidence base is based on the requirements of PPS12. The site-specific evidence on the development programme is being developed in detail. Land Securities is currently working on the assumption that 4,500 units will be delivered within the Plan period, based on market absorption rates. In terms of the requirements site out under paragraph 54 of PPS3: • the site is available; Defence Estates has positively confirmed that the MoD will vacate the site and release it for redevelopment. This is reflected in Paragraph 4.22 of the Issues and Options report; • the site is suitable; it utilises previously developed land. The extensive site-specific evidence base has informed the evolving masterplan for the creation of a balanced, mixed and sustainable new settlement. The identification of the site as a strategic allocation within the Core Strategy is consistent with sub-regional Policy KTG1 which states, inter alia, that full use should be made of previously developed land before greenfield sites, and with the SEP paragraph 19.5 reference to the site as a major regeneration location; • it is achievable; housing will be delivered on the site within five years of the start of the Plan period and beyond, and this will be reflected within the Council's forthcoming housing trajectory. We can provide the Council with data to support this as part of their evidence base for the Core Strategy.	The housing trajectory in the SLAA and the Core Strategy includes the following rates of development at Lodge Hill, provided by Land Securities: 2011-2016 – 1000 Dwellings 2016-2021 – 1800 Dwellings 2021- 2026 – 1800 Dwellings Post 2026 – 400 Dwellings
				Section 4: Question 89 73. Question 89 asks what tests should be used to assess the proposed transport and access solutions for the development. We consider that the transport and access solutions are tested against their ability to address the following issues which are identified in the DfT's Guidance on Transport Assessments: • Reducing the need to travel, especially by car – ensure, at the outset, that thought is given to reducing the need to travel; consider the types of uses (or mix of uses) and the scale of development in order to promote multi-purpose or linked trips; • Sustainable accessibility – promote accessibility by all modes of travel, in particular public transport, cycling and walking; assess the likely travel behaviour or travel pattern to and from the proposed site; and develop appropriate measures to influence travel behaviour; • Dealing with residual trips – provide accurate quantitative and qualitative analyses of the predicted impacts of residual trips from the proposed development and ensure that suitable measures are proposed to manage these impacts; • Mitigation measures – ensure as much as possible that the proposed mitigation measures avoid unnecessary physical improvements to highways and promote innovative and sustainable transport solutions.	Noted.
				Section 4: Question 90 74. Question 90 asks what headline sustainability principles should be applied in planning the settlement. We consider that the approach should reflect that set out in PPS1: Delivering Sustainable Developments and Planning Policy Statement: Planning and Climate Change – Supplement to PPS1. We consider that given the anticipated 'life' and phased nature of the redevelopment of Lodge Hill, and the 'life' of the Core Strategy, the emerging policies need to be sufficiently flexible to ensure delivery in the medium and long term, to respond to changing standards and emerging technologies.	Noted.
				Section 4: Question 91	Noted.

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				75. Question 91 asks whether we have any preferences as to the economic role that the new settlement could fulfil. Lodge Hill needs to fulfil an economic role which is appropriate to its location, its designation as a mixed-use development and one that is complementary to the Medway Towns. It should: • Be a prosperous community, part of a prosperous Medway; • Be a genuinely mixed-use development where there are synergies between uses, and people can live and work; • Provide options and choices for business which complements the wider Medway offer and supports growth sectors; • Provide a unique offer which can help change perceptions of Medway as a business environment; • Provide employment opportunities which maximise employment rates and reduce the need to travel for Lodge Hill residents, and provide jobs for residents of the Hoo Peninsula and Medway.	
				76. In practical terms this means building on the location's strengths and likely current market demand, focusing on creating a high quality place which can attract residents to live and stay in Medway, start new businesses, and provide an excellent base for home-working and small business start up and growth space.	Noted.
				77. It can also act as a new centre providing a combination of local retail, service and leisure provision together with destination uses such as hotel provision, sport, recreation and outdoor and environmental activities.	Noted.
				78. Building on this in the longer term, it can aim to secure larger scale inward investment possibly through a small campus style office/knowledge quarter linked to R+D and environmental business.	Noted.
				Section 4: Question 92 79. Question 92 asks whether we agree that the new settlement should contribute towards a wider green vision or strategy for the Hoo Peninsula and the Isle of Grain. The Medway Green Grid, Hoo Peninsula Green Cluster Studies and Terry Farrell's Hoo Peninsula vision all acknowledge that the development will be a major catalyst in achieving the goals set out for the Hoo Peninsula. In our view, a new settlement should make a contribution towards a wider green vision/strategy, and the issue will be in terms of how and to what extent should it contribute to these strategies.	Noted.
				Section 4: Question 93 80. Question 93 asks whether we have any suggestions/proposals that should feature in the delivery strategy for the new settlement and that can help achieve the timely provision of necessary infrastructure and services. A key objective in terms of the evolution of the masterplan and delivery strategy for Lodge Hill is the timely delivery of infrastructure and services, recognising that a comprehensive approach would be taken to ensure all services/facilities/infrastructure required to sustain the development would be provided. Evidence to support the delivery strategy is being produced to demonstrate that this can be achieved and that the site can be delivered within the Plan period. The delivery strategy will have appropriate risks assessed and contingencies in place. We can confirm that based on extensive work completed to date to inform the evolution of the masterplan for Lodge Hill, we do not envisage any constraints to the delivery of development.	An infrastructure delivery plan will accompany the Core Strategy to demonstrate when and how all its proposals will be delivered.
				Section 5: Spatial Choices or Options 81. We would suggest some amendments to Paragraph 5.7 to ensure that it accurately reflects the position, as follows (suggested amendments in bold text): *'Although many Thames Gateway documents have been issued since then which supersede RPG9a, the original strategy has been reflected within these and therefore continues to be applied. It has been restated and further refined in every development plan document since then – in the case of Medway in two structure plans, one local plan and the new South East Plan. It can be concluded that it remains very relevant, given that it has half of its projected term= still to run in terms of the broader vision'.*	Noted
				82. Paragraph 5.10 refers to the housing requirements and housing land supply position, with reference to the housing section of the Issues and Options report. The comments set out in paragraphs 10-14 (inclusive) of these representations apply.	Noted.
				83. Paragraph 5.11 should be amended to clarify that no additional land needs to be identified beyond that which has been identified within the SEP (which has been reflected within the Issues and Options report).	The Core Strategy is not` preparing a level of development which is higher then the requirements set out in the former South East Plan.
				84. Paragraph 5.16 states that due to the quantity of development that is already committed within the main urban area, it is not feasible or realistic to have options that do not take this into account. We consider that for the reasons set out in paragraphs 10-14 (inclusive) of these representations, this is only appropriate if reliance on existing planning permissions is justified in accordance with PPS3, and if – based on robust and credible evidence – they are deliverable within the Plan period. Paragraph 5.19 also needs to be considered in the context of deliverability.	Lodge Hill is the only Strategic Option being pursued in the Core Strategy.
					Noted.
				85. In the context of the parameters for assessing the alternative options for accommodating growth, the final bullet point of Paragraph 5.18 states that other than the base option, each option is of a size that could be a substitute for the proposed new settlement at Lodge Hill. We have significant reservations about the validity of this assumption. It would appear to us from a review of the relevant SLAA submissions that the scale (hectares) of the four alternative options for accommodating growth are not sufficient to substitute the scale of development that could be accommodated at Lodge Hill, and to accommodate Medway Council's growth requirements. This also applies to Paragraph 5.23, which states that around 200 hectares of land would be required to make up for the Issues and Options report, for the reasons set out above.	Noted but the assessments carried out demonstrated that each option had sufficient land.
				86. Paragraph 5.22 confirms the Council's support for Option 1: new settlement at Lodge Hill. This is in conformity with the SEP in terms of making full use of previously developed land before greenfield sites, and the explicit reference to the site being a major regeneration	Noted.

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				location.	
				87. We consider that the Council should liaise with Maidstone Borough Council to understand its position in terms of housing land supply (with reference to Paragraphs 5.26 and 5.27). With reference to Paragraph 5.27, for the purposes of clarity, if a development at Capstone Valley was increased in size by virtue of extending further southwards into Maidstone, this would not contribute towards Medway Council's housing requirements.	Maidstone Borough Council has informed Medway that it has no intention of allocating land for development at the Southern End of the Capstone Valley.
				88. We assume that the numerical points set out under Paragraph 5.40 are in no order of preference. However, in the context of the requirement for the Core Strategy to be in general conformity with the RSS, and a number of key principles enshrined within national planning policy, in our view there are a number which should be afforded greater weight. These are 1 (conformity with the SEP); 7 (greenfield or previously developed land); and 9 (impact on regeneration strategy for the urban area). It may also be appropriate for the Council to consider including a criterion relating to deliverability within the Plan period.	Noted.
				Section 5: Spatial Choices or Options: All Options 89. Reference is made throughout the assessments to Local Plan designations as potential constraints, for example rural lanes, ALLIs. We consider that it is important to recognize that the status of these may change through the emerging Core Strategy process, and as a result of the Borough-wide evidence base being prepared.	Noted.
				90. Criterion 3 relates to transport impacts. In our view, in order to compare the sites, transport and services would need to be considered in detail. Transport could be assessed via a PTAL, and the services assessed by compiling the number and accessibility of the sites to the local services.	Noted but PTAL has been developed for use in London and has been found to be inappropriate for use outside the capital.
				Section 5: Spatial Choices or Options: Assessment of Option Number 1 91. Consideration 6 on page 96 relates to accessibility to existing services, the overall assessment for which is 'comparable to other options, subject to quality of transport links'. However, there is no apparent consistency with the Council's assessment of the other four options and as such, it is unclear how Lodge Hill is 'comparable' to them. We consider that it is difficult to make a direct comparison with other options because of the size and unique opportunities of the Lodge Hill site. The consideration seems to be framed on an implicit assumption that only houses will be provided, which will need access to existing services. Of course access will be required by new residents to use services outside the site and the quality of transport links will need to be improved to facilitate this. Of more importance, however, is that the scale and location of Lodge Hill at the heart of the Hoo Peninsula has an unrivalled opportunity to provide, in addition to housing, services which will be used by existing communities as well as the new community. Other Options may not be able to provide these services. The uniqueness of scale and location, and the benefits which follow, mean it is therefore not comparable to other Options in this respect.	Noted.
				92. In terms of transport links, the evolving masterplan seeks to improve links for pedestrians and cyclists to the adjacent settlements of Hoo St Werburgh and the Medway Towns. It also aims to secure high quality frequent bus services to the key local destinations within the Medway towns area. A significant proportion of the residents of Lodge Hill would be within an easy (2km) walking distance of Hoo St Werburgh and therefore the residents of both these settlements would benefit from easy access to the services provided at both Hoo and Lodge Hill. The residents would also be within easy cycling distance (5km) of Frindsbury Strood and Wainscott Areas. The scale of Lodge Hill would also be sufficient to support a wide range of services which would be accessible to the residents of Lodge Hill and adjacent settlements via direct and attractive walking and cycling routes.	When assessing access to services in the SLAA, a walking distance of 800 metres was used as a reasonable measure of sustainability. Consequently, all options were comparable in this regard and all would have had to include services and facilities as part of their overall development.
				Section 5: Questions 96 93. Land Securities fully supports the Council's preferred option for a new settlement at Lodge Hill. The site has long been acknowledged as part of the Borough's strategy for accommodating growth, subject to clarification on the timescales of its availability for redevelopment. This has now been confirmed by Defence Estates and the site is deliverable within the Plan period, with early phases expected to be delivered within the first five years of the Plan.	Noted.
				94. Section 24 of the Planning and Compulsory Purchase Act 2004 requires Local Development Documents to be in 'general conformity' with the RSS – which in this case is the SEP. The adopted Kent Thames Gateway sub-regional SEP Policy KTG1 relates to the Core Strategy. In terms of policies and programmes, Criterion (i) requires, as a first priority, making full use of previously developed land before greenfield sites, except where there are clear planning advantages from the development of an urban extension that improves the form, functioning and environment of existing settlements or a new community. Supporting paragraph 19.5 states that the main locational effects of the Core Strategy and related policies will be concentrations of new dwellings, employment and services at major regeneration locations including *'within the Medway urban area at riverside sites, and to the north on Ministry of Defence land at Chattenden'*. The Council's proposed strategy for accommodating their housing requirement, which includes a new settlement at Lodge Hill, conforms with the approach set out in the RSS.	The assessment of options has now been overtaken by the revocation of the South East Plan on 6 July, 2010. If carried out now, the options would be measured against the requirement of paragraph of 36 of PPS3, which gives priority to the development of previously developed land.
				95. The new settlement would utilise previously developed land to create a balanced and sustainable community as a key component of the Council's housing land supply within the Plan period. MEDWAY LOCAL DEVELOPMENT FRAMEWORK: INITIAL SUSTAINABILTY APPRAISAL (JULY 2009) REPRESENTATIONS MADE BY CB RICHARD ELLIS ON BEHALF OF LAND SECURITIES GROUP PLC	Noted.
				96. These representations are made by CB Richard Ellis on behalf of Land Securities Group Plc. Land Securities Group Plc has been selected as the Land Sale Delivery Partner responsible for the development and sale of approximately 320 hectares of Ministry of Defence land at Lodge Hill.	Noted.

