

Cabinet – Supplementary agenda No. 1

A meeting of the Cabinet will be held on:

Date: 2 August 2011

Time: 3.00pm

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

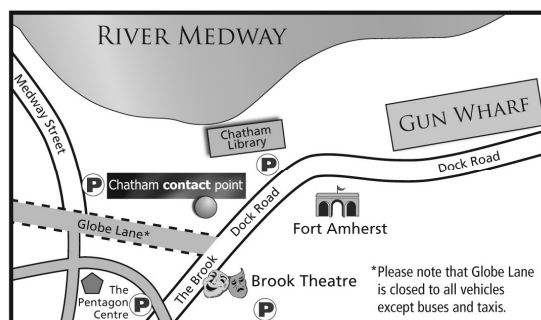
Items

4. Local Development Framework – Attachments 1, 2, 3, 6 and 7 (4 and 5 are to follow) (Pages 1 - 498)

5. Draft Lodge Hill Development Brief – Appendix 1 (Pages 499 - 606)

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

Date: 25 July 2011



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Attachment 1



**MEDWAY LOCAL DEVELOPMENT
FRAMEWORK**

PUBLICATION DRAFT CORE STRATEGY

[CABINET VERSION]

AUGUST 2011



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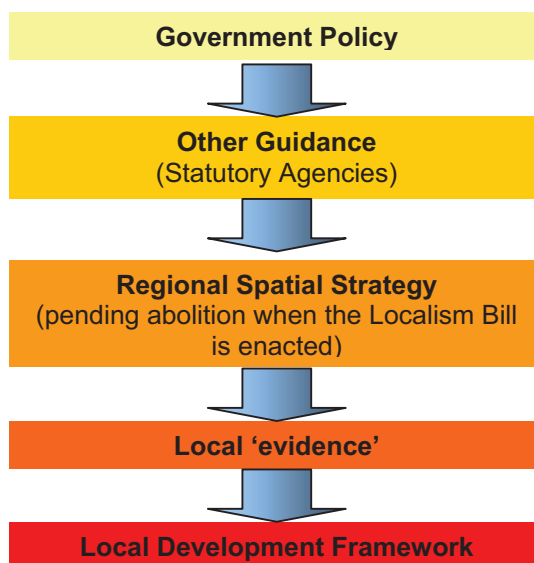
1. Introduction

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

The Development Plans System

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

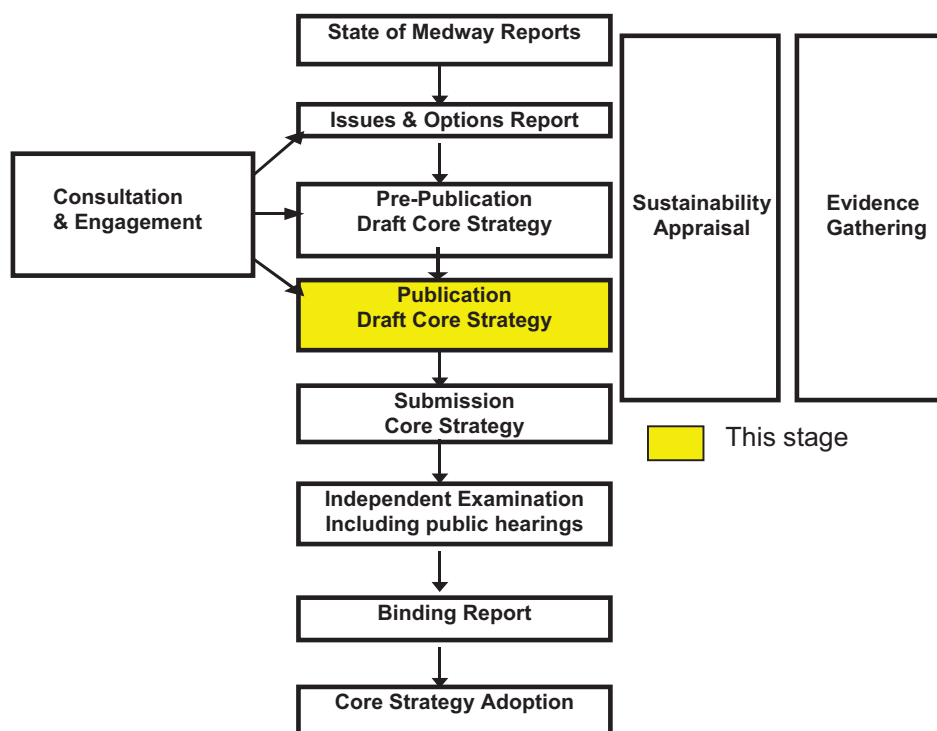
Figure 1-1 The Planning Policy Cascade



The Stage We Have Reached and How We Got There

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

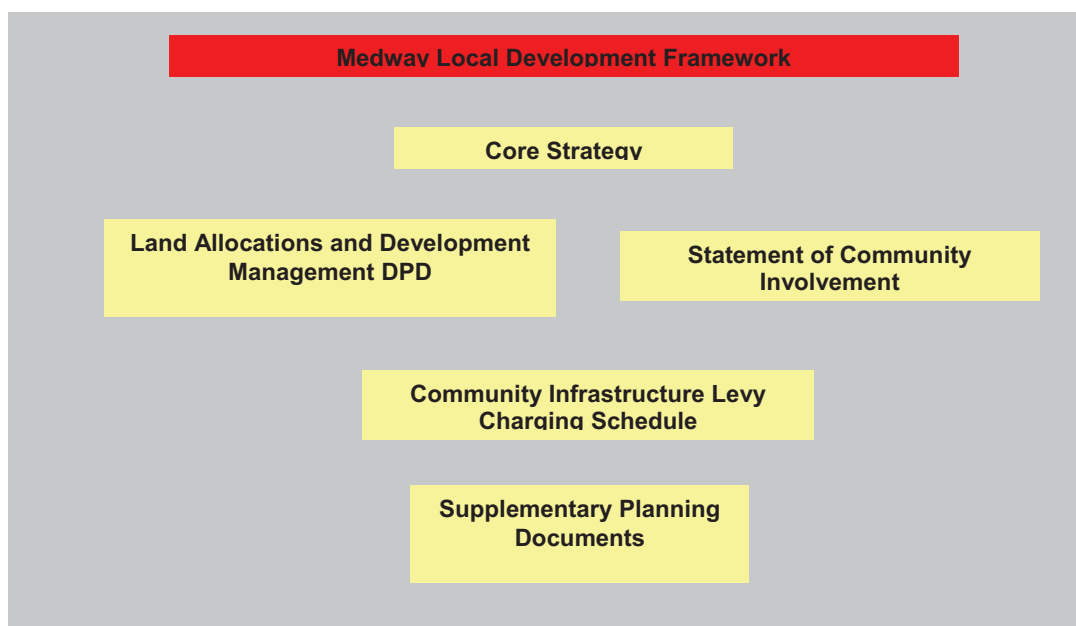
Figure 1-2 Core Strategy Stages



How the Core Strategy Fits Into the LDF

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

Figure 1-3 Medway Local Development Framework



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

Structure of the Core Strategy

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

Sustainability Appraisal

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

Habitats Regulation Assessment / Appropriate Assessment

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

Timetable for the Core Strategy

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

Table 1-1 Core Strategy Timetable

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

Statement of Community Involvement

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

Diversity Impact Assessment

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

Consultation Responses

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

Plan Period

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

Changing Circumstances and Requirements

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

Flexibility and Viability

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

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

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

Saved Policies

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

Other Development Plan Documents

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

Public Consultation

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

- **Post:** Development Plans and Research Team, Regeneration, Community and Culture, Medway Council, Gun Wharf, Dock Road, Chatham, Kent ME4 4TR
- **Website:** <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

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

2. Context and Issues

Introduction

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

Population Base

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

State of Medway Reports (SOMs)

- 2.3 In order to inform the Core Strategy, the Council published a series of State of Medway reports in 2008. These set out the baseline from which the Core Strategy was developed. This information provided stakeholders with a common understanding of the context in which the Local Development Framework is being prepared.
- 2.4 The State of Medway reports cover the following topics:
- Built Environment
 - Chattenden (Lodge Hill)
 - Climate Change, Renewables and Flooding
 - Demography and Social Trends
 - Economy and Employment (including Employment Land)
 - Education and Skills
 - Housing
 - Infrastructure
 - Minerals
 - Natural Assets and Open Space
 - Retail, Leisure and Culture
 - Policy Framework
 - Waste
 - Water Supply
- 2.5 The reports can be viewed on the Council's website at <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. They can be accessed via:
<http://medway.gov.uk/environmentandplanning/developmentplan/localdevelopmentframework/ldfevidencebase.aspx>
- Strategic Land Availability Assessment (SLAA) November 2010
 - Strategic Housing Market Assessment (SHMA) 2010
 - Infrastructure Plan
 - Medway Economic Development Strategy for 2009 - 2012
 - Employment Land Review Consolidation Study 2010
 - SATURN Transport Model
 - Strategic Flood Risk Assessment (SFRA) 2006 & Addendum 2011
 - Strategic Urban Flood Defence Strategy 2010
 - Regional Waste Management Capacity Study 2007
 - The Gravel Resources of North Kent 1987
 - Medway Retail Needs Study 2009
 - Draft Medway Green Grid Action Plan 2007
 - Medway Landscape Character Assessment 2010
 - Medway Renewables Energy Capacity Study 2010
 - Medway Rural Housing Needs Assessment 2009
 - Lodge Hill Evidence Base Reports
(<http://www.medway.gov.uk/environmentandplanning/developmentplan/localdevelopmentframework/ldfevidencebase/lodgehill.aspx>)
- 2.7 The Local Strategic Partnership (LSP) has produced the Medway Sustainable Community Strategy (SCS)¹ alongside the Core Strategy. It is based upon a vast volume of information and input from key community stakeholders. The Medway Sustainable Community Strategy was prepared in the context of the South East Plan, the Regional Economic Strategy, the Thames Gateway Plan and the North Kent Multi-Area Agreement.
- 2.8 The Regional Economic Strategy recognises Medway as a priority area for investment. The North Kent Multi-Area Agreement 2009 was an agreement between Central Government and the 5 local authorities with responsibilities in North Kent (Kent County Council, Medway Council, Dartford Borough Council, Gravesham Borough Council and Swale Borough Council) covering economic development, enterprise, employment, skills, transport, housing and the environment.
- 2.9 The Sustainable Community Strategy document highlights a variety of evidence and issues of particular importance to Medway as summarised below.

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

Economic Profile

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

Social Profile

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

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

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

Environmental, Cultural and Housing Profile

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

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

Medway Now

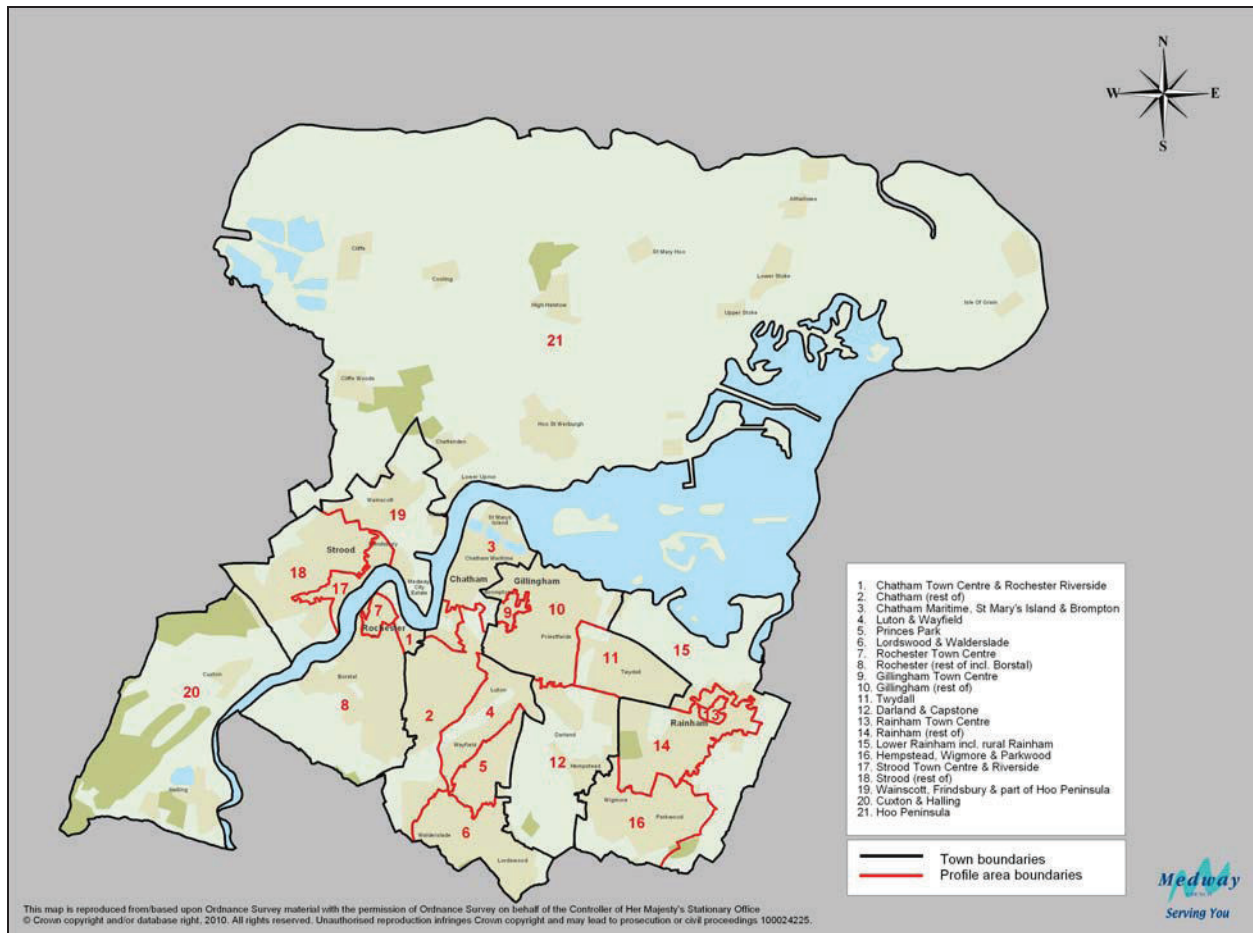
2.25 In addition to this analysis individual neighbourhood area profiles² have been produced in order to drill down below the Medway level. They assess the individual needs of each local area and highlight the key issues that they face. The profiles cover the following 21 local areas within Medway, and the relevant areas are shown in Figure 2-1:

- Chatham town centre and Rochester Riverside
- Chatham (rest of)
- Rochester town centre
- Rochester Riverside (rest of, including Borstal)
- Chatham Maritime, St Mary's Island and Brompton
- Gillingham town centre
- Gillingham (rest of)
- Twydall
- Rainham town centre
- Rainham (rest of)
- Lower Rainham (including rural Rainham)
- Hempstead, Wigmore and Parkwood
- Darland and Capstone
- Princes Park
- Luton and Wayfield
- Lordswood and Walderslade
- Cuxton and Halling
- Strood town centre and Riverside
- Strood (rest of)
- Wainscott, Frindsbury and part of Peninsula
- Hoo Peninsula

2

<http://medway.gov.uk/environmentandplanning/developmentplan/factsandfigures/areaprofiles.aspx>

Figure 2-1 Local Areas



2.26 The headline findings from this work are:

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

2.27 The findings for more local areas are summarised below.

Chatham

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

Rochester

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

Gillingham

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

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

Economy and Learning

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

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

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

also leads to higher economic performance and an improved quality of life. However significant sections of the population are classified as 'deprived'.

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

Transport

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

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

- 2.49 Improve public transport links to the universities and college campuses. These are new destinations well related to the urban core and should be readily accessible by bus in particular.
- 2.50 Make highway improvements including the A228 to Grain and highway capacity improvements including Strood centre. The A228 carries a very high proportion of HGVs accessing the port and energy installations on the Hoo Peninsula and it has a poor safety record. Strood is a particular bottleneck and congestion detracts from the attractiveness of the town centre and results in air pollution.
- 2.51 Provide more opportunities for cycling and walking. Much has been done over the last few years but existing and new improvements should join up to create obvious networks that provide travel alternatives for local people.
- 2.52 Investigate the potential of the River Medway for work and leisure travel and for further river crossings. New opportunities should arise as the regeneration of the urban waterfront progresses and new visitor destinations develop along it.
- 2.53 Provide better transport links and wider transport choices in Medway to support regeneration, increase accessibility and connectivity, and reduce reliance on the car.

Climate Change

- 2.54 Consider extreme weather events (flash flooding, storm surges) that have the potential to significantly affect the Medway area when coupled with sea level rise, as there are significant low-lying areas in the Medway River valley, which are potentially at risk from flood events. A range of studies and plans has been completed to inform the response needed.
- 2.55 Reduce carbon emissions and improve air quality within the Medway area including domestic, business and transport emissions.
- 2.56 Reduce carbon emissions and improve energy efficiency of both new and existing housing by working with the community. Apart from the environmental benefits increasing fuel poverty heightens the importance of this issue.
- 2.57 Increase use of sustainable energy and investigate use of decentralised heating schemes.
- 2.58 Raise awareness of and assist in reducing water wastage, encourage reduction in water consumption and encourage water recycling. This is vital given Medway's low rainfall and tidal river that is not suitable for abstraction.
- 2.59 Realise opportunities to restore and recreate wildlife habitats in association with sustainable flood-risk management. Again a number of plans and strategies have been completed to assist in this.

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

Green Infrastructure

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

- 2.72 Reduce pollution affecting the Medway Estuary and local wildlife habitats.
- 2.73 Recognise that the majority of sand and gravel reserves in Medway are found on the Hoo Peninsula but there are both economic and environmental constraints regarding their extraction.
- 2.74 Provide additional capacity in recycling, recovery and final disposal to meet the national waste strategy targets for municipal and commercial and industrial wastes and enable all waste streams to be 'pushed' up the waste hierarchy away from landfill.

Built Environment and Neighbourhoods

- 2.75 Promote high quality design. Too much of the town centres and surrounding areas is characterised by insensitive architecture and poor urban design. This detracts from the setting of many fine buildings and the image of the area.
- 2.76 Implement the Public Realm Strategy. Our major streets and limited squares need improving and better connections established between them.
- 2.77 Improve the overall image of Medway. This is vital to economic success and community confidence and pride.
- 2.78 Deliver good quality housing in mixed use developments to contribute to sustainable regeneration.
- 2.79 Be aware that although Medway has a younger age profile than Kent and the national average, over time the structure will get older, placing an added pressure on meeting housing needs.
- 2.80 Ensure that more executive housing is provided. Too few business owners and managers reside in Medway and opportunities need to be identified to encourage them to do so.
- 2.81 Develop a multicultural community centre at the historic dockyard. This is a longstanding ambition and an opportunity to celebrate Medway's cultural diversity.
- 2.82 Develop place based initiatives to improve health in neighbourhoods identified as having the worst health and lowest life expectancy. Parts of Medway have significant health issues compared to other areas.
- 2.83 Develop a waterfront arts complex in Chatham as part of a wider cultural area including the Brook and Central theatres. A clear focus for cultural activity is needed and should form part of the regeneration programme for Chatham.
- 2.84 Implement the Chatham Centre and Waterfront Development Framework.
- 2.85 Implement the Gillingham Town Centre Development Framework.
- 2.86 Implement road improvement and retail improvements in Strood.

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

3. Vision and Strategic Objectives

Introduction

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

Sustainable Community Strategy

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

Vision for Medway

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

3.10 The six ambitions are:

- *Medway to have a thriving, diverse and sustainable economy matched by an appropriately skilled workforce and supported by a Higher Education Centre of Excellence*
- *Every child to have a good start in life*
- *Medway residents to enjoy good health, well being and care*
- *Medway to have a safe and high quality environment*
- *Medway to be a place where people value one another, play an active part and have pride in their community and Medway as a whole*
- *Medway to be recognised as a Destination for Culture, Heritage, Sport and Tourism*

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

Overall Levels of Growth

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

Table 3-1 Employment Growth to 2028

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

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

Table 3-2 Job Requirements to 2028

Scenario	Job Requirement
Low employment, low commuting reduction (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

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

The Core Strategy 'Spatial' Vision

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

By 2028 Medway will have experienced major change.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Strategic Objectives

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

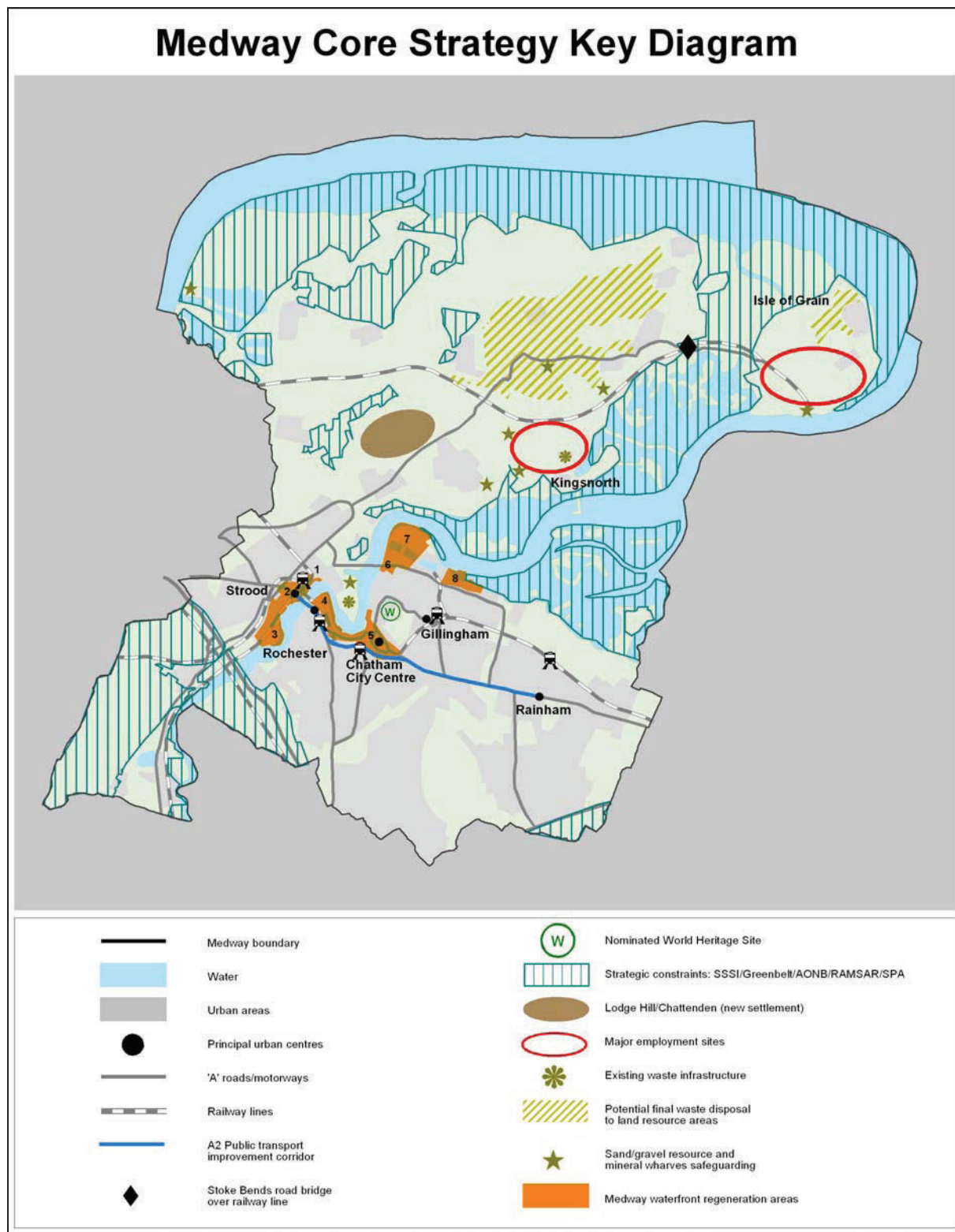
1. To effectively realise Medway's role within the Thames Gateway and associated growth requirements primarily through effective physical regeneration, the reuse of previously developed land and the protection and enhancement of the area's many natural and heritage assets.
2. To develop Chatham as a 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 economic and 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 boost the range and quality of tourist accommodation and positively promote visitor destinations.
8. To significantly reduce deprivation in Medway, including through the implementation of tailored strategies for target neighbourhoods and the development of a network of strong neighbourhood centres, providing a range of local services and acting as community hubs.
9. To ensure that there is sufficient housing to meet people's needs by providing for a range, mix, type and affordability of housing in locations that contribute to the regeneration and sustainability of the area.
10. To provide for the transport needs of the population through the provision of enhanced public transport facilities, proactive management of the highway network and improved facilities for walking and cycling.

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

Key Diagram

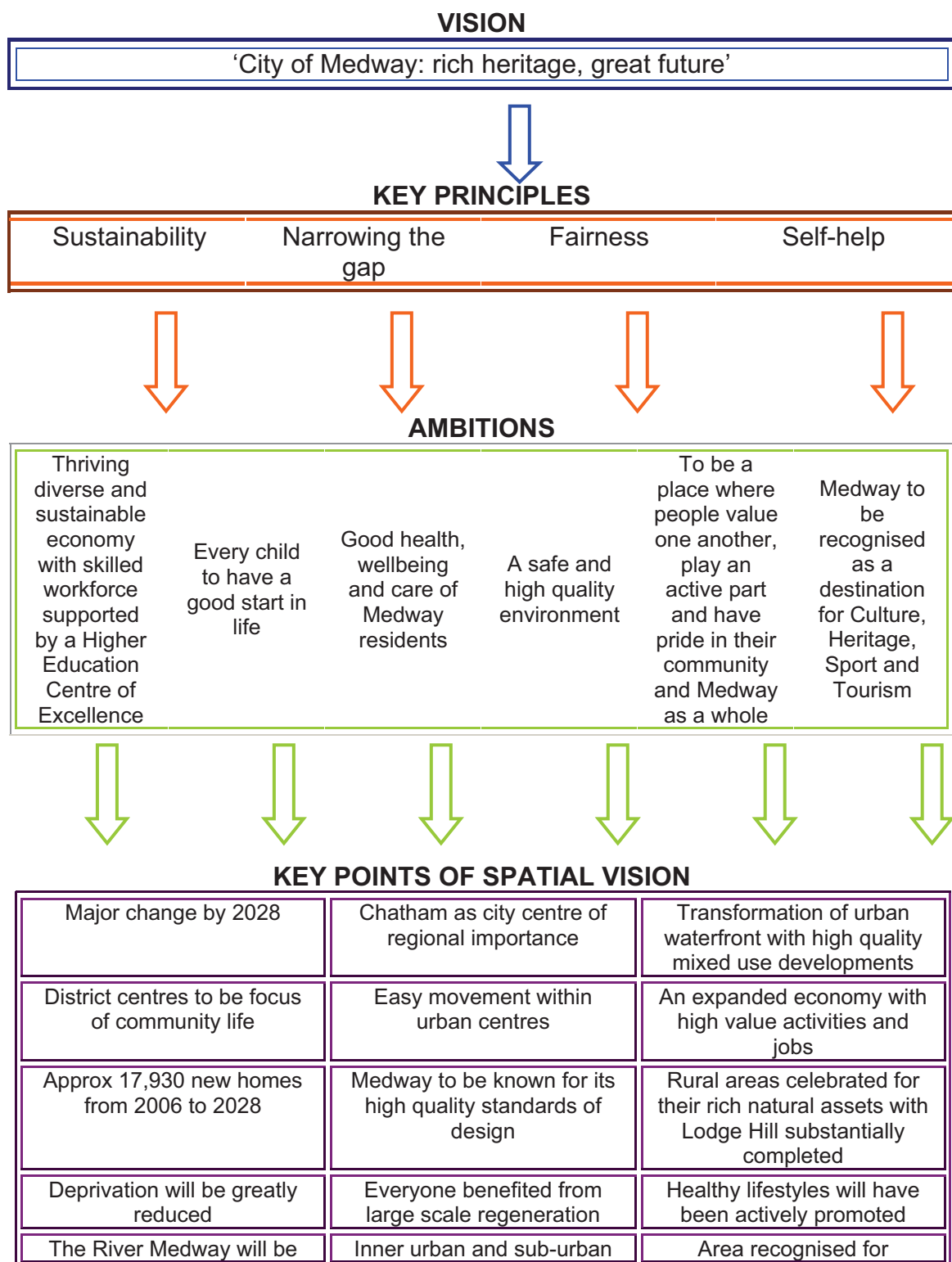
3.23 The main elements of the strategy are illustrated on the Key Diagram below.

Figure 3-1 Medway Core Strategy Key Diagram

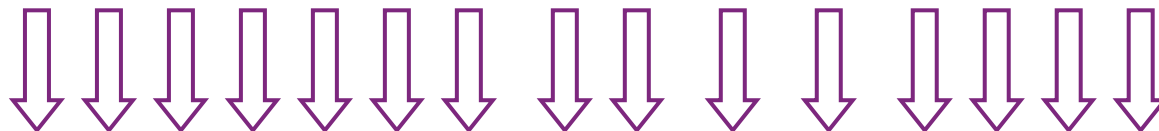


3.24 Figure 3-2 below shows the relationship between the spatial vision, the strategic objectives and each policy as set out in the following chapters.

Figure 3-2 Spatial Vision & Strategic Objectives Diagram



celebrated as dominant and unifying geographical feature of area	communities noted for their thriving local or neighbourhood centres	contribution to nation's energy infrastructure, its port capacity and gateway function for import of minerals



STRATEGIC OBJECTIVES

(Related policy)

Realise Medway's role within Thames Gateway (CS1 Regenerating Medway)	Develop Chatham as a city centre of regional significance (CS1 Regenerating Medway & CS28 Chatham)	Substantially improve the performance of local economy (CS17 Economic Strategy)
Focus employment growth in Chatham Centre (CS28 Chatham)	Maximise development opportunities of four universities and Further Education College (CS20 Education & personal development)	Improve the quality of the townscape and public realm within central urban area and urban waterfront (CS2 Quality & sustainable design)
Significantly reduce deprivation (CS9 Health & social infrastructure)	Sufficient housing to meet people's needs (CS13 Housing provision & distribution & CS14 Affordable Housing)	Provide for transport needs of the population via enhanced public transport facilities (CS24 Transport & movement)
Enhance the quality of life of local people (CS10 Sport & Recreation)	Nurture Medway's rural areas & economy via village improvements and enhanced land management (CS6 Preservation & enhancement of Natural Assets?)	To make the new settlement at Lodge Hill a model for modern living with high design and sustainability standards (CS33 Lodge Hill)
Minimise effects of climate change (CS3 Mitigation & adaptation to climate change)	Ensure sufficient supply of minerals and adequate waste management/disposal (CS22 Provision for Minerals & CS23 Waste Management)	

4. Cross Cutting Themes

Introduction

- 4.1 This chapter covers a range of over-arching topics or themes that need to be taken into account if the Core Strategy vision is to be realised and national policy reflected in relation to matters such as climate change and the protection of environmental and heritage assets. The topics covered are:

- Regenerating Medway
- Quality and Sustainable Design
- Mitigation and Adaptation to Climate Change
- Energy Efficiency and Renewable Energy
- Development and Flood Risk
- Natural Environment and Biodiversity
- Sustainable Communities.

Regenerating Medway

- 4.2 Completing the effective regeneration of Medway's town centres and urban waterfront, including making Chatham a centre of regional significance, is the single biggest challenge facing the area and is therefore the priority for this Core Strategy. Medway has embraced the Thames Gateway project and made enormous strides in attracting resources and managing change on the ground but much still remains to be done.
- 4.3 Chatham, as Medway's main centre, needs a much more positive image and to assert itself as a focus for economic, social and cultural activity. Enormous efforts, including major financial investment, have been put into the land assembly of key waterfront sites and a programme of major infrastructure improvements.
- 4.4 A stage has now been reached where market perceptions have improved and community confidence is growing. However there is much still to do if the enormous potential is to be fully realised and Medway is to be recognised as one of the most significant conurbations in the greater South East and a strategic centre within the Thames Gateway area.
- 4.5 A changed focus now could also result in the returns expected from the financial investments already made being reduced or lost altogether. Accordingly, Policy CS1 re-emphasises the importance of this regeneration programme and the key measures that will be applied to take it forward.
- 4.6 A range of development briefs and masterplans are in place to assist in this process and these will be reviewed and updated as necessary over the plan period. A schedule of these is set out at Appendix B. The Council will work proactively with potential development partners, both public and private, to realise opportunities and coordinate activity.