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				97. CB Richard Ellis, on behalf of Land Securities Group Plc, has submitted detailed representations in respect of the Core Strategy Issues and Options report, which also apply to the Sustainability Appraisal; we have not, therefore, repeated these comments and trust that the Council will amend the Sustainability Appraisal as appropriate and relevant, to reflect any changes made to the Core Strategy.	Noted.
				98. Our general comment to the Sustainability Appraisal relates to the need for Medway Council, through the next version of the Sustainability Appraisal which we anticipate will accompany the next stage of public consultation on the Core Strategy, to articulate in a greater level of detail – based on robust and credible evidence – the rigorous assessment of its spatial options for accommodating growth, to ensure that the statutory requirements of the Sustainability Appraisal process are met.	Noted.
8.		Palm Developments	Palm Developments	See attached response from Jennifer Owen & Associates Ltd made on behalf of Palm Developments. http://medway-consult.limehouse.co.uk/file/993506 **a. Planning Policy Statement 10 (PPS10).** b. The latest advice issued by The Planning Inspectorate (PINS)1 advises that a waste strategy should indicate waste management developments and facilities which are required; where they are to be located; when they are to be provided; and how they will be delivered. PINS advise that there have been many instances where DPDs have been found unsound because of lack of essential baseline information in relation to current levels of waste being generated in each waste stream, how it is managed and what factors are likely to influence the quantities of waste and types of facilities needed over the plan period not being provided. c. PPS10 requires that waste planning authorities in preparing DPD's to deliver the waste policies set out in the Regional Spatial Strategy (RSS) should be able to demonstrate that capacity equivalent to at least 10 years of the annual rates set out in the RSS could be provided and to allocate sites and areas suitable for new or enhanced waste management facilities to support the apportionment set out in the RSS. In order to be able to do this credible evidence base must be provided. d. PPS10 further requires that in identifying the location of waste management facilities or areas care should be taken so as to avoid stifling innovation in line with the waste hierarchy and also that unrealistic assumptions in relation to the development of particular sites or areas should be avoided. e. PPS10 also advises that in identifying sites and areas a broad range of locations should be achieved and the opportunity to collocate facilities should be taken. In particular sites and areas should be assessed against the following criteria i. Extent to which the allocations support policies in PPS10 ii. The physical and environmental constraints on development, including existing and proposed neighbouring land uses including:- 1. Protection of water resources 2. Land instability 3. Visual intrusion 4. Nature conservation 5. Historic environment and built heritage 6. Traffic and access 7. Air emissions, including dust 8. odours 9. Vermin and birds 10. Noise and vibration 11. Litter 12. Potential land use conflict iii. The cumulative effect of previous waste disposal facilities on the local community iv. Capacity of the existing and potential transport infrastructure to support the sustainable movement of waste v. Re use of previously developed land. **f. Regional Spatial Strategy, South East Plan.** i. The RSS sets out policies and requirements for the management of waste. Whilst Policy W7 gives capacity requirements on a county by county basis this is only for MSW and Commercial and Industrial (C and I) waste. There is no clearly defined requirement for Medway in respect of CDE wastes. An illustrative additional capacity requirement is provided and this is discussed below together with an analysis of other relevant policies and advice and how the requirements are met or otherwise by the evidence base for the Core Strategy together with the proposed options. ii. Policy W3. "Provision for recovery and processing capacity for London's waste should only be where there is a proven need, with demonstrable benefits to the region, including improving the viability of recovery and reprocessing activity within the region, and in the nearest appropriate location. A net balance in movements of materials for recovery and reprocessing between the region should be in place by 2016." Reprocessing CDE waste in Medway and sending back clean material will help achieve this goal. iii. Para. 10.16. Beyond 2016 export from London to landfill will be for residuals only. Medway will have a requirement to landfill a proportion of London's residual waste throughout the period to be covered by the Core Strategy. This issue is not addressed in the proposed options nor is there any evidence as to how the apportionment of the requirement is to be divided between Kent and Medway. iv. Para. 10.17. sets out how there may be sites suitable for processing London's waste outside London where the facility is the nearest available outside London and accessible by sustainable transport modes. This can make the operation more economic. Net flow requirements can be achieved by returning processed waste to London for re use. For example with contaminated soils the processed soils can be taken back to London. Locations along the River Medway can meet this requirement. v. Para 10.18 refers to Sub Regional self sufficiency and admits that greater control is possible over MSW compared to C and D waste.	**This representation concerns two specific sites at Trenchmans Wharf and Bores Hole** Noted Noted This is dealt with in the draft core strategy. Noted but there is currently no evidence of demand for such facilities/capacity in Medway.

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				It is, therefore, necessary to ensure that over capacity is provided in respect of treatment facilities for CDE wastes in order to achieve recycling targets. vi. At para 10.19 cross boundary co-operation is expected between Kent and Medway. The CS Issues and Options Report does not anticipate what this might be and does not report what cross boundary movements there might be between the two areas and how proposed facilities will relate to both areas waste streams. vii. Para 10.29. Reports surplus C and D capacity in Medway of 1.034 million tonnes by 2015. The analysis below at section 5 demonstrates that this figure cannot now be correct on the basis of currently permitted sites and is unlikely to have been correct at the time SEPlan was published. viii. Para 10.45 identifies a need for additional landfill capacity after 2013/4 landfill for residues at Sub Regional level (that is London and Medway). The Issues and Options Report does not properly identify requirement, current capacity or options for dealing with additional requirement for the residuals arising from the CDE waste stream. ix. Para 10.47 advises that landfill can be used to meet national environmental objectives such as habitat reestablishment and biodiversity targets. The CS Issues and Options does not consider how environmental objectives could be achieved through the use of part of the Bores Hole/Trenchmans Wharf site as set out below could be used to fulfill environmental objectives such as enhancement of a SSSI. x. Policy W15 identifies the requirement for sub regional network of contaminated C and D facilities and sites for storage, treatment of remediation of contaminated soils and demolition waste. The CS Issues and Options report makes no mention of how Medway could help deliver this policy objective taking account of its location close to London with sustainable transport links to the capital, it being a Growth Area and its location within the Thames Gateway. xi. Para 10.51. The identified facilities should be designed/located to make best use of rail and water transport. The CS Issues and Options Report does not consider how well the selected waste facility options perform in respect of sustainable transport. xii. Policy W16. Waste DPDs should identify sites with appropriate depot and wharf facilities wherever possible. The CS Issues and Options Report does not do this. xiii. Para 10.56. advises that waste management facilities should not be precluded from being established in AONBs or the Green Belt. 4. Issues Process. The Waste Capacity study referred to in para. 28 and documented in the State of Medway Waste report has found to be inaccurate in respect of both the assessment of CDE waste arising together with existing and currently planned capacity. Conformity with National and Regional Policies. The provisions for waste and the options considered in the CS Issues and Options Report do not conform with PPS10 and the RSS as set out in Section 3 above. Sub Regional Context. At para. 4.6 the CS Issues and Options Report fails to identify the important transportation links which Medway has including the River Medway and also its proximity to London. This section has also failed to recognise any role for Medway in the provision of Sub Regional waste facilities or the requirement to take waste from London for landfill. Transport. Medway is well located with respect to London and Thames Gateway. Sites well placed with respect to wharves and rail connections should be investigated. Paras 4.53 and 4.54 set out the importance of the River Medway as a transport corridor and the existence of the wharves along the river but fails to acknowledge that suggestions have been put forward in relation to the use of particular wharves including Trechmans Wharf. Water transport is an economical and highly sustainable transport method for bulky products including waste. This should be acknowledged and formal protection should be given to wharves where there is a good prospect that their commercial use will continue or resume. Landscape, Wildlife, Countryside and Open Space. Designations are not necessarily a hindrance to development. Individual site circumstances should be investigated. The Core strategy must provide flexibility and acknowledge that some protected areas can be enhanced through development particularly where they have be the subject of past development. <u>Waste</u> The use of 1998 research to estimate arisings for this sector is not acceptable. Newer research is needed as set out at Tables 1 and 2 below. Para 4.269 states that increasingly demolition waste is treated and reused on site. However, this type of waste is often processed only very basically and used for on site landscaping projects, usually bunds, which are merely vehicles for ensuring that no waste leaves the site. This is a missed opportunity as the waste could be recycled to a higher level and make a real contribution to replacing primary building products. A pre requisite to allow this to happen is a network of CDE recycling sites which are well located to the point of waste arising or linked to it by sustainable transport networks. Furthermore with planning permissions for projects with an estimated value of more than £300,000 now being required to demonstrate how the reuse, recycling and recovery of waste arising from the project is maximised higher levels of recycling and use are expected. Many sites will not be able to deliver the requirements on site due to the space required for the recycling and storage together with	View noted. The council is working closely with KCC on these matters View noted. These matters are addressed in the draft core strategy and landfill requirements are reducing as higher proportions of C.D and E are recovered and reused. Noted but needs to be weighed against all other considerations. The policy is now revoked and the issue is covered in the draft core strategy. This would only form one element of an options appraisal. This is a matter for the core strategy or subsequent DPD not an Issues and options report. Noted. View noted. View noted. As there are currently no facilities dealing with London's waste such a reference is not justified in what is essentially a factual description. Water access is only one of many considerations that need to be taken into account in assessing sites and facilities. View noted but a core strategy is required to consider broad locations as opposed to specific sites Noted. Noted.

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				amenity constraints due to nearby residential and employment areas.	
				Many of the sites proposed for redevelopment in Medway are actually on the rivers or close to it. Therefore, a riverside site for recycling CDE waste should be a priority for the Core Strategy.	Noted but there is currently no evidence of demand for such a facility.
				Para. 4.277 states that chalk pits are no longer considered suitable for landfill "for environmental reasons". No explanation is given for this assertion and it is the case that with appropriate engineering chalk pits can be used for landfill. The EA Ground advice contained within document LDF1 paras17-22 and Groundwater Protection Policy Section 3.2 only prevents landfill deposits below the water table.	Noted but the costs of preparing such sites are increasing rapidly. As a result they are generally discounted by the industry.
				Para 4.290 recognises that Kingsnorth is too remote to serve the waste market of Medway.	Noted.
				The questions set out at the end of this section are inadequate to deal with the issues which will need to be included within the Core Strategy. It is essential that the issues are clearly divided into the waste streams and it is also made clear what new capacity is required in Medway for each stream. It should also be made clear that questions of location are constrained by National and Regional policy.	The Issues and Options report contains more questions than are usual in such a document and the consultation encouraged any other relevant issues to be raised
				Question 73. For CDE and wastes a cluster for handling, treatment and disposal of residuals should be provided at Bores Hole/Trechmans Wharf as set out below at section 6.	View noted.
				Question 74. Provision for landfill of CDE residual waste should be made at Bores Hole. Land raising and creation of a new void by excavating London Clay are unacceptable or not deliverable for the reasons set out at Section 6 below.	View noted.
				Question 75. A network of recycling facilities should be provided in order to provide economies in relation to transport and also allow competition between operators.	Noted.
				Section 5. Spatial Choices	
				The CS Issues and Options Report has failed to accurately justify quantities of material arising in Medway and also failed to assess the current capacity realistically. Set out below is an analysis of both these issues and an assessment of new capacity which is required and which will need to be provided for in the emerging Core Strategy.	View noted.
				b. Requirement. The Council's calculations on arisings for C and D waste appear to be around 300,000 tpa. This contrasts with that for Kent where Excavation waste is also included in the calculations and 2,678,000tpa is currently assessed as being the arisings in Kent for CDE wastes. Forecast growth predicts that in Kent this will rise to 3,445,000 in 2026. There are currently 1.4 mill people living in Kent and 250,000 people live in Medway. The Medway population is 18% of the Kent population. Using the same ratio gives an estimated CDE arising of some 482,040 tpa rising to 515,178 tpa in 2026 for Medway.	It is not considered that such a direct correlation between population and C,D and E can reasonably be made.
				c. Medway is a Growth area and also part of the Thames Gateway. The population is scheduled to grow from 250,000 to 300,000 during the plan period of the Core Strategy. Growth across the entire County of Kent is more constrained with only part being identified for Growth area status. The predictions for CDE waste arisings made above could, therefore, be an underestimate and should be treated as the lower end of the spectrum.	View noted.
				d. In order to ensure that this capacity is brought forward and to allow for competition between sites capacity increase of 20% should be made. This means that Medway should be seeking to plan for treatment capacity currently of **578,500** tpa rising to **618,200** tpa in 2026.	View noted.
				e. With regard to landfill Policy W6 of the RSS requires that C and D waste recycling in 2008 was 48% and this is expected to rise to 65% in 2025. Landfill is the only reasonable alternative for CDE waste which is not recycled. This means that landfill capacity of 52% of the annual arisings should now be provided and this should reduce to 35% in 2026. Using the figures at para. d. above (again a 20% over capacity should be planned to allow for competition and sites not coming forward) the CDE residual landfill capacity which should now be available in Medway is **300,080** tpa and this should fall to **216,370** tpa in 2026.	View noted.
				f. Set out below is a comparison between the capacity requirement and the currently available or planned capacity for both recycling and landfill of residuals of CDE waste in Medway and the estimated requirement.	
				See attached comment for table. http://medway-consult.limehouse.co.uk/file/993506	
				g. Further landfill capacity will also be required in Kent and Medway in order to take a proportion of London's waste in accordance with Policy W3. This will need to be agreed with Kent County Council as the apportionment figure in SE Plan Policy W3 is combined for both Kent and Medway.	With the revocation of the South East Plan this is no longer a requirement.

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354				h. These calculations show that Medway Council have severely underestimated CDE arisings and that there is a significant current under provision in Medway and this is set to get worse. Table 3 above shows the extent of the capacity deficit and the quantum of materials for which new capacity is required. **Section 6. Evaluation of the Options** a. The CS Issues and Options report goes into some depth in assessing the identified options for housing. In relation to waste the analysis is weak partly as a result of lack of evidence and partly because the waste streams are not treated separately at the assessment stage. This will need to be addressed if the Core Strategy is to be found sound. The analysis set out in Section 5 above has clearly identified a need for new CDE capacity of over 500,000 tpa to be in place by 2026. In reality due to the significant reliance of current capacity at Strood where only temporary planning permissions of 2/3 years exist and the whole area allocated in the Medway Plan is now the subject of a planning application for redevelopment there is an urgent need for this capacity to be accommodated in total. Similarly there is a current shortfall in capacity for the landfill of CDE residuals of some 300,000 tpa which needs to be met. c. The CS Issues and Options Report is not adequate in respect of how these matters are defined or proposed options put forward. The Sustainability Appraisal gives more information but this is still inadequate and in any event needs to be cross referenced into CS Issues and Options Report. Of critical importance to the analysis undertaken in the SA and the CS Issues and Options Report is the failure to consider transport of the waste both in terms of sustainability (travelling shortest distance and use of sustainable modes such as rail and the river) and the impact of cost in moving waste and whether sites will be undeliverable as a result of this factor. d. A further problem is the fact that the options considered in both the SA and the CS Issues and Options Report do not differentiate between the various waste streams. Finally, the options considered also do not equate to the realities of how waste is required to be handled in that options in relation to treatment and disposal are considered as alternatives whereas in practice treatment is never 100% and therefore will always require landfill capacity for residuals. Also there is no point in considering an option which is 100 % landfill as both the Landfill Directive and the RSS have diversion targets which must be met. e. Set out below are the Options considered in the SA and the reasons why they should be rejected. This is followed by an Option generated by the analysis undertaken in this report in respect of CDE waste and considered to be capable of meeting National and Regional Policy requirements including the need for communities to take responsibility for their own waste (the proximity principle) and for the provision of a network of sites in order to allow the development of a an efficient market for recycling CDE waste to produce high quality products. f. The options outlined in the SA for waste are identified at para. 3.17 as being based on "...as much treatment as possible". No figures either for arisings or treatment rates are given. This is a weakness which is fatal to the analysis as without this information it is not possible to say whether the capacity required can be met within the options identified. The problem is particularly acute as the types of waste to be handled at each site are also not identified. A further assumption made is that all Environment Agency requirements are assumed as capable of being met by the options being met. This is not the case for the landraising option as set out below. i. Option 2A: Treatment/processing hub in/or around Kingsnorth. This proposal is too distant from the main areas of arising of CDE waste in Medway and access for London waste would be by road only. It could prove a useful location for the treatment of waste arising from the proposals to develop a strategic housing site at Chattenden. There are no residual disposal proposals associated with this option. This is a one site option and does not provide for the development of an efficient market either for dealing with CDE waste or the recycled products. ii. Option 2B: Viridor's Medway City Estate site. Site reserved for MSW waste which produces higher processing values so no incentive to take CDE waste. This is a one site option and does not provide for the development of an efficient market either for dealing with CDE waste or the recycled products. iii. Option 2C: Chatham Port. Water access is limited by time taken in negotiating locks. Sites within the area are likely to have higher alternative site values than that associated with CDE recycling. Also landowners unlikely to allow waste processing here as it is likely to devalue adjoining sites. It is possible to have temporary CDE recycling but this would then not be in a building so amenity problems could arise. There is no disposal of residuals proposals associated with this option. This is a one site option and does not provide for the development of an efficient market either for dealing with CDE waste or the recycled products. Option 2D: Halling Coal Yard. It is understood that this site is now the subject of a planning permission for housing development so is not, therefore, available. This is a one site option and does not provide for the development of an efficient market either for dealing with CDE waste or the recycled products. v. Option 2E: Void creation. This option should not be considered as it is not viable without the identification of a market for the clay.	It is not accepted that this is the case for the reason given above. View noted. The issue of new/permanent capacity is addressed in the draft core strategy. View noted. It is not considered that the scale of analysis inferred is appropriate for a core strategy issues and options report. This needs to be read alongside all other material, including the Waste State of Medway report. The SA is, inevitably a high level assessment covering many more subjects than just waste. The level of detail and analysis apparently being sought is more appropriate to an EIA associated with a site specific planning application. Kingsnorth has potential for water access and is readily accessible to the main urban area This is cited as an example. As the draft core strategy explains there is potential for a cluster of facilities in this location View noted. The site is not included in any proposal for residential development and would be unsuitable for such a use for a number of reasons. View noted. View noted.

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				vi. Option 2F: Land Raising. This is identified as a sustainable waste management solution which it clearly is not. If no recycling is proposed then the solution does not meet the requirements of either landfill directive or the RSS. Even if this option is combined with a treatment option it will not be possible to achieve the necessary permit for the disposal method as it is not possible to control pollution pathways in respect of surface water and ground water. This can be achieved with the landfill option for residuals by lining the void. It can only be achieved with land raising if walls are engineered around the site. This would not be economically viable for CDE waste residuals. There are also likely to be problems relating to noise and air quality which are much easier to control in a void. g. Set out below is an Option for dealing with the estimated CDE waste arising by recycling and the disposal of residuals which is both sustainable and viable i. A series of riverside CDE recycling sites should be identified including one at Trechmans Wharf totaling 500,000 tpa from Medway and a further 100,000 tpa from London the latter to be specifically brought by barge and processed at Trechmans. Some of these facilities will be temporary. The Trechmans Wharf facility should be given priority and brought forward as quickly as possible as it will deliver the Bores Hole landfill for the deposit of residuals from the recycling operations of the network of facilities. ii. A facility at Kingsnorth/ Chattenden to handle 100,000 tpa in order to service the Chattenden residential Option proposals. Landfill of residuals would need to be off site. iii. Landfill of residuals to be at Bores Hole. h. TRECHMANS WHARF/BORES HOLE i. It is proposed that this facility would process 200,000 tpa made of 100,000 tpa from the London market. The principle means of access would be via the wharf but road access from the A299 will also be provided and the potential to use a rail sidings nearby would be investigated. ii. Material would be offloaded on the wharf and transported to a recycling yard which would be located in a largely cleared area of the land behind the wharf. Trees currently growing along the edge of the wharf would be largely unaffected as the material would be moved by conveyor. Similarly recycled products would be moved back to the wharf by conveyor for removal from the site. iii. Residual waste from the processing and also that arising from other recycling sites located in Medway and brought to the wharf for disposal would be moved into Bores Hole by conveyor through the tunnel under the A228. iv. Bores Hole is a former chalk quarry. The Quarry is situated above the water table. Views into the eastern end of the quarry where it is proposed infilling will take place are very limited. It is proposed that chalk will be excavated from the bottom of the quarry and engineered to form a base and line the sides of the excavated hole in order to comply with the Landfill Directive in respect of ground water protection. v. Nature conservation. Bore Hole is designated as a SSSI. An assessment of the designated has been undertaken (see Appendix A Bioscan report). The conclusions of this report are that the value of the eastern section of the quarry in nature conservation terms is low and that the remainder of the designated would benefit from enhancement funded by the development of the waste facility. vi. Regionally Important Geological Site. Bores Holes is identified as a RIGS but it is not protected as a SSSI for geology. As it is only proposed to landfill part of the site it is likely that the geological interest can be protected. vii. North Downs AONB and North Downs Special Landscape Area. Bores Hole but not Trechmans Wharf is part of the North Downs AONB and SLA. It is not proposed that the filling will be visible from outside the site. viii. Metropolitan Green Belt. Bores Hole but not Trechmans Wharf is part of the Metropolitan Green Belt. Para.10.56 of the RSS makes it quite clear that waste facilities should not be precluded from either the Green Belt or areas designated as AONB. In this case the unique opportunities to co locate recycling and landfill of residuals serviced by a wharf strongly mitigate against policies precluding development in the Green Belt and AONB. ix. Tree Preservation Order. The trees along Trechmans Wharf are protected by TPO. It is anticipated that the majority of trees can be retained as it is proposed that the recycling facility will be located in a clearing on previously developed land and accessed by conveyor. Where trees are removed these will be replaced. i. Set out below is an assessment of the proposals for Trechmans Wharf/Bores Hole against the criteria identified in PPS10, see Section 3 above. i. extent to which the allocations support policies in PPS10. The proposals are well located in relation to arisings, look to see waste dealt with in the community within which it was created, push waste up the waste hierarchy by maximising recycling and meet the criteria set	This is a site specific proposal that would be more appropriately considered in relation to a subsequent site allocations DPD than the core strategy. Planning permission for such a use was also refused in 2005. The draft core strategy identifies sufficient capacity to meet Medway's forecast requirements in other locations.

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				out below. ii. iii. the physical and environmental constraints on development, including existing and proposed neighbouring land uses including:- 1. Protection of water resources. The site is above the water table and can be engineered using on site materials to meet water protection requirements. 2. land instability. No land instability issues have been identified or are expected. 3. visual intrusion. The Trechmans Wharf proposals will be masked by existing woodland and the Bores Hole proposals will not be seen outside the quarry. Activity on the wharf will be visible. This is considered not to be detrimental as it is normal for a riverside location. 4. nature conservation. Overall it is expected that there will be an improvement in the SSSI through the delivery of a management strategy for that part of the SSSI identified as being of appropriate value. 5. historic environment and built heritage. No issues have been identified which would conflict with this requirement. 6. traffic and access. Access will generally be from the river. HGV access will be via the A228, into Bore Hole. 7. air emissions, including dust. It is expected that the recycling will be within a controlled environment. The Bores Hole site is naturally protected by the height of the quarry walls. Measures can be taken within the quarry to ensure that no air quality issues arise. 8. odours. None expected as the waste is CDE. 9. vermin and birds. None expected as the waste is CDE 10. noise and vibration. Expected to be controlled within acceptable levels. 11. litter. None expected as the waste is CDE 12. potential land use conflict. None expected as sufficient land within control to prevent problems arising. i. iv. the cumulative effect of previous waste disposal facilities on the local community. There are no other waste disposal facilities in the area. ii. v. capacity of the existing and potential transport infrastructure to support the sustainable movement of waste. The principal method of transport will be via the river. Motor vehicle access will be directly onto the A288. iii. vi. Re use of previously developed land. Both sites are PDL. Bores Hole does not have a restoration requirement.	
9.		Kent Downs AONB Unit	Stella Bandu	See attached comment from Kent Downs AONB Unit http://medway-consult.limehouse.co.uk/file/952591 We would expect the Medway Core Strategy to contain specific policy seeking the conservation and enhancement of the AONB. **Integrated Countryside Management** Paragraph 4.224 raises a new approach termed Integrated Countryside and given the strategic role of the Kent Downs AONB, we would want to see it incorporated as a key element of the Core Strategy. **Sustainable Construction and Renewable Energy** Regarding provision of renewable energy we request that the Kent Downs AONB position statement on the matter be used to guide policy formulation. Any approach needs to consider the need to reduce the amount of energy used in the first place as well as looking at the opportunity to utilise “green energy” sources. **Transport (PROW network and cycle routes)** We would like to see the creation of strategic new cycle (or multi user) routes along the Medway River being included as part of any transport strategy for the area.	Policies on natural assets, landscape and countryside and open space all seek to conserve and enhance the countryside, with particular emphasis given to the Kent Downs AONB. Noted. This has been taken into account in the foundation of the renewable energy policy. The transport policy makes provision for the extension of walking and cycling networks and a riverside cycleway is

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				Capstone Urban Extension We agree with the Council's decision not to support this option. **Annual Monitoring Report** It is a duty of the Kent Downs partnership (including Medway Council) to monitor the condition of the AONB - the condition monitoring of the Kent Downs AONB should be incorporated in the LDF monitoring process.	promoted in the River Medway policy. Noted. Noted.
10.		dha planning	Klaire Lander	See attached comment on behalf of Kent Police. http://medway-consult.limehouse.co.uk/file/951398 **Identifying the need for Police Infrastructure** Kent Police must react to population growth by expanding and investing in order to hold crime at existing levels when population growth occurs. Unless Kent Police is able to obtain appropriate infrastructure contributions as a service it cannot guarantee that it can maintain the same level of policing as growth takes place. SEP policy CC7 and PPS12 state importance of infrastructure needs and costs. Q.3 – It is essential that the infrastructure needs of Kent Police and emergency services should be includes in the Core Strategy to ensure that sufficient developer contributions can be obtained to prevent increasing levels of crime and to main sustainable communities. Kent Police would like to see a specific policy within the Core Strategy on planning obligations such as – Development tends to place new demands on local infrastructure and services. It should not be an unreasonable burden on existing infrastructure and it is therefore essential that development should not take place until the infrastructure needed to support it is available. **Designing out crime** PPS1 and Para 7.22 in SEP require design to address heath and safety concerns including how good design can reduce the opportunity for crime and disorder and the fear of crime. **Population numbers, demographics, tenure mix** Core strategy should seek for new development to provide an appropriate mix of housing, tenure type and occupancy to ensure crime profiles of neighbourhoods and settlements are not adversely affected, which in turn would have an effect on the existing quality of life. **Town centre regeneration and intensification** Any increased density and amount of development and issues such as promoting the 24 hr economy will impact on the Police's existing resources. The CS should include a policy to encourage a safer evening and night time economy, strengthening town centres and reducing criminality. Such a policy could read as – The Council wants to promote a range of uses in town centres which result in a balanced and safe evening/night time economy…….The quantity, type and location of A3, A4,A5 and other evening or late night uses will be controlled, having regard to other spatial planning documents and policies, together with the aims and objectives of the Community Strategy and also the Community Safety Strategy produced by the Crime and Disorder Partnership. Where the new A3, A4 and A5 uses are permitted, financial contributions will be sought for related town centre improvements including additional CCTV, improved lighting, improved signage for CCTV and Alcohol free zones and any necessary additional infrastructure identified by the relevant agencies. In relation to those areas where concentrations of drinking establishments, night clubs or other evening or late night uses have caused existing anti-social problems, there will be a presumption against further consents for such uses. **Transport and access to services** Adequate infrastructure needs to be in place to ensure that emergency services can respond quickly to incidents. Q.22 – Kent Police would support a stronger emphasis on the need to reduce traffic congestion throughout Medway.	Noted. The South East Plan was revoked on the 6th July 2010. Medway Council does not seek contributions from developers to fund policing and has no plans to do so. An infrastructure delivery plan will accompany the submission of the Core Strategy. Noted. The housing policy seeks an appropriate mix of housing and tenure. These issues will be addressed in a subsequent development management/site allocations development plan document. An infrastructure delivery plan will accompany the submission of the Core Strategy. The transport policy seeks to reduce

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				Flooding – can represent a risk to the Police Service in terms of manpower and resource pressure in responding to flooding incidents – policies to reduce the risk of flooding should be included in the CS. …….calculating contributions towards police services …..based upon population growth rather than housing growth.	congestion. The development and flood risk policy seeks to minimise the risk from flooding.
	Sub-Regional Context				
	Population				
	Housing				
11.		South East England Partnership Board	Tom Kingston	See attached comment http://medway-consult.limehouse.co.uk/file/992618 We consider it important for your Core Strategy to set out the housing requirement in the South East Plan and show a clear distribution between areas within and outside of the Kent Thames Gateway sub-region to provide clarity for the purposes of delivering regional planning objectives. South East Plan Policy H1 sets a target of 16,300 dwelling completions for Medway between 2006 and 2026; Policy KTG4 specifies that 15,700 of these should be within the Kent Thames Gateway sub-region. We would like to see the Core Strategy make a commitment to contributing to the regional density target of 40 dwellings per hectare (as set out in policy H5 of the South East Plan) and examine how higher densities might be achieved at the local level. The Delivery Strategy will need to identify what infrastructure is required to support the overall strategy, when it is required, and how it will be delivered. We would welcome reference to the definition of infrastructure as set out within the South East Plan (in the box beneath paragraph 5.22) and to Policy CC8: Green Infrastructure (with the box beneath paragraph 5.27). This will help to ensure that development and infrastructure are provided in a coordinated manner as encouraged by Policy CC7 of the South East Plan. We would support a policy in the Core Strategy on developer contributions/ planning obligations. The Core Strategy could usefully refer to the definition of Smart Growth given in Policy RE5 of the South East Plan and set out what achieving Smart Growth in the district requires in terms of the six key principles: employment; enterprise; innovation and creativity; skills; competition; and investment in infrastructure, including transport and physical development. We would advise that the Core Strategy includes a combination of policy measures to address the sustainable use of natural resources including support for sustainable construction (South East Plan Policy CC4), waste minimisation and reuse (South East Plan Policy W1) and water efficiency (South East Plan Policy NRM1). Q.21 - chalk reserves need to be safeguarded in line with South East Plan Policy M4. We recognise the points in paragraph 4.256; however safeguarding does not necessarily mean the mineral will be exploited and it is needed to protect against sterilisation from non-minerals development.	The South East Plan was revoked on the 6th July 2010. The housing policy addressed the proposed distribution of housing in Medway. The requirement of 16,300 dwellings has been retained. The government has now deleted its minimum density target from PPS3. The Core Strategy consequently does not include a density target. The infrastructure delivery plan will include a definition of infrastructure and the implementation chapter of the Core Strategy includes reference to the Councils Developer Contributions guide. Although the economic policy does not refer to smart growth, it does support its six key principles. The sustainability issues are addressed in the Core Strategy. The Core Strategy has concluded that there is no need to safeguard chalk reserves given adequate supplies in Tonbridge and Malling to serve the proposed cement manufacturing plant at Holborough.
	Transport				
12.				See attached pdf file for comments http://medway-consult.limehouse.co.uk/file/931925 G L Hearn are instructed by ArcelorMittal Kent Wire Ltd to respond to the consultation in respect of the Issues and Options Report. Although these representations are submitted on behalf of one of the occupiers of Chatham Docks, their purpose is to demonstrate that the Docks as a whole represent a valuable local and regional resource with the potential to play an increasingly influential role in the Medway economy. **Question 26.** The representations are concerned specifically with question 26: "Should formal protection be given to local wharves and Chatham Docks over the long term?" They are submitted in the context, as recognised within Strategic Priority 4 – Employment Space that: "Reallocations of employment land for residential use and the dearth of good quality sites in the Borough means that Medway's potential	The River Medway policy states that 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. The transport and movement policy states that existing wharf and port capacity will be safeguarded in order to meet national