Policy CS1: Regenerating Medway

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

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

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

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

Quality and Sustainable Design

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

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

Policy CS2: Quality and Sustainable Design

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

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

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

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

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

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

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

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

existing development and that unnecessary travel demands do not arise

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

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

Mitigation and Adaptation to Climate Change

- 4.15 Climate change and its potential effects is one of the greatest issues affecting humanity. Extreme heat and flooding can threaten human life and flooding can cause major property damage. Higher average temperatures affect both flora and fauna and sea level rise threatens coastal areas. The Government has introduced a number of measures to address the issue, including measures that should to be considered in local development frameworks. Through PPS1 and its climate change update, sustainable development, adaptation to climate change and mitigation are now key cornerstones of planning.
- 4.16 A well-known and recognised contributor to climate change is carbon dioxide emissions, sometimes referred to as the carbon footprint of an area. Therefore a critical part of any strategy for tackling climate change needs to deal with this issue.
- 4.17 A detailed explanation of Medway's ecological footprint is contained within the Climate Change, Renewables and Flooding State of Medway Report.
- 4.18 A Local Area Agreement target sought a reduction of emissions by 13.9% by 2011, equating to 4.3 tonnes of CO₂ per capita. Further and more stringent targets are likely to be applied to Medway over the plan period.
- 4.19 In order to improve the sustainability of new homes, the Government has introduced The Code for Sustainable Homes. This rates new homes against nine measures of sustainability: CO₂, pollution, water, health and well being, materials, management, surface water run-off, ecology and waste. The code uses a 6 level rating system, according to the degree to which the homes measure up to the 9 measures. The previous Government set a target for all new homes to achieve a Level 3 rating by 2010, progressing to a Level 6 (or zero carbon) rating by 2016. The current Government has confirmed a commitment to zero carbon homes by 2016. However the definition of zero carbon is being amended to remove the requirement for Level 6 of the Sustainable Homes Code and replace it with amendments to Part L of the Building Regulations, coupled with off-site 'allowable solutions', for example contributions to carbon reduction projects in the community. Details of the scheme are not yet finalised.
- 4.20 The Building Research Establishment operates a similar system for non-residential development called the BREEAM standard. This rates buildings as

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

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

Policy CS3: Mitigation and Adaptation to Climate Change

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

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

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

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

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

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

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

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

Energy Efficiency and Renewable Energy

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

currently almost wholly from conventional sources. In order to assess Medway's potential in terms of renewable energy the Renewable Energy Capacity Study 2010 was commissioned³.

- 4.27 This shows that there is potential for the Medway area to generate around 641MW of power or heat equivalent using renewable sources. It indicates that this could be provided through a number of technologies, covering wind (both small and large scale), biomass, solar and district heating. The largest proportion could come from wind developments of varying scales but this would involve the use of locations across the middle of the Hoo Peninsula, which are sensitive both environmentally and visually. Other technologies, especially photovoltaics or solar thermal could be spread across a number of concentrated areas through the main centres.
- 4.28 A number of the available technologies only tend to become viable on larger scale developments. Combined heat and power systems usually need a demand at a community scale to be cost effective. Others such as ground source heat pumps are often constrained due to the land surface that is usually demanded to accommodate them, although this has lessened with vertical systems being introduced as alternatives.
- 4.29 To consider the impact on scheme viability of applying higher sustainable code levels and the impacts of including renewable technologies, the study specifically considers the strategic sites of Rochester Riverside, Chatham Centre and Waterfront and Lodge Hill. It discusses potential mixes of technologies that could be used over the plan period, on the basis that these schemes will all come through during and after the national timetable for zero carbon homes.
- 4.30 If the Government grants permission for the proposed new coal power station at Kingsnorth, it is expected to include Carbon Capture and Storage. In addition the Council has recommended that, if approved, a condition be applied requiring pipes to be laid to the edge of the site, which could be connected for waste heat to be used as part of a district heating system. This could potentially be of a significant scale due to the volume of waste heat available.
- 4.31 The greatest constraints to a speedy development of a district heating system would be the commitment of the utility companies and current legislation and processes, which are not geared towards large scale district heating schemes. However the study suggests that this is a key element that should be further investigated.
- 4.32 Due to the large size of the existing housing stock and the nature of commercial and industrial activity across the area, simply controlling new development will not, in itself, be enough to result in a significant reduction in 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

³ http://medway.gov.uk/pdf/renewable_energy_capacity_study_may_2010.pdf

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

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

Policy CS4: Energy Efficiency and Renewable Energy

All new development will be expected to maximise energy efficiency savings through passive design and building fabric improvements. Developments of 10 dwellings or more, or over 1,000 sq m of non-residential floorspace should also meet 20% of the residual on-site energy requirements from decentralised, renewable energy sources. Direction for which technologies would be most appropriate should be taken from the Medway Renewable Energy Capacity Study, although emerging and innovative technologies will also be supported. If it is demonstrated that this target cannot be met economically through on-site measures, equivalent CO² savings will be sought through compensatory off-site measures including renewable energy schemes and retrofit schemes for existing buildings in the local area.

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

Development and Flood Risk

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

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

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

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

strategies that should be applied to ensure flood risk is managed sustainably⁴. This will ensure that all flood defences along the waterfront meet a universal standard. It is accepted that, although a large part of the urban waterfront is located within the flood plain, it needs to be defended due to the long established development form and the value of the commercial assets that would otherwise be at risk. Beyond the current urban boundaries however it is important to avoid inappropriate development that would increase flood risk and reduce the capacity to store water.

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

Policy CS5: Development and Flood Risk

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

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

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

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

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

Proposals in areas at risk from flooding must demonstrate that

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

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

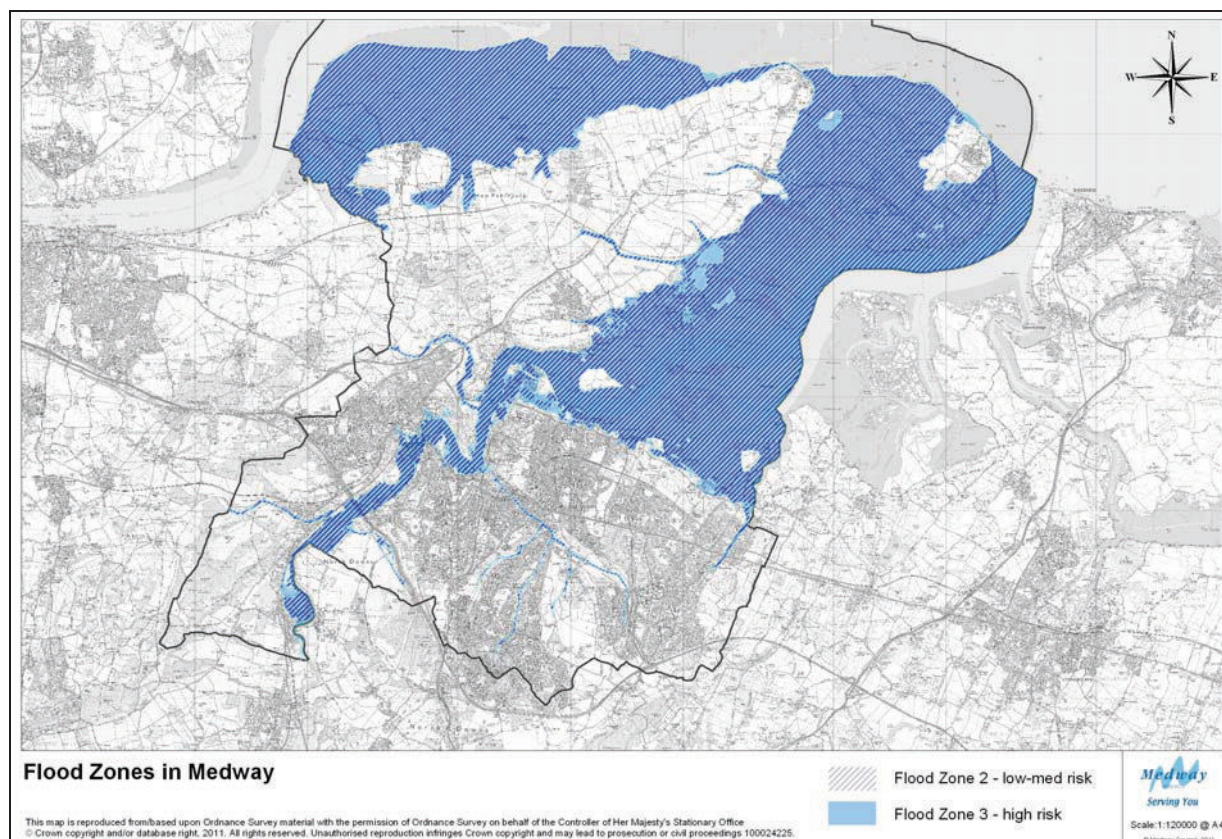
Options to manage flood risk identified in the High Level Appraisal of the Potential Solutions to Manage Flood Risk in the Urban Medway⁵ should be incorporated where possible.

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

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

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

Figure 4-1 Flood Zones in Medway



Natural Environment and Biodiversity

Preservation and Enhancement of Natural Assets

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

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

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

- Chestnut Woods
- Coney and Daisy Banks
- Dargets Woods
- Darland Banks
- East Hoath Wood
- Hook Wood
- Horsted Farm/Ridgeway
- Mill Hill Wood
- Rede Common
- Sindal Shaw
- Watts Meadow
- Princes Park
- Riverside Country Park
- Capstone Country Park
- Ranscombe Farm Reserve

4.64 In addition to National and Local Nature Reserves, other nature reserves may also be established independently from Natural England and the local authorities. In Medway, the Royal Society for the Protection of Birds purchased Cliffe Pools on the Hoo Peninsula in 2001 and is developing visitor and education facilities. This is a winter roosting site for thousands of birds. The RSPB also manages the national nature reserve at Northward Hill and its management is linked to that for Cliffe Pools.

4.65 It is recognised that the protection and conservation of sites of significant nature conservation interest outside the network of statutorily protected sites is essential to the maintenance of the UK's natural heritage. Such sites are identified as local wildlife sites and in Kent they have been known as Sites of Nature Conservation Interest (SNCI).

4.66 The Kent Biodiversity Partnership designates local wildlife sites and although the sites are not statutorily protected, they are generally recognised by local authorities, included in development plans and offered protection through policies in those plans.

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

- Ambley and East Hoath Woods
- Berengrave Pit
- Bridge Woods, Burham
- Cuxton Pit
- Cuxton Wood (Mill Wood)
- Darland Banks
- Grain Pit
- Great Lines
- Grove Wood
- Hook Wood, Walderslade

- Luton Banks
- Princes Avenue
- River Medway and Marshes, Wouldham
- River Medway between Cuxton and Temple Marsh
- South Hill and Houlder Quarry
- South Wood
- Yaugher Woods

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

Policy CS6: Preservation and Enhancement of Natural Assets

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

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

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

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

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

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

Countryside and Landscape

- 4.71 Medway's distinctive sense of place is closely linked to its landscape setting. Its chalk hills and valleys, the Hoo Peninsula with its wooded spine and extensive marshes and the river and its estuary all play their part. Special Landscape Areas and Areas of Local Landscape Importance were designated in the Medway Local Plan, 2003. These reflected countywide and locally recognised areas of importance. PPS7 does not support local designations that may unduly restrict development and economic activity. When drawn up it is considered that these designations should be replaced by criteria based policies. However the Coalition Government has indicated that it will reintroduce a form of local designation. The Core Strategy consequently includes a policy that could replace the designations and applies it to the whole of the rural area rather than specific parts. However this approach may be adapted in light of the Government's proposals when details are available.
- 4.72 Medway adopted a Landscape Character Assessment in March 2011⁶, which is a spatially mapped strategy that supports this approach and provides an evidence base to inform decisions on planning applications in the countryside and urban fringe. It sets out a framework for protecting and enhancing the character and function of the area's distinct landscapes. It recognises that the landscape has been degraded in some places and sets out recommendations to restore and strengthen sites.

⁶ http://www.medway.gov.uk/pdf/Medway%20LCA%20Mar11_Main%20report.pdf ;
http://www.medway.gov.uk/pdf/Medway%20LCA%20Mar11_Appendices.pdf ;
http://www.medway.gov.uk/pdf/Medway%20LCA%20Mar11_Map.pdf

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

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

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

Policy CS7: Countryside and Landscape

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

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

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

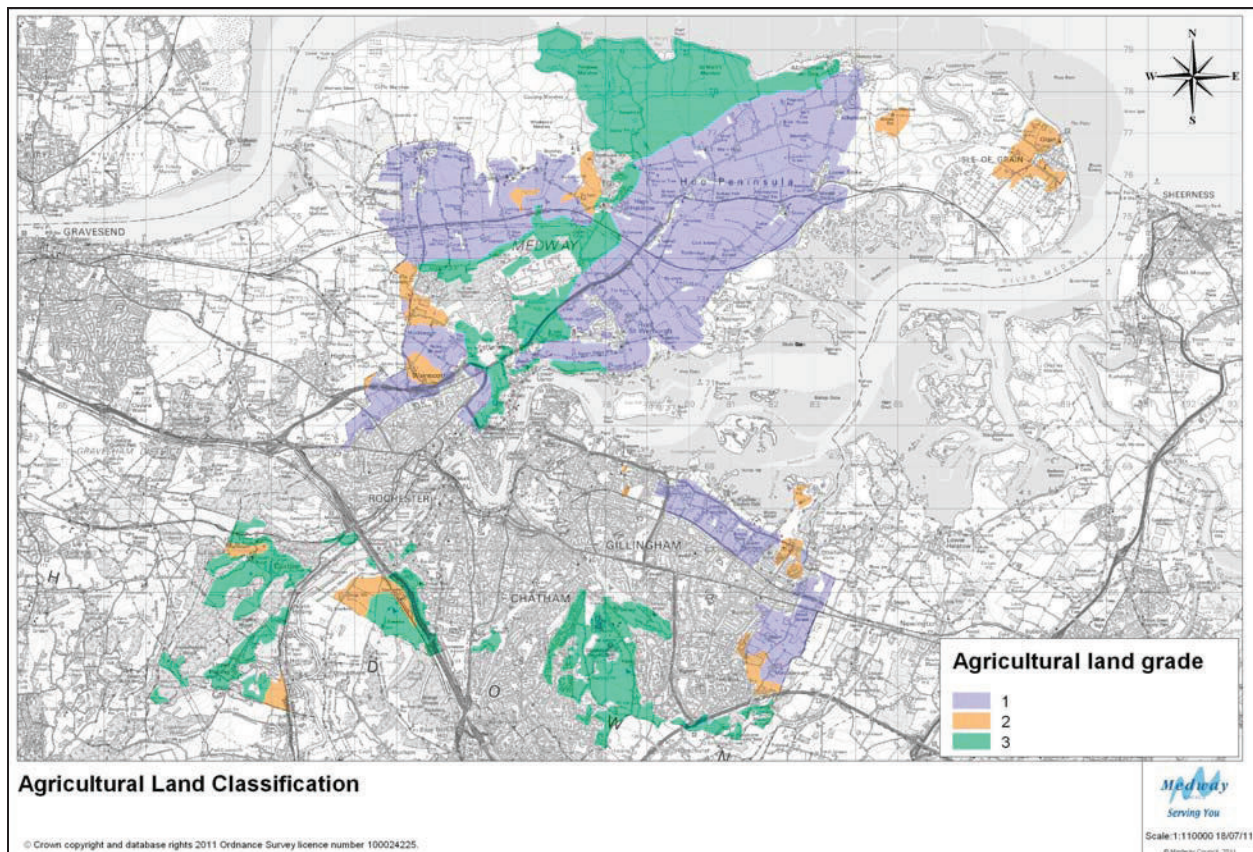
- The landform and natural patterns of drainage
- The pattern and composition of trees and woodland

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

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

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

Figure 4-2 Agricultural Land Classification



Green Infrastructure

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

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

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

4.89 Medway's Green Grid is defined under five broad geographical areas that reflect the distinctive characteristics of Medway:

- Medway Waterfront – there is a strong focus on public realm in the centre of Medway, intrinsic to regeneration ambitions for the area, realising the connections to a riverside city with an enhanced environment and accessibility for pedestrians.
- Hoo Peninsula – the key aim is to open up access to the high quality environment, characterised by the marshes bordering the Thames and Medway and the wooded ridge and open farmland across the wider peninsula. Green infrastructure planning is linked to plans for developments, such as Lodge Hill, RSPB's reserves at Cliffe Pools and Northward Hill and work emerging from the Four Parishes Plan on the eastern side of the peninsula. The strategy seeks to protect the important natural environment, whilst enhancing sensitive access to the area, linking local villages and nearby towns with the peninsula, raising recognition of its value.
- Medway Valley – this area focuses on the area to the south of the M2 and follows the river and the landscape of the Kent Downs. Work here reflects the need to manage the protected landscape of the Downs and to improve opportunities for access, particularly along the banks of the river, linking Medway with Maidstone. The Valley of Visions Landscape Partnership is leading in delivering this work.
- Estuary and Orchards – this area in north Gillingham and Rainham reflects the landscape dominated by the estuarine location and traditional fruit growing areas. The strategy here is to restore and promote the landscape character and improve access for neighbouring communities to the natural environment.
- Great Lines to the Downs – this route connects Medway's landmark heritage park based around the Great Lines to the towns' backdrop of the Kent Downs. The aim is to develop and enhance the connections between local communities and the surrounding countryside, valleys and parks.

4.90 Green Grid is supported by a broad based partnership of statutory, voluntary and community organisations and has corporate involvement across the Council to coordinate planning work, funding and the delivery of projects. Delivery is also informed by and progressed through a number of other initiatives such as the Green Cluster studies and the Valley of Visions programme.

4.91 Greening the Gateway Kent and Medway produced a number of 'Green Cluster' studies to promote an ambitious vision for landscape enhancement across north Kent. Those in Medway cover:

- The Hoo Peninsula⁷
 - Capstone to Bredhurst⁸
- 4.92 Two other Cluster studies are concentrated in adjoining authorities but by crossing into Medway, demonstrate the wider connectivity of the schemes. These are the Shorne to Shore Study and the Thames and Medway Canal Study. Both promote improvements to access from Medway to adjoining areas as part of a wider vision for enhanced opportunities to get into the countryside.
- 4.93 The Valley of Visions project is based in the Medway Valley south of the urban area in the Medway Gap between Medway and Maidstone. It is a partnership scheme supported by the Heritage Lottery Fund. Its focus is on enhancing landscape and habitats, improving public access, promoting the area's historic heritage, and establishing strong links with local communities.
- 4.94 Kent Wildlife Trust is managing the Medway Smile Living Landscape Scheme to the south of Medway, together with local landowners and the local community, this aims to extend areas for nature and create a network of good wildlife habitats. The Four Parishes Plan on the eastern side of the Hoo Peninsula also promotes the Living Landscape initiative.
- 4.95 Parks and other open spaces are also a vital element of the green infrastructure resource. The open space network in Medway has been assessed in line with PPG17 guidance for its ability to meet the needs of local communities. The Council has used the findings of this work to develop standards for the provision and quality of a range of green spaces. These will be applied in the planning of new developments, and in progressing green infrastructure ambitions.
- 4.96 A high quality of public realm is essential in reinforcing Medway's assets such as the river and in making it an attractive, liveable and inclusive place. Redevelopment of Medway's large riverside and other brownfield sites offers opportunities to open up hitherto inaccessible areas, create new and attractive destinations for visitors and citizens and to extend access to the rural riverside by foot and cycle routes.

Policy CS8: Open Space, Green Grid and Public Realm

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

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

⁷ <http://www.gtghm.org.uk/documents/hoo-brochure-1265037396.pdf>

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

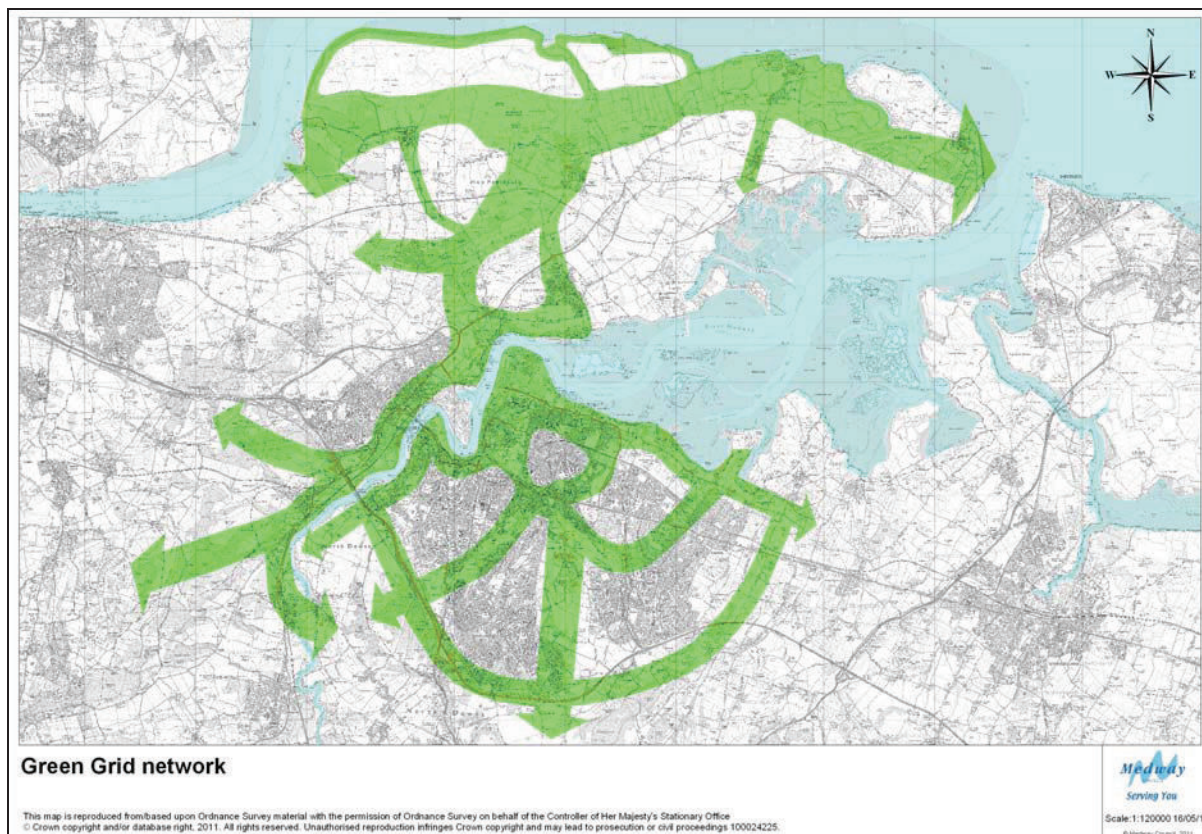
Waterfront, across the Hoo Peninsula, Medway Valley, the Estuary and Orchards and Great Lines to the Downs. These will be informed by the proposals in the Green Cluster Studies, Valley of Visions landscape programme and Living Landscapes project

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

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

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

Figure 4-3 Green Grid Corridors



Sustainable Communities

Health and Social Infrastructure

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

Deprivation

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

Health

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

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

- A Healthier Medway (the 10 year strategy for the PCT)
- Strategic Commissioning Plan 2008 – 2013
- Primary Care Strategy 2009.

4.105 The main issues from the Estate Strategy 2010 – 2020 are:

- Ensuring good coverage for access to services by locating facilities appropriately
- A commitment to sustainable development i.e. maximise estate usage and occupancy and refurbishing unless a new build is the most appropriate option
- Working with local partners to embody the principles of “Total Place” in Medway in terms of asset use
- Ensuring GP practices are fit for purpose
- Working with NHS Medway and its delivery partner Medway Community Estates to enable them to develop and adapt their business.

4.106 At this time, there is considerable uncertainty with regard to developing additional health sites given the difficulties of ensuring sufficient funding is available. Inevitably, the disposal of surplus or redundant sites will be required in order to fund these. Facilities in the following locations may be affected by either enhancement or relocation schemes over the planning period: Canterbury Street, Gillingham, Chatham Town Centre, St Bartholomew’s Hospital, Chattenden/Hoo, Hempstead, Luton, Twydall, Wainscott and the Wayfield/Walderslade area. Other areas for consideration include: Rochester Riverside, Hoo Peninsula, Darland House, Elm House Clinic, New Road, Kings Road Clinic, Luton, Nelson Road, and Balmoral Road.

4.107 Premises are generally located appropriately across Medway but there is need for some development and some rationalisation within them. There is some under utilisation of buildings. There are areas of planned housing regeneration, which are currently under provided. Primary care services are provided from a range of facilities and the standard of GP premises requires significant investment to improve them.

4.108 Over the longer term there may be benefits from relocating services away from St Bartholomew’s Hospital to other local centres, but as yet there is no programme in place for this to happen.

4.109 Medway is served by one major hospital. Medway Maritime Hospital in Gillingham is the largest and busiest hospital in Kent. Some recent developments at the hospital include:

- The start of a major building development programme, which will see some of the hospital’s old blocks replaced with new, modern facilities
- The completion of some 250 new spaces to the car park; and

- The start of £1.5m investment in the emergency department over the next three years, which plans to move the emergency department to a new building on the hospital site as part of the Trust's major redevelopment plan.

4.110 NHS Medway is responsible for 68 GP practices. There are 125 GPs (and 60 part-time / locum GPs) serving the nearly 280,000 people in the NHS area.

4.111 There are also 10 healthy living centres and health centres in Medway. These are the base for a number of integrated health services and some community facilities. Some are also co-located with GP practices. The Medway NHS Foundation Trust provides Medway secondary care. It employs over 3,500 staff in a wide variety of clinical and non-clinical roles.

Adult Social Care

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

Places of Worship

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

Voluntary Sector

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

Custodial Services

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

Youth Services

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

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

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

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

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

Policy CS9: Health and Social Infrastructure

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

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

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

Sport and Recreation

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

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

Policy CS10: Sport and Recreation

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

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

Culture and Leisure

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

- Supporting the bid for World Heritage Site Status
- Ongoing development of the Medway museum offer at the Historic Dockyard and the Guildhall and Royal Engineers Museums.

4.128 Medway's Economic Development Strategy emphasises the importance of cultural and creative industries, in contributing to the growth of Medway's tourism and economic prosperity. Arts and Culture are important contributors to Medway's wider economic growth and its growth as a tourist destination. In particular, Chatham's two theatres, free festivals, historic buildings, the Guildhall museum, the increased visitor numbers to Chatham's Historic Dockyard and Dickens World all represent a significant contribution to Medway's economy.

4.129 Medway's cultural strategy outlines a number of further aspirations to work with partners to promote and develop the cultural offer.

Policy CS11: Culture and Leisure

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

Heritage Assets

4.130 Medway's historic environment is an irreplaceable asset. It is an expression of our history, heritage and culture and lies at the heart of local and regional character and sense of place. It helps to maintain varied and attractive places in which to live and work, provides historic places to visit and enjoy and encourages investment in, and re-use of, old buildings. It has the potential to act as a significant draw for inward investment and heritage led regeneration.

4.131 The importance of the historic environment in contributing to sustainable development in terms of its potential to support regeneration, tourism and social inclusion as well as conservation can be seen by the revitalisation of The Historic Dockyard, Chatham.

4.132 Medway is particularly fortunate in that it has a number of the region's most significant historic environment assets including:

- The historic City of Rochester
- The potential World Heritage Site of Chatham Dockyard and its Defences
- Significant defence heritage including– Upnor and Rochester Castles, Fort Amherst and the Chatham Lines, and the Great, Lower and Inner Lines.

4.133 Most of these heritage assets are protected to some degree by statute - for instance designation as conservation areas, scheduled ancient monuments or listed buildings. However, the historic environment is much more extensive

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

- Historic street patterns and forms of development in many parts of Medway, particularly within the major town centres (and not just in conservation areas). An example of this is the long and winding Chatham and Rochester High Streets, which stretch from Rochester Bridge to Luton arches.
- A unique river and hillside topography. Historically the escarpments and the tops of hills were often left undeveloped for Military purposes. This, together with key landmark buildings of national and international importance such as Rochester and Upnor castles, Fort Amherst, the Dockyard and the Cathedral, has left a legacy of unique views. There are also a number of local landmark buildings within each view. Development over a wide area (and not just within conservation areas) could impact upon this historic environment. Strategic views, together with a management strategy for controlling development that impinges upon these views is laid out in the Building Height Policy for Medway. In addition, the setting of the proposed World Heritage Site is defined by its 'buffer zone' (as laid out in the World Heritage Site Management Plan)
- Unlisted buildings, which contribute to the character of their localities.
- Areas of rich archaeological importance dating from the Palaeolithic, Mesolithic and Neolithic periods to the 20th Century.

4.134 It is recognised that the historic environment will be subject to change and that it is not possible, or at times desirable, to maintain all aspects. Through the use of conservation area appraisals and management plans (where appropriate), development briefs, The Chatham Dockyard and its Defences World Heritage Site Management Plan, and the Kent Historic Environment Record, the Council will adopt a managed approach to this change based on an understanding of the character and significance of the historic environment.

4.135 In applying policy CS12 it is recognised that sensitive modern design which takes into account historic street patterns, scale, plot width, townscape and so on can enhance the historic environment. Conversely 'Historic Style' facadism applied without a thorough understanding of the historic environment may be inappropriate.

Policy CS12: Heritage Assets

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

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

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

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

Figure 4-4 Great Lines Heritage Park

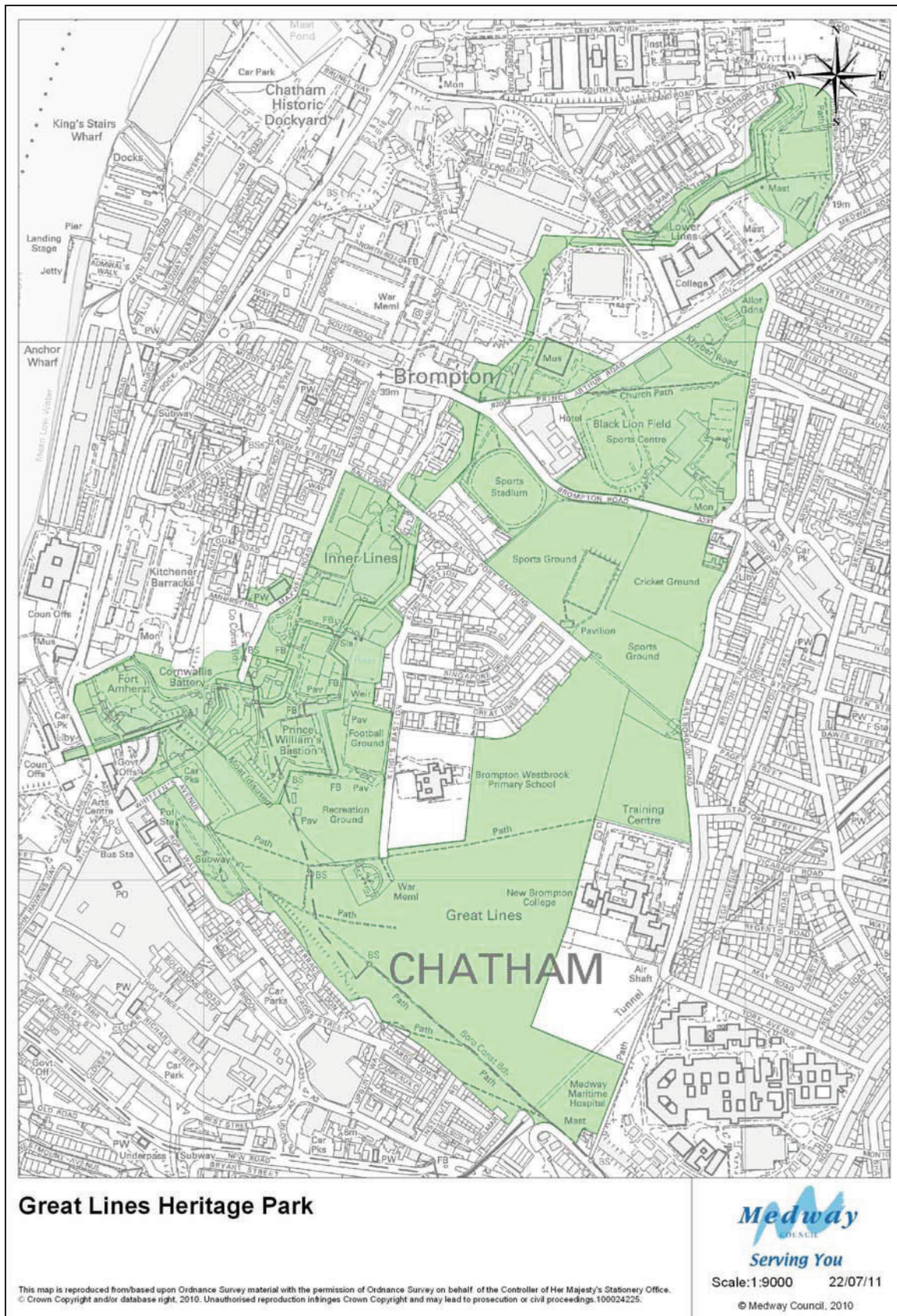
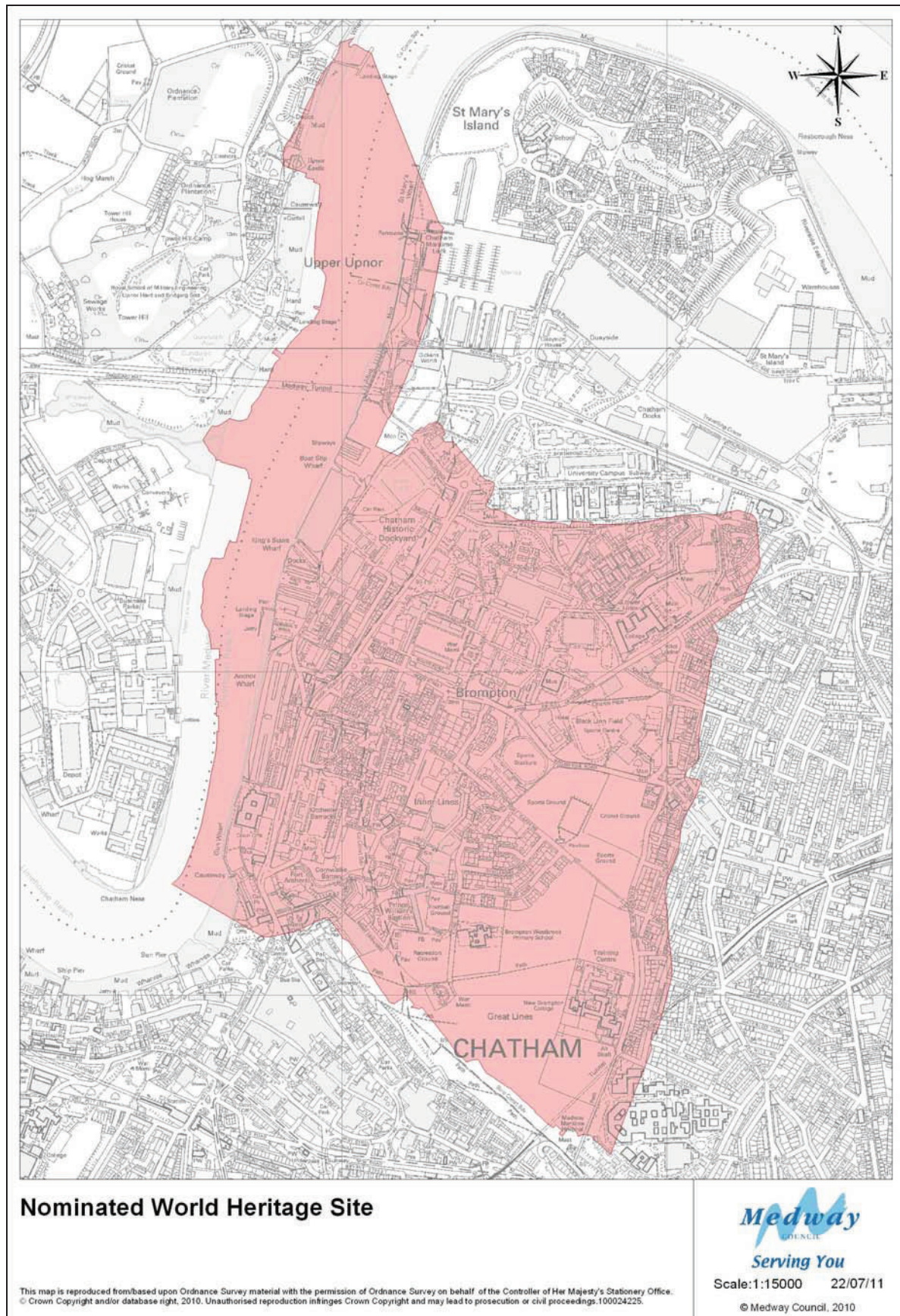


Figure 4-5 Nominated World Heritage Site



5. Housing

Introduction

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

Housing Provision and Distribution

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

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

Housing Delivery

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

Table 5-1 Medway Housing Supply Components

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

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

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

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

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

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

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

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

Table 5-3 Local Plan Allocations

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

Policy CS13: Housing Provision and Distribution

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

This will include:

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

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

Affordable Housing

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

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

* The same assumption should be made for affordable rented need as this is essentially the same client group

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

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

Policy CS14: Affordable Housing

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

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

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

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

On sites of 15 or more (gross) dwellings, on-site provision should be made, which seeks to incorporate a range of different dwelling types and sizes which reflect the site's characteristics, the development as a whole and the types of need identified in the most up-to-date Strategic Housing Market Assessment and Housing Needs Study. Any 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

5.29 The planning system has traditionally been most concerned with the provision of new housing for occupation by self-contained households. However:

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

- 5.30 Accordingly the sections below consider these and related issues.