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				to generate significant new employment opportunities could be severely constrained unless the amount of available employment land can be increased." The clear implication is that existing sites with the potential to provide employment opportunities should be retained for that purpose. This should apply to an even greater extent to those sites which possess particular qualities or characteristics which set them apart from other existing employment land. In making these comments we note that Chatham Port is identified as a site within the portfolio of employment sites at Appendix 7, and that it has the potential to provide significant additional floorspace. It is one of the larger sites within the tier below the Isle of Grain and Kingsnorth. We strongly believe that formal protection should be given to Chatham Docks and to other port facilities in Medway. The Medway Towns have a long history as a military and commercial port which has, over the years, contributed substantially to the local economy. The Docks represent a resource which, in combination with other economic initiatives, can help to drive and sustain long term regeneration. A port facility is by definition unique and irreplaceable. Once it has been lost it cannot readily be reinstated to its former use. For that reason alone the Docks are worthy of specific protection through planning policy but there are additional factors specific to Chatham Docks which reinforce the case for their retention as a functioning port. ArcelorMittal currently occupies a site of some 12 acres within the Docks. The company directly employs at total of 50 staff in a range of disciplines including; management, manufacturing and port operations. In addition to these direct employees the company also actively supports countless local people from the sandwich lady who calls every morning through to local engineering suppliers. The company not only manufactures reinforcing steel for use in major construction projects such as Heathrow Terminal 5 and the Olympic project to name two high profile contracts, but also handles and stores for onward transmission products such as road salt, sugar, timber, construction aggregates, glass for recycling and biomass used at Kingsnorth power station, and many other types of products. Employees are recruited predominantly from within the Medway Towns and remuneration is significantly above the norm for the area as a whole. The Docks are therefore a significant contributor to the local economy. At present, ArcelorMittal handles some 250,000 tonnes of cargo per year, but there is scope for this to increase significantly to at least 500,000 tonnes within the next two years and up to 1 million tonnes within the next five years. An increase in job opportunities would be an inevitable consequence. In order to achieve these volumes investment will be required that the business is willing to provide. However in order to effect this investment greater certainty over the future of the Docks is necessary. The operational characteristics of ports vary widely, of course. They range from the largest deep water ports such as Southampton, Felixstowe and Harwich to the smaller, more specialist facilities able to handle smaller vessels. Chatham Docks falls within this latter "niche" market and performs an important complementary function. It is important to the UK maritime economy that a range of facilities able to handle the full range of vessel types and sizes is maintained. In the interest of promoting more sustainable forms of transport it has become a feature of government policy to seek to bring about a shift from road to rail transport including reducing the amount of heavy goods vehicle traffic. Chatham Docks is particularly well placed in this respect since it benefits from a link to the national railway network. It was by this means that steel was transported from the Docks to the Heathrow construction site and scope clearly exists to expand the use of this valuable regional facility. Notwithstanding the opportunities for freight transport by rail, the Docks are also well connected to the regional and national highway network which is important because, inevitably, a substantial volume of goods will continue to be transported by road. To summarise, we believe that the long term interests of Medway will be best served by the retention, and enhancement, of resources with the potential to contribute towards economic regeneration. Chatham Docks comprise a facility with unique qualities, and its loss would detract significantly from the variety of available employment land. As such, we consider that it should be afforded strong policy protection through the emerging Local Development Framework.	and regional capacity requirements and to encourage the local transportation of goods.
	Economy				
13.		Henderson Global Investors	Henderson Global Investors	Attached comment from Indigo Planning Ltd on behalf of Henderson Global Investors, who manage Gillingham Business Park on behalf of the head leasehold property fund. http://medway-consult.limehouse.co.uk/file/954343 Gillingham Business Park is an important established employment location in Medway and is acknowledged as such in adopted Local Plan policy. The park is currently identified for a mix of employment uses comprising B1, B2 and/or B8, and this is in accordance with the current range of uses at the park and our client's aspirations for the property. The park was constructed in phases over the period 1978 to the present day, and it is acknowledged that that there is a potential need for re-investment in a number of the park's older phases. However, it is important that this is considered in the context of market demand. We note that the Council's Economic Strategy recommends a utilisation audit of GBP to establish whether/the extent to which there are vacant/under-used sites and premises that could be made available. We understand that a similar audit was carried out in relation to Medway City Estate, and that this resulted in a strategy for the park in terms of future potential development. Our client is willing to work with the Council on this and is open to the possibility of intensified development at the park to meet local employment needs at this location. However, it is important that the Council is realistic in terms of its aspirations for the park and that emerging policy reflects the importance of being able to respond to market demand for employment floorspace in Gillingham. I trust that this will be taken into consideration in progressing this key policy document.	The economic policy promotes reinvestment strategies for existing established employment areas but does not attempt to estimate the likely additional employment floor space which could be forthcoming.
14.	Question 29	Costco Wholesale UK Ltd	Costco Wholesale UK Ltd	See attached comments (pdf file) for Q29, 30, 32 & 33 submitted by RPS Group on behalf of Costco Wholesale UK Ltd (Costco) http://medway-consult.limehouse.co.uk/file/946830 Q.29 - Costco supports Strategic Policy 2. This option recognises the importance of up skilling the workforce to improve the quality of jobs and meet employers' skills needs.	The economic policy supports the up-skilling of the workforce.

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				Costco supports Strategic Priority 4 and a review of all mixed use land allocations to assess whether the extent to which there ought to be a re-balancing of residential and employment uses, away from the former and towards the latter. We note that there is currently an inadequate supply of employment land (Para 13.1 Employment & Economy Review 2009) and employment cannot be created in Medway without the allocation of the necessary space which is currently insufficient. It is considered in allocating employment land that a definition of appropriate uses should be included within the Medway Core Strategy that recognises sui generis uses – Q.30 Q.32 & 33 - It is essential that the Medway Core Strategy supports a wide range of employment uses including sui-generis warehouse clubs. As explained, these have an important employment generality and support function.	The Council is continuing to implement the existing proposals for its regeneration sites and has not attempted to re-balance their uses. The economic policy chapter makes provision for an adequate supply of employment land. Warehouse clubs will be considered through the development management system. Retail policies seek to concentrate retail development in the town centres.
	Retailing & Town Centres				
15.		DTZ	Hempstead Valley Shopping Centre	See attached pdf file http://medway-consult.limehouse.co.uk/file/948361 **15. DTZ** **Medway Council- Medway Council Core Strategy Issues and Options Consultation, July 2009** We write on behalf of our clients, British Steel Pension Fund Ltd and British Airways Pension Trustees Ltd (The Trustees) joint owners of Hempstead Valley Centre (the Centre), in response to Medway Council's current consultation on the Core Strategy Issues and Options Report (July 2009).	Noted.
				Hempstead Valley Hempstead Valley Centre was originally opened in 1978. Last year the Centre celebrated its 30th birthday and it is popular and well managed retail and community centre with over 50 shops including Sainsbury's, Marks and Spencer's and a BHS Department Store, financial services, travel agents, restaurants and high street retailers including Argos, Boots and WH smith. As the Issues and Options report acknowledges, the Centre is an important part of Medway's retail offer and "counteracts at least some potential leakage to other areas" (para. 4.155).	Noted.
				The Centre is therefore an important retail centre, service provider, local employer and community resource for Medway. This is reflected in its designation as District Centre in the Local Plan and Urban Service Centre in the Structure Plan.	Noted.
				The Trustees are now looking to the next 30 years and have been considering a range of investment options for the Centre in order to maintain its retail role, enhance its mix of uses and to improve public realm and transport facilities. The Trustees have been in discussion with Medway Council's members and officers on the future of the Centre. It is therefore vital that emerging policies for the Centre are flexible and enable it to maintain and enhance its role within the local community and for Medway generally.	Noted.
				As long standing and committed owners, the Trustees will play the key role in the future delivery of policies and proposals for the Centre. The Trustees therefore welcome the opportunity to participate in the future planning for the Centre through the LDF and wish to register their interest in fully engaging in the Core Strategy process.	Noted.
				Retailing and town centres This representation specifically relates to the "Retailing and Town Centres" section of the Issues and Options report and within that to Question 50 which asks: Do you agree with the strategies for Hempstead Valley being encouraged to diversify into a more typical district centre with re-investment in its retail function to retain its competitiveness over the longer term?	Noted
				We agree with the Council's analysis set out at para. 4.129 and 4.130 that recent retail investment in Medway has been concentrated in out of centre retail warehouse parks and stand-alone foodstores, and as such there has been considerable "leakage" in terms of spending, particularly on comparison goods.	Noted.
				As a designated district centre within the retail hierarchy, Hempstead Valley has played and needs to continue to play a significant role in preventing further leakage from the Medway catchment area.	Noted.
				Hempstead Valley Centre covers approximately 9.5ha and is surrounded by residential development, therefore making it easily accessible by foot and bicycle for local residents. It is also well connected with the local road network being in close proximity to the A278, A229, A230 and A2, with the M2 (Junction 4) also located just 1.3km to the south. The Centre provides approximately 2,200 car parking spaces, including disabled and cycle/ motorcycle parking, and includes a bus terminal within the site offering access by public transport. Gillingham or Rainham train station is 10 minutes away by car.	Noted.
				A strengths and weakness analysis is set out in tabular form at page 49 of the Issues and Options Report. Whilst we would concur with a number of the points, we would wish to see the following reflected in the strengths and weakness analysis going forward: • The Centre has a good range of national multiples in the comparison sector. However it needs to be noted that many units are	The strengths and weaknesses are taken from the Nathaniel Lichfield Retail Needs Study, 2009. Noted.

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				now small by modern standards and the Centre is facing increased competition from sub-regional and out of centre locations; • The Centre provides a major convenience food offering for the Medway catchment by virtue of the Sainsbury's and M&S store. • The Centre also provides other service related and community use functions (as noted above) which taken with the food offer underline the Centre's district centre role; • We note improvements to public transport facilities and pedestrian/ cycle linkages can be made (as in many town and district centres), but we do not accept that Hempstead Valley acts like a "free standing" retail destination or that it poorly linked to surrounding areas;	Noted. Noted. The Nathaniel Lichfield Study compared the function of Hempstead Valley with that of a district centre defined in PPS6 (now in PPS4). This included local public facilities such as a library and a range of non- retail services and found some deficiencies at Hempstead Valley. The study states that although pedestrian crossings and subways are provided, they do not appear to be well used and Hempstead Valley Drive and Sharsted Way, which encircle the shopping centre, are busy with traffic and present a barrier to unconstrained pedestrian movement.
				• We do not concur that a lack of vacant units "prevents new retailers from locating at the centre"- rather this is indicative of a well managed centre and the need for larger comparison shop units to maintain existing and attract new retailers.	Noted.
				<u>The future role of Hempstead Valley Centre</u> According to the Council's Retail and Leisure Study (2009) prepared by Nathaniel Lichfield & Partners, Medway is currently experiencing considerable leakage in terms of retail spending, particularly comparison goods, to centres outside of Medway.	Noted.
				To ensure Medway maintains and claws backs some of this retail expenditure there is a need to strengthen the Borough's retail offer, the cornerstone of which will be the improvement of Medway's centres particularly Chatham, which is identified in Policy TC1 of the South East Plan as a Primary Regional Centre and 'Centre for Significant Change'. We note and support the Issues and Options report proposal that Chatham will be the main focus of regeneration and improvements to Medway's retail offer.	Noted.
				Question 44 asks whether new retail development of 30,000 sq m (gross) should be a priority for Chatham. Whilst we support the need to improve Chatham's retail offer, we also consider that given current and foreseeable market conditions, the Council needs to identify the likely viability and deliverability of such a major proposal within a reasonable timeframe.	Noted.
				We therefore welcome the report's recognition that defined District Centres, including Hempstead Valley, complement Chatham by "providing for bulk convenience shopping and a range of comparison shopping facilities and other services"(4.132). It is therefore equally important that these centre's are maintained and strengthened as they will also play a key role in clawing back lost retail expenditure.	Noted.
				As such the Council needs to ensure that future planning policy supports and encourages District Centres to maintain their competitive position and continue to be successful in their own right, as this will allow them to positively contribute to the achievement of the Council's objectives for retail within the Borough.	The retail and town centre policy in the core strategy seeks to maintain and enhance the viability and vitality of its network of retail centres and makes provision for additional retail development of an appropriate scale at the district centres, including Hempstead Valley.
				As one of the five District Centre's in Medway, Hempstead Valley plays a key role in the Borough's network of centres. Despite relatively healthy levels of trading over the past decade the Centre is now 30 years old and in need of further enhancements to ensure its ongoing success. Central to these enhancements will be an improved retail offer that will help safeguard the Centre's future competitiveness, together with other secondary uses further diversifying the Centre's role.	Noted.
				In planning for the future enhancement and regeneration of Hempstead Valley, the Trustees consider a phased approach to investment is required that responds to the Centre's short term and medium-longer term needs, and puts in place policies and proposals that support the sustainable future of Hempstead Valley as a vital and viable district centre within the Borough.	Noted.
				The Trustees have identified that there is an urgent need to reconfigure and extend the southern retail street which currently contains the BhS store. This mall consists of many small units that increasingly do not meet modern retail requirements and where occupational levels are under pressure. Unless action is taken as soon as possible to offer more appropriately sized and configured units, it is the Trustees view that vitality and viability of the centre will be significantly impacted upon. It is thus the Trustees intention to submit a planning application for these "short term" proposals in the near future in order that the centre continues to perform its role in the retail hierarchy. The Trustees are continuing to work on detailed proposals, but as discussed with Council officers the proposals could include the following:	Noted.
				<u>The short term</u> • New public transport facilities improving pedestrian convenience and interchange • Improved new public realm and linkage across the site • New landmark southern entrance • New and expanded community facilities	Noted.