Existing Housing Stock

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

Housing Type and Tenure

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

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

Special Care Accommodation

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

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

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

Institutional and Student Housing

- 5.39 Given the rapid expansion of the Universities at Medway and the associated rise in student numbers to 10,000 and further increases envisaged over the next few years, it is important to avoid situations where established residential neighbourhoods are adversely affected by an over concentration of students and existing privately rented accommodation is not 'lost' to tenants with otherwise limited housing options.
- 5.40 These issues have recently been recognised in a revision to the Use Classes Order, which makes private units in multiple occupation a class in its own right and so requiring express planning consent.
- 5.41 Equally the Council is committed to positively supporting the expansion of further and higher education and so it will work with the universities and Mid Kent College to help deliver bespoke student accommodation where necessary. To this end, a student accommodation registration scheme will be set up. A recent study¹⁰ analyses student housing requirements in Medway. It looks at the relationship between students and the wider housing market. The report recognises that current economic circumstances make it difficult to predict future student housing requirements with much certainty. Consequently, the council will need to regularly liaise with the universities in order to ensure that student accommodation needs can be properly met.
- 5.42 However, should further planning controls ever be needed in the future, due to the growth of student houses in the area eventually resulting in the creation of imbalanced communities, the Council will make an 'Article 4 Direction' that restricts home owners 'Permitted Development' rights to use their property as houses in multiple occupation (HMOs) within Class C4 of the Use Classes Order.

Health and Education Implications for Housing

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

⁹ Housing Learning and Improvement Partnership 2006, Extra Care Housing Toolkit)

¹⁰ Understanding the housing needs of students in Medway, ORS – June 2010

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

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

Policy CS15: Housing Design and Other Housing Requirements

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

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

Gypsies, Travellers and Travelling Showpeople

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

Policy CS16: Gypsies, Travellers and Travelling Showpeople

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

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

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

6. Economic Development

Introduction

- 6.1 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.
- 6.2 Traditionally the Medway economy was dominated by the naval dockyard and associated industries but in recent years it has diversified. However it is still characterised by very low local pay rates and significant levels of out commuting to London and the greater Maidstone area.
- 6.3 The challenges for the future are therefore to increase the value of local jobs, to reduce, to a degree, the current reliance on net out commuting and to grow local enterprises – currently the area has a very high proportion of small and micro businesses.

Economic Development

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

- The large employment area at Kingsnorth is now well connected to the main road network and offers a range of opportunities including logistics and distribution, off-site manufacture for the construction sector, environmental technologies and waste management and processing
- Central Chatham associated with its development as a centre of regional significance and with a specific focus on fostering development within the creative industries and office sectors.

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

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

6.7 It considered that the most significant opportunities are with the creative industries and tourism but the specific development opportunities described above also point to a range of other opportunities, particularly around construction, environmental technologies, power and energy generation and advanced manufacturing.

6.8 Skills development and Medway's expanded further and higher education capacity go hand in hand and the Council and its partners will continue to work very closely with the four universities and Mid Kent College to both improve skills capacity and match it more closely to the needs of employers.

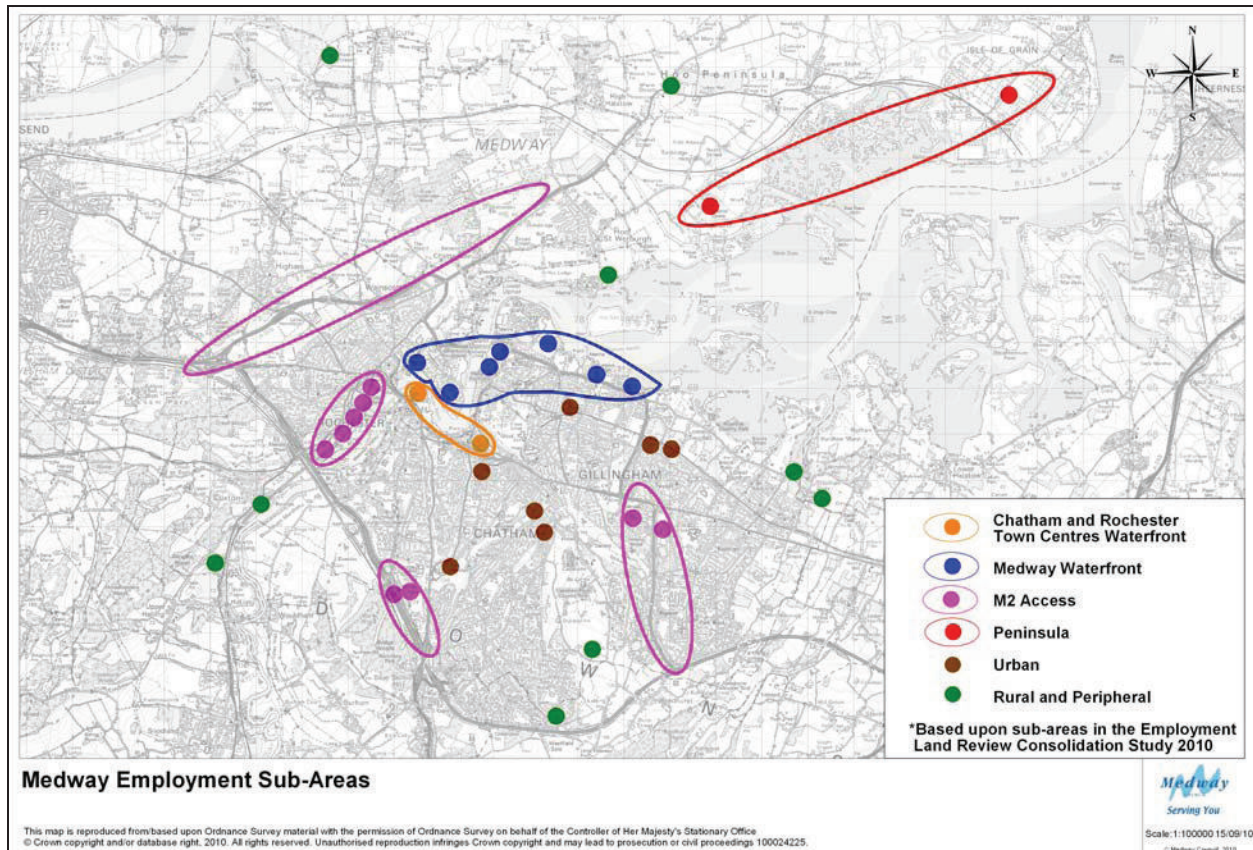
6.9 Modern start-up businesses help to create jobs and contribute to Gross Value Added (GVA). The development of more effective and innovative firms, complementing more traditional industries, is an important contributor to productivity growth and a competitive economy. In order to assist these businesses, a range of support measures is essential to ensure sustainable growth.

6.10 An effective start-up strategy will be one that seeks to address imbalances by providing services tailored to meet specific needs. Medway is at the forefront of best practice in this field and has been recognised nationally by its Beacon Council award for business support. The Council's "Medway Means Business" programme enables interaction with the business community, aspirant entrepreneurs and new and growing businesses.

6.11 Tangible business support initiatives further strengthen the support on offer. Medway offers managed workspace facilities, graduate and apprenticeship work support programmes, financial support services such as start up grants and interest free loans, employment support services and European funded business support projects to facilitate cross-channel trade and business environmental sustainability. Medway is also developing its own entrepreneurial culture, building enterprise into the school curriculum and developing links between schools and the Universities at Medway.

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

Figure 6-1 Medway Employment Sub Areas



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

Table 6-1 Floorspace Requirements by Sub Areas

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

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

Table 6-2 Employment Floorspace Supply by Sub Areas

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

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

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

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

Policy CS17: Economic Development

The development of the Medway economy will be dynamic and widely based, to provide employment for the community as a whole, to provide greater choice for the workforce, offer an alternative to 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 and the development of the large Isle of Grain employment site and the Kingsnorth Commercial Park, and associated energy and port related areas.

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

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

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

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

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

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

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

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

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

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

Tourism

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

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

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

Policy CS18: Tourism

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

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

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

Local tourism will be supported by:

- Encouraging tourism and provision for visitors which is appropriate to the character of the area
- Retaining and enhancing existing serviced accommodation and supporting the provision of new serviced accommodation in towns and villages
- Encouraging proposals for new hotel accommodation and conference/exhibition facilities in locations which complement regeneration opportunities, particularly along the urban waterfront
- Maintaining and enhancing existing tourist and visitor facilities
- Supporting new tourist initiatives:
 - 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

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

6.40 Shopping or retail potential is considered in two categories:

- 'Convenience' – goods bought on a day-to-day basis, mainly food
- 'Comparison' – or 'durable' goods. These include clothing, footwear, electricals etc.

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

Table 6-3 Convenience Floorspace Capacities 2008 - 2026

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

Table 6-4 Convenience Floorspace Options 2008 - 2026

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

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

6.43 It concluded that there was no obvious area of deficiency in Medway, that some capacity could be accommodated within existing vacant premises or small redevelopments within the main centres but outside of the main centres the priority should be to serve major new residential developments.

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

Table 6-5 Comparison Floorspace Options 2008 - 2026

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

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

- 6.46 It is therefore intended that the strategy for Medway will be to enhance Chatham's current position in the shopping hierarchy and improve the area's market share of available expenditure.
- 6.47 The retail study points out that the shopping centres within Medway are all located close to each other, particularly Strood, Rochester and Chatham and that their primary catchment areas therefore overlap. The main centres collectively provide what is described as a reasonably good range of comparison shops (393 units with sales floorspace of 86,396 sq m net), including a range of national multiples and independent specialists. However, the choice of shopping could be improved. Existing provision largely caters for the middle and lower end of the market, and has a poor offer for the upper end.
- 6.48 It concludes that Medway is well provided for in terms of retail warehouse facilities. Retail parks provide about 42,000 sq m (net) of comparison floorspace. This accounts for about 28% of all comparison sales floorspace.
- 6.49 The Study provides a sound basis for the future retail strategy and how this should be applied in each centre.
- 6.50 Chatham is, and will, remain the main comparison shopping destination and the main focus for employment, leisure, entertainment and cultural activities. As the main centre, it needs to compete with other large regional/sub-regional centres such as Maidstone, Bromley and Canterbury. To achieve this it needs to be the focus for major retail developments, large-scale leisure and other uses that attract large numbers of people, including major cultural, tourism and community facilities. At least 30,000 sq m of additional floorspace should be brought forward to radically change the perception of the centre and its range of shops and attract larger retailers.
- 6.51 The District Centres will complement Chatham by providing convenience food shopping and a range of comparison shopping facilities and other services catering for their immediate catchments. Opportunities to develop additional small scale shop premises will be encouraged, and the priority will be for additional convenience shopping facilities and lower order comparison shopping. Higher order comparison shopping will be focused in Chatham.
- 6.52 Neighbourhood and Village Centres will be maintained to ensure they provide basic food and grocery shopping facilities, supported by a limited choice and range of comparison shops selling lower order comparison goods (bought on a regular basis) and a range of non-retail services and community uses. Together with local parades they will continue to serve smaller catchment areas focused on their respective local communities.
- 6.53 The Medway Local Plan 2003 sought to protect and enhance a very large number of sometimes very small local and neighbourhood centres. However since it was adopted many have struggled commercially or even disappeared completely. The intention therefore is to now afford protection to those centres that are of sufficient scale and are in locations that readily serve significant residential communities. These are identified in Chapter 10.
- 6.54 The floorspace figures shown in policy CS19 reflect the findings of the Medway Retail Needs Study, 2009 and the Medway Land Availability

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

Policy CS19: Retail and Town Centres

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

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

Provision will be made for the following retail development:

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

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

Education and Personal Development

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

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

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

Policy CS20: Education and Personal Development

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

- **All-through primary provision with integrated or associated early years provision**
- **Re-investment in secondary education, including the development of Academies**
- **Management arrangements for schools which fully exploit their potential as community hubs**
- **A distributed adult learning service with a new focus on 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.

7. Energy, Waste and Minerals

Introduction

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

Conventional Energy Generation

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

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

Policy CS21: Conventional Energy Generation

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

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

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

Provision for Minerals

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

- A reduction in overall need through increased efficiency of use
- Use of recycled and secondary aggregates to supplant primary sources as far as technically practical; and
- Securing the remainder of the supply need from new primary extraction (terrestrial and marine).

7.14 It also applies the following hierarchy in terms of meeting need:

1. Increased use of alternatives to primary aggregates are to be encouraged where technically practicable
2. Use of imported marine resources, where environmentally sustainable sources are present; and
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 South East Plan
4. Make provision at existing cement manufacturing facilities for at least 15 years of production, and 25 years at new sites.

7.15 There is no specific guidance for high purity chalk for whiting purposes or for clay, although both occur in Medway. However it is prudent that resources of high quality engineering clay and chalk should be maintained. Medway has no brick or clay tile industry but has abundant London Clay resources that can be used for certain purposes such as coastal flood defences.

7.16 The likely revocation of the South East Plan will mean that Medway no longer has to make provision to meet a sub-regional apportionment for secondary aggregates of 0.2 million tonnes per annum (mtpa). However it is national policy to seek to substitute primary aggregates with secondary sources and significant amounts of this material are derived from the construction and demolition waste stream. Accordingly it is considered that Medway should make provision for the 0.2 million tonnes per annum previously envisaged.

7.17 Both land won minerals (crushed rock and sand and gravel) and marine dredged materials (sand and gravel) are imported into the South East. Wharves and railheads are essential to this source of supply and it is of growing importance to overall aggregate supply. Some 13.1 million tonnes of sands and gravels and crushed rock were supplied to the region in 2007, while only 8.5 million tonnes came from land won reserves. Medway's regional contribution is in the order of 2 million tonnes so the safeguarding of facilities will be important to maintain this increasingly important source of supply.

7.18 Medway has the following facilities:

Marine Wharves:

- Euro Wharf, Frindsbury, Medway City Estate – Aggregates

Combined Rail Depot and Marine Wharves:

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

Planned but Non Operational Marine Wharves:

- Halling (adjacent to Halling Coal Rail Depot and Wharf) – Aggregates/Waste Treatment to form Secondary Aggregates.

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

- 2.7 million tonnes, minus current permitted reserves of 1.2 million tonnes, giving a residual requirement of 1.5 million tonnes; and
- A rolling land bank of 1.26 million tonnes throughout the life of the plan.

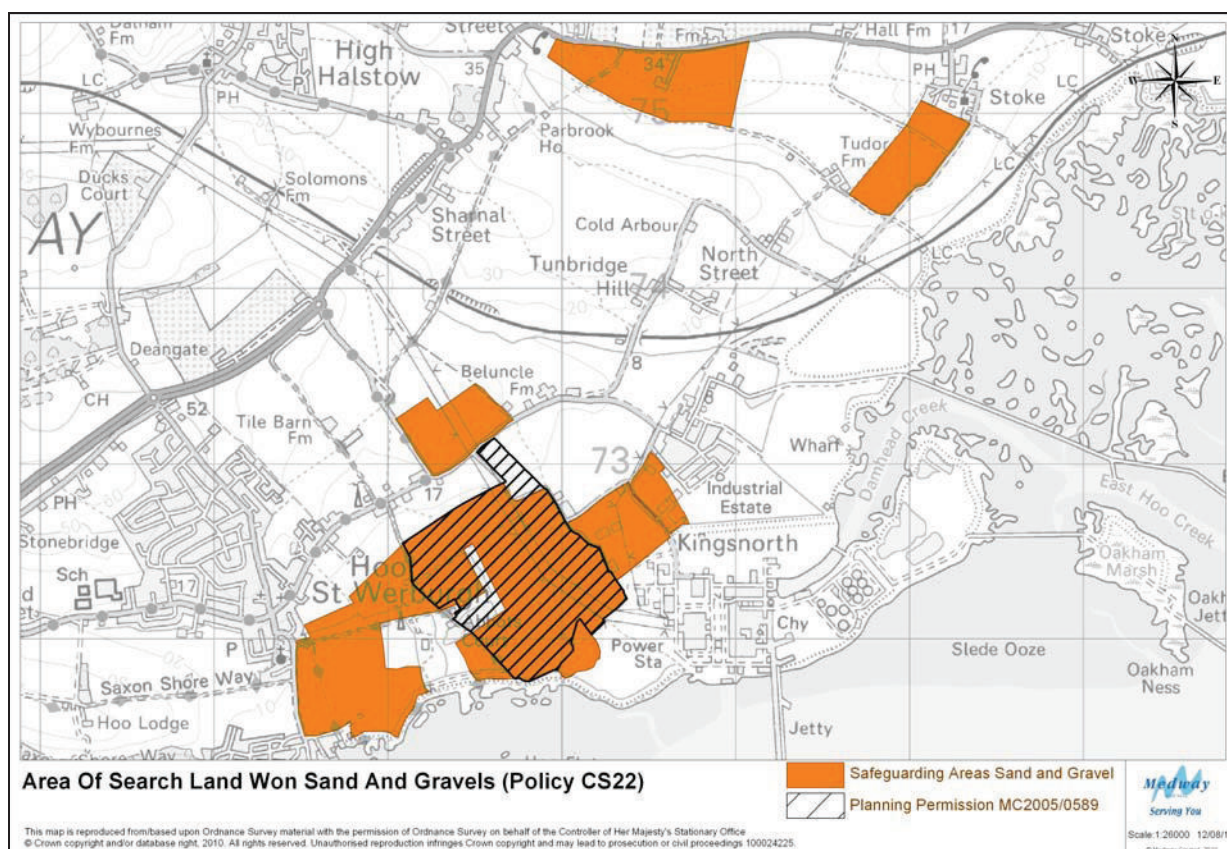
7.27 Resources available have varying degrees of reliability in terms of both quantity and economic viability. The potential reserves at Grain are now considered to be uneconomic. Against this, total proven reserves are 1,640,000 tonnes and total potential (proven and unproven) river terrace sand and gravel reserves in the unconstrained areas of the Hoo Peninsula are assessed as being in a range from 3,345,326 tonnes to 4,547,940 tonnes.

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

7.29 The current land bank figure is equivalent to 6.6 years. With each successive year this is reduced by the assumed production of 0.18 mtpa. Assuming further reserves are permitted from the unconstrained identified potentially workable sand and gravel reserves on the peninsula these would ensure a 7 year land bank is maintained up to and beyond the end of the plan period. The lower reserve figure of 3.45 million tonnes would provide for a land bank until 2028 and the potentially higher figure of 4.54 million tonnes until 2035.

7.30 The identified reserves are shown on Figure 7.1

Figure 7-1 Land Won Sand and Gravels



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

Policy CS22: Provision for Minerals

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

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

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

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

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

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

Waste Management

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

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

Figure 7-2 The Waste Hierarchy



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

Commercial and Industrial Wastes

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

Table 7-1 Average tonnage per Sector per Annum

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

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

Table 7-2 Disposal of Commercial and Industrial Waste 2008

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

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

Construction, Demolition and Excavation Waste

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

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

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

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

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

Hazardous Wastes

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

Table 7-4 Disposal of Hazardous Waste, 2008

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

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

7.50 Facilities within Medway catering for hazardous wastes include tyre shredding and waste oils recycling plants at Kingsnorth and metal recovery at Medway City Estate with the following capacities:

- 167,500 tonnes per annum oil/water waste treatment
- 147,125 tonnes per annum metals ferrous/non-ferrous recovery
- 74,740 tonnes per annum photographic and printing waste disposal and recycling, including silver recovery and refining
- 3,650 tonnes per annum asbestos wastes treatment and transfer.

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

7.52 Regional analysis identified priority needs for hazardous waste capacity in the form of:

- Additional hazardous waste landfill capacity in the south and south-east of the region (prior to the new waste hierarchy being introduced)
- Treatment facilities for air pollution control residues (primarily flue residues from controlled processes)
- Treatment facilities for waste electronic and electrical equipment (WEEE); and
- Sub-regional networks of contaminated Construction Demolition and Excavation waste treatment facilities.

7.53 It was suggested that authorities should:

- Identify and safeguard sites for the storage, treatment and remediation of contaminated and demolition waste
- Identify criteria for the determination of large-scale specialist hazardous waste facilities, and a network of landfill cells for stabilised non-reactive hazardous wastes.

London's Waste Exports

7.54 Medway is still technically required to have regard for London's waste exports. However it is increasingly likely to be the case that any materials will be residues from higher order waste management processes. The quantities are unclear and the London authorities and commercial operators have expressed no interest in new landfill capacity.

7.55 It is expected that the Government will clarify its position on this in due course but given the absence of any current demand in Medway it is not intended to make specific provision for London's waste.

The Strive for Overall Self Sufficiency

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

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

7.57 For the future, the priorities are therefore to:

- Ensure there is sufficient capacity for waste handling, recycling and treatment for each of the waste streams, including transfer capacity for municipal waste
- That there is adequate collection infrastructure, given increasing separation of different wastes at source
- Consider whether specific provision should be made for new landfill capacity and, if so, whether this should be for non-inert or hazardous wastes, or a combination of these.

7.58 Medway City Estate and Kingsnorth are already established as centres for waste handling and treatment and, subject to market demand, further expansion would be appropriate provided relevant environmental standards are met.

7.59 With rapid developments in the waste management field it is difficult to forecast what specific collection and transfer facilities will be required over the plan period but these can usually be readily dealt with in conjunction with the planning of new developments and in the established employment areas.

7.60 Landfill capacity across the South East is declining rapidly but that is also the case with the quantity of material that needs to be disposed of in this way. Providing new capacity is almost wholly dependent on having suitable void space and the right geological conditions.

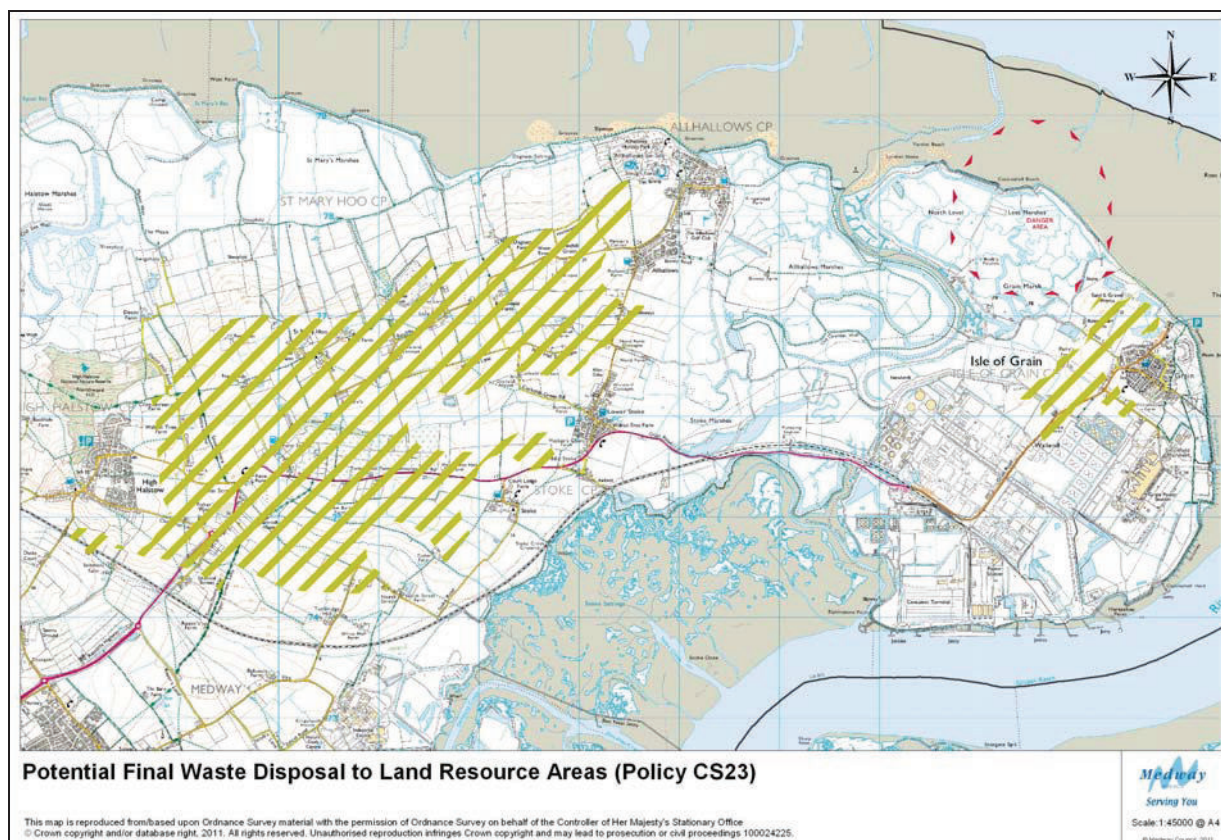
7.61 Much of Medway sits on chalk, a highly permeable rock, unsuitable for non-inert and hazardous waste disposal. However chalk quarries can and have been restored using inert materials. The Hoo Peninsula, on the other hand, is overlain with London Clay and this impermeable material is well suited for the landfilling of non-inert and hazardous materials that cannot be disposed of in any other way. However there are no existing voids so any provision would either involve the creation of new void space by extraction of cover material or re-profiling land by raising its natural contours or a combination of the two approaches.

7.62 It would appear that Medway's arisings from all sectors, including hazardous wastes, are not sufficiently large to justify the investment required to create new void space, though cross boundary flows of wastes historically occur and this may well distort what would otherwise be 'perfect' self-sufficiency in an area's range of waste management capacities including final disposal to land. The Hoo Peninsula is also remote from major markets adding to transport costs and the environmental impact of transporting materials.

7.63 Given these considerations no specific allocations for new landfill/landraise facilities are proposed but Policy CS23 includes appropriate criteria for determining any proposals that might come forward. The potential final waste disposal to land resource areas that are relatively free of strategic constraints are shown in Figure 7-2 below.

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

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



Policy CS23: Waste Management

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

- Ensuring all new built developments make appropriate provision for the separation, storage and collection of waste materials
- Permitting facilities for the reuse, recycling, treatment and transfer of waste materials, subject to their being of an appropriate environmental standard. Medway City Estate and Kingsnorth and, at a lesser scale, the existing established employment areas are the preferred locations for such activities
- Assessing the potential for a soil treatment facility, subject to acceptable local environmental impacts, adequate access arrangements and any impact on residential amenity.

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

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

guidelines as set out in the Medway Landscape Character Assessment

- **Other local impacts, including on residential amenity, being acceptable**
- **The site being well related to the primary road network and with suitable site access and egress arrangements**
- **It being clearly demonstrated that the materials to be deposited cannot be reasonably disposed of in any other way (that is that they are irreducible residues)**
- **That the facility will handle a high proportion of such waste arising within Medway and the immediately surrounding area to ensure a sustainable pattern of disposal**
- **Unless a specific needs case can be demonstrated, that wastes to be deposited do not involve a road haulage distance of more than 50 miles**
- **That all the reasonable requirements of the Environment Agency can be satisfied**
- **There being a clear programme and time limit for the operation proposed and satisfactory provision for the restoration and after-use of the site.**

8. Transport and Movement

Introduction

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

Thames Gateway Funding and LTP2

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

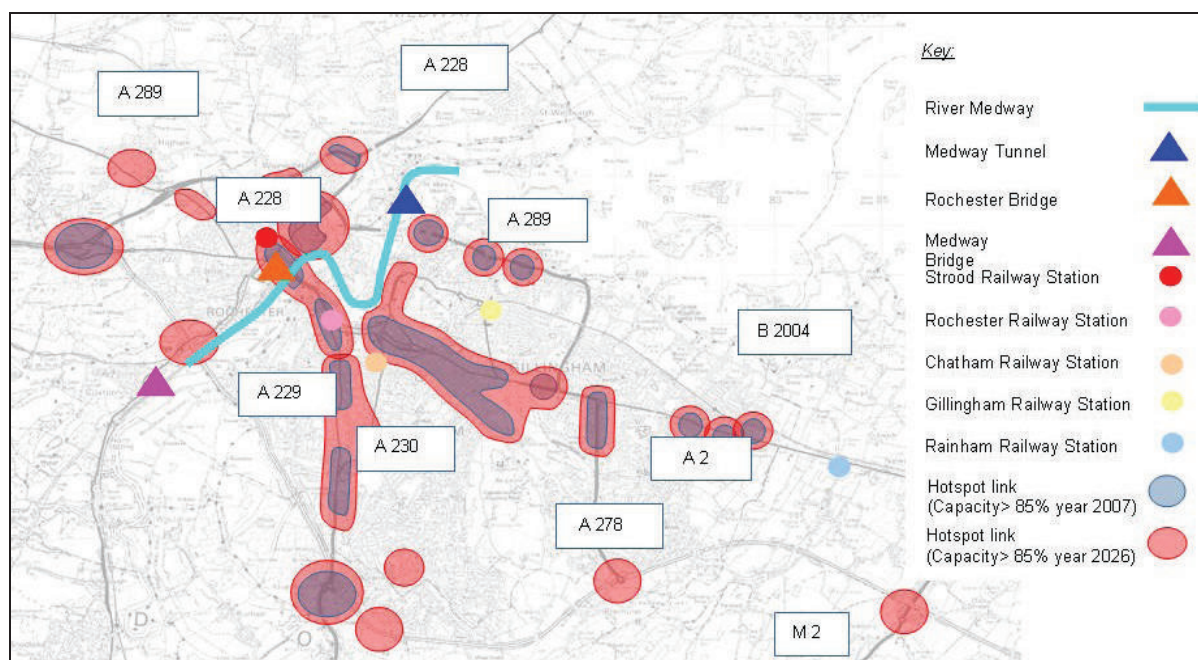
Context and Priorities

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

economic growth, the natural environment, connectivity, equality of opportunity and health.