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				• Improved servicing and access arrangements • Re-developed and reconfigured southern retail offer to provide new, additional, better shaped and modern retail units in semi open shopping street.	
				Medium-long term • Focus on northern retail offer • Accommodation to meet Sainsbury's growing need for a more efficient store to meet increased competition from out of centre stores • Identification of opportunities for other uses, such as residential and hotel and additional leisure uses	No provision has been made in the Strategic Land Availability Assessment or in the core strategy for residential development within the Hempstead Valley site.
				Question 50 As noted above we do not accept that Hempstead Valley acts like a "free-standing" centre or that it is not a "typical" district centre, given as set out above its wider convenience food and service offer.	Noted.
				The Trustees as long term and committed owners are passionate to see the Centre develop over the next 30 years in a manner which is economically, socially and environmentally sustainable. In this context the Trustees are keen to continue to explore diversifying the Centre's offer with additional non-retail uses, service functions, public transport facilities and additional linkage to neighbouring areas.	Noted.
				As recognised in Question 50 this will involve re-investment in the Centre's retail offer to retail its competitiveness. The Trustees wish to bring about change in a manner and timing which maximises the contribution the Centre can make in preventing further leakage from the catchment area.	Noted.
				The Trustees are also conscious that given their ownership, investment and funding position they are capable of delivering the "short term" proposals whitin the next 2-3 years, subject to planning. The Trustees evolving strategy is therefore to see a phased development at the Centre with initial investment focused on the southern retail street and medium to longer term investment focused on the northern mall.	Noted.
				In this regard we would urge the Council to maintain a flexible approach that recognises in its evolving LDF policies that re-investment is required in the short and medium as well as the longer term at the Centre. For this reason it remains the Trustees objective to work with the Council through the LDF process and to bring forward proposals in the context of an overall and indicative masterplan as to how Hempstead Valley will develop over the next 30 years.	The retail and town centre policy provides for flexibility in the range of development which will be supported in Medway's network of retail centres.
16.	Question 44 & 46	Ropemaker Properties Limited	Ropemaker Properties Limited	See attached comment from Turley Associates Ltd. on behalf of Ropemaker Properties Limited http://medway-consult.limehouse.co.uk/file/954006	
				Q.46 Our client supports the development of a Central Area Plan for Strood which seeks to capitalise on its public transport links and plan to better 'knit' the centre together. We also support the recognition that Strood has a below average proportion of restaurants (Class A3) and takeaways (Class A5) and as such these uses should be promoted with a Central Area Plan for the town.	A masterplan has been prepared for Strood town centre and has been taken into account in the preparation of the policy for Strood.
				Q. 44 Our client would also support major new retail development in Chatham but on the basis that this does not preclude or prejudice development in centres such as Strood where a number of potential development sites have been identified in the town centre by the Medway Council Retail Needs Study (March 2009). Our client supports these proposed enhancements of the town centre which would complement Strood Retail Park and improve the retail offer and attractiveness of the town.	Noted.
				……to highlight the potential of the retail park to provide small retail units for high street fashion and potentially restaurants as cafes, as well as improved linkages with the high street. We look forward to engaging with the central area preparation process.	Noted.
	Leisure, Culture & Tourism				
17.		Sport England	John Feetam	See attached comment from Sport England http://medway-consult.limehouse.co.uk/file/952520 **Developing spatial planning approaches** • Maximise contributions to spatial planning initiatives such as greenspace networks or better use of the urban fringe and the wider countryside? • Develop policies which respond to the expressed needs and demands of marginal or controversial sports, with due regard to resource protection and wider sustainability issues? • Explore opportunities for sport and recreation to make a contribution to unprogrammed development proposals? The above checklist is part of Sport England's extensive guidance on ensuring appropriate attention is paid to sport within Local Development Frameworks. This guidance can be found on our website at: www.sportengland.org > Facilities and Planning > Developing Policies for Sport	Noted.
				Planning Policies for Sport and Active Recreation To assist in the development of planning policies for sport, within the Core Strategy and other relevant DPD's, I would like to draw your attention to Sport England's '*Planning for Sport and Active Recreation: Objectives and Opportunities*' document. This document presents Sport England's planning policy objectives across a wide range of areas including the protection and promotion of provision, providing for sport through new development, sport in the countryside and urban fringe and the management of sports facilities. I would	Noted.

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				particularly refer you to Planning Policy Objectives 1, 2, 7 and 8. The document can be viewed and downloaded via the above link.	
				Developing and Using the Evidence Base It is vital that along with the vision and spatial objectives of the Core Strategy, policies relating to sport are supported by a robust evidence base. PPS12 states that '*the Core Strategy should be supported by evidence of what physical, social and green infrastructure is needed to enable the amount of development proposed for the area, taking account of its type and distribution*' (Para 4.8). The development of an evidence base for sport is required to assist the sound development of the Core Strategy and its ability to meet the tests of soundness set out in PPS12. The 'Justified' test is of particular relevance	The core strategy draws upon the Medway Countryside, Wildlife and Open Space Strategy, 2008-2016 and the Sports Development Strategy, 2009-2016 as part of its evidence base.
				With regards to sport this evidence tends to be included within a wider PPG17 compliant assessment of open space, sport and recreation provision. As you will be aware PPG17 states '*that to ensure effective planning for open space, sport and recreation it is essential that the needs of local communities are known. Local authorities should undertake robust assessments of the existing and future needs of their communities for open space, sport and recreational facilities*' (Para. 1). These assessments should cover both indoor and outdoor sports facilities.	Medway's open space was assessed as part of the Countryside, Wildlife and Open Space Strategy preparation. An up to date PPG17 assessment is currently underway, together with a household survey.
				It is Sport England's opinion that a PPG17 assessment should be supported by associated strategies for such provision which go beyond an assessment and the setting of standards. The strategies should develop the assessment work to provide recommendations and priorities for improving provision in line with the wider objectives for the area, as set out in relevant plans and strategies e.g. Community and Council Plan. The development of such strategies will in turn provide clear infrastructure requirements and priority projects relating to the needs of existing residents, the amount of development proposed for the area and catering for a desired increase in participation. These requirements can be fed into the development of the Core Strategy and other relevant DPD's. This approach is supported by Policy S5 of the South East Plan.	Noted.
				The following checklist should be of assistance in ensuring the Core Strategy is supported by a robust evidence base for sport. *The Evidence Base* • Has the range of information gathered by Sport England, and updated by local authorities, in relation to facility planning (Active Places Power and Active People), been drawn upon? • Has the information available through PPG17 audits and needs assessments of open space and sport and recreation facilities been used? • Has the evidence base and any resulting local standards of provision built in projected increases in the participation rates in sporting activities as a result on policy objectives, LAA targets and related initiatives in the area e.g. sports governing body initiatives? • Has use been made of parallel data gathering and analysis exercises undertaken as part of initiatives such as green infrastructure planning and playing pitch strategies which could provide opportunities for joint working? • Has there been a consideration of the quality and accessibility of provision as part of the preparation of Local Area Agreements? • Have cross-boundary issues, particularly relating to facility provision been addressed? • Has information from other local authority strategies, including sport and recreation strategies, play strategies and community strategies been considered?	See the Sports Development Strategy, 2009-2016
				The Evidence Base in Medway Sport England is aware of work undertaken to date by your authority to develop an evidence base for sporting provision. It is Sport England's understanding that the key documents are the 'Medway Wildlife, Countryside and Open Spaces Strategy 2008-16' and the 'Sport and Recreation Strategy 2009-2016'. Sport England does hold concerns these documents and their ability to support the development of the Core Strategy. The concerns primarily focus on the nature of the demand assessment carried out for indoor sports facilities in the Sport and Recreation Strategy, and the apparent out of date information on playing pitch provision contained in the Wildlife, Countryside and Open Space Strategy. It is noted that this strategy recognises the issue and indicates that the playing pitch study requires a review.	Further work has been undertaken to update and supplement these studies.
				Based on the information contained in the above documents it is Sport England's opinion that a sufficiently robust and sound evidence base, in line with the guidance in PPS12, PPG17 and Policy S5 of the South East Plan, is not yet in place to support the development of the Core Strategy. If the evidence base was in place then this would greatly assist in providing detailed answers to the questions raised on page 62 of the Issues and Options Report. The development of the Core Strategy could then focus on specific spatial options to address the identified deficiencies and barriers to participation in order to assist in meeting the desires of the Community and Council Plans along with the targets in the Local Area Agreement.	See above.
				Sport England would welcome further discussions with your authority to ensure that we are fully aware of the work that is currently in place and its status. We would also be pleased to offer assistance in developing this evidence base further.	Noted.
				Issues and Options Report – Sport and Leisure Further to the above comments Sport England is concerned with the statements in paragraphs 4.194 and 4.197 of the Issues and Options Report alluding to Sport England standards for sports halls and playing pitches. Sport England does not have any such standards. We provide a number of tools and guidance to assist local authorities to develop locally derived standards of provision as advocated by PPG17. The statements in these paragraphs regarding Sport England standards are therefore incorrect.	Noted. This has been corrected in the core strategy. A set of localised standards will be prepared, drawing upon information gained from the new PPG17 assessment and the household survey.
				In line with comments above we welcome the principle of the Core Strategy highlighting and addressing specific identified deficiencies in sporting provision. However, we would expect such statements to clearly reference the evidence base on which the issues are	Noted.

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				founded and for that evidence to be robust and up to date. For example, we would hold concerns if the statements made regarding playing pitch provision are based on the results of the 2002/03 playing pitch study which is now up to 7 years old.	
				Co-location and Sustainable Community Sports Facilities It is noted that the report mentions the principle of co-location and community hubs, for example on school sites (Q40). Further to these points below are two areas of guidance which may be of interest.	Noted.
				Win Win Scenario This guidance supports the principle of developing community hubs on education sites through delivering opportunities for both community sport and arts. www.sportengland.org > Support and Advice > Building Schools and Sport	Noted.
				Sustainable Community Sports Hub Toolkit This toolkit and initiative promotes the development of high quality, demand led sports facilities with secure long term financial sustainability through the principle of co-location. The approach seeks to work with all relevant sectors and funding streams to overcome pressures on local authority resources, expenditure and subsidies. Through strategic planning and the co-location of services, including a mixture of public and private provision, the approach seeks to create a dowry through commercial and other rental opportunities. the establishment of the dowry seeks to generate sufficient income streams to reduce operating subsidies to enable the development of ring fenced funds for lifecycle costs. www.sportengland.org > Facilities and Planning > Planning Tools and Guidance	Noted.
				Urban Design and Masterplanning Sport England has produced a guide to assist with designing developments which encourage participation in sport and physical activity. Linked to a number of the above comments this guide, called 'Active Design', could help your authority ensure that high quality design is achieved in new developments and in turn assist the implementation of any related forthcoming strategic objectives and policies in the Core Strategy. Taking widely accepted principles of good design (character, continuity, quality, legibility etc) as a starting point, the guidance uses three objectives to frame advice on positive design: improving accessibility; enhancing amenity; and increasing awareness. Using the three design objectives, the guidance explores in detail their application to three activity settings: everyday activity destinations (shops, homes, schools workplaces); informal activity and recreation (play areas, parks & gardens); and formal sports and leisure activities (sports pitches, swimming pools etc) Active Design poses a number of questions for consideration by planners and urban designers. The following table gives a flavour of these questions.	Noted.
				Theme Example questions Accessibility (21 questions) • Are everyday activity destinations accessible to all travel modes? • Does the design enable the most direct and safe active travel route between everyday activity destinations? • Are everyday activity destinations co-located to offer the opportunity for linked trips? • Are active travel routes to everyday activity destinations prioritised? • Does the design and layout of everyday activity destinations help to prioritise pedestrian, cycle and public transport access?	Noted.
				Amenity (12 questions) • Are flexible and durable high-quality public spaces proposed? • Does the quality, design and layout of open spaces enhance the setting of development? • Does the design of informal sport and recreation facilities create a high quality environment?	Noted.
				Awareness (13 questions) • Are everyday activity destinations co-located with sports and leisure facilities in a manner that promotes awareness? • Are informal sport and recreation facilities located in prominent positions? • Is appropriate high quality provision made for all age groups within the community? • Are formal sports and leisure facilities located in prominent positions playing a positive role as landmarks and attractions?	Noted.
				The full guidance is available at: www.sportengland.org/activedesign Sport England would be particularly interested to work with Medway Council to apply the principles of Active Design to the master planning of any new large scale developments proposed through the Core Strategy e.g. Lodge Hill, Chattenden.	Noted.
	Minerals				
18.			Lafarge Aggregates Ltd.	Attached comment submitted by Heaton Planning Ltd on behalf of Lafarge Aggregates Ltd. http://medway-consult.limehouse.co.uk/file/952322 The National and regional guidelines for aggregates provision in England, 2005 – 2020 were published in June 2009. These confirm that the regional requirement for the South East is 12.18 mtpa. Paragraph 4.234 discusses the preference for the regional agency to reduce this figure further. We do not believe a separate approach for the South East to reduce the guideline figure is appropriate. We recommend that Medway should follow the apportionment approach that has previously been undertaken and is used throughout the rest of England. Whichever method is taken to identifying the future apportionment within Medway, it is clear within the Core Strategy document that additional reserves will need to be secured towards the end of the plan period, paragraph 4.237. The Core Strategy, paragraph 4.245, identifies potential extensions to the Kingsnorth site and these are supported by Lafarge.	Since the abolition of the South East Plan the targets set out in Policy M3 no longer are in force. However, Medway will continue to have the responsibility to plan for a steady and adequate supply of aggregate minerals to foster economic growth. To that end work done to evidence the sub-regional apportionment set out in the "Proposed Changes" to the revision of Policy M3, published on 19th

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				In terms of this support for extensions, we would be happy to have discussions with you over the possible extension areas and we can potentially assist with geological information and information concerning deliverability. The Core Strategy, at paragraph 4.247, raises concern that due to the existing site not yet fully implemented the reserves may not be economically viable. We can confirm that this is not the case. The existing site at Kingsnorth is economically viable and operations are scheduled to begin in the next couple of years. The Council should therefore consider this site as being deliverable within the plan period Q.69 further extensions to the Kingsnorth site that can assist in facilitating nearby regeneration sites and the Lodge Hill settlement are welcomed.	March 2010 can be used to inform the Medway Core Strategy aggregate minerals supply planning.
19.	Question 71	Lafarge Cement UK PLC		See attached pdf file http://medway-consult.limehouse.co.uk/file/947953 Q.71 - Lafarge considers there is a strong case for safeguarding chalk reserves in the vicinity of the Medway Works project. MSP1 par 13 - Mineral Safeguarding Areas in order that proven resources are not needlessly sterilised by non-mineral development …… …defining Mineral Safeguarding Areas (MSAs) in Local Development Documents "*to alert prospective applicants for non-minerals development to the existence of valuable mineral resources.*" Such an approach would also secure the future of the permitted reserves against conflict with future alternative development within, say, a 500m stand-off from the planning permission limits. While the risk currently is minimal, as the land concerned is currently owned by Lafarge, that might not remain the case during the longer term. In that event, the public interest in a major South East cement manufacturing facility could be protected by safeguarding.	MPS 1 does make clear the safeguarding of economic minerals from other development that would sterilise them, as set out in Paragraph 13, though the reserves have to be 'proven' in nature; not simply assumed due to their proximity or that they are continuous to permitted reserves. Lafarge Cement UK have apparently not assessed the Chalk in the suggested 500 Metre margin around the existent planning consent. These deposits are, or have to be considered, as unproven at this stage. Safeguarding is directly related to the establishment and maintenance of a landbank of permitted reserves to ensure the long term economic planning of the cement manufacturing industry. MPG10 states in paragraphs 58 and 59: ***58**. Mineral planning authorities should normally aim to maintain cement plant with a stock of permitted reserves of at least 15 years. Where significant new investment (such as a new kiln) is agreed with the mineral planning authority, the plant should be provided with a stock of permitted reserves to provide for at least 25 years. New plant on a greenfield site should be provided with a stock of permitted reserves lasting more than 25 years.* ***59** Development plans should normally allocate sufficient land for mineral extraction for cement manufacture to provide for the maintenance of landbanks.* The Medway Works have substantial reserves well beyond 25 years, the required amount for a new investment site. Safeguarding additional reserves at this time is not required to maintain a sufficient land bank through the plan period. In addition the area in Medway that would be covered by the 500 meter margin is open countryside that is within the