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

Figure 8-1 Main Congestion Hotspots



- 8.11 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.
- 8.12 Consequently five overarching priorities have been set out in the third Local Transport Plan to guide future policies and programmes. These, and the key actions proposed under each are set out below:

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

Key actions:

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

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

Key actions:

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

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

Key actions:

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

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

Key actions:

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

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

Key actions:

- Road safety interventions incorporating highway schemes, education, publicity, promotion and enforcement
- Safer routes to school initiatives
- Encouraging cycling
- Improved pedestrian access to local facilities
- Development of Green Grid and the Coastal Access initiatives, and improving public rights of way
- Public safety initiatives
- Effective highway maintenance, including footways and cycleways.

8.13 Specific schemes to address these matters are grouped under five transport objectives and programmed as follows:

- Short term: April 2011 to March 2016
- Medium term: April 2016 to March 2021
- Long term: April 2021 to March 2026.

8.14 A full list of schemes and actions can be found in Appendix E.

8.15 Although many actions and schemes are proposed over the life of this plan it is expected that the great majority will not require additional land, other than as an integral feature of new built developments. However some schemes to address congestion hotspots may do so, depending on detailed designs, and these are listed below:

- A289 link between Four Elms roundabout and Medway Tunnel including Sans Pareil and Anthony's Way roundabouts and exit from Medway City Estate
- A2 junctions and link between Chatham Hill and Canterbury Street junctions
- A2/A228 links through Strood town centre
- A2 junction with Mierscourt Road, Rainham

8.16 The M2 through the area was widened and upgraded only a few years ago. Generous carriageway capacity has been provided and most junctions operate satisfactorily. However Junction 3 (Chatham) is an exception. This is a very large and complex junction that caters not only for motorway traffic but also local traffic accessing the A299 (Bluebell Hill) between Medway and Maidstone. The junction is located outside of the Medway boundary but significant amounts of traffic using it originate in Medway.

8.17 The Highways Agency is concerned that further growth would impact on this junction, notwithstanding the fact that there are few significant proposals for new development close to it. Given this situation the Council will work with the

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

Other Transport Related Issues

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

Piers and Jetties:

- Commodore Hard

- Lower Upnor Pier
- Chatham Maritime Marina
- Thunderbolt Pier
- Sun Pier
- Strood Pier
- Rochester Pier

8.24 In terms of aviation there are two established facilities:

- Rochester Airport – a general aviation facility with two grass runways, catering for leisure flying, flight training and some emergency service uses. It is subject to airspace safeguarding by the Council
- Stoke Microlights – this is a small, unlicensed, facility situated relatively close to the large employment area at Kingsnorth. There is currently no safeguarding regime in place, either for the limited facilities on the ground or the surrounding airspace.

8.25 Facilities at Rochester Airport need reinvestment and upgrading and the current operator is working closely with the Council to see how this might be achieved, while also ensuring that adjacent land can be fully utilised for employment purposes (see Economy chapter). Investigations are ongoing and it is expected that a masterplan covering both the Airport and surrounding land will be agreed in the near future.

8.26 The Stoke facility is limited in scale and constrained by high voltage power lines and other features. Accordingly it is not proposed to afford it long term safeguarding.

Transport and Development

8.27 Although some continuing growth in private car traffic is probable, it is vital that alternatives are available if congestion along many urban routes is not to reach unacceptable levels.

8.28 The urban regeneration areas are exceptionally well located in relation to existing bus routes and the mainline rail stations and so can contribute to the enhancement of these facilities, as opposed to catering solely for the car.

8.29 In the case of Lodge Hill and the larger employment areas some highway improvements will be required but there are still opportunities for public transport solutions that will contribute to meeting the demand for non-commercial movements arising from these developments.

8.30 Accordingly it will be important, in all appropriate cases, to strike a balance between design solutions catering for the car and providing other choices, whether they are public transport, walking or cycling.

8.31 This will also be critically important in the town centres and Chatham in particular. Here adequate and high quality public parking, geared towards the short stay visitor, is important for their commercial viability. However employees and shoppers must also have access to high quality bus (including park and ride) and rail options if congestion is to be managed and high quality environments created and maintained.

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

Policy CS24: Transport and Movement

Over the plan period:

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

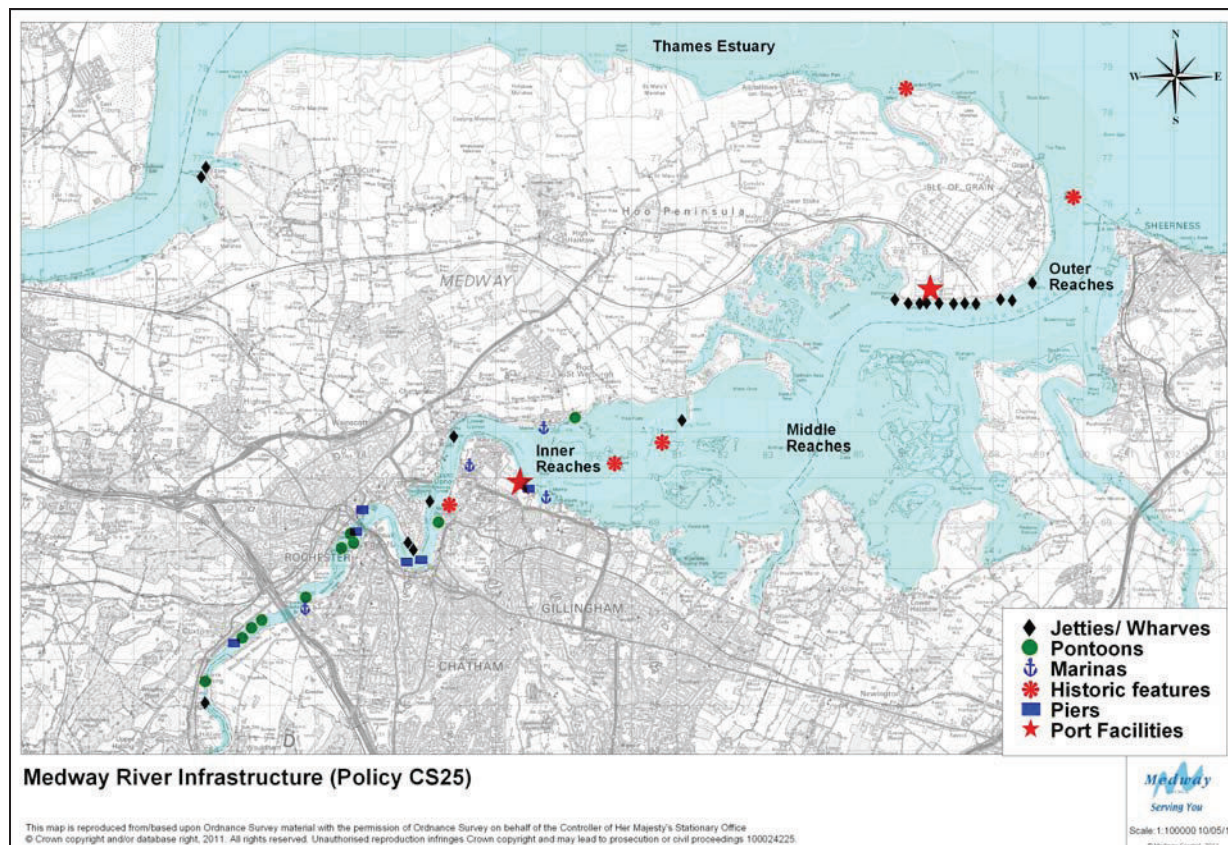
9. The River Medway

Introduction

- 9.1 The Medway is one of the largest rivers in the South East and it is a defining feature of the area. It was made navigable as far as Maidstone in the 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 and is increasingly recognised for its nature conservation value.
- 9.2 The River forms one of the most dramatic and consistent features of the Medway administrative area; providing a strong link as it broadens out from the urban areas towards the marshes and the Thames estuary; weaving together a tapestry that connects a variety of landscapes, settlements and communities. It provides Medway with much of its strong sense of place and it contributes significantly to the identity of the area. The river is also highly visible from many places, providing dramatic views, particularly from strategic points along the waterfront and from areas of higher ground. However it is less accessible in other areas – a legacy from the time when the Navy and industry monopolised the waterfront. The Medway is also home to a significant number of industrial archaeological assets.
- 9.3 The tidal River comprises three reaches – outer (Sheerness to Chetney Marshes), middle (Chetney Marshes to Gillingham) and inner (Gillingham to Allington Lock). The 'Conservator' is the Medway Ports Authority, part of Peel Ports and operator of both Chatham and Sheerness Docks. The conservator has responsibility (below the high water mark) for navigation arrangements, 'trots' or floating berths, associated byelaws and other matters.
- 9.4 The local character of the river and its edges varies along its length. Distinctive natural features within the undeveloped sections of waterfront between Gillingham and Sheerness include extensive areas of inter-tidal habitat, comprising saltmarsh and mudflat. The wooded slopes around Upnor provide particularly dramatic views from the river and from the south bank. Historic military uses are distinctive features along the river, particularly at Chatham Historic Dockyard and at Rochester and Upnor Castles. Developed sections along the north bank include major infrastructure facilities at Grain and Kingsnorth, including power stations and a container port. Within the urban area there is a working port at Gillingham (Chatham Docks). Industrial facilities predominate along the North Bank at Medway City Estate.
- 9.5 The estuary also supports nationally and internationally important populations of breeding and passage birds. It is likely that it will be designated as a Marine Coastal Zone.
- 9.6 Major new housing schemes are replacing former uses at Rochester Riverside and St Mary's Island. There are marinas at various locations, including sites at Upnor, St Mary's Island, Gillingham Waterfront, Strood, Rochester and Cuxton. The rich variety of industrial, historic and leisure uses along the river provides a diverse and varied character with strong local distinctiveness.

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

Figure 9-1 River Medway



Management of the Natural Eco-system

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

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

Regeneration

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

century the Historic Dockyard at Chatham became the Royal Navy's 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.

Marine Leisure

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

Chatham Docks

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

Wharves, Piers and Jetties

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

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

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

Policy CS25: The River Medway

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

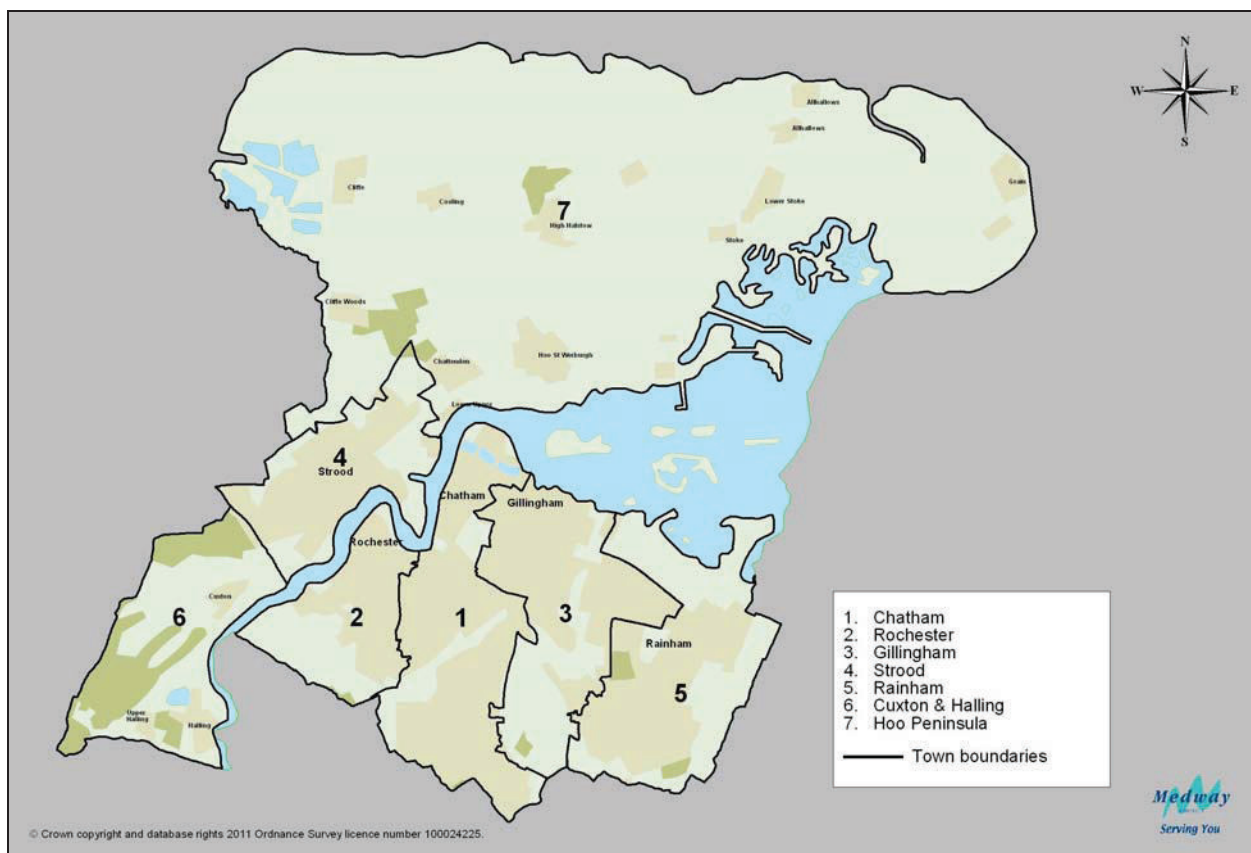
- **Along the urban waterfront mixed use redevelopment will be promoted in order to create safe, high quality environments, provide new homes and jobs, leisure and social infrastructure facilities with public spaces as focal points, a riverside walk and cycle way and increased public access to the river**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

10. Area Policies

Introduction

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

Figure 10-1 Spatial Sub Areas



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

Strood

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

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

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

1. Capitalise on major developments

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

2. Strengthen the role of Strood's town centre

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

3. Improve the appearance of the town centre

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

4. Secure Strood as a working town

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

5. Managing the Medway – improving access and flood defences

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

6. Rediscovering heritage assets – promoting distinctiveness

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

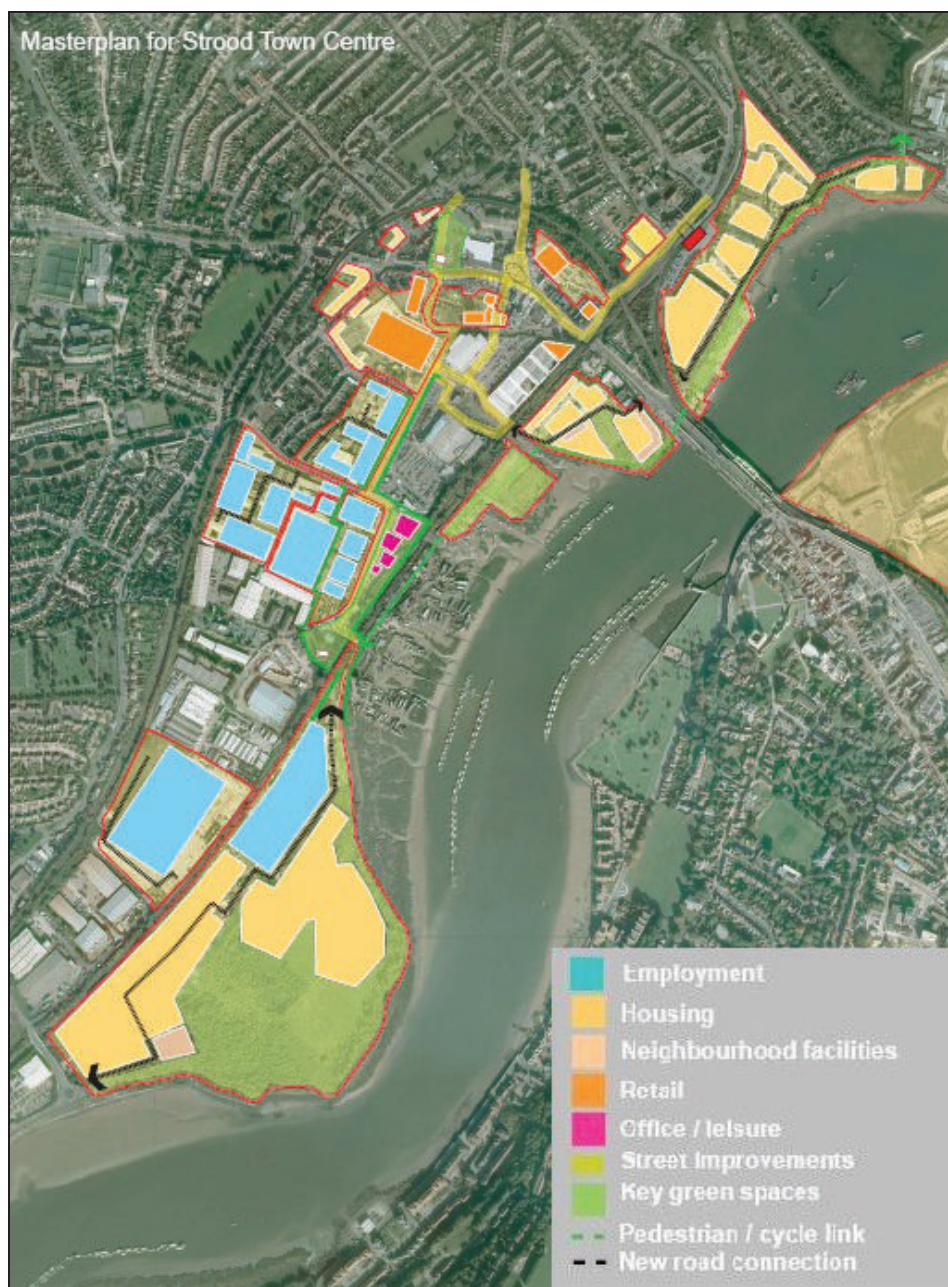
7. Enabling improved access and movement

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

8. Promoting open space and urban green space

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

Figure 10-2 Strood Town Centre Masterplan



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

Table 10-1 Potential Housing Development in Strood

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

Table 10-2 Potential Employment Development in Strood

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

Table 10-3 Potential Retail Development in Strood

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

Housing: showing sites over 100 units

Employment & retail: showing sites over 1000 sq. m

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

Policy CS26: Strood

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

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

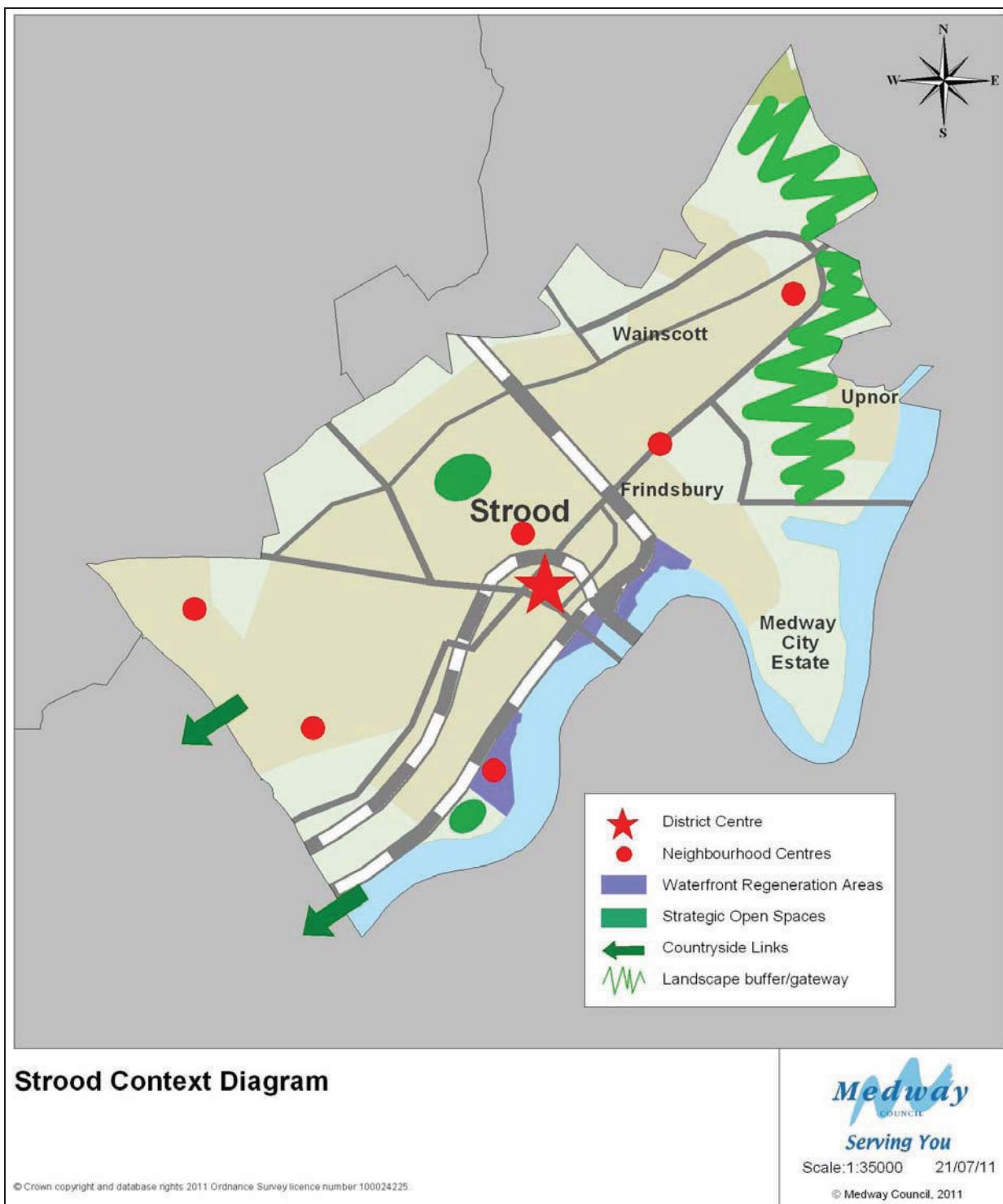
- Safeguarding open spaces and enhancing the public realm, particularly along the waterfront
- Promoting employment opportunities through reinvestment in the existing employment sites and in conjunction with mixed use developments in and adjoining the centre
- Reducing the impact of traffic through improved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

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

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

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

Figure 10-3 Strood Context Diagram



Rochester

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

complement the historic character of Rochester town centre and the new community at Rochester Riverside.

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

Table 10-4 Potential Housing Development in Rochester

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

Table 10-5 Potential Employment Development in Rochester

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

Table 10-6 Potential Retail Development in Rochester

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

**All Rochester Riverside permissions added together as one entry.*

Housing: showing sites over 100 units

Employment & retail: showing sites over 1000 sq. m

Policy CS27: Rochester

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

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

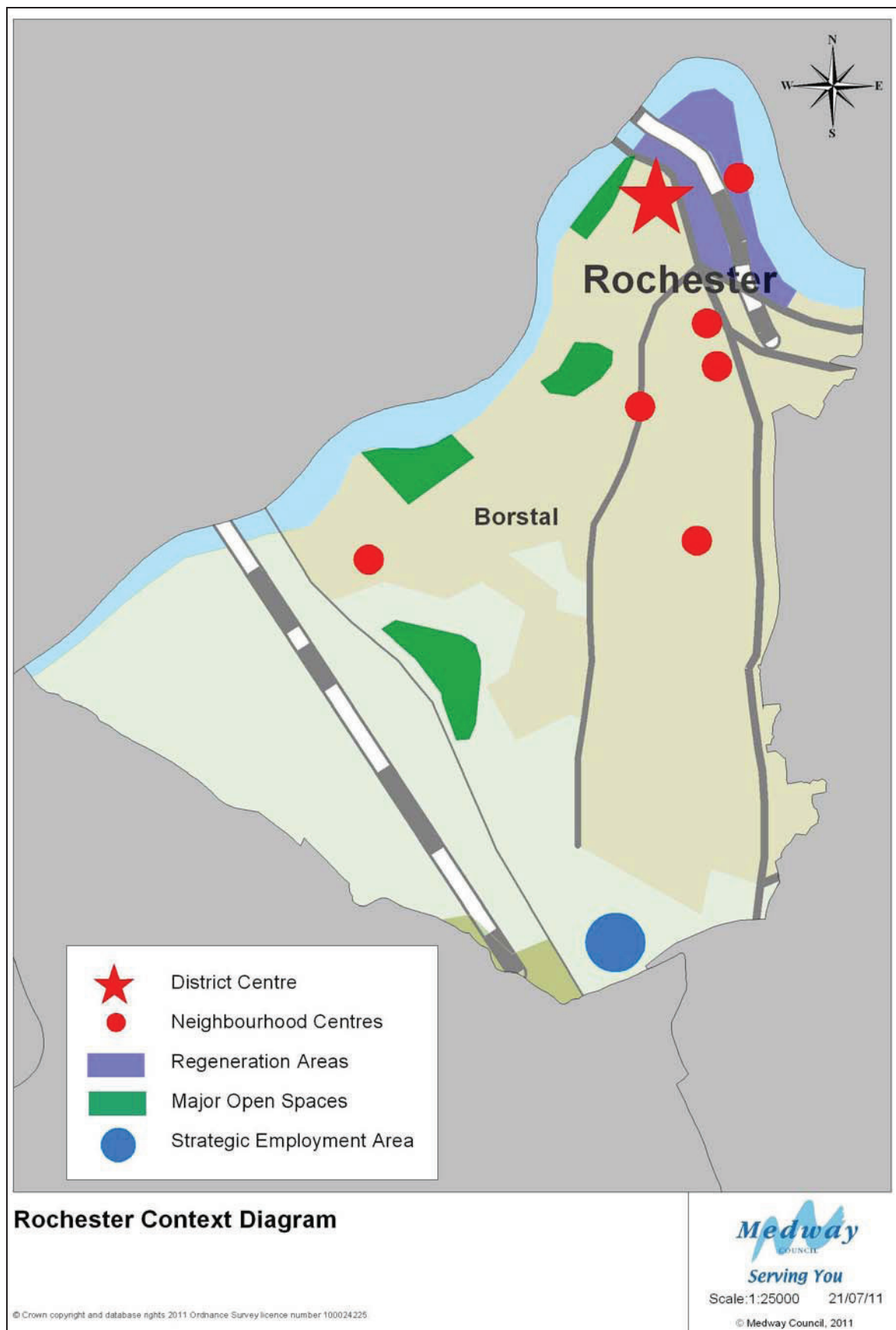
Beyond the town centre the following local centres will be safeguarded and promoted as neighbourhood centres:

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

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

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

Figure 10-4 Rochester Context Diagram



Chatham

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

- Improved visibility and access to historic features, including the Barrier Ditch, and connections to the Great Lines; and
- Hotel development on the waterfront.

10.39 A new central library and learning resource and Civic Office comprising;

- A new central library and learning resource centre (This has now been accommodated in a former military building on the waterfront near Gun Wharf)
- A new Civic Office to meet the changing needs of the Council and to reflect future approaches to integrated service delivery to the community, particularly “First Point of Contact” facilities (This has now been accomplished by the Council occupying the former Lloyds building at Gun Wharf)
- A range of related and complementary facilities, which could include small scale retail and cafes and restaurants; and
- A new public square.

10.40 Major environmental improvements throughout the Centre including;

- New waterfront park and riverside promenade from Old Gun Wharf to Sun Pier
- Greatly improved access to the waterfront by breaking down the severance effect caused by Sir John Hawkins Way and Globe Lane
- Increased use of Sun Pier for boat moorings and related activities
- Greatly enhanced Paddock to provide an attractive and useable civic space; and
- Improvements along the High Street, including the creation of new high quality public spaces within the shopping area.

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

- Returning The Brook and Best Street to two-way streets, with associated environmental improvements (virtually complete)
- Closure of Sir John Hawkins Way and Globe Lane to through traffic and downgrading of Medway Street and Lower High Street (completed)
- Removal of the Sir John Hawkins Way flyover and enhanced streetscape along the route to the flyover (completed)
- Greatly improved public transport access, with new, modern, high technology bus facilities along the route of Sir John Hawkins Way close to the Pentagon Centre and the High Street (virtually completed)
- Enhanced and rationalised car parking, including new, high quality, well located multi-storey car parking to serve the centre
- Improved pedestrian and cycle connections, including links along the waterfront and the possibility of establishing a cross-river link to Medway City Estate.

10.42 Two further supplementary planning documents were also adopted, which provide more detail on specific areas of the town centre. These are the Chatham Pentagon Centre Development Brief, 2005 and the Chatham Centre and Waterfront Development Brief, 2008. The latter incorporates three masterplans:

- Station Gateway – featuring major improvements to Chatham Station and the creation of a new commercial quarter and pedestrian routes leading down to the Waterfront and High Street
- Waterfront – featuring development of a significant scale near Sun Pier and a radically improved waterfront park
- The Brook – promoting radical improvements to the local townscape and the creation of new residential and commercial uses on the northern side with new connections to the Great Lines and Fort Amherst.

10.43 More recently two further masterplans have also been adopted:

- High Street/Best Street – containing major retail proposals for the shopping heart of the centre, along with radical townscape improvements and new pedestrian links and open spaces
- Gun Wharf – covering the area from the Historic Dockyard to the Waterfront with the objective of bringing to life the rich heritage of this area and linking it to the rest of the town centre.

10.44 All these documents remain relevant to the regeneration of the town centre and the stage has now been reached where private investment will increasingly drive change following the completion of extensive publicly funded infrastructure works.

10.45 Beyond the centre of Chatham are numerous but distinct residential neighbourhoods stretching down to near the M2. Most have well established local centres providing a strong focus for their communities, although they are of varying visual quality. Detailed schemes for their improvement and development should be taken forward in conjunction with local people where resources permit. There are a number of locally important employment areas and retaining these and encouraging reinvestment in them will be important. Initiatives are in place to tackle deprivation in the most disadvantaged neighbourhoods. The emphasis is on improving skills and access to employment. A specific challenge will to sustain and expand these programmes over the longer term.

10.46 Over the plan period the broad scale and location of new housing, employment and retail related development is expected to be as indicated in the following tables.

Table 10-7 Potential Housing Development in Chatham

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

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

Table 10-8 Potential Employment Development in Chatham

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

Table 10-9 Potential Retail Development in Chatham

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

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

**Chatham Waterfront sites have been combined under one entry*

Housing: showing sites over 100 units

Employment & retail: showing sites over 1000 sq. m

Policy CS28: Chatham

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

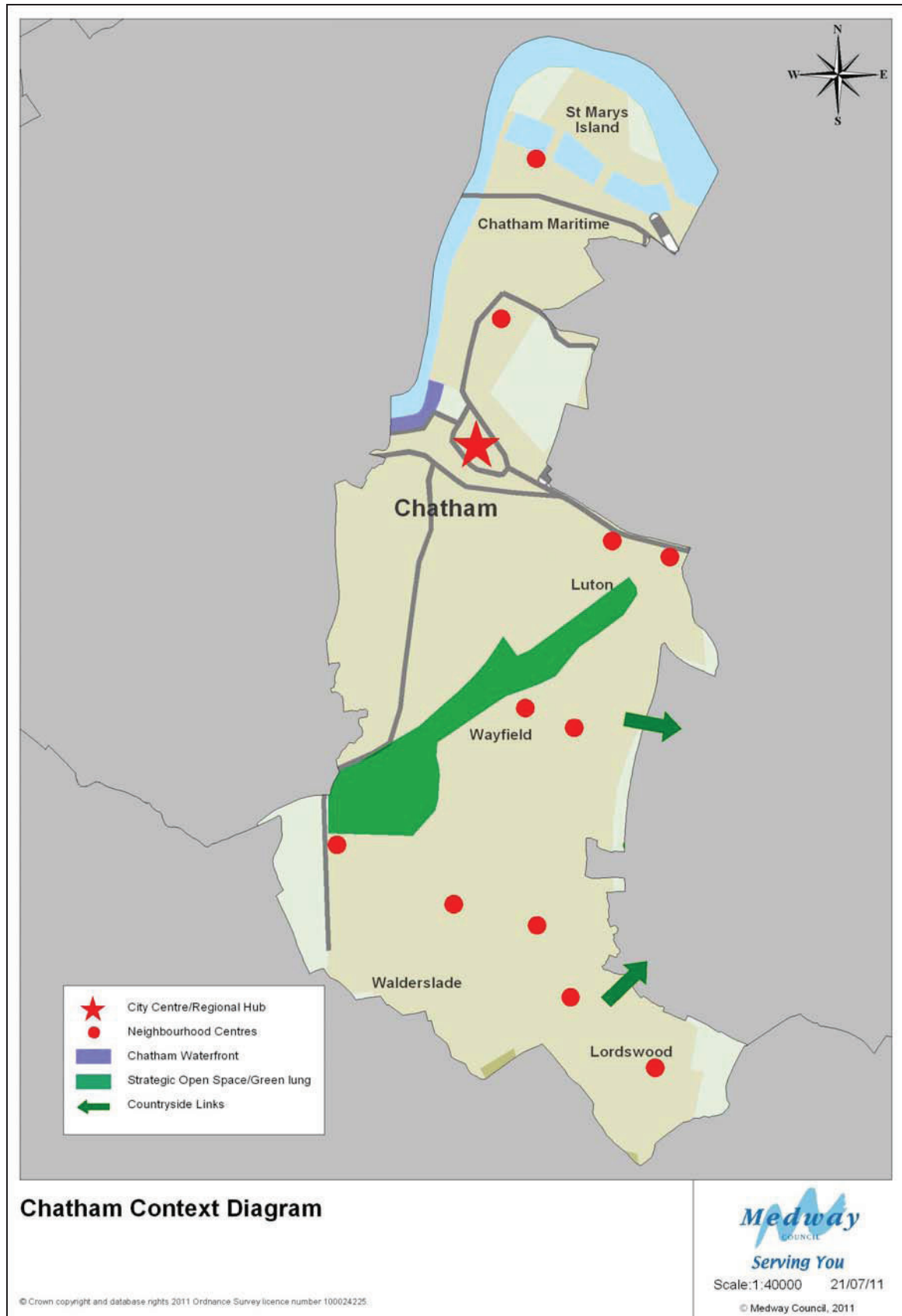
- Greatly improved shopping facilities
- A world class waterfront
- Major environmental improvements
- Accessibility improvements to and within the centre
- New employment floorspace and housing reflecting the five masterplans covering the centre.

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

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

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

Figure 10-5 Chatham Context Diagram



Gillingham

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

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

Table 10-10 Potential Housing Development in Gillingham

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

Table 10-11 Potential Employment Development in Gillingham

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

Table 10-12 Potential Retail Development in Gillingham

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

Housing: showing sites over 100 units

Employment & retail: showing sites over 1000 sq. m

Policy CS29: Gillingham

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

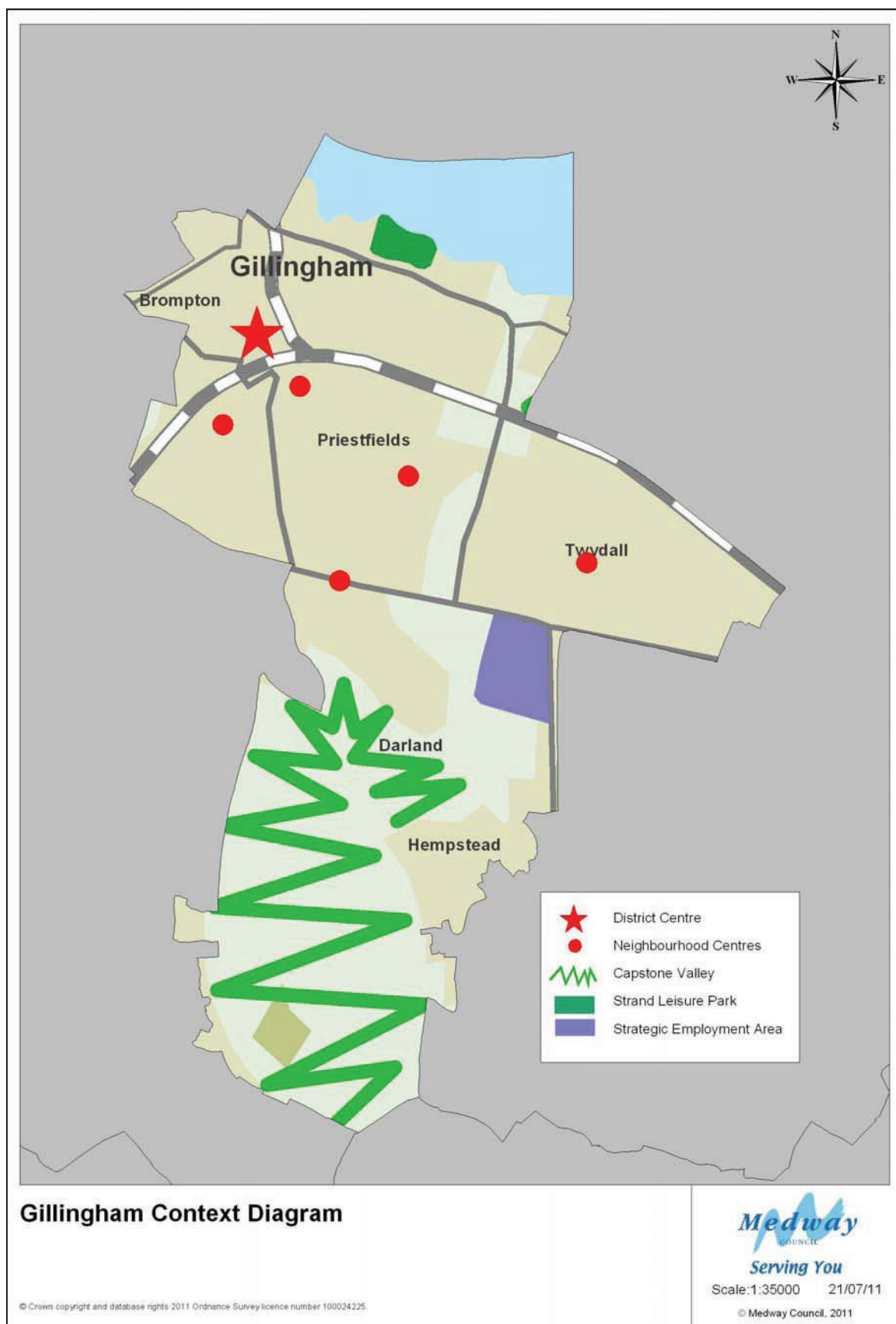
Specific efforts will be made to capitalise on the proximity of the universities at Pembroke and Mid Kent College and to continue measures to reduce deprivation.

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

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

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

Figure 10-6 Gillingham Context Diagram



Rainham

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

Table 10-13 Potential Housing Development in Rainham

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

Table 10-14 Potential Employment Development in Rainham

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

Table 10-15 Potential Retail Development in Rainham

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

* Hempstead Valley Shopping Centre sites have been combined under one entry

Housing: showing sites over 100 units

Employment & retail: showing sites over 1000 sq. m

Policy CS30: Rainham

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

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

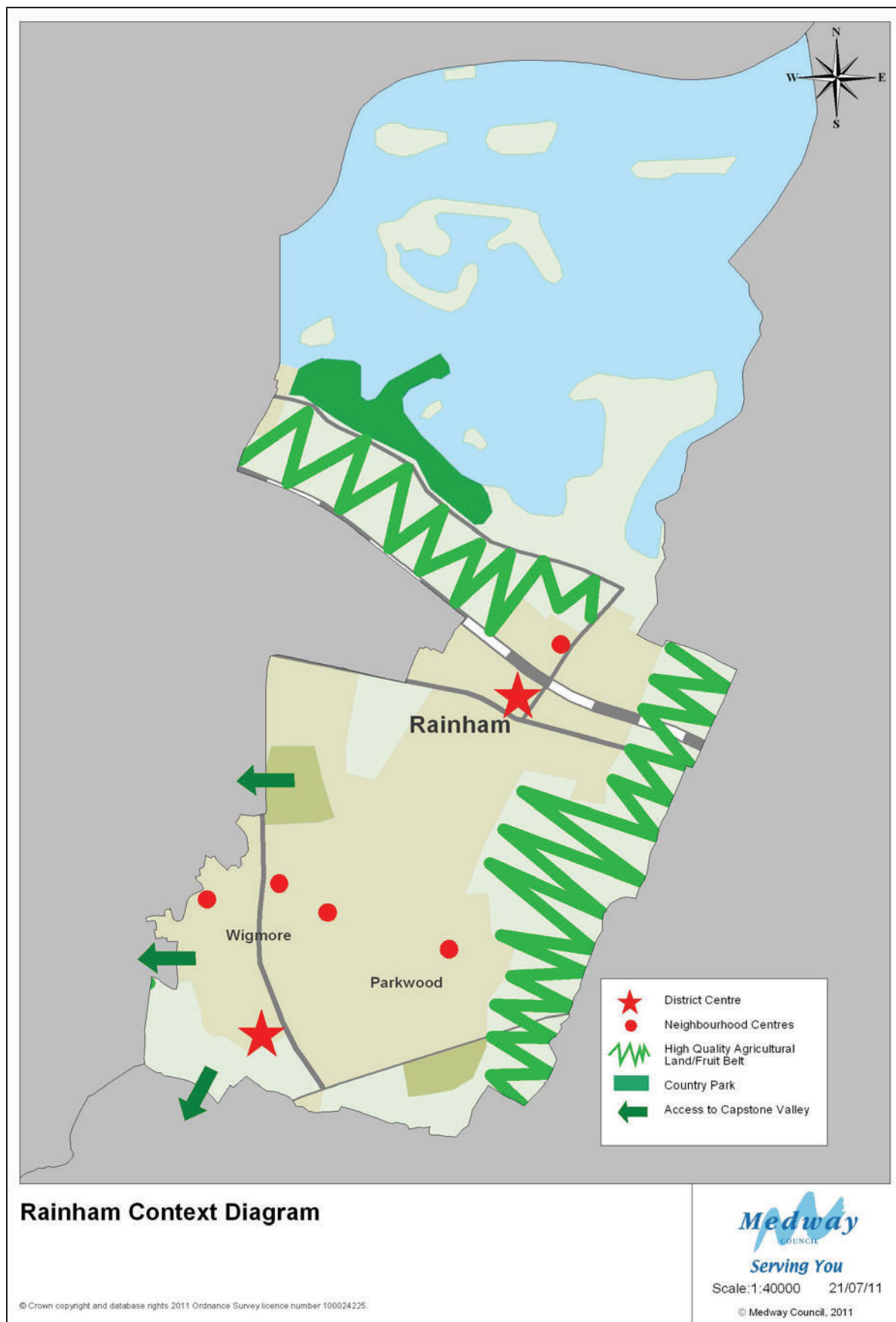
Opportunities to diversify the mainly comparison based shopping offer and provide a wider range of non-retail services typical of a district centre will be encouraged.

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

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

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

Figure 10-7 Rainham Context Diagram



Hoo Peninsula and Isle of Grain

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

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

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

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

Table 10-16 Potential Housing Development on Hoo Peninsula

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

Table 10-17 Potential Employment Development on Hoo Peninsula

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

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

Table 10-18 Potential Retail Development on Hoo Peninsula

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

Housing: showing sites over 100 units

Employment & retail: showing sites over 1000 sq. m

Policy CS31: Hoo Peninsula and the Isle of Grain

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

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

This applies to the following settlements:

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

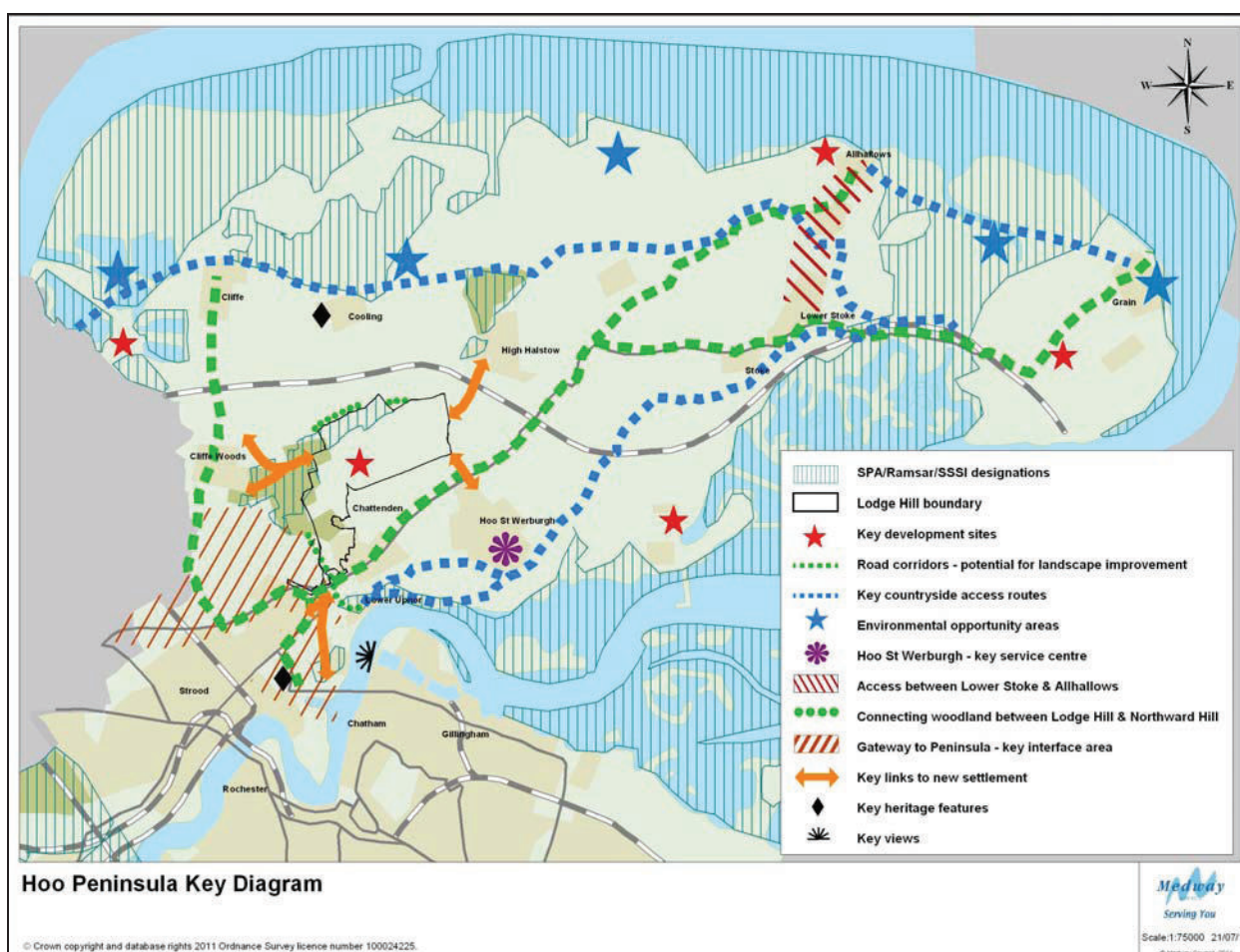
The Council will seek to realise the potential of the Peninsula as a destination for walking and cycling by safeguarding and promoting key access routes, such as the national coastal path, supporting the

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

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

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

Figure 10-8 Hoo Peninsula Context Diagram



Medway Valley

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

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

rugged industrial legacy softens and new countryside initiatives improve appreciation of its exceptionally high intrinsic quality.

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

Table 10-19 Potential Housing Development in Medway Valley

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

Table 10-20 Potential Employment Development in Medway Valley

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

Table 10-21 Potential Retail Development in Medway Valley

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

Housing: showing sites over 100 units

Employment & retail: showing sites over 1000 sq. m

Policy CS32: Medway Valley

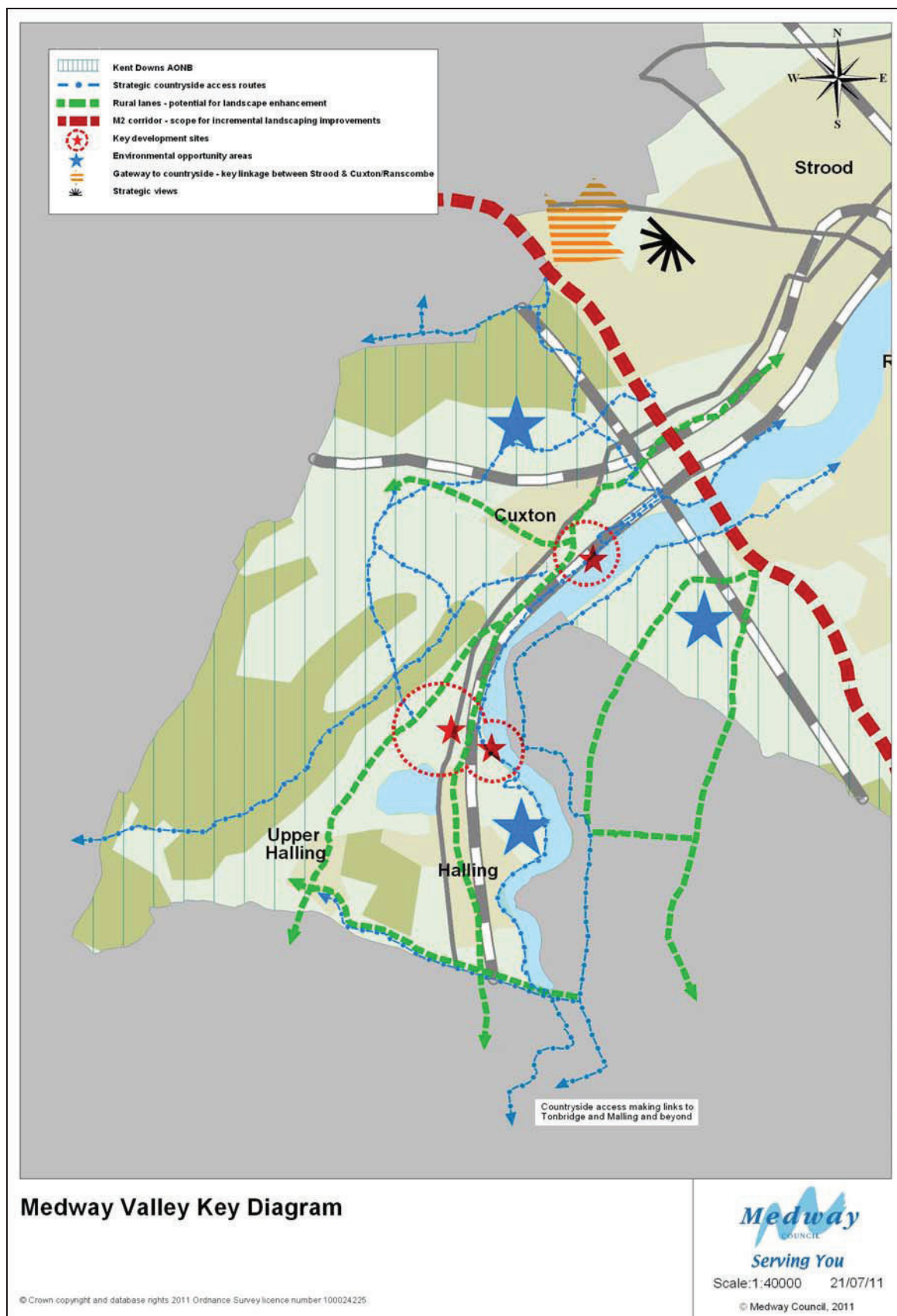
The focus on green infrastructure planning in the Cobham-Shorne-Ranscombe area will be maintained and developed to improve access to and management of the high quality environment.

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

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

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

Figure 10-9 Medway Valley Context Diagram



Lodge Hill

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

Figure 10-10 Lodge Hill Connections



10.103 The site's physical constraints are recognised and understood. Detailed investigations have been undertaken which demonstrate that they can be appropriately addressed to allow the majority of the site to be developed over the period covered by the Core Strategy. There has been extensive engagement with local communities. This will need to continue throughout the planning phase of the new settlement, leading up to the submission of planning application(s) for the redevelopment of the site. The new community as it grows will also need to be involved as the development evolves.

10.104 There is no comparable opportunity in the Thames Gateway for a new settlement of this scale and nature on previously developed land and it is important that every effort is made to create a settlement that meets high standards of design and sustainability while relating sensitively to its exceptional surroundings. The following vision reflects this:

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

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

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

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

10.105 In delivering this vision the following principles will guide all planning and development decisions:

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

- *Well served* – allowing the community within Lodge Hill and beyond to benefit from public, private and voluntary services that are accessible to all and meet people's needs and aspirations
- *Well run* – effective engagement and participation by local people, groups and businesses in the planning, design and delivery of Lodge Hill, with a sustainable management model and effective leadership, governance and participation of the community in the long-term stewardship of Lodge Hill.

10.106 In this Core Strategy, Lodge Hill is categorised as a 'strategic allocation', which is defined on the Proposals Map. Policy CS33 below will be expanded on by a site-specific Development Brief and a masterplan for the site, which will guide detailed planning decisions. The masterplan will be subject to regular reviews to ensure that proposals for the site remain robust in the face of changing circumstances.

Policy CS33: Lodge Hill

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

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

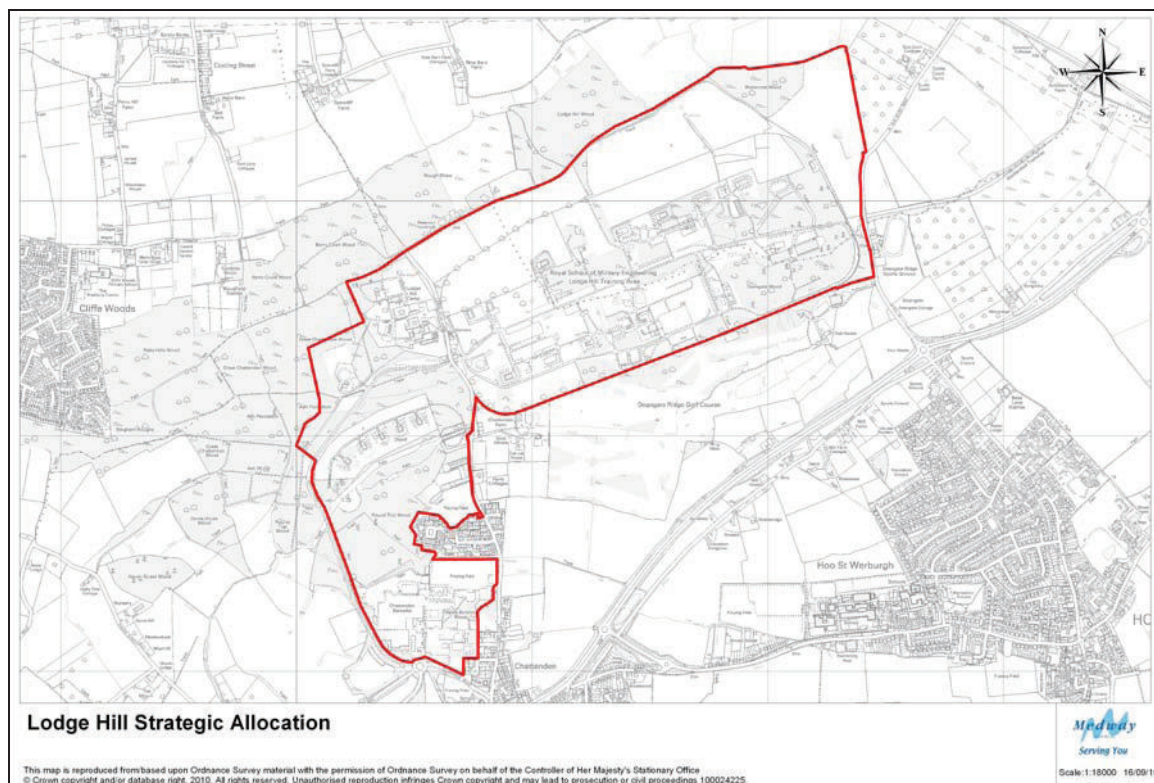
Planning permissions will be granted subject to:

- **Being consistent with a Development Brief and site-wide masterplan. These should fully reflect the Vision and Objectives for the site as set out above and be in accordance with the design principles and parameters illustrated on the Lodge Hill Concept Plan**
- **The provision of supporting infrastructure, including transport links, green infrastructure and community facilities**
- **Design solutions having due regard to:**
 - **The military history and heritage of the site**
 - **The proximity of the Chattenden Woods Site of Special Scientific Interest, including the need for appropriate buffers and management arrangements**
 - **The provision of open space and other community facilities**
 - **The benefits of retaining existing trees, hedgerows and other landscape features within the site**
 - **Measures to enhance biodiversity within and in close proximity to the site**
 - **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, mix of uses and layout of development enables future residents to achieve a good quality of life and encourages healthy and active lifestyles
- The requirements of a comprehensive Access Strategy and associated Transport Assessments, to be phased in accordance with the demands generated by the development, including:
 - Accesses at the eastern and southern ends of the site
 - Contributions to offsite highway and junction improvements directly related to the scale and phasing of the development
 - Early provision of a high quality bus service including priority measures on the highway network, or other comparable public transport facilities connecting the settlement to the main Medway urban area
 - Measures to actively promote sustainable transport, including public transport use, walking and cycling
 - Measures to minimise rat-running on the surrounding rural road network while promoting connectivity for pedestrians and cyclists

Figure 10-11 Lodge Hill Strategic Allocation



Implementation

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

Table 10-22 Proposed Land Uses at Lodge Hill

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

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

- The expected size and tenure mix of the residential accommodation anticipated

- The simultaneous marketing of multiple development opportunities to different developers
- The response of the housebuilder industry to predicted changes in industry and economic circumstances; and
- The appeal of Lodge Hill in the short, medium and long term in a local, regional and national context.

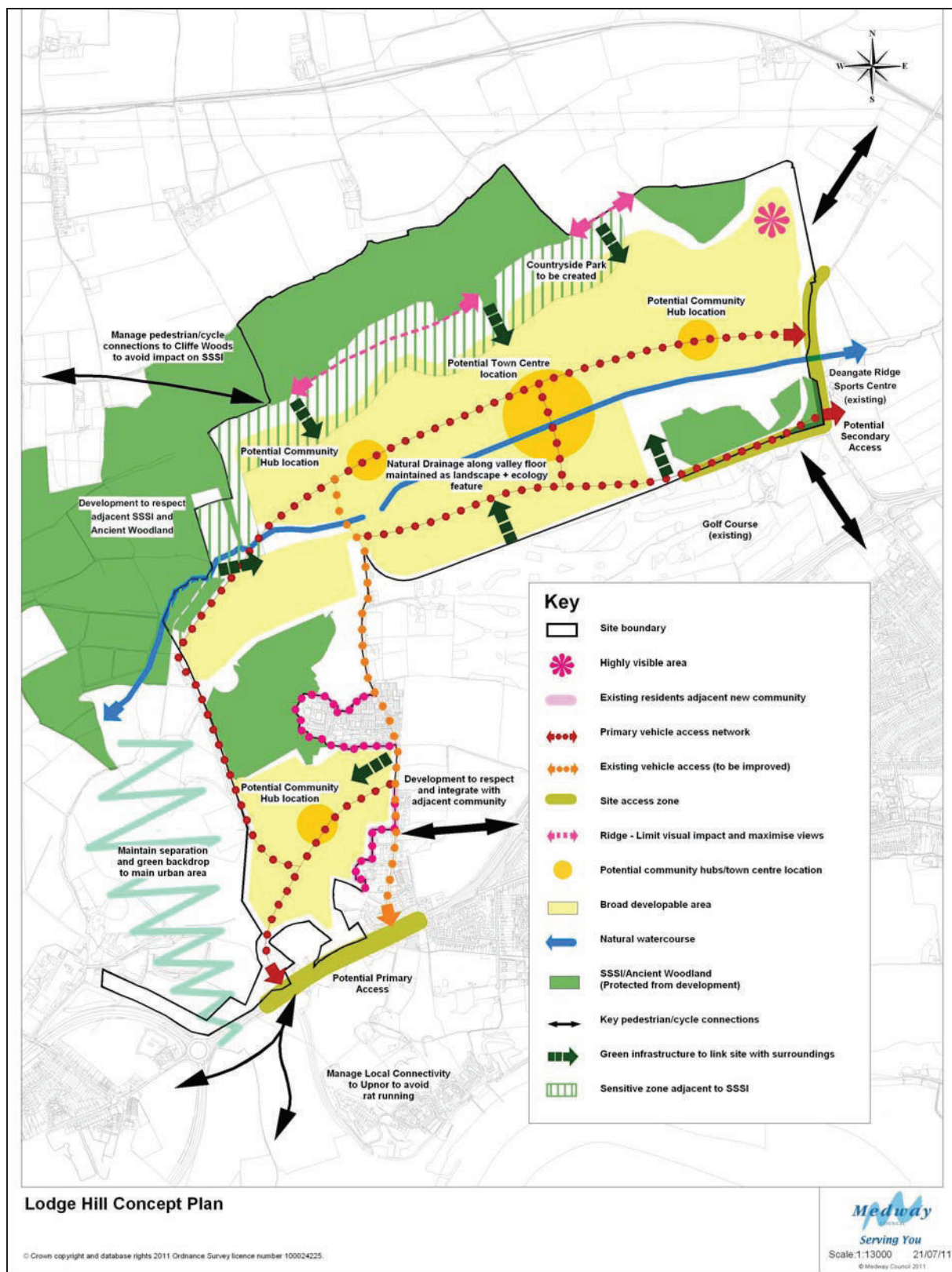
10.109 It is expected that the first residential dwellings would be delivered in 2014. The annual delivery rate of dwellings will step up from the start on site and will fluctuate across the period. It should reach an average of around 300 dwellings (all tenures). This is reflected within the housing trajectory. Lodge Hill is expected to contribute approximately 1,000 dwellings within the first five years after the Core Strategy's adoption.

10.110 In terms of the delivery of economic growth and employment opportunities, there will be a range of employment opportunities across the uses proposed, including business premises, shops and leisure, hotels and public services. As part of the objective of creating sustainable economic growth, the development of the new settlement should also explore opportunities to facilitate new working practices such as live/work and local communications and technology hubs.

10.111 The policy is based on the delivery of a minimum of 43,000 square metres of dedicated space for business uses, which reflects the fact that it will take a certain amount of time to establish Lodge Hill as a high quality business location. However, there is capacity to accommodate significantly more employment floorspace if its full potential is realised. The policy incorporates an ambition for a higher level of provision.

10.112 The development is expected to be delivered in phases. There may be strategic infrastructure that will be delivered ahead of the phased sequence. This will assist the delivery of future phases and may also help in meeting some of the objectives for the development. Land remediation may also be undertaken intensively at the beginning of the development process.

Figure 10-12 Lodge Hill Concept Diagram



10.113 The evidence base for the Core Strategy includes a number of Lodge Hill-specific documents that assess infrastructure requirements/provision for the development. It sets out the responsibility and funding source for delivery of each element, and the consultation bodies who have a bearing on the delivery. It demonstrates that there are good prospects of this being provided to enable the scale of development expected within the Plan period to be delivered, consistent with the requirement set out in PPS12.

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

Monitoring

10.115 A number of formal and informal mechanisms are already in place to monitor progress of this strategically important project. An extensive development team is in place, as are arrangements for ongoing community and stakeholder engagement.

10.116 As the project develops progress will be reported formally through the Annual Monitoring Report but this is likely to be supplemented by at least six monthly project reviews and update reports to the Rural Liaison Committee and other relevant bodies.

10.117 The following indicators and targets will be used to monitor the progress of Lodge Hill.

Table 10-23 Monitoring Targets for Lodge Hill

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

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

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

11. Implementation, Monitoring and Review

Introduction

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

Delivery Partners

The Private Sector

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

Other Public Sector Bodies

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

Local Strategic Partnership

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

Implementing Development

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

Policy CS34: Implementation of the Core Strategy

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

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

necessary, remedial action taken

Intending developers are strongly advised to:

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

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

Implementing Infrastructure

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

Monitoring and Implementation Framework

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

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

Review

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

Developer Contributions

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

Community Infrastructure Levy

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

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

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

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

Policy CS35: Developer Contributions

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

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

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

Table 11-1 Monitoring and Implementation Framework

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

CS6 Preservation and Enhancement of Natural Assets	Development that would harm the effectiveness of existing flood defences or prejudice their maintenance or management will not be permitted.	✓	✓	✓	✓	Development management	Agency advice on flooding and water quality grounds Number/percent of applications conforming to conditions listed in policy summary points
	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.	✓	✓	✓	✓		
	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.	✓	✓	✓	✓		
							Hectareage of land lost Number/area of new habitat created Contributions received towards opens spaces Amounts and actions done on management of sites

	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.	✓	✓	✓			
CS7 Countryside and Landscape	Development in the countryside will be permitted in accordance with the objectives and principles of PPS4 and PPS7.	✓	✓	✓	Via planning applications Medway Council Amenity Organisations	Landscape Character Assessments Number of schemes implemented taking account of proposals in listed studies	
	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.	✓	✓	✓			
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.	✓	✓	✓	Via planning applications Medway Council	Number of applications observing these guidelines	
	New or enhanced urban spaces should be provided as a part of major regeneration proposals.	✓	✓	✓			
CS9 Health and Social	The development of sustainable places in Medway with healthy communities and social infrastructure where residents enjoy a high quality of life	✓	✓	✓	Medway Council & Partner agencies	Health deprivation by – Index of Deprivation	

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

	year), of which at least 17,500 will be within the Thames Gateway Area.					Number of new and converted dwellings on previously developed land Housing trajectory - 2006-2028
CS14 Affordable Housing	25% affordable housing provision will be sought on all sites within the existing defined boundary of the main urban area and Hoo St. Werburgh	✓	✓	✓	✓	Gross affordable completions (count) Affordable completions as proportion of all completions
		✓	✓	✓	✓	
		✓	✓	✓	✓	
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.	✓	✓	✓	✓	Housing Quality - Building for Life Assessments
CS16 Gypsies, Travellers and Travelling Show people	To meet the identified need for Gypsy, Traveller and Travelling Show people pitches within Medway, sufficient sites will be allocated within the Allocations and Development Management Development Plan Document.	✓	✓	✓	✓	Net additional pitches (Gypsy and Traveller)
CS17 Economic Strategy	The development of the Medway economy will be dynamic and widely based, to provide employment for the community as a whole, to provide greater choice for the workforce, offer an alternative to out-commuting and achieve a balance with housing growth.	✓	✓	✓	✓	Amount and type of completed employment floor space. Amount and type of employment land available

								Job Seekers Allowance claimant count & rate Employment rate GVA per capita Business stock
CS18 Tourism	Medway Council will positively promote sustainable tourism development.	✓	✓	✓	Medway Council	Planning applications	Number of visitor stays in Medway Length of season Average length of stays	
	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	✓	✓	✓				
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.	✓	✓	✓	Medway Council	Planning applications	Net completions A1-A3 Gross completions in town centres	
	Town centres and edge of centre sites will be the preferred location for such development and a sequential test will be applied for development elsewhere in accordance with PPS4.	✓	✓	✓				
CS20 Education and Personal Development	The Council will work with all relevant partners to develop a fully integrated educational offer	✓	✓	✓	Medway Council		Number of planning applications not according with sequential test GCSE attainment rate NVQ levels	

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

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

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

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

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

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

	Residential Provision. • West Gate Village 'hub' provided. • Remaining 50% of the central 'core' (mixed use) hub. Hotel facilities provided at both Lodge Hill and Chattenden.	• Traffic measures as required to address cut-through traffic, • Enabling works (demolition, vegetation clearance, remediation and earthworks) undertaken in Phase 2 area. • On-site utilities provided within the Phase 2 area (Water, LV, Energy infrastructure, Gas connection). • Surface water drainage works and attenuation undertaken within Phase 2 area. • Potential further works required to attenuation in Valley area to increase capacity. • Creation of Westgate, Denegate and Chattenden West Neighbourhoods. • Landscaping of the Western Shelterbelt, Central Park, SSSI buffer Zone, Chattenden Wood Nature Reserve, A228, and provision of (other) Heritage Beacon project. • Provision of remaining Central Hub mixed uses and Lodge Hill Hotel. • Provision of Westgate Hub. • Provision of further mixed use (approx 40%) at Chattenden Hub, and provision of Chattenden Hotel / Knowledge Park. • Provision of 50% of Elderly Care residential. • First Stage of Secondary School provision. • Provision of the Community Centre/Library. • Second Primary School delivered. • Potential refurbishment of existing Chattenden Primary School. • Third Primary School delivered (either in		

Lodge Hill (Strategic Allocation)	Phase 3 • Approx. 754 residential dwellings. • Approx. 5,644 sq m of Business floor-space. • Remaining 50% of Residential Elderly Care facilities provided. • Remaining 40% of Chattenden Hub provided.	2025-2028	• Phase 2 or Phase 3, depending on need). • Second Stage of GP surgery provision. • Further provision for public realm and GI commensurate with the quantum of development. • Further water body provision to suit the requirements for the attenuation of the site.	Yes	Developer	Phase (3) Soil Treatment Facility installed. Onsite soil treatment and reinstatement to be undertaken on a phased basis.