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					Metropolitan Green Belt and in part within the designated North Downs Area of Outstanding Natural Beauty. The potential for major new development that might sterilize unproven chalk reserves is contrary to established policy and highly unlikely within the plan period.
20.	Question 71	Omya UK Ltd	Omya UK Ltd	See attached pdf http://medway-consult.limehouse.co.uk/file/947957 Q.71 Omya considers there is a strong case for safeguarding chalk reserves in the vicinity of Cliffe. The basis of safeguarding is set out in MPS1 paragraph 13, where the first bullet point suggests Mineral Safeguarding Areas in order that proven resources are not needlessly sterilised by non-mineral development; the third bullet point suggests defining Mineral Safeguarding Areas (MSAs) in Local Development Documents "*to alert prospective applicants for non-minerals development to the existence of valuable mineral resources.*" Such an approach would also secure the future of the permitted reserves against conflict with future alternative development within, say, a 500m stand-off from the planning permission limits.	MPS 1 makes clear the safeguarding of economic minerals from other development that would sterilise them, as set out in Paragraph 13, though the reserves have to be 'proven' in nature. Without evidence as to the nature of the materials such that they are of proven economic importance, a question is raised that the subsequent lack of safeguarding by the mineral planning authority is not in conflict with MPS1.
	Energy				
21.			Leslie Morris	Attached comment from National Grid http://medway-consult.limehouse.co.uk/file/954332 We therefore wish to be involved in the preparation, alteration and review of Development Plan Documents (DPDs) which may affect our assets including policies and plans relating to the following issues: Any policies relating to overhead transmission lines, underground cables or gas pipeline installations. Site specific allocations/land use policies affecting sites crossed by overhead lines, underground cables or gas transmission pipelines. Land use policies/development proposed adjacent to existing high voltage electricity substation sites and gas above ground installations. Any policies relating to the diverting or undergrounding of overhead transmission lines. Other policies relating to infrastructure or utility provision. Policies relating to development in the countryside. Landscape policies. Waste and mineral plans. In addition, we also want to be consulted by developers and local authorities on planning applications, which may affect our assets and are happy to provide pre-application advice. Our aim in this is to ensure that the safe and secure transportation of electricity and gas is not compromised. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure.	National Grid is included on the LDF consultation database and will be consulted at all stages of plan preparation.
	Climate change				
	Lodge Hill, Chattenden				
22.		Medway Magna Ltd	Medway Magna Ltd	See attached Medway Magna Ltd comment http://medway-consult.limehouse.co.uk/file/952622 **Economic Development Strategy and Employment Land Study.** 3.2 This runs only to 2011 and this timeframe is inappropriate to this necessary and important component of the evidence base, in that it should be testing the position, if not up to 2026, at least to 2016.	The Medway Economic Development Strategy was reviewed in 2009 and now covers the period up to 2026.
				3.3 One of the principal failings of the previous attempt at a Core Strategy was the complete lack of connection between the aspiration to create 50,000 jobs, subsequently reduced to 40,000, by 2021, (Medway Economic Development Statement and Action Plan) and employment land supply. The latest iteration of the Employment Development Strategy and Employment Land Study fails yet again to make the connection between employment aspirations and land supply.	Medway Council is no longer pursuing a target of 40,000 to 50,000 jobs in the core strategy. It has now adopted a range of estimates from 9,400 to 21,500 jobs.
				3.4 The Economic Development Strategy at paragraphs 8.6 to 8.9 concluded that land and Kingsnorth and Grain "are not locations that will attract employers looking for a high quality operating environment". Yet at paragraph 4.65 of the Issues and Options consultation, it is stated that both sites are potentially suitable locations for environmental technology etc. Grain and Kingnorth are in the wrong place to	Planning permission has now been granted for over 460,000 sq.m. of B1c, B2 and B8 employment uses at the Isle of

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				serve Medway, with most of its population south of the river and where good quality employment land allocations are needed.	Grain and the site at Kingsnorth is currently being prepared for development. Consequently, Medway Council is including both sites in its employment land supply. This approach has been confirmed by the recent Employment Land Consolidation Study.
				3.5 Question 35 asks whether land at Kingsnorth and Grain should be actively promoted as locations for environmental technology and related activities. These two sites distort the council's perception of employment land availability. Medway Magna agree with those who produced the Economic Development Strategy (para 8.9), that they ought to be excluded from any calculations of forecast of take up of employment land, as they are irrelevant to most employment uses.	See above.
				3.6 The Issues and Options paper fails to mention the need for high quality employment land; a necessary requirement in Medway, as identified by the Economic Development Strategy at paragraph 8.33.	The economic policy emphasises high value activity and higher skilled employment activities, the provision of employment floorspace to provide a range and choice of sites in terms of quality, type and size, the creation of a high quality environment at Lodge Hill for the development of employment and continuing opportunities at Rochester Airfield to develop a technology and knowledge based cluster.
				3.7 It is clear from the Issues and Options Paper that the council are still not addressing the fundamental shortcomings of Medway's economic characteristics. Nor does the economic evidence base for the Core Strategy address the correct period. If the Core Strategy emerges using this information base, it will be unsound.	An extensive range of evidence has been produced since the Issues and Options report was published and the proposed policy approach reflects this.
				Green Grid Strategy 3.8 Medway Magna Ltd recognise this as an aspiration and would say that development on the sites proposed would achieve the objectives of the interlinkages in the Green Grid Strategy to a greater extent than the chosen option at Chattenden, which is completely divorced from the Towns.	The aim of the green grid is to ensure that adequate open space is provided in association with new development and that it be linked into a wider grid. The green grid strategy can therefore be pursued irrespective of where development takes place.
				Infrastructure Plan 3.9 This is stated that it will be part of the evidence base for the Core Strategy and is as yet, incomplete. This begs the question of how the council can then discount all potential growth options bar Chattenden because the amount and timing of infrastructure delivery is fundamental to growth options.	An infrastructure plan cannot be completed until the development strategy has been developed. It is therefore unsurprising that it was incomplete when the Issues and Options report was published. The full plan will accompany the submission of the core strategy.
				SATURN Transport Model 3.10 This has yet to be completed. It is also understood that Mott McDonald have carried out a Transportation Assessment of the Towns. Medway Magna have not had sight of this document and at the time of writing this response, it is not clear whether it is in the public domain.	A report referring to the initial conclusions from running the SATURN model is referred to in the Issues and Options report. Developers can arrange runs of the model by the consultants at cost.
				3.11 Question 22 asks whether the correct transport issues have been addressed. It is not just the capacity of public transport in the Towns that is an issue but its convenience, particularly in respect of journey times.	Noted.
				3.12 At the local level and for topographical reasons, the Medway highway network radiates out from Chatham town centre, mainly along the A2. About 51% of Medway's population resides east of the river and south of the A2. All traffic and 100% of public transport between these areas has to use the A2 through Chatham	Both public transport and other traffic is dispersed over a network of roads and it is incorrect to claim that it all has to use the A2 through Chatham.
				3.13 It is clear from the Issues and Options paper that this situation is not effectively addressed. The current position is unsustainable (long public transport journey times, especially between Walderslade and Hempstead) and unattractive to many potential users.	Opinion noted.
				3.14 Medway council has no plans to change what is an unsustainable situation, which fundamentally makes current public transport provision unattractive. Medway Magna, as part of a planned urban extension, proposes the provision of the Medway Towns Southern Relief Road (MTSRR). This road featured as a strategic requirement in the previous Structure Plan but has for unsubstantiated reasons been abandoned by both Medway and Maidstone Councils.	This road proposal was abandoned by KCC in 1997 as it could not score highly enough to have any prospect of attracting funding, it would have had severe implications for parts of the existing network and it had serious environmental

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					impacts.
368				3.15 With the completion of MTSRR (proposed by Medway Magna), the town centre will be relieved of substantial volumes of traffic, which currently has no alternative route. In addition to shorter and more efficient car journey's, there would for the first time, be public transport from Lordswood, Warrenwood, Walderslade, Wayfield, Weedswood and Horsted direct to Rainham Mark, Parkwood, Miers Court, Wigmore and Hemstead. Such public transport provision would be much more sustainable than at present. Peak hour bus travel between Lordswood and Rainham can take up to 90 minutes. Medway council's proposed solution to retain a narrow lane, with passing places for buses and restrictions on other vehicles, as the sole connector between major communities in Medway is symptomatic of the failure to provide facilities necessary for the largest urban area in the Thames Gateway.	Opinion noted. No evidence has been produced by Medway Magna to substantiate its traffic movement assumptions, nor the efficacy of a relief road as suggested.
				3.16 The evidence base needs updating in this respect and the Medway Magna option for development assessing in this context; see below.	Noted.
				Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessment. 3.17 The housing evidence relied upon by the Core Strategy will be fundamental to it and will need to demonstrate how the Strategy will meet the housing requirements of the Regional Plan and indeed exceed them as the provision figures therein are minima. The Medway Towns are a growth hub and will need to maximise housing provision.	The South East Plan was revoked on 6 July, 2010. The Medway SLAA now demonstrates a surplus housing supply of over 3,000 dwellings over the requirement up to 2026.
				3.18 A major failing in the Medway Towns is the lack of progress on regeneration. Part five of the Issues and Options paper suggest the existing strategy should form the basis for the future. Even at this stage, an objective assessment of the, as yet, incomplete evidence base would reveal little if any progress on housing provision associated with regeneration.	While the sentiment expressed is noted it is at odds with the fact that housing completions in Medway have exceeded all records over the last two years and than the area is substantially performing both other growth areas and the rest of Kent.
				3.19 Medway Magna Ltd will, closer to the examination of the Core Strategy, look at the likelihood of the council's housing trajectory, which will presumably be updated at that time, reflecting what is likely in practice. The council and the Inspector will be reminded that even since the mid 1980's, for example, many alternative housing proposals have always been disregarded because of the prospects of an "early win" at Rochester Riverside.	Noted and see above.
				3.20 The Inspector examining the Local Plan in 2002, was told that "smoke would come out of the first chimneys at Riverside" in 2006, whereas no dwellings have yet been completed. The Housing Market Assessment, identified a need for what has been described as "up market" housing in Medway.	Noted.
				3.21 There is a real problem in Medway in respect of housing mix. Too much reliance on riverside sites produces too many flats - a type of accommodation of which there is now a surplus and not always suited to families, which in turn restricts the provision of affordable housing.	There are, currently, fewer flats in Medway than virtually any other area and Lodge Hill will feature a high proportion of family housing..
				3.22 It is disturbing to see, particularly in the light of an incomplete evidence base in respect of transportation and housing trajectory, the statement in paragraph 4.35 of the Issues and Options paper. This concludes that "there is no obvious need to identify additional sites beyond the existing urban boundaries, other than at Lodge Hill, Chattenden..."	This conclusion has been reinforced by the results of the Medway SLAA. See above.
				3.23 While the same paragraph recognises that identified sites will need to come forward in a timely manner, there is no debate on the consequences if they do not and what potential other options will need to be considered. The questions relating to housing include only one "macro" question relating to regeneration. At the peak of the housing boom, there were difficulties in bringing forward Rochester Riverside, where the number of dwellings was increased from 400 to 2,000 for reasons of viability and still required very large sums of public funding.	The Medway SLAA now demonstrates a surplus housing supply of over 3,000 dwellings over the requirement up to 2026.
				3.24 There needs to be a suite of questions that examine whether the predisposition to Lodge Hill, Chatterden, for example, really does confer the benefits claimed. The evidence base needs to establish the levels of infrastructure required for what is described as a strategic location and whether it can be delivered on time and on budget.	There is a substantial evidence base relating to Chattenden and the comparative ease with which it can be delivered. The Issues and Options report included many more questions than usual and invited respondees to make any additional points they considered relevant.
				3.25 Medway Magna are of the view that for the Core Strategy to be found sound, it will need an evidence base that clearly justifies the council's current approach in respect of the following broad headings: i. The relationship between employment land provision and job creation. ii. Housing provision in terms of timing, mix and location. iii. The transportation problems that exist in the Medway Towns and how these are to be resolved; and iv. The justification for Lodge Hill, Chattenden and the reasons why this strategic option is the best in the light of the matters identified above.	Noted.
				4: Chattenden, Lodge Hill and the Assessment of Options 4.1 Reference has already been made to the need for an evidence base that enables the conclusion to be drawn in the Core Strategy that Lodge Hill, Chattenden, is the most sustainable option for major growth up to 2026 and beyond in the Medway Towns. Medway Magna Ltd are of the opinion that because the landscape has subsumed much of what might be termed previously developed land, the	The masterplan submitted by Land Securities shows how the Lodge Hill site can accommodate the level of growth proposed. The high proportion of

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				scale of the redevelopment of such land has been over estimated.	previously developed land has also been documented.
				4.2 The Core Strategy will need to demonstrate that a stand alone settlement at Chattenden, that currently has poor accessibility, is a better option than a planned urban extension/s to the Medway Towns. Is 20 to 25 hectares of employment land proposed to principally serve the employment needs of the occupiers of the 5,000 dwellings?	Accessibility is being addressed in the planning of Lodge Hill but it is well related to the principle road network. Employment provision is planned that seeks to balance provision with the eventual resident workforce.
				4.3 The assertion in paragraph 4.448, fourth bullet point, that by concentrating development at one location, there is an opportunity to fashion a development of real note and one with a full range of local services. It is stated that this would be difficult to achieve on urban extension sites where, it is claimed, development would impact more significantly on existing communities.	Noted.
				4.4 In most cases, sustainable urban extensions will be preferable to stand alone new settlements, so the Core Strategy will need to robustly set out why Chattenden has advantages over the other options set out. Other options, it has to be said, that have been assessed on an incomplete evidence base and assertions in the absence of knowledge to the contrary, on such matters as transportation.	Lodge Hill is the only previously developed land option and consequently most closely meets one of the national policy requirements for the selection of sites for housing development. It is noted that Medway Magna has submitted no detailed evidence to justify its proposal for the Capstone Valley, contrary to PPS12.
				4.5 For example, under the summary assessments, options 2 to 5, are claimed to have a high negative impact, when considered against the need to integrate with existing urban form. One of the primary objectives when planning sustainable urban extensions is to ensure that they do integrate and indeed complement and/or improve existing urban form.	Opinion noted.
				4.6 The Medway Magna proposal - Option 3 is also regarded as having a high negative impact when assessed on its perceived transport impacts. Medway Magna have consistently said that the development would include what was previously a Strategic and Local Plan requirement, i.e. the Medway Towns Southern Relief Road, (MTSRR). It would also connect the North Danes Way to the MTSRR, thereby improving access to J3 and J4 of the M2.	The route of the southern relief road mainly lies outside the administrative boundary of Medway and is not supported either by Maidstone Borough Council or Kent County Council as Highways Authority. Nor do these comments address impacts on the existing road network, for example Sharsted Way, Luton Road and M2 junctions 3 and 4.
				4.7 The assessments of the options is wholly subjective and indicates an obvious predisposition to Chattenden, irrespective of the merits of other options. Options that have not been properly tested because of an inadequate evidence base.	Opiniion noted and the respondee is reminded that PPS12 places the onus on development promoters to provide robust evidence to justify their proposals.. No such evidence has been submitted in support of the Medway Magna proposals for the Capstone Valley.
				4.8 The proposal at Medway Magna would therefore have opportunities for substantial improvements to transport provision. Provision of the MTSRR would enable a radical revision of the transport network in the Medway Towns, providing high levels of integration by all modes between the areas of Walderslade, Hepstead and the Town Centre and reduce traffic attempting to use the M2 for purposes for which it is not intended. Most trips between Walderslade and Hempstead have of necessity to go through the Town Centre and due to the distance involved and the lack of alternatives, many of these trips have to be undertaken by car.	See previous comments on the MTSRR.
				4.9 A Southern Peripheral Road would reduce the number of vehicles traversing the Centre, provide the opportunity for upgraded and much more efficient direct transport connections by all modes, which should reduce the overall level of emissions. The MTSRR would also enable ready access to the improved junction 3 of the M2 Motorway, maximising the use of infrastructure investment and also bring about development led improvements to junction 4 of the M2.	See previous comments on the MTSRR.
				4.10 In the light of these potential advantages, the Core Strategy will need to robustly demonstrate that development at Chattenden would: i. Be readily accessible to the local and national transportation network. ii. Result in reduced carbon emissions when compared with sustainable urban extensions. iii. Enable radical improvements to be made to public transport within the Medway Towns, with particular emphasis on reduced journey times. iv. Enable an early start to the delivery of market and affordable housing. v. Provide high quality employment land which will need high quality access to the national highway network. vi. Be accessible to a range of services, and vii. Integrate with existing urban centres viii. Guarantee delivery in a climate where public funding is in doubt.	Noted.