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

Rochester	East of Wainscott Road, Wainscott (plg permission)	96 homes, 300sq/m retail area	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	
	East of Higham Road, Wainscott (plg permission)	98 homes	2011-2016				
	Riverside (plg permission)	300-700 homes, 2400-12000sq/m employment space, 4440-6800sq/m retail area 600-1000 homes, 9600-10000sq/m employment space, 2360sq/m retail area 300-400 homes, 9000sq/m employment	2011-2016 2016-2021	- Off-site utilities (approx £1m foul sewerage reinforcement & £1.2m electricity connection); (part) Riverside Walk, Phase 1A - £260,000: 2011-2012; (part) Public Space, Phase 1A - £300,000: 2011-2012 - Primary school (need to consider development phasing & impact on pupil numbers); - GP practice (rented out to PCT, so cost issues); - Off-site utilities (including approx £2m for gas provision); - Crescent Park & Riverside Walk (part).	Yes	Developer / utilities providers	£4m utilities funding gap (uncertainty regards scale of contributions) Potential substantial burden on developers if external providers unwilling to fund off-site utilities.

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

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

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

Howlands Nursery Christmas St (plg permission)	60 homes (38 Not started 5 under construction 17 completed.)	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 (completed)	2011- 2016	TBC			
Astra Site, Courteney Rd (plg permission)	1250 sqm B8 completed 2301 sqm other completed	2011- 2016	Air Quality Management / Monitoring improvements	Yes	Developer	No – s106 received
Rainham Mark Grammar School Pump Lane (plg permission)	35 homes 37 under construction	2011- 2016	Open space improvements / sports facilities	Yes	Developer	
Rear of 9-25 Birling Avenue (Call for Sites) Planning permission for 46 refused.	32 homes Not started	2011- 2016	TBC			
Retail Core(High St,Jeffrey St,King St) Gillingham (Development Framework) Outline pp MC10/1095 - 82 Jeffrey St. 12 units not started.	100 homes, 4750sq/m employment space, 3750sq/m retail area	2021- 2026	TBC			

Horsted		150 homes, 2480 sq/m employment space, 200 sq/m retail area Not started 264 homes	2011-2016 2016-2021	- Improved bus and pedestrian facilities; - Horsted Gyrotory system (financial contributions towards).	Yes	Developer	
Medway City Estate	Former Mid Kent College, Maidstone Road (plg permission) New application to reduce numbers.	11147 sq/m employment space	2011-2016 2016-2021	TBC			
	BAE Systems (Call for Sites)	6160 sq/m employment space	2011-2016 2016-2021	TBC			
	Woolmans Wood Caravan Site (Withdrawn H&MU DPD)	14430 sq/m retail area Not started 9354sqm	2011-2016	- Park and Ride facility; - Alteration of Anthony's Way / A289 roundabout; signalisation schemes within vicinity; - Footway widening on Anthony's Way; - River walk; - Improvement / creation of estuarine habitat lost.	Yes	Developer	New application submitted for a different range of goods includes Park & Ride facility.
	Land between Vanguard Way and George Summers Close (plg permission) New application Sainsbury						
Chatham	Sir John Hawkins Car Park (Call for Sites)	120 homes, 3059sq/m retail area	2011-2016	TBC			
	Between Cross Street & The Brook (MLP 2003 allocation)	110 homes, 3680sq/m retail area	2011-2016	TBC			
	1-35 High Street (Grays Garage) (MLP 2003 allocation)	54 homes, 800sq/m employment space, 800sq/m retail area	2011-2016	TBC			
	2 Ash Tree Lane (plg permission)	55 homes 8 not started 47 under construction	2011-2016	Traffic calming measures.	Yes	Developer	
	Chatham Waterfront (Call for Sites)	400 homes, 5456sq/m employment space, 7772sq/m	2016-2021	- Waterfront Park & (part) Riverside Walk; - Flood Defence Strategy measures (Scott	Yes	Developer	Potentially high Flood Defence associated cost

Planning permission		retail area 94 homes 111 Homes not started Hotel 86 beds 3381sqm commercial	2021- 2026	Wilson's August 2010 report).				
Chatham con...	Pentagon (Call for Sites)	1500sq/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 (Call for Sites)	60 homes, 1898sq/m retail area	2016- 2021	• TBC				
	1 Batchelor Street, off the Brook (Call for Sites)	50 homes, 1600sq/m retail area	2016- 2021	• TBC				
	Whiffens Avenue Car Park (Call for Sites)	70 homes	2016- 2021	• TBC				
	Eidon St, Carpeaux Close & Hards Town (Development brief)	50 homes	2016- 2021	• TBC				
	Former Officers Mess, Maidstone Rd (Call for Sites)	4300sq/m employment space	2016- 2021	• TBC				
	Cross Street Planning permission	3430sqm A1/A2 118 residential units						
	296 - 310 High Street (Development brief)	2040sq/m employment space	2016- 2021	• TBC				
Chatham con...	19 New Road Av & 3 New Cut (Development brief)	1328sq/m retail area	2016- 2021	• TBC				
	Chatham Retailing, Clover/Richard/Rhode/Hi gh Sts	2800sq/m retail area, 11440sq/m employment space	2021- 2026	• TBC				

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

Appendix A: Schedule of Superseded (Replaced) Policies

Superseded Policies:

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

Local Plan Policy No.	Policy	Core Strategy Policy No.
BNE39	Protected Species	CS6
BNE40	Cliffe Conservation Park	CS6, 7
BNE44	Community Woodlands	CS6, 7, 8
BNE45	Undeveloped Coast	CS5, 6, 7, 8
BNE48	Agricultural Land	CS7
ED9	Chatham Port	CS24, 25
ED11	Existing Tourist Facilities	CS18
ED14	Bed & Breakfast Accommodation and Guest Houses	CS18
H3	Affordable Housing	CS14
H5	High Density Housing	CS15
H10	Housing Mix	CS15
H11	Residential Development in rural Settlements	CS7
H13	Gypsy Caravan Sites and Travelling Showpeople's Quarters	CS16
R10	Local Centres, Village Shops and Neighbourhood Centres	CS19, 26 To 32
R11	Town Centre Uses and the Sequential Approach	CS19
R13	Retail uses and the Sequential Approach	CS19
L13	Water Based Leisure	CS25
T5	Bus Preference Measures	CS24
T6	Provision for Public Transport	CS24
T9	River Buses and Piers	CS24, 25
T10	Wharves	CS24, 25
T11	Development Funded Transport Improvements	CS34
CF1	Community Facilities	CS9, 10, 11
CF2	New Community Facilities	CS9, 10, 11
CF4	Primary Healthcare Facilities	CS9
CF5	Nursing and Special Care	CS15
CF7	Further, Higher and Adult Education	CS17, 20
CF9	Power Stations	CS21
CF11	Renewable Energy	CS4
CF13	Tidal Flood Areas	CS5

Appendix B: Schedule of Current Supplementary Planning Documents

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

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

Item	Type*	Title	Date Adopted	Remarks
15	SPD	Interface Lands Development Brief http://www.medway.gov.uk/pdf/The%20Interface%20Land%20SPD%20October%202010.pdf	2010	Conforms with a number of local plan policies. Relates to a site between the Chatham Historic Dockyard and Chatham Maritime
15	Other	Strood Town Centre Masterplan http://www.medway.gov.uk/strood_town_centre_masterplan_report_-_final.pdf	2009	Endorsed by the Cabinet to inform the Local Development Framework Core Strategy and planning decisions in the area
16	SPD	Amherst Hill Design Brief http://www.medway.gov.uk/PDF/Amherst%20Hill%20Design%20Brief%20Oct%202010.pdf	2010	Conforms to local plan policy H1 and relates to a site to the rear of Kitchener Barracks
Other Adopted Supplementary Planning Documents				
17	SPD	A Building Heights Policy for Medway A Building Heights Policy for Medway Part 1 (pdf 4,075 KB), Part 2 (pdf 3,968KB), Appendix (6,275KB)	2006	Prepared in accordance with CABE/English Heritage guidance. Covers central Medway
18	SPD	Development Contributions Guide Developer Contributions Guide (pdf 2,438KB)	2008	Conforms with Policy S6 of the Medway Local Plan. Covers the whole of the administrative area
Conservation Area Appraisals				
19	CA	Brompton Lines Conservation Area Appraisal, 2006 http://www.medway.gov.uk/brompton_lines_ca_appraisal_all-2.pdf	2006	Not prepared under planning legislation but material considerations in the areas covered
20	CA	Upper Upnor Conservation Area Appraisal, 2004 http://www.medway.gov.uk/upnor_ca_appraisal_publication_1105.pdf	2004	
21	CA	Upper Bush Conservation Area Appraisal, 2004 http://www.medway.gov.uk/upper_bush_conservation_area_appraisal_rev.pdf	2004	
22	CA	New Road, Chatham, Conservation Area Appraisal, 2004 http://www.medway.gov.uk/new_road_chatham_adopted_version.pdf	2004	
23	CA	Maidstone Road, Chatham, Conservation Area Appraisal, 2004 http://www.medway.gov.uk/maidstone_road_chatham_adopted_version.pdf	2004	

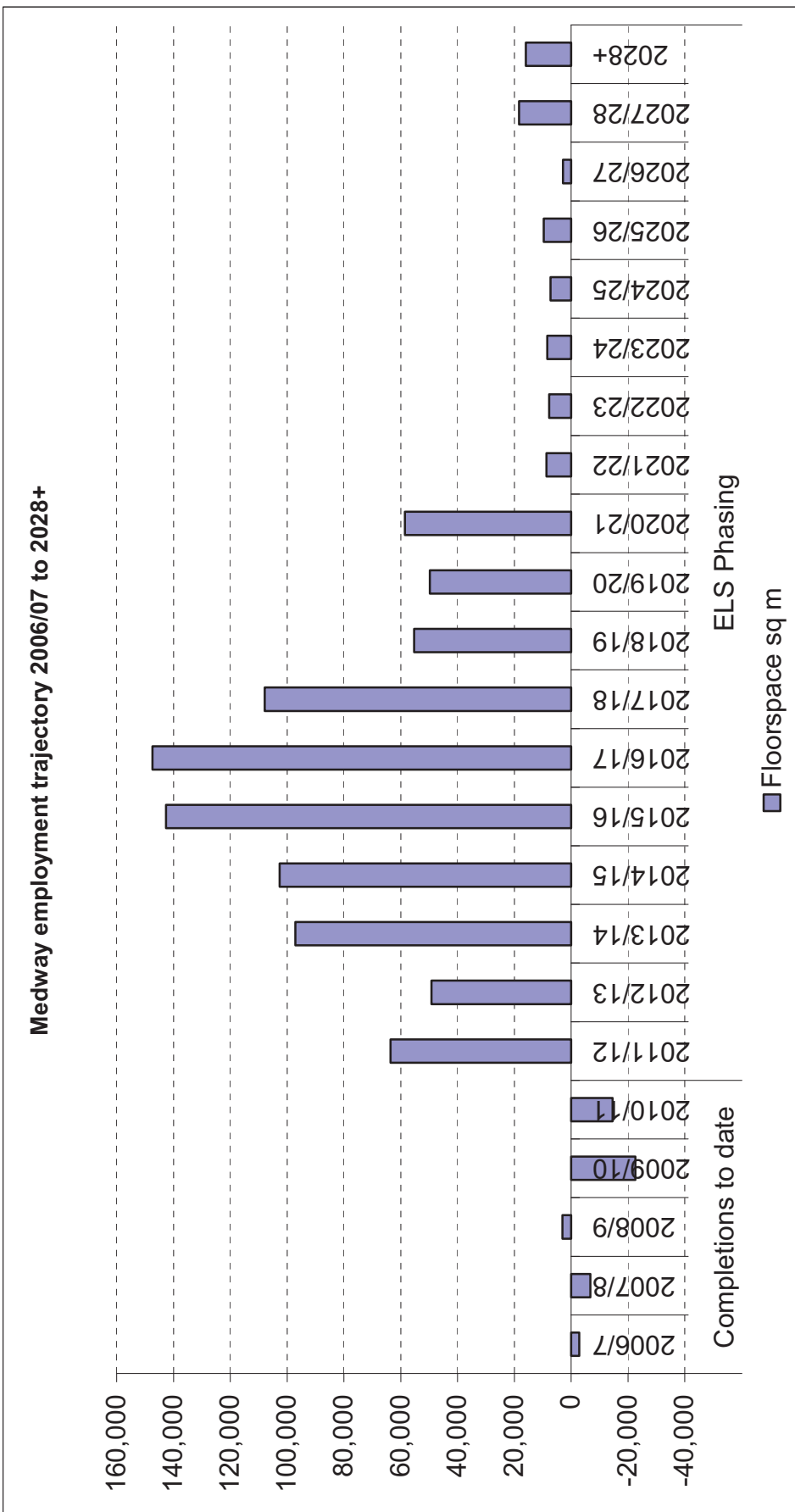
Item	Type*	Title	Date Adopted	Remarks
24	CA	Historic Rochester Conservation Area Appraisal http://www.medway.gov.uk/index/environment/9984.html/conservationareas/102816.htmwill	2010	
Conservation Guides				
25	Other	Conservation Areas in Medway http://www.medway.gov.uk/conservation_areas_jan_07.pdf	2007	General guides
26	Other	Listed Buildings in Medway http://www.medway.gov.uk/listed_buildings_leaflet.pdf		
27	Other	Watts Avenue/ Roebuck Road design guidance http://www.medway.gov.uk/watts_ave_booklet.pdf		
28	Other	Gillingham Park design guidance http://www.medway.gov.uk/gillingham_park_bklt-5.pdf		

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

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

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

Appendix D: Employment trajectory



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

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

Transport objective 1: Highway maintenance

Schemes/actions:

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

Transport objective 2: Improving Infrastructure Capacity

Schemes/actions:

- Network management, guided by the Network Management Plan
- Operation of Urban Traffic Management and Control. This is currently being implemented and is expected to
 - 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	Short / medium	Phased intervention to link to the development of Lodge Hill, Chattenden development to

Sans Pareil and Anthony's Way roundabouts and exit from Medway City Estate.		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:
 - Reconstruction and possible relocation of Rochester station (identified in Kent RUS, 2010);
 - Reconstruction of Strood station
 - Reconstruction and reconfiguration of Chatham station to support regeneration and improve the gateway to the town centre
 - Delivery of accessibility improvements to stations, including forecourt improvements at Rainham station
 - Capacity improvements at Rochester bridge junction as part of East Kent resignalling (identified in Kent RUS, 2010)
 - Improved transport interchange opportunities at key mainline stations
 - Encouragement of cycling to stations by improved cycle links and more secure cycle parking.
- Coach travel, focussing on coach park and ride
- Community transport, focussing on the further development of the Villager service
- River transport and river crossings, focussing on:
 - Maintaining and developing a comprehensive network of piers that could support a river taxi and other leisure related services
 - Seeking a partner to operate a river taxi or possibly an amphibious vehicle
 - Investigate the potential for a new river crossing for pedestrians, cyclists and public transport.

Transport objective 4: Encouraging active travel and improving health

Schemes/actions:

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

- Improving accessibility to public rights of way through network and waymarking improvements, including making more of the network accessible to people with mobility difficulties
 - Participation in the regional Coastal Access project and 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 network
 - Walk to School schemes throughout the year
- Road safety enforcement
- Safer routes to school, including through;
 - Improvements to key pedestrian routes from key catchment areas to schools
 - Expanding the existing walking bus initiative
 - Appropriate highway infrastructure and focused parking enforcement in the vicinity of school entrances
 - Campaigns and initiatives
 - Information and education on safer walking
 - Providing bus safety education
 - Encouraging schools to work with neighbouring schools so that joint initiatives can reflect any wider issues within the area
- Community safety initiatives.

Glossary of Terms

Affordable Housing	Housing provided for those people who need to be in an area but who are unable to afford open market prices or rents.
Ancient Semi Natural Woodland	Woodland likely to have existed prior to 1600 and containing trees and shrubs that are predominantly native. All stands of ancient woodland, which does not obviously originate from planting.
Annual Monitoring Report (AMR)	Authorities are required to prepare annual monitoring reports to assess the implementation of the local development scheme and the extent to which policies in local development documents are being achieved.
Appropriate Assessment	Appropriate Assessment is a requirement of the EC Habitats Directive 92/43/EEC and EC Birds Directive 79/409/EEC and is used to assess the impacts of a land use plan against the conservation objectives of a European Site and to ascertain whether it would adversely affect the integrity of that site.
Area Action Plan (AAP)	Planning frameworks for areas of change and areas of conservation.
Biodiversity	The number and variety of species found within a specified geographical area
Brownfield sites/Land (Derelict land, Recycled land)	Previously developed land that is, or was, occupied by a permanent (non-agricultural) structure and associated fixed surface infrastructure. The definition covers the curtilage of the development (except housing). It may occur in both built up and rural settings.
Call for Sites	The process of asking landowners and developers, to put forward sites to Medway Council to consider for development for the period up to 2026 and beyond. Sites should be able to accommodate 5 or more dwellings or are 0.15 hectares or greater in size
Carbon Capture and Storage	This is a means of mitigating the contribution of fossil fuel emissions to global warming, based on capturing carbon dioxide and storing it away from the atmosphere by different.
Category A Trees	Trees that are particularly good examples of their species, especially if rare or unusual, of significant conservation, historical, commemorative or other value or those of particular visual importance.
Climate Change	Rising global temperatures which will result in changes in weather patterns, rising sea levels and

	increased frequency and intensity of extreme weather
Cluster	A geographical concentration of inter-connected businesses
Coastal squeeze	Areas of mudflat or salt marsh that are reducing in area as a result of rising sea levels against increasingly defended land.
Combined heat and power (CHP)	Technology for energy recovery systems, which provides both electricity and heat and can be linked to community heating schemes or to individual premises.
Commitment	A development proposal which is allocated in a development plan or for which planning permission has been granted.
Comparison Shopping/Goods	Higher value non-food goods (consumer durables such as clothing, footwear, jewellery, books, etc) – purchases tend to be less frequent than everyday items, and often involve comparison between different items and brands. Traditionally associated with High Street shopping.
Conservation Area	An area designated under the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990 on account of its special architectural or historic interest where its character and appearance should be preserved and enhanced.
Convenience Shopping/Goods	Food, drink and other frequently purchased lower value items e.g. household cleaning materials, newspapers, and confectionary.
Core Strategy	A development plan document, forming part of the local development framework that sets out the long term spatial vision for an area with strategic policies and proposals to deliver that vision
dB	A decibel is a unit for measuring the intensity of a sound.
Derelict land	Land so damaged by industrial or other development that it is incapable of beneficial use without treatment.
Development	The carrying out of building, engineering, mining or other operations in, on, over or under land, or the making of any material change in the use of any buildings or other land.
Development Brief	A supplementary planning document prepared in support of policies and proposals within the Development Plan. They inform developers and other interested parties of the constraints and opportunities presented by a site and the type of development expected or encouraged by local

	planning policies.
Development Plan Document (DPD)	Spatial planning documents covering a range of policy areas that will undergo a process of consultation and are subject to alteration following independent examination.
District Centre	Shops, separate from the town centre, usually are containing at least one food supermarket or superstore, and non-retail services such as banks, building societies and restaurants.
Ecological Footprint	An ecological footprint is a concept based on how much land and water area a human population needs to produce the resources required to sustain itself and to absorb its wastes, given prevailing technology.
Ecosystems	A complex set of relationships between species and habitats of an area. Ecosystems vary in size with each species dependant on one another
Edge of centre	A location that is well connected to and within easy walking distance of the primary shopping centre.
Environmental Compensation/Mitigation	Mechanisms whereby the loss of environmental resources can be mitigated or compensated for where an environmental feature is lost, with a feature of at least equivalent value.
Green Belt	Green Belts are specifically established through development plans and consist of predominantly open land around urban areas and other settlements with the strategic role of preventing the outward expansion of built up areas, safeguarding the surrounding countryside from encroachment, assisting urban regeneration and providing areas for outdoor recreation.
Green Corridors/Green Grid	A network of open spaces, often linear in nature, possibly linked and providing connections between town and country.
Greenfield land/sites	Previously undeveloped land within or beyond the confines of built up areas. National definition of this (PPG3) includes former mineral working which has been the subject of an agreed restoration programme.
Greenhouse Gas	A gas in the Earth's atmosphere (such as carbon dioxide) that absorbs infra-red radiation emitted by the Earth's surface as a result of exposure to solar ultra-violet radiation, thus increasing the mean temperature of the planet.
Green Infrastructure	Sustainable Drainage systems (SUD's), flood risk management water resource management, tackling of heat island effect e.t.c.
GEA	Gross External Area

Gross Value Added	Measures the contribution to the economy of each individual producer, industry or sector in the United Kingdom and is used for the estimation of Gross Domestic Product (GDP)
Household	One person living alone or a family or group of people living at the same address and sharing domestic facilities and housekeeping arrangements.
Landbank	A supply of land intended for a particular purpose. For minerals it relates to the mineral reserves associated with land that has planning permission.
Landfill	The deposition of waste onto hollow or void space in the land, usually below the level of the surrounding land in such a way that pollution or harm to the environment is prevented
Listed Building	A Building of special historic or architectural interest. Listing gives a building statutory protection against unauthorised demolition, alteration and extension.
Local Centre	A small group of retail and services outlets usually comprising a newsagent, a general grocery store, a sub post office and occasionally a pharmacy, a hairdresser and other small shops of a local nature.
Local Development Documents (LDDs)	Introduced in the Planning and Compulsory Purchase Act 2004, they comprise both statutory development plan documents (DPD's) and non-statutory Supplementary Planning Documents (SPDs). LDDs include core policies, area action plans, proposals map, site-specific policies and a Statement of Community Involvement.
Local Development Framework (LDF)	Introduced in the Planning and Compulsory Purchase Act 2004, they comprise a 'folder' of Local Development Documents (LDDs). They have replaced the former framework of District Local Plans, Minerals and Waste Local Plans and Supplementary Planning Guidance. They form the framework for delivering the spatial planning strategy for the area. The series of documents, which when adopted will replace the adopted Local Plan
Local Development Scheme (LDS)	The LDS is a public statement identifying which local development documents will be produced, in what order and when.
Local Plans	The lower tier of the former statutory development plan setting out detailed policies and proposals for a local authority's area, or for a particular subject (e.g. the Kent Waste and Minerals Local Plans were prepared for the Kent & Medway area). Local Plans were required to be in general conformity with the adopted Structure Plan for the area.

Local Strategic Partnership	A single body that brings together at a local level the different parts of the public sector as well as the private, business, community and voluntary sectors so that different initiatives and services support each other and work together. They are responsible for developing and driving the implementation of Community Strategies and Local Area Agreements (LAAs)
Low Cost Market Housing	Housing provided at a purchase price significantly below prevailing open market prices in the locality. Does not mean either smaller housing or housing built to a lower standard.
Mixed Use Development	Areas/Buildings where a mixture of commercial, retail and residential uses predominate thereby meeting social, economic and cultural needs in one area and contributing to communities with good access to a full range of services and reduced need to travel.
Multi Area Agreement	A voluntary agreement between two or more authorities, their partners and the government working collectively to improve local economic prosperity
National Nature Reserves	Areas defined by English Nature and considered to be of such national importance as to require preservation and management. Designated under section 19 of the National Parks and Access to the Countryside Act 1949 or section 35 of the Wildlife and Countryside Act 1981.
Permitted Development Rights (PD)	Small scale developments, which do not require planning permission from the Local Planning Authority.
Planning and Compulsory Purchase Act 2004	An act to make provision relating to spatial development, town and country planning and the compulsory acquisition of land
Planning Policy Statement (PPS)	Subject specific national Government policies, on national land use in England that replaced Planning Policy Guidance (PPGs) notes.
Previously Developed Land	Land in urban or rural areas, which is, or was, occupied by a permanent (non agricultural) structure and associated fixed surface infrastructure, including the curtilage of the development (except housing). It includes defence buildings and land used for mineral extraction and waste disposal where provision for restoration has not been made.
Primary Road Network	Those inter-urban routes, which provide access to within five miles of the larger urban centres. These roads include motorways, trunk roads and primary "A" roads.
Quality Bus Corridors	Quality bus corridors are uncongested, have real

	time bus information at bus stops and easy access onto and off the buses.
RAMSAR Site	Sites designated under the RAMSAR Convention on the Conservation of Wetlands of International Importance Especially Waterfowl Habitat, ratified by the British Government in 1976. Natural England has the responsibility of identifying RAMSAR sites.
Regional Spatial Strategy (RSS)	Identification and definition of policies relating to the development and use of land in the region that were prepared by the regional planning body and approved by the Secretary of State.
Retail Park	Groups of retail warehouses formed into "Centres" generally with shared car parking
Retail Warehousing/Warehouses	Stores specialising in an aspect of comparison goods retailing, frequently trading in bulky goods such as home improvement products, major electrical items, motor accessories, furniture, carpets and garden products and bulky DIY items, catering mainly for car-borne customers and often in out-of-town locations.
Regionally Important Geological and Geomorphological Sites	Designated by locally developed criteria to cover the most important places for geology and geomorphology outside statutorily protected land such as Sites of Special Scientific Interest (SSSI).
Rural Service Centre	Settlements within rural areas that provide an important service role (e.g. employment, shops, community facilities) to their local population and their immediate rural hinterland.
Scheduled Ancient Monument	An archaeological site of national importance (buildings or other structures) included within a schedule compiled by the Secretary of State for Culture, Media and Sport under the Ancient Monuments and Archaeological Areas Act 1979 (as amended by the National Heritage Act 1983), as being of significant archaeological importance. Consent is required from the Secretary of State for works affecting a Scheduled Ancient Monument.
Semi-Natural Areas	An area of native flora and/or fauna species that is apparently natural but has been significantly modified by human activities.
Shoreline Management Plans (SMPs)	Prepared by a group of agencies including local maritime authorities and the Environment Agency. SMPs provide a large scale assessment of the risks associated with coastal processes and present a framework to reduce these risks to people, property and the environment.
Sites of Nature Conservation Interest (SNCI)	Identified by the Kent Wildlife Trust (KWT) and considered to be of countywide importance.

Sites of Special Scientific Interest (SSSI)	Nationally important areas for the conservation of wildlife habitats, geological features and landforms. SSSI's are areas of land that have been notified by English Nature as being of special interest under the Wildlife and Countryside Act 1981 or the National Parks and Access to the Countryside Act 1949.
Social rented properties	A form of housing tenure owned and managed by the state or not-for-profit organisations, usually with the aim of providing affordable housing
South East Plan	The South East Plan is the Regional Spatial Strategy (RSS) that set out a vision for the future of the South East Region until 2026, outlining how to respond to challenges facing the region such as housing, the economy, transport and protecting the environment
Spatial Planning	Spatial planning goes beyond traditional land use planning to bring together and integrate policies for the development and use of land with other policies and programmes which influence the nature of places and how they function.
Spatial Portrait	A description of the main social and economic characteristics which sets out the context for the LDF
Special Areas for Conservation (SAC)	Areas designated under Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna. They contribute to the conservation of biodiversity.
Special Protection Area (SPA)	Areas designated under European Community Directive 79/409 on the Conservation of Wild Birds, to conserve the habitat of rare or vulnerable birds and all regularly occurring migratory birds.
State of Medway Report	One of a series of factual reports produced to inform the preparation of Medway's LDF
Statement of Community Involvement (SCI)	The statement of community involvement explains to local communities and stakeholders how they will be involved in the preparation of local development documents, and the steps that authorities will take to facilitate this involvement.
Strategic Land Availability Assessment	An assessment to identify sites that are available or could become available for housing, employment or other developments in the period up to 2026 and beyond. Sites should be able to accommodate 5 or more dwellings or are 0.15 hectares or greater in size
Strategic Gap	An area of predominantly open land between existing urban areas which serves to maintain their separate identity and prevent their coalescence with each other or with smaller nearby settlements.

Sustainable Urban Drainage (SUD)	A sequence of management practice and control structures designed to drain surface water in a more sustainable fashion than some conventional techniques.
Superstores	Self-service stores selling mainly food or food and non-food goods, usually more than 2,500 square metres trading floor space, with supporting car parking.
Supplementary Planning Document (SPD)	Issues and sites for which the local planning authority wishes to provide detailed policy guidance, which will supplement policies and proposals in the development plan documents.
Sustainability Appraisal (SA)	Assessment of the environmental, economic and social impact of policies, to ensure that all policies and proposals reflect sustainable development principles.
Sustainable Community Strategy (SCS)	A document prepared by a local strategic partnership which sets out a vision and plans for agencies, organisations and communities who work together to improve the quality of life in an area
Sustainable Development	Commonly defined as “development that meets the needs of the present without compromising the ability of future generations to meet their own needs” (World Commission on Environment and Development, 1987).
Sustainable Urban Drainage System (SUDS)	SUDS provide for more environmentally sustainable urban drainage through systems designed to reduce run off, slow its rate or provide for filtering, sedimentation and biological degradation of the water.
Thames Gateway	The regional growth area on both sides of the Thames Estuary within North Kent, South Essex and East London which is of national and regional importance for economic regeneration, redevelopment of brownfield sites and the promotion of sustainable development.
Town Centre	City, town and traditional suburban centres, which provide a range of facilities and services and which fulfil a function as a focus for both the community and for public transport. It excludes small parades of shops of purely local significance.
Traffic calming	Measures to reduce vehicle speeds to improve safety and enhance an area’s quality of life.
Thames Gateway Planning Framework	A planning framework that established a set of principles to guide the consideration of future proposals for the development and environmental enhancement of the Thames Gateway.
Travel Plans	A package of practical measures to encourage staff and/or visitors to a development to choose

	alternatives to single occupancy car use and to reduce the need to travel.
Urban Capacity	An estimate of the potential for additional development that can be accommodated within an urban area.
Urban Extension	A large expansion of a town or city
Urban Fringe	Countryside on the periphery of urban areas often subject to development pressures or activities that threaten the appearance/management of the countryside.
Use Classes	A classification of land uses for development control purposes defined by the Town and Country Planning (Use Classes) Order 1987 and subsequent amendment orders. Changes of use of buildings or other land between uses within a single 'use class' are excluded from the definition of development in the Town and Country Planning Act 1990, thus making planning permission unnecessary i.e. A Statutory Instrument which defines broad categories of use of land and buildings.
Waste	Refers to all types of waste including trade, commercial, industrial, construction and demolition, agricultural, mineral, quarrying and household waste.
Windfall sites	Sites, which become available for development, which were not previously identified as allocations or identified as commitments through previous planning permissions.
World Heritage Site	Cultural and natural sites of outstanding world-wide value designated by the World Heritage Committee for inclusion on UNESCO's World Heritage Site list

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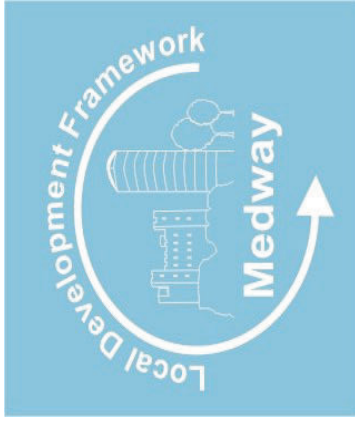
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ATTACHMENT 2



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

August 2011



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

	meet them. The concept of the strategic gap, having been deleted from the South East Plan, has been reintroduced. The concept of openness in bullet point one is more applicable to the Green Belt and is more stringent than necessary elsewhere. References to “the separation of settlements” should be removed and the first bullet point clarified.	policy, Policy KTG1.x seeks to protect from development, the Metropolitan Green Belt, the Area of Outstanding Natural Beauty and avoid coalescence with adjoining settlements to the south, east and west of the Medway urban area and to the west of Sittingbourne. The first bullet point of policy CS7 seeks to retain the openness and intrinsic character of the countryside. This policy is derived from PPS4: Planning for Sustainable Economic Growth and PPS7: Sustainable Development in Rural Areas. One of the Government’s objectives, set out in paragraph 10 of PPS4, is to promote thriving, inclusive and distinctive rural communities whilst continuing to protect the open countryside for the benefit of all. Medway Council considers that the maintenance of the separation of rural settlements contributes both to the retention of distinctive rural communities and to the protection of the open countryside. Policy EC6.1 of PPS4 requires local authorities to protect the countryside for the sake of its intrinsic character and beauty, the diversity of its landscapes, heritage

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

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

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

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

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

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

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

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

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

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

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

	Worried about the Housing Space Standards (which should be guidance rather than strict standards) stifling development and increasing dwelling prices, and potential over supply of housing shown in the trajectory for 2013-18.	Examination of recent housing schemes in Medway has revealed that most house and flat designs either meet the proposed Medway standards or come close to meeting them. Those designs, which failed by a substantial margin were cramped and unfit for purpose.
	Considers that there is a need for further student accommodation.	Paragraphs 6.35 to 6.37 address the issue of student accommodation and it is stated in 6.37 that the Council will work with the universities and Mid-Kent College to help deliver student accommodation.
	Opposed to the need for Health Impact Assessments to accompany planning applications.	The provision of health impact assessments can help at the planning or pre-planning application stage to identify and remedy any shortcomings in the proposal with regard to its impact on health and thus to smooth the path of an application through the planning system.
	Table 11.10: The Victory Pier development has outline planning permission for 808 residential units – not 776 as stated in the table.	It is agreed that there is an outline planning permission for 808 units but it is understood that 32 of those units have been replaced by a planning permission for student accommodation.
	Table 11.11: Victory Pier has outline planning permission for an employment capacity of 1510m². Furthermore we have permission for 1333 m² of restaurant. This should be included in the table.	Table 11.11 will be amended by the addition of Victory Pier with a capacity of 1510 sq.m. The tables in chapter 11 only list housing employment and retail uses.

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

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

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

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

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

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

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

	DIA needs to take account of not only ethnic minorities, but all minorities, as faith groups often face discrimination because of their religious beliefs. Policies should be aimed at providing a range of accommodation types and sizes, the protection of future community facilities and provision of suitable burial sites.	Noted.
	Proposes changes the strategic objectives, to paragraphs 5.107 and 5.108 and to policy CS 9.	In strategic objective number 10, the reference to improved cultural facilities already encompasses faith facilities and there is therefore no need to add a separate reference to faith facilities. In paragraph 5.107, delete paragraph from “but it is not clear” onwards and replace with “Current provision is not thought to be adequate and more will be required. Faith groups, characteristically, are self funding but need support to find space for their congregations.” In paragraph 108, insert “some of which are faith based” after “voluntary and community associations”. Add “with national organisations.” To the end of the paragraph. In policy CS9, insert “and facilitating new” after “Protecting and enhancing existing”.
Cemex	More emphasis should be made about the Halling site.	Noted and additional references will be added in the areas chapter.
	Protection of obsolete wharves should not be required.	The wharf at Halling is not considered obsolete and important for the future. Underused wharves may well come back into use

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

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

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

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

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

	plan for the whole site. It is intended that this development will form the next stage of the Company's investment programme in the Borough. We set out comments below on the principle elements of the draft core strategy that are relevant to the Company's scheme for regenerating the Horsted campus site. Section 11 - Area Policies We welcome the inclusion of the site within Table 11.17 potential housing development sites in Chatham with an assessed capacity of 414 dwellings, which is consistent with the 2005 decision. However we have concerns about its inclusion within Table 11.8 of potential employment development sites with a capacity of 2480m². Although this figure is consistent with the level of B1 floorspace included in the 2005 scheme, we will shortly be submitting evidence to the Council which demonstrates that there is insufficient occupier-demand in the local area to support this element of the scheme. Countryside Properties does anticipate that its development will be able to make a contribution to local employment provision, through the inclusion of care accommodation in the scheme and related small-scale retail and community facilities. Such an approach is supported by draft policy CS17 of the core strategy which identifies health and social care as one of the employment sectors that will be encouraged.		Table 11.8: reflects figures included in the SLAA. Any variation to the current planning permission would need to be considered on its merits.
	Section 12 - Implementation, Monitoring and Review The company welcomes inclusion of the site in Table 12.2, the Infrastructure Delivery Schedule and its recognition that the Horsted Campus scheme will deliver improved bus and pedestrian facilities and contribute towards improving the Horsted Gyratory scheme. We are concerned however that the table indicates that two-thirds of the proposed housing will not be delivered until after 2016. The company is submitting its new application shortly with the aim of securing the Council's support for a start on site in 2011. Section 6 - Housing The company welcomes the recognition in draft policy CS14 that the provision of affordable housing must be subject to site viability as this is a key issue in respect of the Horsted campus site. The recognition in draft policy CS15 that a mix of housing should be developed is welcomed. We note that para 6.30 acknowledges that there is little justification for moving away from the provision of flats and apartments in Medway, unlike in other districts. We consider that this paragraph should be	See above. In the absence of a planning permission the SLAA applies standard assumptions concerning deliverability. Subject to planning permission being granted there is no planning impediment to the pace of development.	
		Whilst paragraph 6.30 refers, in particular, to the opportunities for high quality schemes for flats and apartments at the waterfront regeneration sites, there is nothing in the core strategy which prevents	

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

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

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

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

		this area will be protected from unsuitable development by the application of policy CS7.
	Policy CS31. We support the policy	Noted.
	Policy CS32 – should make reference to Medway valley being subject to extensive 'strategic constraints' (as shown on the Key Diagram).	The supporting text to policy CS32 refers to the constraints. The Medway Valley will be protected by the application of policy CS7 and there is no need to repeat this in policy CS32.
	Policy CS33: The yield from Lodge Hill should be expressed as a range of 3,000 – 5,000 dwellings. The resident working age population should also be expressed as a range.	See above.
	The site should not include the SSSI.	Although the site boundary includes the SSSI, no development is proposed within it.
	In the 6 th bullet point of CS33, "having regard " to these matters is not strong enough and each item should be a requirement. Furthermore, an additional requirement should be that the design solutions should respond to the setting in the landscape and the particular features of the surrounding landscape which is a designated Area of Local Landscape Importance.	Whilst many of the items under bullet point 6 could be made a requirement, some degree of flexibility is necessary. For example, not all trees will be worthy of protection and a tree survey will be necessary to determine which ones should be retained. Also, one or more of the heat and power measures may prove to be impractical or uneconomic. Consequently, the items in bullet point 6 provide a checklist for the development brief, which will firm up the requirements as necessary.
	Agree with Policy CS24 : Transport and Movement - Support policy but request that Rainham train station is listed in the list of stations to be improved.	There are no current plans to upgrade Rainham station and it is the most modern mainline station in Medway. However upgrading

		proposals can still be considered outside the core strategy.
	Agree with Policy CS30: Rainham - support policy.	Noted
Dickens Country Protection Society (Chris Fribbins)	Overview - The DCPS appreciate the pressure for further development (both industrial/commercial and residential in the Medway Council area and support the policy of limiting this to specific areas on the Hoo Peninsula (Kingsnorth/Grain and Lodge Hill/Chattenden). However there is concern about the impact of all of these developments on the road network (in particular Four Elms Hill and Sans Pareil Roundabouts and potentially Hollywood Lane and Hoo Road and roads into Strood). These are all within our area of benefit. With the importance of the Lodge Hill development meeting both residential and community facilities for the wider peninsula, access may be a significant problem. We would also be concerned should the development of Lodge Hill be restricted or does not take place as developers are looking at other sites on the peninsula. We would hope that the policies and assessment of these developments would hold even if Lodge Hill is restricted.	Noted The traffic impact of the Lodge Hill proposal has been tested using the Council's traffic modeling system, SATURN, and has been found to be acceptable, subject to a package of improvements. Were the Lodge Hill development not to take place, the core strategy as a whole would need to be re-examined. The fact that Lodge Hill is on the Hoo Peninsula does not automatically mean that any replacement would necessarily have to be on the peninsula.
	Context and Issues - There appears to be insufficient recognition of the historic heritage of the area. There is a current exercise by English Heritage which is investigating the historic landscape of the Hoo peninsula and surrounding areas. There are a number of historic monuments across the peninsula and in our area and beyond which need to be clearly identified and protected. Options and Alternatives - We recognise the long term aim of developing Grain and Kingsnorth as major employment areas, however do have concerns regarding the traffic impacts of these.	Further references to this will be added in the next draft. Traffic impact of the development of these sites was taken into account when the planning applications were being considered.
	Vision and Strategic Objectives - Support the vision and the importance of the quality of development in Lodge Hill and the need to complement other villages in the area and not impact on them (loss of shops and services that are replaced at Lodge Hill as an example) To nurture Medway's rural area and economy, including through village improvements projects, enhanced land management and local	Noted.

	access strategies is welcome and would be willing to work with Parish Councils and others on this.	
	CS1: Regenerating Medway - There is a need to identify the importance of the natural heritage and its contribution and importance to regeneration.	Policy CS1 deals specifically with the redevelopment programme for Medway. The importance of the natural heritage is recognised elsewhere in the core strategy.
	CS5: Development and Flood Risk - This policy is supported and is practical in limiting developments unless they can meet strict criteria.	Noted
	CS6: Preservation and Enhancement of Natural Assets - Support this policy. However where negative impact cannot be avoided, the wording the 'compensation will be sought' should be strengthened to 'compensation will be provided' and functioning prior to the damage occurring.	Delete " sought " and replace with " provided ". The timing of the creation of new habitats and their maintenance arrangements will be a matter of detail to be included within an appropriate, legally binding agreement.
	CS12: Heritage Assets - Support the policy, but would want to see more recognition of the assets that do exist and policies to protect and enhance them where possible.	It is considered that the explanatory text and the policy, adequately describe the compass of the historic assets of Medway and the necessary scope of the policy to protect and enhance them.
	CS13: Housing Provision and Distribution - While generally supportive we recognize the pressure that 17,930 new homes would have on the wide infrastructure of the Medway Towns and need to ensure that infrastructure improvement matches the development and where possible precedes it.	An infrastructure plan, which sets out the infrastructure necessary to be provided to support the development proposed in the core strategy, will be submitted to the Secretary of State together with the strategy itself.
	CS21: Conventional Energy Generation - We recognise the strategic, regional and national nature of power generation on the Hoo peninsula but feel that the area has not benefited from that commitment. We would want to see that provision recognised as the area carries a larger burden because of this.	Policy CS21 makes provision for the recruitment of local labour, local supply chains, district heating and further added value research and

		development activities that would all benefit the local area.
	CS22: Provision for Minerals - Existing mineral wharves in our area are a valuable asset, but such use does conflict with policies that recognise the Historic Monuments and right of access to the riverside and public footpaths. We would want to see specific mention of the need to develop more compatible ways of working that allow this without impacting on the wharf operations.	See response to Cliffe and Cliffe Woods PC.
	CS23: Waste Management - Concern that the only identified sites for disposal to land appear to be on the Hoo peninsula with the impact that would have on the area and further contribute to traffic concerns.	See response to Cliffe and Cliffe Woods PC.
	CS24: Transport and Movement - Concern about the lower car parking standards in areas with already or potentially good public transport availability. An attractive, accessible and affordable public transport alternative to reduce car usage is required, but there will still be need for private transport out of peak times that public transport cannot meet and car ownership will remain high.	Noted.
	CS31: Hoo Peninsula and the Isle of Grain - Support this policy and look forward to working with others to achieve the aims. However experience has shown that it is difficult to generate interest in the local community and this will require dedicated resources to achieve.	Noted
	CS33: Lodge Hill - Recognise the intent of the policy but have some concerns regarding the scope and size of highways improvements suggested. This will be insufficient to respond to the pressures on the local highway network that this development, along with Kingsnorth and Grain will generate. Other conflicts from Medway City Estate (Park and Ride) and increased usage of the site will also feed onto the same highway network. Traffic management to limit access between Lodge Hill/Chattenden and Upnor (Upnor Road/Upchat Road) would also create problems for some local residents and especially the ability of Upnor residents to access the facilities at Lodge Hill. There needs to be much more work done to mitigate against the environmental impacts which could include, for example, the direct loss of habitat supporting the nationally important population of nightingale present. The remaining population within the adjacent Chattenden Woods SSSI will also need to be protected.	The Council recognises that Four Elms roundabout and the road network to Sans Pareil and the Medway Tunnel are a congestion hotspot. Development proposals for Lodge Hill will have to provide sufficient, appropriately phased improvements to this road network to ensure that its impact is limited as far as possible. This is reflected in the existing wording of Policy CS33. Measures to discourage rat running will have to provide local

		accessibility for residents of existing communities, as noted in policy CS33 and on the Concept Plan (Figure 11.4). The Council is also preparing a development brief for the site which will consider both of these issues in greater detail. The importance of the site for nightingales, among other ecology, is recognised. Land Securities and Medway Council are working closely with Natural England to ensure that this is protected. All designated habitat areas (including the SSSI and ancient woodlands) are to be protected, as shown on the Concept Plan (Figure 11.4) Further references to this issue will be added to Chapter 12 Further references to water issues are being added to the next draft in response to a number of representations and initial results from the SA. Although the evidence list on page 12 does not include a reference to a water company plan, there is a reference elsewhere. Paragraph 5.23 refers to proposals in Southern Water's Final Resources
Environment Agency	Key issues (page 10) - It is not clear on how Medway needs to work with or who they will need to control/influence to tackle the core issues e.g. reducing pollution affecting the estuary. It is stated that it needs to be done but there is no reference to who you should work with or how it might be done. Water - There is not much in the draft Core Strategy (CS) about water infrastructure (drinking water and waste water) costs and needs. There is limited evidence on water and waste water requirements for deciding on the 'Key Issues' in the CS Section 2.22 Page 10. No water cycle strategy has been carried out and there is no reference to Water Company Plans, therefore water is not represented in the evidence list in the CS Section 2.29 Page 12. Water as a limiting factor is mentioned in the SA Section 3.33. Water supply is a crucial sustainability issue, but not addressed in the CS.	

		Management Plan 2010 to 2035, to ensure an adequate water supply and policy CS3 supports these proposals.
	Wastewater treatments works are mentioned under the infrastructure requirements for Hoo and Rochester (Table 12.2 CS Page 127) but no other water infrastructure (potable or waste) has been identified as a requirement for these or other sites. The water and wastewater infrastructure needs to be in place to support any new development. The CS strategy needs to ensure that it is clear that this, as well as other essential infrastructure, is provided in a timely manner.	Again, Southern Water Plc is engaged with the Council in the development of the Medway Core Strategy. Their comments on what additional infrastructure that will be required for the main areas expected for development are addressed by their representation. Also, the Infrastructure Plan, part of the Medway Core Strategy's evidence base, has considered what the potable and waste water treatment infrastructure requirements to support the area's expected growth will be. This evidence is integral to the Medway Core Strategy and supports the rationale for the growth identified to support the area's renaissance.
	<u>Using water wisely – Retrofitting</u> Very little is mentioned in the CS regarding retrofitting. Little outline is given regarding what is meant by retrofitting. We recommend that the retrofitting section explains that energy and water demand management should be considered. The SA section 6.76 states that <i>"retrofitting in support of 'crucial sustainability issues'"</i> and section 11.5 says <i>"retrofitting is supported through the core strategy policies"</i>. Something more explicit should be included to describe what Medway envisage as retrofitting and which policies support it. We agree with section 6.81 of the SA that this needs firming up.	The sections of the sustainability appraisal referred to, were mainly references to retrofitting technologies relating to energy. In the core strategy, paragraph 5.30 refers to the problems of bringing older housing stock up to new thermal standards (i.e. insulation), it being neither cheap nor easy to achieve. It is noted that retrofitting could be applied to water as well as energy,

		although the Environment Agency does not give any examples of water retrofitting. One example could be universal water metering which is included in the core strategy as one of Southern Water's proposals that is supported by policy CS3.
	<u>Water Quality</u> - One of the six ambitions in the CS Section 4.10 Page 24 is to have a safe and high quality environment. Green infrastructure is well represented later in the document but the blue ribbon network of water courses is missing. There is an opportunity to link high quality water bodies to place making and a high quality built environment. More could be made, generally, of the benefits of a good quality water environment. This link could be made in the green grid and green space section – Policy CS8 Page 43. Contributing to improved river water quality is not an indicator in the River Medway Policy. The SA suggests that CS should look at how to monitor the impact of water policies, but none seem to be included in Monitoring section. We agree with 6.33 of SA that states that water quality is missing.	The Medway Core Strategy does address the need to integrate watercourses into 'place making'. Policy CS7: Countryside and Landscape, the policy sates amongst other matters that, "Appropriate designs of development shall accord with which it is located, including having regard to and conserving: The landform and natural patterns of drainage." References to water quality, pollution and the 'blue grid' are being added to the river chapter.
	Policy CS3 – Whilst the use of Code for Sustainable Homes (CfSH) is fine, for water code level 3 and 4 are the same. There is no discussion over why level 3 has been chosen over any of the higher levels. The guidance identifies some really cheap and simple ways of gaining points for each level. Its disappointing that Medway appears to lack the ambition of other councils who have adopted policies driving for higher standards when the development is on a larger scale (a threshold number of dwellings), to account for economies of scale. Policy CS3 should also include state the importance of working with utility providers to ensure phasing and timing of development to allow plans to work and deliver as planned.	A number of refinements are proposed to policy CS3, including the introduction of a water usage target.
	Policy CS6 should include a commitment to work within Medway responsibilities to deliver the objectives of the Water Framework Directive (WFD) including actions	The end of para. 5.23 will have the following sentences added:

	related to discharges and extractions from the environment as well as morphological work. A measure on WFD status for monitoring could point towards needs for more action or identify areas where the council may want to influence more action in others to ensure their natural assets and resources are of as high a standard as possible.	<i>“The Water Framework Directive applies to all types of groundwater including rivers, lakes, estuaries, wetlands, ground and coastal waters. The directive’s aim is to push the proportion of water bodies in good ecological status (GES) from 26% now (2011) to 32% by 2015; and then get the majority of our water bodies to GES as soon as possible, and get as many of the UK’s water bodies as possible to GES by 2027. The Council will support the objective to increase the proportion of Medway’s water reaching GES through: Infrastructure capacities, timing and delivery for new development. Proper integration of Sustainable Urban Drainage systems and/or water neutral developments.”</i> Policy CS3 will be amended with the following wording added to the end, as follows: “It will also support the objectives of the Water Framework Directive for water bodies to reach a Good Ecological Status by 2027”
	The River Medway policy CS25 makes no reference to improving water quality in the Medway and there is no mention of the water framework directive within the core	Medway Council acknowledges that it is a partner for implementing

	strategy. There is an action within the Thames river basin management plan specifically for the Medway (TH0091) - Education campaign for boat users regarding disposal of toilet waste, oil, solvent, paint and cleaning products in waters at risk from diffuse pollution, which lists the Local Authorities as delivery partners. As they have put quite a lot of emphasis on the river it may be appropriate to require contributions from developers for the maintenance and improvement of the river, as they get a premium for developments that benefit from proximity to the river. We and the wildlife trusts have made similar requirements in other councils e.g. Hastings and Eastbourne, where developers are required to contribute to green networks or a green network fund. The council seemed quite amenable to it, and asked to have it in our formal response. Policy CS25 seems to be promoting new marinas and other landing places quite a lot within the River Medway policy. The council is advised that such proposals are not likely to have no environmental impact.	action TH0091 of the Thames River Basin Management Plan in 2012. This is an educational campaign and the core strategy is not the appropriate vehicle for implementing this proposal. Contributions towards the maintenance and improvement of the river can be considered on a site-by-site basis through the development management system and does not require a specific policy in the core strategy. Otherwise a number of changes are proposed to the river chapter.
	Brownfield Land The CS lists re-use of previously developed land (PDL) as its primary key strategic objective (CS page 25) but does not develop this objective further to say how this re-use can be delivered.	Policy CS1 will be amended by the insertion of a new paragraph at the beginning, which states “The development strategy for Medway is to prioritise re-investment in the urban fabric, particularly by the redevelopment and re-cycling of underused, derelict and

		previously developed land with a focus on the Medway Riverside and the town centres.”
	Section 12.5 highlights the location of Medway within the Thames Gateway that has some of the most complex and difficult development sites thanks to legacy of past industrial use, flood risk and land contamination, but again does not suggest mechanisms to help deliver other than say public subsidy will be required to bring them forward.	Policy CS1 states that Medway Council will continue to work in partnership with all relevant bodies and commercial interests in taking the regeneration programme forward. The problems of taking difficult sites forward will therefore be addressed on a site by site basis in conjunction with the relevant parties.
	It would be of benefit to the core strategy to suggest mechanisms by which partners could work together towards delivery of brownfield land locally. There are some activities which in order to bring benefits locally is best delivered at a more strategic level where significant economies of scale exist and can be made.	Policy CS1 states that Medway Council will continue to work in partnership with all relevant bodies and commercial interests in taking the regeneration programme forward. The problems of taking difficult sites forward will therefore be addressed on a site by site basis in conjunction with the relevant parties.
	Assessment and sustainable remediation of brownfield and land contamination is something that can be done at this level and there are opportunities within Medway to facilitate this for the numerous brownfield land sites in this area.	Noted.
	There are a number of strategies, concepts and evidence based work streams that could be developed and delivered to help unlock brownfield sites in Medway including Global Remediation Strategies, Custer Initiatives and Local Brownfield Strategies. We suggest they should be incorporated into the CS possibly under a new “Land Quality” or “Brownfield Land” heading in section 5, Cross Cutting Themes.	Medway Council will give consideration to these and other measures when considering means to unlock difficult development sites but it does not consider it necessary to describe them in the core strategy.

	<u>Promoting Sustainable Remediation – Cluster initiative</u>, Cluster is a method for developing and remediation of a group of sites that are relatively close to each other that would be either uneconomic to develop on their own or represent an opportunity to act in a more sustainable manner, for example to save on costs, reduce resource consumption and environmental impacts. In addition, significant reductions in the timescale of projects may be achieved. With the added advantage of bringing a number of contaminated and derelict land back into beneficial use with associated community gains. After treatment on the hub site, some or all of the material may be suitable for use on either the originating site or on another site within the Cluster group. In addition, some materials may be treated to enable their reclassification from hazardous to non-hazardous, thereby providing the opportunity to dispose of materials with no reuse potential in local waste management facilities. A soil treatment centre or soil hospital was developed for the Olympic Park remediation works and a something similar could be developed for the Medway area. Such a centre would act as treatment hub for local treatment of soils and would be linked to section 3.52 of the core strategy that discusses treatment of waste close to origin.	Such a system is attractive and the Medway Core Strategy will be permissive rather than prescriptive of where this would happen in the area. However the Council has found no evidence of market demand for such facilities.
	Flood Risk Pages 34 to 36 Section 5.33- This sentence '<i>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</i>' should be changed as it does not reflect the variety of techniques that can be used to manage flood risk. '<i>Where development is unavoidable next to rivers and the coast, as is the case in much of urban Medway, a range of sustainable flood risk management measures should be incorporated, including a mixture of formal flood defences land raising, flood resilience and resistance measures</i>'.	Noted. The second sentence of section 5.33 in the Draft Core Strategy shall read: 'Where development is unavoidable next to rivers and the coast, as is the case in much of urban Medway, a range of sustainable flood risk management measures should be incorporated, including a mixture of formal flood defences land raising, flood resilience and resistance measures'.

	Section 5.45- This whole paragraph is incorrect. It will need to be changed to read as follows - <i>'to encourage the uptake of SUDs the Flood and Water Management Act 2010 amends section 106 of the Water Industry Act 1991, which removes the automatic right for development to connect surface water runoff to the public sewer system. The Act creates SUDs approval bodies which will be unitary/county local authorities. SUDs approval bodies will be required to approve SUDs in line with new national standards (which are being drawn up by CIRIA and WRc). Where SUDs drainage systems drain more than one property the SUDs approval body will be required to adopt and maintain them.'</i>	Paragraph 5.45 will be deleted and replaced by the following " The Flood and Water Management Act, 2010, creates SUDs approval bodies which will be unitary/county local authorities. SUDs approval bodies will be required to approve SUDs in line with new national standards, which are currently being drawn up. Where SUDs drainage systems drain more than one property, the SUDs approval body will be required to adopt and maintain them. "
	Section 5.46 – The word 'defence' should be changed to 'flood risk management'. The sentence saying 'potential defence works and strategies that should be applied to meet the required defence standard' should be changed to read <i>'potential works and strategies that should be applied to ensure flood risk is managed sustainably'</i>	Noted, the sentence 5.46 shall now read: 'potential works and strategies that should be applied to ensure flood risk is managed sustainably'
	Policy CS5 – The following should be changed to more accurately reflect the outputs of the study, <i>'Relevant flood defence works as identified in the Medway Strategic Urban Flood Defence Strategy should be incorporated, if applicable'</i> this should be changed to 'Options to manage flood risk as identified in the High level appraisal of the potential solutions to manage Flood Risk in the Urban Medway should be incorporated where applicable.'	Where policy CS5 states: 'Relevant flood defence works as identified in the Medway Strategic Urban Flood Defence Strategy should be incorporated, if applicable' replace with: 'Options to manage flood risk as identified in the High level

		<i>appraisal of the potential solutions to manage Flood Risk in the Urban Medway should be incorporated where applicable.</i> Agreed. Paragraph 10.8 will be amended by deleting the first two sentences and inserting “Currently, consultants are completing an update of the Strategic Flood Risk Assessment for the Medway and are preparing an associated appraisal of the potential options to manage flood risk in the Urban Medway (the basis for the Strategic Urban Flood Defence Strategy). This puts forward options for managing flood risk for new development which are largely based on flood defence asset replacement and do not consider protection that could be afforded by a combination of flood risk management measures.” Noted.	<i>appraisal of the potential solutions to manage Flood Risk in the Urban Medway should be incorporated where applicable.</i> Agreed. Paragraph 10.8 will be amended by deleting the first two sentences and inserting “Currently, consultants are completing an update of the Strategic Flood Risk Assessment for the Medway and are preparing an associated appraisal of the potential options to manage flood risk in the Urban Medway (the basis for the Strategic Urban Flood Defence Strategy). This puts forward options for managing flood risk for new development which are largely based on flood defence asset replacement and do not consider protection that could be afforded by a combination of flood risk management measures.” Noted.
	Section 10.8 (page 90) – This whole paragraph needs to be changed to more accurately reflect the outputs of the defence study. Suggested wording: ‘Currently consultants are completing an update of the Strategic Flood Risk Assessment for the Medway and are preparing an associated appraisal of the potential options to manage flood risk in the Urban Medway. This high level study puts forwards options for managing flood risk in the urban Medway for new development, the options presented are largely based on flood defence asset replacement and do not consider protection that could be afforded by a combination of flood risk management measures. Currently, there are different standards and levels due to different land ownerships and engineering works of different ages. It is accepted that, although a large part of the urban waterfront is located within the flood plain, it needs to be defended due to the long established settlement form and the value of the commercial assets that would otherwise be at risk. Beyond the current urban boundaries however it is important to avoid inappropriate development that would increase flood risk and reduce the capacity to store flood water.		
	Section 10.9 - An important area of regeneration the sequential test (ST) will conclude that development in some flood risk areas is appropriate. As such, flood risk must be taken into account at the earliest opportunity. Policy CS25 (page 92) – This policy currently does not have regard to PPS25 and the sequential test. It should be amended to include ST and exception test. This policy needs to make it clear the ST will be informed by the Strategic Flood Risk Assessment and the Medway Strategic Urban Flood Defence Strategy. We are unclear as to what is meant by the ‘natural floodplain’. PPS25 definitions should be used for functional floodplain. We recommend a policy of no encroachment into the river channel, encroachment as a result of development can have significant		Flood risk is currently dealt with in policy CS5 as well as paragraph 10.8 and policy CS25. It would be more appropriate for all flood risk issues to be consolidated into a single policy. Consequently, the fifth bullet point of policy CS25

	impacts on erosion and sediment transport in estuarine environments and can lead to undermining of defences as well as loss of habitat.	will be deleted, paragraph 10.8 will be inserted after paragraph 5.46 on page 35 and any necessary amendments will be made to policy CS5.										
	<u>Intertidal Habitat Creation</u> - We strongly support CS Section 10.7 Page 90. Our Thames Estuary 2100 Plan sets out how to manage tidal flood risk for London and the Thames estuary through to the end of the century. We also used our climate change and geomorphological modeling to understand the potential loss of designated intertidal habitat in the estuary due to sea level rise, identifying 1200 hectares of habitat that will potentially need to be replaced. We published our findings in the interactive web based Coastal Habitat Management Plan (CHaMP), which was endorsed by Natural England. 3 preferred Intertidal Habitat Creation and Replacement sites within Medway – St. Marys, Grain and Allhallows. <table><tr><th>Site</th><th>Ecological development</th></tr><tr><td>Site 1</td><td>Tidal in first 20 years of plan</td></tr><tr><td>Site 2</td><td>Tidal in first 20 years of plan</td></tr><tr><td>Site 3</td><td>Tidal mid century</td></tr><tr><td>Site 4</td><td>Tidal in third quarter of century</td></tr></table>	Site	Ecological development	Site 1	Tidal in first 20 years of plan	Site 2	Tidal in first 20 years of plan	Site 3	Tidal mid century	Site 4	Tidal in third quarter of century	Noted.
Site	Ecological development											
Site 1	Tidal in first 20 years of plan											
Site 2	Tidal in first 20 years of plan											
Site 3	Tidal mid century											
Site 4	Tidal in third quarter of century											
	<u>London's Waste Exports</u> - Whilst the South East Plan has been revoked, that does not necessarily mean that government may not require waste from London to be dealt with by other areas. Medway, need to have a contingency plan.	Given the introduction of a new zero waste hierarchy, rapidly declining demand for landfill generally and no interest in Medway from London Boroughs or commercial operators it is considered that there is no basis for										

		making provision for London's waste.
	The <u>Strive for Overall Self Sufficiency</u> - Section 8.59 (page 80) looks at waste arising just from Medway. Whilst we recognise that an element of self-sufficiency is required, realistically, Medway is part of Kent and the South East Region (section 8.49) and has in some areas the most suitable geology for potential new landfill sites in Kent. It is preferable not to transport waste long distances for disposal, however in some circumstances it may be necessary because other constraints such as environmental constraints. This section needs to look at the potential for Medway to accept not only waste from Medway but the whole of Kent. The council also seems to have overlooked the fact that transportation may not just be by road but by water.	Self-sufficiency at Medway is a guiding principle of national waste planning policy, although it is understood that waste movements across administrative boundaries do occur. Multi-modal transport for waste is something occurring at Chatham Docks at present. Further opportunities exist at Grain and Halling. The text of the Core Strategy acknowledges this inherent potential.
	Policy CS23: Waste Management (Page 81) - Within this policy it is stated that "Provision will be made for the collection, reuse, recycling, treatment and disposal of Medway's waste by: Assessing the potential for an inert waste landfill site etc". As previously stated the council needs to consider not just its own waste but from other areas within the region and potentially London. We are also not sure how the council can justify assessing the requirement for a new inert landfill when this material can be reused and recycled, and there are already existing inert landfills within the region. This goes against the principles of the waste hierarchy as outlined in the Waste Strategy 2007. One of the criteria used within the policy to help assess the proposal for new void space for a non-inert and hazardous waste disposal site, is the site being well related to the primary road network. The council needs to consider other modes of transport, for example by rail or by sea. Another criterion is "That all the reasonable requirements of the Environment Agency can be satisfied". It is the council who will determine if a location is appropriate or not with our advice on the potential impacts the proposed facility may have on the environment. As such, it is in fact environmental constraints that will determine whether a proposed location for a facility is appropriate or not. As such, we would recommend that this bullet point is amended to reflect this. We are keen to work with the council and its	References to inert waste are being deleted in view of the new zero waste principle. The proximity principle requires the authority to approach waste management capacity planning in a manner that discourages rather than simply accommodates increased 'waste miles'. Assessment of site suitability as to whether it is a sustainable location with multi-modal transport opportunity will be a function of other, site specific, development plan documents. The Core Strategy does identify broadly such

	partners on future projects, particularly where our evidence base and advice can help in decision making, and where it meets the needs of other priorities and directives such as flood risk management and WFD.	sites; Medway City Estate, Kingsnorth and to a lesser extent the established employment areas. Chatham Dock is already undertaking waste processing and is an established employment site.
Friends of the North Kent Marshes	Policy CS1: Regenerating Medway - This regeneration policy does not mention Medway's globally important natural heritage and the need for its protection and enhancement; indeed Medway's regeneration cannot take place at the expense of our rich natural heritage. Therefore, both our globally important natural heritage as well as our globally important cultural heritage should be at the heart of this policy. The scale of development proposed in this policy could have a negative impact on the Medway Estuary and Marshes SPA/Ramsar Site. We strongly recommend that riverside regeneration sites be fully assessed in the Appropriate Assessment (AA) of the Core Strategy. Policy CS3: Mitigation and Adaptation to Climate Change - There is much concern about the sustainability of water supplies within Medway, therefore water efficiency must be a priority and all new developments must be required to meet the strictest water efficiency standards as well as new technologies i.e. rainwater harvesting. We strongly urge that for new developments this policy should say 'a minimum of level 4 rating of the Code for Sustainable Homes' and not merely try to 'achieve level 3' so that Medway is able to meet its carbon reduction targets. Policy CS4: Energy Efficiency and Renewable Energy - We support the target of energy from renewable for new developments to be 20%. Policy CS5: Development and Flood Risk - We support the commitment to address coastal squeeze and work with the Environment Agency to identify and implement positive solutions. We would strongly urge that Medway Council includes the RSPB in this partnership to identify work that needs to be undertaken in order to investigate the issue further and evaluate the sites that have been identified. We note and agree with the statement in the Medway Wildlife, Countryside and Open Spaces Strategy 2008-2016 that '<i>RSPB advocates that compensatory habitat is provided for lost intertidal habitats by managed realignment, but not at the expense</i>	Policy CS1 deals specifically with the redevelopment programme for Medway. The importance of the natural heritage is addressed elsewhere in the core strategy. An appropriate Assessment will be carried out on the core strategy before it is submitted to the Secretary of State. An amendment has been proposed elsewhere in the document that will introduce a water usage target. Noted. Noted.