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				4.11 The evidence base as currently formulated, demonstrates none of the above. There are also other important considerations which need to be addressed by the Core Strategy. The principal ones are: i. The regeneration of Chatham Town Centre. ii. The need to reduce out-commuting from the Towns. iii. Improving the image of the Medway Towns as a place to do business. iv. The level of public funding likely to be available to maintain regeneration momentum. Consideration of an approach that balances the merits of brown and greenfield development that will deliver, must be explored.	All these matters have been considered and are reflected in the draft core strategy.
				4.12 There is nothing in the Issues and Options Report that at present suggests how the Core Strategy will bring about objectives i to iii above.	Noted.
	5. Spatial Choices or Options				
23.		Government Office for the South East (GOSE)	Marie O'Sullivan	Your authority undertook a Planning Advisory Service visit in March 2009 and we understand that you decided to take up all the subsequent support packages offered. In addition, a PINS Front loading visit was held in June 2009 and a joint PINS frontloading visit for the Kent Thames Gateway was undertaken in October 2009. We strongly advise you to take into account the support and advice provided by these support packages, in preparing the next version of your core strategy.	Noted and all the advice received has been closely followed.
				PPS12 (paragraph 4.13) states that the time horizon of the core strategy should be at least 15 years from the date of adoption. As the expected adoption date of the core strategy is October 2011, what is your proposed approach to this issue?	The plan period for the core strategy will extend from its adoption in 2012 to 2028.
				PPS12 (paragraphs 1.2 and 1.6) states that the Sustainable Community Strategy sets out the strategic vision for a place, and provides the vehicle for considering and deciding how to address difficult cross cutting issues. Spatial planning objectives for local areas should be aligned not only with national and regional plans, but also with the shared local priorities set out in sustainable Community Strategies, where these are consistent with national and regional policy.	The sustainable community strategy has been fully taken into account in the core strategy.
				In view of the above, we suggest that you take this into account in preparing the core strategy. We are aware of Medway's Community Plan covering the years 2007-2010, however, we understand that a revised Community Strategy is being prepared. We assume you will be reflecting this in the emerging core strategy, subject to the guidance set out in PPS12.	A revised community strategy was adopted in 2010 and this extends to 2026.
				Whilst this may not be a reason for finding the document unsound, we suggest that you think about the length of the document you are preparing. One way that you may wish to consider addressing this is by including information in topic papers? The 2004 Regulations as amended do allow for accompanying documents to be produced [2008 Amendment Regulations, 30 (1) (g)].	The length of the document reflects the need to include a range of strategic policies appropriate to a large unitary authority. The Council has prepared fourteen State of Medway reports (ie. topic reports), as well as a range of other evidence documents. Further topic papers will be prepared at the submission stage.
				The PINS publication "Examining Development Plan Documents: Learning from Experience" (Sept 2009) endorses the above. It states that all DPDs should be concise and focussed and convey the essential messages in a clear and engaging way (page 5).	Noted.
				We note the helpful use of footnotes within the core strategy and suggest that you continue with this approach, as advised in the PINS advice "Examining Development Plan Documents: Learning form Experience (September 2009) paragraph 34.	Noted. It is intended that the submission core strategy will be accompanied by a comprehensive evidence 'map'.
				In addition, if you are drawing together more than one piece of the evidence base, you may need to consider producing a topic paper setting out your conclusions.	Noted.
				Reference is made to a separate AAP for Lodge Hill. This position will need to be updated in the next version of the core strategy, in view of the December 2009 LDS.	The AAP has been replaced with a strategic allocation for Lodge Hill/Chattenden.
				By allocating Lodge Hill as a strategic site in the core strategy, you will need to have the evidence base in place to justify your proposals. We understand that you are working in partnership with Land Securities, which is to be welcomed.	Noted.
				Finally, the South East Plan (May 2009) sets out the policy context for Lodge Hill (paragraph 19.5) which is not solely housing, but employment and other services.	The South East Plan was revoked on 6 July, 2010. However, the Lodge Hill proposals continue to be based on the concept of the development of a sustainable community.
				You make reference to the inclusion of a "vision section" and "strategic objectives" section in the document.	Agreed.
				PPS12 (paragraphs 4.1, 4.2) provides advice on setting out the vision for an area. Your core strategy should set out how the area and the places within it should develop. It should be informed by an analysis of the characteristics of the area and its constituent parts, and the key issues and challenges facing them. The vision should be in general conformity with the RSS and closely relate to the Sustainable Community Strategy.	Noted.
				PPS12 (paragraph 4.3) states that the strategic objectives form the link between the high level vision and the detailed strategy. They should expand the vision into key specific issues for the area which need to be addressed, and how that will be achieved within the timescale of the core strategy.	Noted.

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				PPS12 (paragraphs 4.1, 4.4, 4.5) also sets out advice on the delivery strategy. This should set out how much development is intended to happen where, when and by what means it will be delivered. It needs to show how the objectives will be delivered, whether through the actions taken by the council or by other bodies. There also needs to be co-ordination of actions and the core strategy needs to demonstrate that the agencies/partners necessary for its delivery have been involved in its preparation. There should also be a realistic prospect of delivery within the plan period. You are strongly advised to take account of the above advice set out in PPS12. We would generally expect to see the vision, strategic objectives and delivery strategy set out at the beginning of the core strategy.	Noted.
				PPS12 (paragraph 4.14) states that the need for frequent updating can be reduced by taking long-term views and providing some flexibility. PPS12 continues (paragraph 4.46) by stating that a strategy is unlikely to be effective if it cannot deal with changing circumstances and should set out how it can handle contingencies. Examples of this would be addressing in core strategies the South East Plan partial reviews on Gypsies and travellers' accommodation and on the primary aggregates apportionment.	Noted.
				Reference is made to a series of meetings which you have had with key agencies. We strongly suggest that you have an audit trail of any discussions held and agreed actions.	Noted.
				Paragraph 3.3 sets out the most significant PPSs and PPGs relevant for the area. However, in doing so, you need to be aware of other national policy that is also relevant for your area.	Noted.
				Paragraph 3.9 refers to no apportionment between Kent County Council and Medway on waste issues, and the need for agreement. In this situation, you are advised to have written agreement between yourselves and Kent County Council as to the figures used in your respective core strategies. This is to ensure that the Inspector is content that the South East Plan figures overall will be met.	Noted.
				You make reference to the Minerals apportionment in the South East Plan and the Partial Review. You will be aware of the stage reached in the South East Plan Minerals Partial Review – The Panel report was published in November 2009. Work is underway on the next stage.	Noted.
				The South East Plan sets out the requirements for the Kent Thames Gateway. In producing the core strategy, it is suggested that you make clear how any requirements set by the Kent Thames Gateway are to be met and how any requirements for the rest of Medway are to be met.	Noted.
				The South East Plan sets out requirements for the Kent Thames Gateway LPAs which are to be brought forward as a sub-regional area. As you progress towards examination, you may find it useful to have written confirmation or a joint statement by the Kent Thames Gateway LPAs on the approach each authority is taking, which can be put before the Inspector.	Noted.
				Reference is made to few significant cross border issues. Even so, you are advised to fully consider the advice in PPS12 (paragraph 4.45) which states that a core strategy should be coherent with the core strategies prepared by neighbouring authorities, where cross boundary issues are relevant.	Noted.
				As stated above, you may find it useful if a topic paper is prepared jointly by the Kent Thames Gateway LPAs.	Noted..
				Reference is made to infrastructure such as ports, additional university provision, etc. In terms of setting out the place shaping for the area, we strongly suggest, if you have not already done so, engaging with these bodies so that you can factor in their long term proposals (PPS12, paragraph 4.8).	Noted.
				Paragraph 4.12 states that your authority is unsure whether to address the implications of the Thames Estuary 2100 consultation plan now or at a future review. As this is a consultation plan, do you expect the position to become clearer over time?	This is dependent upon the decision of the Environment Agency.
				You may find it useful to refer to PPS12 (4.45) which refers to deliverability of the core strategy. It states that the core strategy should ensure that there are not regulatory or national policy barriers to the delivery of the strategy, such as threats to protected wildlife sites and landscapes or sites of historic or cultural importance. In addition, there may be cross boundary issues to consider, for example you make reference to sites in Essex. Flexibility in approach (PPS12, paragraph 4.46) is also a consideration.	Noted.
				The table in paragraph 4.21 includes sites that you intend to carry over from the adopted local plan saved policies. You will be aware that these sites will fall within broad locations and that you will need to take into consideration Sustainability Appraisal of the plan.	Noted.
				Paragraph 2.8 states that the SHLAA was being prepared in house. You will need to consider this piece of the evidence base once completed, and its impacts on the statistics and sites in the table in paragraph 4.21.	Noted.
				Finally, it is suggested that it would be useful in the next stage of document preparation to set out the separate housing allocations for the area within the Kent Thames Gateway Sub-region (15,700) which is part of a growth area; and the area outside (600), and how you intend to address the individual housing allocations.	This has been addressed in the housing chapter.
				You may wish to consider including a very simple table that highlights in 5 year blocks the number of units that are to be delivered as per paragraphs 54 & 55 of PPS3.	This has been addressed in the housing chapter.
				In addition, a housing trajectory should be prepared to accompany the core strategy (PPS3, paragraph 55). PPS3 (paragraph 62) also refers to the provision of a housing implementation strategy.	Noted.
				You are also advised to take account of the advice on the efficient use of land and density levels set out in PPS3 (paragraph 47).	Noted.
				Finally, you will be aware of the need to make provision for gypsies and travellers (PPS3, paragraph 21).	Noted.
				PPS3 (paragraph 22) states that based upon the evidence of the Strategic Housing Market Assessment and other local evidence, local planning authorities should set out in LDDs the likely proportion of households that require market or affordable housing, the profile of household types requiring market housing and the size and type of affordable housing required.	Noted.
				PPS3 (paragraph 29) goes on to say that local planning authorities should set a plan wide target for the amount of affordable housing to be provided and reflect an assessment of the viability of land. Authorities should set separate targets for social rented and intermediate housing, and set out the range of circumstances in which affordable housing will be required. Finally, the approach to developer	Noted.

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				contributions should be set out.	
				Local planning authorities may also wish to take account of the contribution of low cost market housing as part of the overall housing mix (paragraph 29).	The core strategy contains a policy on developer contributions. This is also the subject of an adopted supplementary planning document.
				You are advised to take the above points into consideration as you progress the core strategy document.	Noted
				In working up your transport proposals for the core strategy, we assume that you will be taking into consideration the local transport plan covering Medway.	Confirmed..
				Reference is made to further work being in hand to define what quantum and type of employment floorspace should be provided over the period to 2026.	Now completed.
				You are strongly advised to complete this work as it is likely to have a significant impact on place shaping within Medway. You will also need to have regard to the South East Plan in formulating your employment policies.	See above.
				In addressing the Medway retail centres, you are advised to have regard to the South East Plan. Chatham is designated as a primary regional centre and a centre for significant change.	Although the South East Plan has been revoked, the core strategy continues to recognise Chatham as a centre for significant change.
				Please see comments above on the delivery strategy (page 3). We assume you will be assessing each retail area and allocating a floorspace figure (if appropriate) to be delivered at retail centres over the plan period (PPS12, paragraph 4.1).	Noted
				Para 4.158 You refer to retail at Lodge Hill. We suggest you consider establishing what level of retail provision you would expect to see at this location. Is it intended to be “local needs” shopping?	The level of retail development proposed for Lodge Hill has been addressed in the Lodge Hill policy.
				Paragraph 4.179 In terms of engaging with stakeholders in the preparation of the core strategy (see PPS12 paragraph 4.1) have you consulted with the police, fire service, etc on your proposals for Medway, for example, the housing allocation which will cover the period up to 2026? In engaging with the above, you may wish to consider the option of shared facilities.	Yes.
				Minerals You have acknowledged the Minerals partial review of the South East Plan and are advised to take account of this as you progress your core strategy. You will be aware of the need for contingencies in such cases where there is not maximum certainty and establishing what triggers may be used to address the issue (PPS12, paragraph 4.46).	Noted.
				It is stated with the document that there is no case for safeguarding reserves of chalk or clay (paragraphs 4.253, 4.257, 4.261). This approach does not appear to reflect the guidance set out in the South East Plan (paragraph 10.74). This states that minerals planning authorities should ensure that provision is made for sufficient supplies of aggregates, clay, chalk, silica sand and gypsum to be extracted and processed to meet regional, and where appropriate national needs	No provision is proposed as there are no longer any operational plants in the area or proposals for any new ones.
				In addition, SEP Policy M4 refers specifically to requirements in Kent. It states that minerals planning authorities should plan for a permitted reserve of chalk for cement manufacture, sufficient to last for at least 25 years at current production rates, which should be maintained throughout the plan period in Kent and Medway. However, the proposed approach in the core strategy is not to address chalk reserves.	The reserves at Home Farm in Holbourgh just over the administrative boundary are in excess of 25 years. As of 2010 construction of the plant has not been scheduled.
				In addition, Policy M4 states that permitted reserve of silica sand should be maintained throughout the plan period in Surrey and Kent.	There is no silica sand in Medway.
				Reference is made to the option of safeguarding operational wharves (paragraph 4.249). However, SEP Policy M5 sets out that minerals planning authorities should assess the need for wharf facilities and identify strategic sites for safeguarding. Policy M5 also advises the safeguarding of existing minerals sites, proposed sites and areas of search, which your authority are also advised to take account of in preparing the core strategy.	Noted.
				Finally, we suggest that as a waste and minerals authority along with Kent County Council, have you established any joint working arrangements, which would assist with document preparation (PPS12, paragraph 4.16)?	Medway Council and Kent County Council have established lines of communication in order to progress the collection of evidence sufficient to plan each area’s mineral and waste planning but neither authority considers there is a need for joint plans.
				You have included a considerable amount of background information on waste issues within the document. As you progress the core strategy, we presume that policies for inclusion within the document will be set out, taking into account the advice set out in national policy guidance and regional planning guidance. At this stage, the government office has the following comments to make:	Noted.
				You set out (paragraphs 4.282 & 4.283) considerations in terms of dealing with waste. It is suggested that you consider SEP Policy W17.	Point is noted, though the South East Plan has now been abolished.
				We suggest that elements of the waste section is updated, for example the table in paragraph 4.266 does not appear to include the statistics set out in SEP Policy W7	Point is noted, though the South East Plan has now been abolished. The evidence base will continue to evolve through time to inform the Core Strategy as appropriate.

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				Paragraph 4.283 refers to continuing the provision for landfill. In doing so, this should reflect the SEP Policy W13 which states that documents should make provision for "declining" landfill capacity and SEP Policy W5 sets out targets for diversion from landfill.	Point is noted, though the South East Plan has now been abolished.
				We suggest that as a waste authority along with Kent County Council, that you consider joint working arrangements, which would assist with document preparation (PPS12, paragraph 4.16). This would also accord with SEP Policy W4 which refers to sub-regional self sufficiency and collaborative working. In addition, Policy W3 provides a joint figure for Kent & Medway. We assume that your authority is in discussion with Kent County Council on the division of any "Kent wide" figures. In addition, we suggest that you have written confirmation of any agreement on the division of figures with Kent County Council or any other waste planning authorities.	See above comment in relation to minerals.
				Finally, we suggest that you consider the advice in the PINS document "Examining Development Plan documents: Learning from Experience" (Sept 2009) on waste planning. It states that waste plans should indicate what waste management developments and facilities are required, where they are to be located, when provided and how they will be delivered.	Noted.
				Energy We suggest that you consider the advice set out in the supplement to PPS1 "Planning and Climate Change" (paragraph 31). This states that when proposing any local requirements for sustainable buildings, authorities must be able to demonstrate the local circumstances that warrant and allow this. In addition, paragraph 20 refers to considering identifying suitable areas for renewable and low-carbon energy sources and supporting infrastructure.	Noted.
				Paragraph 4.458 As you progress the core strategy, you will need to set out the amount and type of floorspace expected to come forward during the plan period at the Lodge Hill site.	This has been addressed in the Lodge Hill chapter.
				Options You have listed out the options and made reference to separate SA documents. We suggest that you consider the advice in the PINS document "Examining Development Plan documents: Learning from Experience" (Sept 2009) paragraph 40. This refers to the importance of the role of SA in choosing the option and the need for this to be clearly articulated. The SA should inform the content of the core strategy. It concludes stating that thought should be given at the outset as to what sort of sustainability appraisal is needed.	Noted and the SA has and continues to inform development of the core strategy.
				A submitted core strategy must be accompanied by a map to show how the existing adopted proposals map will be changed, as a consequence of the adoption of the core strategy where changes are proposed (See Examining Development Plan documents: Learning from Experience" Sept 2009, paragraphs 52 to 57). You will need to factor in this work and consider how you will approach it.	Noted.
				PPS12 (paragraph 4.1) advises that locations for strategic development should be indicated on a key diagram. Where core strategies allocate strategic sites, they must include a submission proposals map (PPS12, paragraph 4.7).	Noted.
				We suggest that you take into account the advice set out in PPS12 (paragraph 4.47) which states that the delivery strategy should contain clear targets or measurable outcomes to assist the monitoring process. At present, the approach to monitoring is not clear. Once you have established the place shaping aspects of the document, i.e. quantum figures for varying uses at different locations across Medway, this should feed into the monitoring framework.	Noted.
				Development Management Policies If your authority are considering including development management policies within the core strategy, you should consider the advice in PPS12 (paragraph 4.32). If the intention of the local planning authority is to apply national guidance, it does not need to reiterate it in DPDs. There may be local reasons for having greater detail than national or regional policy, such as local circumstances which suggest that a local interpretation is appropriate. Local Planning Authorities may include local policies in their DPDs if they have sound evidence that is justified by local circumstances.	Noted.
				You are advised to include an appendix within the core strategy setting out the saved local plan policies which the core strategy seeks to replace.	Noted.
	Evaluation of the Options				
24.		Kent County Council	Richard Feasey	**Initial Archaeological Appraisal of 5 Strategic Sites** The following brief assessment has been undertaken primarily from readily available resources held by the Kent County Council Historic Environment Record. It is not a detailed appraisal but merely provides a broad initial view on the sensitivity of the archaeological, historic building and historic landscape resource and the way in which this should be approached for some of the options. The sensitivity of particular sites may change following more detailed appraisal and in light of new information. The process of assessment will be reviewed and refined as the Local Development Framework evolves.	The archaeological appraisal is welcomed and will be included in the Council's evidence base.
				A crude 5 point scale has been used to rank the options with regard to the historic environment. This is: ***Scale*** 1 Development of this site (or part of) should be avoided 2 Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible. 3 Significant archaeology could be dealt with through suitable conditions on a planning approval. 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.	

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				5 No known archaeological potential on the site or part of it.	
				Note that for each described site several 'Scales' may be noted reflecting the varying potential across the site. For consideration of the site as a whole the lowest numerical 'Scale', i.e. that with the highest archaeological sensitivity, should be used.	
				The following sites have identified specific archaeological issues. **New Settlement at Lodge Hill, Chattenden (Scale 2)** The archaeological and heritage interest in the site relates to both the pre-military and military use of the site.	A full heritage assessment has been completed and agreed with English Heritage.
				For the pre-military use of the site the area is considered to have a good but localised potential for remains dating from the later prehistoric to post-medieval periods.	
				The site has been subject to extensive post-1870 military use associated with Lodge Hill Camp, Lodge Hill Depot and Chattenden Barracks which is of archaeological and heritage interest.	
				Detailed heritage assessments are required to ensure retention of important archaeological remains, historically significant buildings and structures and to ensure that suitable mitigation is implemented prior to redevelopment.	
				Expanded Hoo (Scale 2/3) Hoo lies in an area of considerable archaeological potential and archaeological remains from the later prehistoric to post-medieval times have been recorded across this part of the Hoo Peninsula.	Noted and the Council has been cooperating with English Heritage on its research project.
				The current settlement pattern is part of the distinctive landscape of the Hoo Peninsula which is currently the subject of an English Heritage research project.	
				The Hoo Peninsula is located in a strategic position at the mouth of the Thames and Medway and there are a number of important military remains in the area including a well preserved WWII stop-line.	
				The precise nature and location of development would determine how historic environment issues should be dealt with. A combination of detailed heritage assessments and programmes of archaeological mitigation would be required to ensure retention and/or recording of important archaeological remains and historically significant buildings and structures.	
				Capstone Urban Extension (Scale 3) Archaeological interest is related to Prehistoric, Roman and medieval remains which have previously been recorded in the Capstone Valley.	Noted.
				A WWII heavy anti-aircraft battery is known at Gibraltar Farm. Upstanding remains of a hutted military camp survive at the site and buried remains of the battery may survive.	
				The precise nature and location of development would determine how historic environment issues should be dealt with. A combination of detailed heritage assessments and programmes of archaeological mitigation would be required to ensure retention and/or recording of important archaeological remains and historically significant buildings and structures.	
				East of Rainham Urban Expansion *(Scale 3)* The principal focus of known archaeology in the area East of Rainham is focused on the line of the A2 which follows the route of Roman Watling Street between Rochester and Canterbury. There are also a number of post-medieval farmsteads which could potentially have earlier medieval origins.	Noted.
				The East of Rainham Urban Expansion area is a large site in an area of limited systematic archaeological investigation. Archaeological programme of works would be suitable and can be covered by condition	
				North of Rainham Urban Expansion (Scale 2/3) Lies in a topographically favourable position on the banks of the River Medway. There is a good potential for prehistoric and later settlement and occupation on the higher dry-land areas, whilst in the lower lying former marshland there may be remains associated with marshland exploitation – track-ways, evidence for fishing, salt-working and other activities.	Noted.
				There is evidence for significant archaeological remains in the form of Palaeolithic and Neolithic occupation close to Bloors Lane Community Woodland and to the east of Manor Court and Little London Farm.	
				The North of Rainham Urban Expansion area is a large site and the precise nature and location of development would determine how historic environment issues should be dealt with. A combination of detailed heritage assessments and programmes of archaeological mitigation would be required to ensure retention and/or recording of important archaeological remains and historically significant buildings and structures.	
25.		Highways Agency	Howard Moore	See attached comments. http://medway-consult.limehouse.co.uk/file/951315	
				Although the IOR does not discuss the prospect of employment growth at Chattenden the HA have been informed that approximately 3,000 jobs have been included for Chattenden in the Medway Model. This figure should be confirmed and, if accurate, used when undertaking transport assessments for Chattenden.	Noted.
				Due to its non-urban location Option 1 could potentially generate a considerable volume of vehicular traffic that is likely to impact upon the A2 and M2 (particularly Junction 1). The IOR proposes that the Medway Transport Model is used to assess the impact of the Chattenden development. The HA would wish to review the assumptions used and corresponding outputs from this assessment process.	This is being done.
				Chattenden is remote from the main urban conurbation and therefore may not lend itself to integration with, and the extension of, existing urban public transport services.	Opportunities for high quality bus connections have been identified and are expected to be a condition of any planning permission.

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				When undertaking an impact assessment of Chattenden the HA requests that junction assessments are undertaken of all SRN junctions and links which suffer a material impact.	Noted.
				Whilst Option 2 involves the expansion of a number of villages at the western end of the Hoo Peninsula, the other three options are located on the edge of urban areas and therefore could make better use of existing facilities than the two rural options. This may help to limit the number of vehicular trips generated.	Noted.
				Options 4 and 5 are located within reasonable walking or cycling distance of railway stations within Medway that provide services to London in approximately an hour (or less in some cases due to anticipated high speed rail services). This may encourage commuters to undertake longer distance trips without utilising the strategic road network. Options 1, 2 and 3 are located at less convenient distances from the nearest rail station.	Noted but the urban extension options, particularly that for the Capstone Valley would have direct implications for M2 junctions 3 and/or 4 and no doubt the Agency will wish to take note of this..
				In order to maintain consistency and provide the necessary level of assessment the impact of the options considered should be undertaken using the Medway Transport Model.	Noted..
				The Isle of Grain is also identified as a potential area for employment growth. The IOR contains no information regarding the quantum of development (or type of employment) planned for this area.	Assumptions were provided for the SATURN model. The Isle of Grain now has planning permission for over 450,000 sq m. of B2, B8 and other uses.
				The IOR discusses the transport impacts, particularly on the highway network that may arise following housing and employment growth without any associated transport infrastructure or public transport improvements.	Noted and this was to provide a consistent baseline..
				The full impact of the five spatial options on the strategic road network cannot be determined without more detailed information regarding the type, quantum and phasing of development planned at each site.	Noted.
				Due to a lack of information provided regarding the quantum of housing and employment development, the Highways Agency are not certain as to the most appropriate alternatives to Option 1 at Chattenden. However, it is recommended that Options 4 and 5 are considered as alternatives due to their location on the urban fringe, their reasonable distance from railway stations and the access that both locations provide to existing, or an extension of existing, services and infrastructure.	Noted but the Issues and Options report makes clear that these are unlikely yo be progressed for the reasons given, transport being only one of many factors considered.
				A review should be undertaken regarding the 'self-sufficiency' of the non-urban options and ability of these sites to minimise external trips.	This is being done for the Lodge Hill option, which is being progressed in the Core Strategy.
				The outputs from the modelling of the options under consideration should be presented to the Highways Agency for review.	Noted.
26.	Question 95	Member of Parliament	MP Paul Clark	See attached comment http://medway-consult.limehouse.co.uk/file/991780	
				As Member of Parliament for Gillingham and Rainham, I wish to indicate my objection to 'Option 3: Capstone Urban Extension' (p. 93, Issues and Options Report, July 2009); 'Option 4: East of Rainham Urban Extension' and 'Option 5: North of Rainham Urban Extension'.	Noted.
				I have totally opposed any development within the Capstone Valley.	Noted.
				The proposals are unnecessary to meet the anticipated housing projections.	Noted.
				When assessing those already delivered, those sites with planning permission and regeneration sites available, the total availability in Medway is 19,355 – 3,000 in excess of that identified in the South East Plan.	Noted. The South East Plan was revoked on 6 July 2010.
				The sites identified, with the exception of Lodge Hill, do not require an extension of the urban boundaries. Even the Lodge Hill development will be principally on previously developed land	Noted.
				The Medway Magna proposals cover areas which are sites of Nature Conservation Interest, Community Woodlands (BNE44) and an important buffer between the built up areas of Hempstead and Lordswood. This proposal is unnecessary, unwarranted and must be opposed at all costs.	The Capstone Valley option is not being pursued.
				The same arguments hold for the proposals in 'Option 4: East of Rainham Urban Extension' (p.93) and 'Option 5: North of Rainham Urban Extension' p93). Unfortunately, many of these proposals are not new. Landowners and consortia have tried time and again to weaken the restrictions on these areas in Lower Rainham. As a Gillingham Borough Councillor in the 1980s I opposed such attempts and I oppose them now thirty years on. The areas targeted are recognised as Conservation Areas (BNE12), as Special Landscape Areas and even as a Tidal Flood Area (CF13).	Noted.
				The sites identified within the Medway Core Strategy document follow the Government's policies of using "brownfield sites first". Medway is able to provide more than sufficient sites over the 20 year period without encroaching on those green, open and important sites identified in Options 3, 4 and 5.	Agreed
				I fear that many of those behind these attempted raids on the open spaces of Medway and have long tried to weaken the resolve of elected members, have no thought for the proper balance required within an area between homes, jobs, space and conservation – their sole motive is profit with little thought to the communities they leave behind. So Option 1 should be supported and Options 3,4, and 5 opposed at all costs.	Noted.
27.	Question 96	Barratt Strategic		See attached pdf file for comments. http://medway-consult.limehouse.co.uk/file/947809	

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				Q.96 - Barratt Strategic do not accept the proposition that a new settlement at Lodge Hill Chattenden accommodating some 4500 units is the best option available to the Council in delivering its housing land supply targets… the practicalities of delivering the scale of development proposed (4500 dwellings plus ancillary facilities) are in our opinion such that to rely on Chattenden alone, would be foolhardy to say the least, and could lead to serious questions being raised about the credibility of the housing land supply strategy being advocated in the Core Strategy. Chattenden represents 28% of the councils housing land supply requirement over the plan period. Despite the fact we are 3 years into the plan period (2006-2026) the site still does not benefit from planning permission. Indeed there is not even an application before the council yet.	The strategic Land Availability Assessment has identified a surplus of 3,000 dwellings to come forward before 2026, without including any windfalls. A further 1113 have been identified for the post 2026 period. Consequently, there is a built in contingency, to make up for any shortfall in delivery, without the need to identify further greenfield sites. Detailed planning of the site is progressing.
				Barratt Strategic do not feel Chattenden can deliver 4500 units over the plan period. The scale of delivery is not realistic. 3000 units is in Barratt Strategic opinion the maximum this site can deliver over the plan period.	Land Securities, the agents for the release and development of Lodge Hill have assured the Council of the delivery of 4,600 dwellings by 2026
				Barratt Strategic feels that the level of development likely to come forward from extant planning permissions/ the town centre/waterfront regeneration sites will be less than anticipated. Barratt Strategic feels the council need a contingency and that an extended Hoo is the most suitable location for this. To this end they also support the identification of 1500 units at an extended Hoo (to include sites at/around Hoo, St Werburgh, and the nearby villages of High Halstow and Cliffe Woods).	See above in relation to surplus provision. There is therefore considered to be no case for considering the option proposed.