	<i>of internationally designated freshwater areas'. We also note that these are not the only locations identified in the TE2100 Plan there are another four sites within the Thames Estuary. We trust that Medway Council will do all in its power to protect our internationally designated freshwater habitats.</i>	
	Policy CS7: Countryside and Landscape - We strongly urge that Areas of Local Landscape Importance are given special consideration; they complement other designations and contribute significantly to our sense of place. This policy talks about landscape but with no particular reference to the North Kent Marshes Special Landscape Area (SLA) and the Medway Wildlife, Countryside and Open Spaces Strategy 2008 - 2016 Located in North Medway, the North Kent Marshes Special Landscape Area occupies 19% of rural Medway. The landscape of the North Kent Marshes is of county importance and is recognised as a Special Landscape Area in the Local Plan and Kent and Medway Structure Plan. The marshland landscape, with its broad and low horizons is of particular importance for wetland birds, which visit in tens of thousands during the winter. Key features of the landscape are their sense of remoteness, the ditches that form wet fences controlling the movement of people and cattle, and the winter flooding which creates wetlands for feeding birds and breeding. The remoteness of the North Kent Marshes is a product of its separation from urban Medway. The rural hinterland, which acts as a buffer between the marshes and urban Medway, provides this physical separation and therefore also requires careful management. This policy should reflect the importance of this rural green buffer that must be maintained.	Paragraph 25 of PPS7, states that local landscape designations should only be maintained where it can clearly be shown that criteria based policies cannot provide the necessary protection. No evidence has been provided of this and therefore the local landscape designations will not be retained. The landscape characteristics of Medway are described in the Medway Landscape Character Assessment.
	Policy CS8: Open Space, Green Grid and Public Realm - This policy text states that access to open spaces will be improved and that the strategy seeks to protect the important natural environment while enhancing sensitive access to the area. There is potential that increased access to coastal sites in Medway could have a negative impact on designated sites, through increased recreational disturbance. We strongly recommend this matter be fully assessed in the AA of the Core Strategy.	Noted
	Policy CS12: Heritage Assets - Support the policy, but would want to see more recognition of the assets that do exist and policies to protect and enhance them where possible. Indeed Cliffe has one of the finest collections of buildings on the Hoo Peninsula.	It is considered that the explanatory text and the policy adequately describe the compass of the historic assets of Medway and the necessary scope of the policy to protect and enhance them.

	Policy CS17: Economic Development - Employment development in an inappropriate location and/or without effective mitigation could have a negative impact on features of nature conservation concern, including internationally designated sites, for example by increased noise and disturbance through construction activities. We therefore strongly recommend that this matter be fully assessed in the AA of the Core Strategy.	Noted
	Policy CS21: Conventional Energy Generation - This policy states that 'proposals for additional power generation and energy storage capacity on the Hoo Peninsula and the Isle of Grain will be supported subject to their impact on the natural environment...being acceptable'. This matter must be fully assessed in the AA of the Core Strategy. We would encourage sustainable energy to be used wherever possible, to be developed in a way that guarantees the protection of sensitive and important wildlife sites and species.	Noted
	Policy CS22: Provision for minerals - We are concerned about the location of the safeguarded areas for sand and gravel extraction (part of and adjacent to the Medway SPA/Ramsar site) and the consequent direct and indirect impacts on these designated sites. This matter must be fully assessed in the AA of the Core Strategy. All mineral extraction sites should have a presumption that restoration will be to nature conservation after use, including reed bed and open water habitats, enabling Medway to make a positive contribution to the Kent Biodiversity Action Plan targets.	Noted
	Policy CS23: Waste management - We are concerned that the only identified sites for disposal to land appear to be on the Hoo Peninsula with the impact that would have on the area. In addition to the listed criteria, land raising or the creation of a void space to facilitate the disposal of hazardous and non-inert waste on the Hoo Peninsula and the Isle of Grain should be considered against the environmental impacts, particularly on the SPA/Ramsar sites. This matter must be fully assessed in the AA of the Core Strategy.	Noted.
	Policy CS24: Transport and Movement - We are supportive of this policy to extend walking and cycling networks.	Noted.
	Policy CS25: The River Medway - We question why there is a policy specific to the River Medway, but not the River Thames. Some text in this chapter is equally relevant to the Thames, for example the section titled '<i>Management of the Natural Ecosystem</i>'. This policy supports greater use of the river by recreational boat users.	The River Medway passes through the urban area and is subject to many pressures resulting from the use of the river itself and adjacent

	Given the potential impacts of increased recreational disturbance to the SPA/Ramsar sites, this matter must be fully assessed in the AA of the Core Strategy.	development. The Thames coastline remains essentially undeveloped and the Council has no proposals either for increased use of the river or development on adjacent land. Consequently, no specific policy for the River Thames is deemed to be necessary.
	Policy CS31: Hoo Peninsula and the Isle of Grain - We are generally supportive of this policy. It is worth noting that the farmland in this area also acts as a vital rural green buffer protecting the internationally protected marshland sites from disturbance from more urban areas, this must be maintained.	Noted.
	Policy CS 33: Lodge Hill - We have serious concerns about the direct and indirect environmental impacts of this development which will result in the direct loss of habitat supporting a significant proportion of the nationally important population of nightingale present at the site. The remaining population within the adjacent Chattenden Woods SSSI will be likely to suffer significant indirect urbanisation effects, including recreational disturbance and cat predation.	Land Securities are working closely with English Nature to ensure that the natural environment in the vicinity of Lodge Hill will be adequately protected.
Frindsbury Extra Parish Council (David Coomber, Chairman)	2.25 Water Supply in Medway is a major concern as more development comes on stream (e.g. Lodge Hill), this needs urgent attention.	When the overall level of development in Medway was being considered during the preparation of the South East Plan, water supply was taken into account and it was concluded that there would be an adequate supply of water to serve this development. Any specific issues relating to water supply at Lodge Hill will be addressed in a masterplan and development brief for the site.
	2.27 – supports the implementation of road and retail improvements to Strood.	Noted.
	5.25 – not in favour of wind farms in the middle of the Hoo Peninsular.	There are no proposals in the core strategy for wind farms in the

			middle of the Hoo Peninsula.
	5.36 – Both Medway City Estate and Hogmarsh Valley need protection from possible flooding.		Noted.
	5.54 – Fully supports the designation of the SSSI for Tower Hill to Cockham Wood.		Noted.
	5.75 – Supports the enhancement of the southern gateway to the area of Medway City Estate and Manor Farm.		Noted.
	CS8 – Supports bullet points 3-5.		Noted.
	5.100 – Supports additional and enhanced health facilities at Wainscott.		Noted.
	5.119 – Supports conservation and improvements to visitor facilities for Rochester Castle and Upnor Castle.		Noted.
	6.19 – Affordable housing: supports final paragraph, and believes that direct consultation should take place between developers and Parish Councils.		Noted.
	6.33 – Supports special care accommodation, and identifies the former site of Temple School as a suitable location.		Noted.
	7.48 – Retail and town centres – keen on the provision of traffic management measures needed to address the impacts arising as a result of the new Sainsburys store that has just been permitted.		Noted
	8.43 – Construction, demolition and excavation waste – in any planning application to develop an alternative facility for waste treatment, the Parish Council would need to pay particular attention to potential routes taken by HGV vehicles to and from Medway City Estate.		Noted.
	8.54 – Supports self sufficiency, but monitoring required.		Noted
	8.58 – Supports infilling of large chalk pit at Frindsbury.		Noted.
	9.19 – Supports retention of Lower Upnor Pier for water transport.		Noted
	11.8 – supports upgrading of Strood Station.		Noted
	11.14 supports retail development in Wainscott Road and its safeguarding as a neighbourhood centre.		Noted
	Lodge Hill – Concerns over amount of potential construction traffic passing through the parish.		The routing of construction traffic will be addressed at the planning application stage to ensure that local amenity is safeguarded.

Frindsbury & Wainscott Community Association (Mrs Anne Wade)	Page 7 - 2.11 <u>Social Profile</u> . We note 150th - housing development encourages over-population - result deprivation.	Both population growth forecasts over the plan period and the way people are now choosing to live has resulted in pressure for the development of further housing. Good design, appropriate infrastructure and use of previously developed land will both deliver the required numbers of new units and help to regenerate the area resulting in a reduction rather than an increase in deprivation.
	Page 10 - 2.23 <u>Hoo Peninsula</u> . Grade 1 Farmland - conserved only if Chattenden development is scaled down.	A small proportion of Grade 3 agricultural land would be affected by the development. No Grade 1 land would be. The vast majority of the development site area is previously developed land.
	Page 15 - 3 <u>Options and Alternatives</u> . 815 dwellings annually are excessive. Infrastructure does not and cannot cope. We should be removed from the Thames Gateway.	The Thames Gateway remains a growth area that Medway Council cannot ignore or withdraw from, as it is national government planning policy. The projected 815 new dwellings annually reflect a balance between local needs, growth area requirements and the availability of previously developed land.
	Page 39 - <u>Countryside & Landscape 5.70</u> Fringe Land - protection from urban sprawl. Should receive far stronger protection - frequently fails against Developer policies and the Appeal System.	The Strategic Land Availability Appraisal (SLAA) has identified sufficient within the main urban areas, plus Lodge Hill to meet Medway's housing requirements without resorting to the release of fringe land for urban extensions. This land will be protected by Policy

		CS7 that sets out strong criteria for the protection of the countryside, which the Council considers, will stand up in the appeal system to ad hoc proposals for development.
	5.75 - Medway City Estate is a 'hotch potch' of buildings without landscaping. Promised improvement has not happened. Many services should remain in Town Centres.	The employment area was developed under the auspices of an enterprise zone during the 1980's. The need to improve the estates overall setting is well understood. Noted.
	Page 41 - 8.7 <u>Countryside & Landscape</u> Urban sprawl, has not been contained under present Planning System.	Noted.
	Page 46 - 5.102 <u>Sustainable Communities</u> St Bart's Hospital (listed) should remain as a centre for Rehabilitation; centrally located - well adapted to need, should be retained at all costs. <u>Remove this policy</u> from the L.D.F.	The local Primary Care Trust regard the building as no longer suitable for local health care needs and will be seeking to replace the facility with a more modern site in the area over the plan period. Noted.
	Page 49 - <u>Conservation Areas</u> need even stronger Protection.	Noted and see above.
	Page 53 - 6. <u>Housing</u> . Housing figures unacceptable - even excessive; present Infrastructure cannot cope.	
	Page 63 <u>Economic Development</u> .2 More available housing results in commuting.	Employment land is being planned as well as new dwellings to counter this. Noted.
	Page 70 - 7.48 <u>Retail Warehousing</u> - another example of Urban Sprawl.	Noted.
	Page 78 - <u>Energy Waste & Minerals</u> .	
	8.43 - Alternative Facility Medway City Estate. Access and Lorry movements in surrounding locality.	Noted; application has been withdrawn. The table in Appendix C identifies the Medway City Estate as a congestion hot spot where intervention to improve capacity and junction operation is currently under investigation.
	Page 80 - 8.58 The Pit at Manor Farm - Conservation Area - unsuitable for	Noted.

	Infill; difficult access and amenity destruction - rejected by KCC and LA in 1996. <u>We request this Policy be removed from L.D.F.</u>	
	Key Action, Bus transport from Hoo Peninsular is poor. Should be a service from Wainscott to the Town. Buses from Hoo are frequently overcrowded. Bus design is <u>not</u> Passenger friendly - lacking shopping space, narrow seating, fierce braking system.	The key actions (which are quoted from the Local Transport Plan) include improving the quality of bus services. This includes bus services to rural and peripheral areas. Policy CS33 (Lodge Hill) also includes a specific requirement for Fastrack-style bus links from the site to the Medway Towns, which should be able to benefit neighbouring communities as well.
	9.13 - Four Elms Roundabout is poorly designed - too large - many road users consider it a traffic hazard.	The core strategy recognises that the Four Elms roundabout is a main congestion hotspot where investment is required to tackle the problem.
	Page 104 <u>Area Policies</u> - 11.7 Strood Deprivation - translocation of business to City Estate and large supermarkets on the periphery. Demolition of Civic Centre was a retrograde move. The Civic Centre provided various public facilities for payment, meetings with Councillors and Groups, and adequate parking. Strood has nothing to offer as a replacement for these <u>lost Amenities</u>. Gun Wharf is <u>more than unacceptable</u>. No Parking and very limited space for Meetings.	Noted
	Page 96 11.14 What is meant by a Neighbourhood Centre at Temple Waterfront? Why is it necessary, given Strood Town Centre problems?	The neighbourhood centre in this case is a mixed use centre comprising a small number of retail and office uses and a community use to serve the residents of 620 dwellings, all of which are part of an outline planning permission.
	11.17 - Development figures denote overdevelopment with attendant problems. We emphasise that Frindsbury and Strood have very different backgrounds - historically and in many other respects. Strood was always an URBAN area - Frindsbury related to the Countryside. Identity is valuable and should be conserved. <u>Planners</u>	All the sites listed in table 11.1 are already committed, either through development briefs or planning permissions.

	<u>please note.</u>	
	Chatham Page 99 - 11.35 The New Civic Office is inadequate Parking facilities for visitors non-existent. Not served well by public transport. 3. Distant from Town Centres of Strood and Gillingham and the Hoo Peninsular.	Noted
	Hoo Peninsula Page 104 - 11.63 Hoo Peninsula, with its rural quality, will be lost if large settlements are allowed at Chattenden. Furthermore, a lower Thames Crossing would destroy the unique isolation it has enjoyed over the centuries.	View noted.
	Page 111 - 11.97 We request a relatively small development at Lodge Hill and Chattenden - the rest of the site should be a Country Open Space, managed to protect the very high ecological value - we need such a provision on the West Bank of Medway.	Land Securities are working closely with English Nature to ensure that the ecological value of the area is protected.
	Finally, we have found this document has much of the content we have met before in other Consultations - we wonder how much will come to fruition by 2026.	Noted
Geoff Orton	Insufficient protection to the important SSSI sites in the area of Lodge Hill/Chattenden; breeding nightingales and ancient woodlands will be adversely affected (including direct losses) reducing the 'sustainable' profile of the project that will not, in the future, be an 'exemplar' example of development.	The Masterplan and Development Brief, currently being prepared, are addressing the issue of protecting the SSSI.
	Use of buffer zones around development even if this means a reduction in the area allocated to housing development (Lodge Hill/Chattenden)	The Masterplan and Development Brief, currently being prepared, are addressing the concept of a buffer zone.
	ALLI should not be disbanded as there is no real justification.	Noted and see earlier responses on this issue
	Implementation incorrectly spelt in Chapter 12. heading.	Noted.
	Glosser of terms would benefit from the inclusion of LNR's, ALLI's and the differentiation of "Country Park" and "Countryside Park"	Noted.
Goodman (Barton Willmore)	The Kingsnorth employment area is now known as the 'Kingsnorth Commercial Park'. Amend text accordingly (inc. policy CS7)	Policy CS17 to be amended to read " the large Isle of Grain employment site and the Kingsnorth Commercial Park ".
	In relation to Kingsnorth, the Core Strategy is too prescriptive. The references to	Paragraph 7.5 identifies some

	specific industrial centres are not supported by any evidence base. The outline consent provides for a broad range of occupiers as possible (B1C and B2-B8 uses)	possible types of development which could be come forward in a number of locations
Graham Simpkin Planning	There should be an additional policy committing to a future review of settlement boundaries in a future DPD	This will be undertaken as part of the normal planning process and there is no need for an additional policy in the core strategy.
	Policy CS7 should be amended or another policy added to ensure that the needs of food production are balanced against the strongly worded protectionist policies relating to the countryside, ecology, heritage etc.	Policy CS7 already addresses the issue of food production by seeking to protect the best and most versatile agricultural land.
	Policy CS9 on health & social infrastructure should be expanded to embrace the provision of care homes/sheltered/extra care housing by the private sector	The provision of care homes/sheltered and extra care housing is addressed in policies CS14 and 15.
	Policy CS14 should enable affordable housing to be provided by the private as well as the public sector. The policy should also enable the provision of privately funded affordable housing to meet the needs of elderly owner-occupiers who may require sheltered/extra care housing.	Policy CS14 does allow for the provision of the private as well as the public sector.
	Policy CS19 deals with retail and town centres, but there is no mention of garden centres.	If necessary, garden centres will be the subject of policies in the Site Allocations and Development Management development plan document, which will be prepared after the completion of the core strategy.
	Policy CS31 should be expanded to support proposals for economic development and specialist housing nursing and care homes.	Economic development, housing and nursing and care homes are dealt with in other policies in the core strategy and there are no grounds for including them in policy CS31.
	Policy CS33 should ensure that access to the new Lodge Hill development should be by connection to the existing roundabout rather than as shown on the diagram linking to Four Elms Hill.	The eastern access to the site is currently shown to be via Dux Court Lane. The evidence base for the

		Core Strategy shows that the accesses currently proposed will be suitable to serve the amount of development shown and there is therefore no justification for insisting that access be taken from the Main Road roundabout. However, detailed proposals for site access will be progressed through masterplanning work.
Gravesham Borough Council	Why GBC is making representations: GBC needs to know what the impact of development in Medway will be on its area as development in the Medway area will impact upon the available options and ability to deliver dwellings in Gravesham because of capacity constraints on existing infrastructure, etc. Duration of Spatial Strategy (to 2028) Gravesham Borough Council welcomes Medway Council's decision to look beyond 2026.	Noted.
	para 1.16 - Whilst Gravesham BC do appreciate that an appropriate assessment in its entirety does not need to be published until Reg 27, Medway are putting forward proposals that individually or in combination at their present level may be harmful to Natura 2000 sites and thus be incapable of being delivered in a manner presently envisaged. Policy CS6 whilst suitable for local wildlife sites etc (potentially) cannot be applied to Natura 2000 especially as a. they don't define what impact would be beneficial and thus outweigh damage to a habitat and b. its not within Medway's gift to decide what impact to a Natura 2000 site is appropriate and if mitigation is suitable, this impact has to be 'for imperative reasons of over-riding public interest' and would require Defra's approval.	A draft report on an appropriate assessment is scheduled to be completed by August, 2011 and this can then be taken into account in making final amendments to the core strategy before submission to the Secretary of State. The implications for the Natura 2000 network are being fully taken into account but it is also noted that the greatest threat to the network is climate change resulting in coastal squeeze. The Council has been seeking to work with the EA to address this.
	Policy CS13: Housing Provision and Distribution - Why GBC is making representations: Medway lies within the same housing sub-market area as Gravesham and it is important that there is clarity in terms of what Medway is seeking to achieve so that we can take this into account: In setting our own housing	Given that Medway has achieved an average of 702 housing completions over the last 11 years, the South East Plan requirement of

815 new dwellings per year is an ambitious target. Consequently, Medway Council considers that setting a higher figure would be unachievable. That notwithstanding, the Medway Strategic Land Availability Assessment First Review, May 2011, has identified sufficient land for the development of 20,125 dwellings between 2006 and 2028, a surplus of 2195 over the South East Plan requirement should Medway's expectations be exceeded. This is close to the lower end of the trend requirement of 20,400 identified in Gravesham's representation and represents an annual average of c.915 completions. Deliverability remains a key issue – particularly in the current economic climate and the Council remains confident that the level of growth proposed is the most realistic in all the circumstances. Finally, the KCC projections and all subsequent work was subject to independent examination and the EIP Panel concluded that, taking account of all available evidence a figure of 815 per annum was appropriate for Medway.	targets for both market and affordable housing in order to identify and, if needed, mitigate any negative impacts to our Borough and the community as a result of adverse environmental and infrastructure impacts. Rationale and justification for setting housing requirement. Para 3.3 of the plan advises: When the South East Plan was being prepared Medway Council supported the proposed housing requirement for the area of an average of 815 dwellings per year for the 2006 to 2026 period. This was considered to represent a realistic balance between meeting local needs and contributing to growth in the Thames Gateway, a national priority area for both growth and regeneration. This remains the case... A higher option is therefore not required and unlikely to be deliverable. Gravesham BC recognises that, as explained in para 1.24 of the Medway pre-publication Core Strategy, that the Core Strategy is being prepared at a time when there is some uncertainty over the future of the planning system. When the plan was written the Coalition Government had revoked the South East Plan, although this has subsequently been re-instated. Setting housing figures is therefore taking place in a arena of considerable flux but one of the factors that should be considered will be demographic housing need. We do recognise that one of the key problems with focusing on demographic projections, especially trend-based projections, is that they can be subject to considerable variation. However the sub-national population projections for Medway from 2006 to 2026 (or 2008-2028 for the latest projections) are surprisingly similar irrespective of whether the 2004, 2006 or 2008-based population projections are considered. For the equivalent household projections is more variable ranging from 21 to 18,000 households and this suggests that Medway may be under-supplying slightly against trend. This is entirely within Medway's determination but Gravesham BC is concerned that the justification for Medway's distribution is not predicated on the rationale submitted by KCC and Medway at the start of the South East Plan process, which is flawed. The housing distribution methodology document submitted by KCC and Medway in December 2005 included KCC Trend Based Demographic Forecasts - September 2005 in annex 7 and this showed that SEERA's option for Kent Thames Gateway of 48,000 dwellings 2006-2026 was close to that implied by the long term migration trend (47,900 dwellings). Within the sub-region (paras 81 to 83 and annex 7) Gravesham only had a trend requirement for c 4,000 dwellings and Dartford 5,000 dwellings from 2006-2026. In comparison, the zero net migration and trend forecasts identified a trend requirement for 20,400 to 21,900 dwellings for Medway and 12,500 to 16,100 dwellings in Swale.	

	Fundamentally the advice submitted by KCC and Medway in December 2005 was that Kent Thameside could identify a significant supply of dwellings on a number of key strategic sites without the need to use Greenfield or Green Belt land. Alternative options were tested (para 136) that resulted in a distribution that more closely matched the scale of housing requirement generated by the existing communities, but this was rejected as it would have continued to require new greenfield development in the Medway and Swale areas, whilst restraining brownfield potential in Kent Thameside. It was recognised in the SE Plan EIP Panel report (para 19.4) that delivery of essential infrastructure would be a key determinant of both economic growth and the phasing of development and the current funding constraints make this even more important. This sub-regional approach also needs to be reconsidered with the anticipated demise of the SE Plan. Greater clarity is needed for the reasons given above	This should not be confused with circumstances elsewhere in the Kent Thames Gateway, which are for individual districts to determine.
	Policy CS24: Transport and Movement - Transport section shows that there are capacity issues at many locations, however CS24 does not include any text that says development should not be permitted if negative impacts can't be negated.	The text makes clear that overall congestion will be as a result of background traffic growth. It is unlikely that this would result from a single development but transport assessments accompanying planning applications will nevertheless need to consider this.
	Policy CS33: Lodge Hill - Gravesham made comments to the July 2009 Issues and Options consultation which has not been responded to as part of this consultation, although we believe that responses were taken to Cabinet but do not appear to have been published as supporting documentation. The accompanying maps usefully show Lodge Hill in context (which is appreciated) and it is apparent that the Lodge Hill proposal has the potential to significantly impact on the M2 junction and Higham. Unfortunately it still reads as a proposal that has been considered in isolation, purely within a Medway perspective. Pg.99 of the Medway Strategic Land Availability Assessment (SLAA) Draft Final Report November 2010 (Subject to approval by the Medway Strategic Housing Partnership Board) http://www.medway.gov.uk/pdf/Medway%20SLAA%20November%202010.pdf Says: The indicative phasing in table 1 should reflect Land Securities' assessment, which is based on delivery rates in line with market absorption rates. Consequently, table 1 should show 2011-2016, 1000 dwellings, 2016-2021, 1,800 dwellings, 2021-	It is recognised that traffic from Lodge Hill is likely to have an impact on the M2, particularly junction 1. This is identified in Figure 9.1. Discussions with the Highways Agency are ongoing and suitable mitigation measures will need to be provided for as part of any development proposals. The provision of fast, frequent bus links to the main urban area including appropriate rail interchanges will limit any potential

	2026, 1,800 dwellings, 2026+, 400 dwellings. The information from http://www.lodgehill.info/websitfiles/lodge_hill_newsletter_issue_1_final.pdf explains that a planning application is expected in 2011 and therefore it is unfortunate that Gravesham is still requesting additional information about the Lodge Hill proposal and its infrastructure delivery milestones and the spatial implications of these - particularly in respect to transport and the impact on Higham and the rural villages in Gravesham.	impact on Higham. In view of this representation Land Securities have met Higham PC and there is no evidence of adverse effects in Gravesham beyond Junction 1 on the M2 – a matter which is being addressed.
Harrisons Surveyors (John Porter)	Assumption that 70% of employment sites could be developed is overly optimistic, consequently, additional employment land will need to be identified and allocated.	The employment land availability position in Medway is as follows: A total of 811,556 sq.m. of B1, B2 and B8 is identified in the area. The Employment Land Review Consolidation Study 2010 demonstrated that a floorspace requirement of these uses up to 2026 totals 384,963 sq. m. only 47% of the identified supply. A surplus of 426,593 sq.m. (53%) is available for flexibility in delivery over the plan period till 2026. Consequently there is no case for allocating additional land.
Health and Safety Executive	Doesn't comment upon individual Local Development Plans.	Noted
	Refers to information on its website. If there are any major hazard sites and pipelines, or associated consultation zones, within the local development plan area it	Noted.

	would be helpful to indicate this to potential developers.	
	Suggested wording for a policy statement that could be included in the Plan.	Noted.
	Any major hazard sites (and pipelines) should be shown on the proposals map.	These matters would be addressed in the Site Allocations DPD that will follow the Core Strategy.
Highways Agency		
	In the area surrounding Medway, the Highways Agency has responsibility for the M2, the A2 west of M2 Junction 1 and the A249 north of M2 Junction 5. The section of the M2 comprising Junctions 1, 2, 3 and 4 is of primary concern in context of Medway. The Strategic Road Network serves an important function in facilitating the movement of traffic over long distances. It is the Highways Agency's role to safeguard this core function. It is recognised that junctions which adjoin the M2 south of the main Medway urban area serve a dual role of providing access/egress to the Strategic Road Network and forming a part of important local distributor and cross-country routes, including the A289 to/from Hoo Peninsula, the A228 to/from Snodland and Ditton, the A229 to/from Maidstone and the A249 link between M2 Junction 5 and M20 Junction 7, Maidstone.	Noted.
	Economic Development - Hoo Peninsula (DCS Paragraphs 3.31 - 3.34, p.19) DCS Paragraph 3.31 indicates that the Economic Development Strategy adopted by Medway Council in December 2009 raised concerns about the scale of employment development on Hoo Peninsula distorting the labour market because the proposed employment sites are remote from the main Medway urban area where a large proportion of the labour force will reside. Despite the conclusion of the Economic Development Strategy, which was adopted prior to planning permissions being granted at the Isle of Grain and Kingsnorth, DCS indicates that employment development should occur at these locations and it is considered that residential development at Lodge Hill will provide a larger local workforce for new jobs on Hoo Peninsula in the future (DCS Paragraph 3.34).	Noted and one effect of this should be to 'pull' traffic away from the A2/M2..
	Given there is now more certainty surrounding the development of Isle of Grain and Kingsnorth as strategic locations for large scale employment following the recent planning permissions, the Highways Agency notes that the DCS does not suggest extension of the proposed Fastrack style high quality public transport system to the Isle of Grain and Kingsnorth. Such high quality public transport links would improve	Any extension of bus services to the Isle of Grain and Kingsnorth will be a matter for the commercial bus operators. Estimated passenger numbers do not indicate that this

	connectivity with the main Medway urban area and the proposed Lodge Hill development. Recognising that these sites are remote from any major residential area, it is important that attractive public transport services are provided and these form part of a wider Fastrack style public transport system proposed for Medway.	would be commercially viable but the Council will continue to monitor the situation and advocate such services where these can be justified.
	Economic Development - Rochester Airfield (DCS Paragraph 3.38 p.20) DCS Paragraph 3.38 indicates that Medway Council is currently working with BAE systems in preparing a development brief and masterplan for a technology and knowledge hub clustered around existing aviation facilities at Rochester Airfield. Employment development at this location could generate additional traffic at M2 Junction 3 and on adjoining links. M2 Junction 3 can experience significant congestion during peak periods and this could be further exacerbated by additional development traffic. The Infrastructure Delivery Schedule incorporated within the DCS does not indicate any required infrastructure to support development at this location.	Saturn modeling is currently being carried out. This includes the inputting of more details into the model that take into account the overall package of measures proposed in the core strategy. Detailed capacity assessments will be required on any junctions that are seen to be affected. In any event, Junction 3 is still within its 'design period' and it is considered that the Highways Agency should be considering appropriate remedial measures for the junction in view of this. This notwithstanding the Council will work proactively with the HA and KCC (as the relevant transport authority) to determine what measures might be taken to reasonably manage movements at this strategic junction.
	The Highways Agency recommends that assessment be undertaken as part of the development brief and masterplan work of the potential impact of proposed development at Rochester Airfield on M2 Junction 3 and adjoining links and	Noted..

	junctions. The Highways Agency would like to be consulted on this process and is happy to offer any assistance.	
	The Highways Agency requires more detailed assessment of the impact to the Strategic Road Network arising from proposed development across Medway. Where the impact to the Strategic Road Network is found to be material, detailed capacity assessments should be undertaken of the junctions and links affected. These capacity assessments should identify if the Strategic Road Network has sufficient spare capacity to accommodate Medway's development aspirations. Where the Strategic Road Network is found to be over capacity, suitable mitigation should be identified. In addition to assessing Medway's preferred option, consideration should also be given to the assessment of reasonable alternatives.	Given the other policy objections to the alternatives identified in the Issues and Options report, Medway Council does not consider it necessary to carry out further, detailed highway assessments, particularly as all of these are considered as likely to have markedly greater implications for the motorway network.
	The Highways Agency is happy to work with Medway Council in identifying any existing and future capacity issues on the Strategic Road Network.	Noted.
	A further key action set out under DCS Paragraph 9.10 is <i>"The introduction of Fastrack style services on major urban and inter urban routes, including to and from Lodge Hill"</i> .	Noted.
	The Highways Agency welcomes this proposal and believes that a Fastrack style high quality bus link between Lodge Hill and the main Medway urban area is crucial in reducing car dependency. It is the Highways Agency's view that implementation of a high quality public transport link should be regarded as the minimum level of intervention necessary to achieve sufficient mode shift away from the car and minimise the impact on the local and strategic road network which may otherwise occur.	Noted and Policy CS33 allows for the early provision of high quality and high frequency bus services which could include a Fastrack system.
	It is expected that such a high quality public transport link would be provided in addition to a sufficient mix of residential and employment land uses at Lodge Hill which will increase the containment of the development and give residents the option of walking and cycling to local job opportunities rather than having to resort to using the car to travel further away. The balance of residential and employment land uses at Lodge Hill is crucial and the quantum suggested in DCS Tables 11.16-11.18 should help towards reducing external car trips at source.	Noted.
	The Highways Agency believes that a high quality public transport system should comprise of bus priority at key junctions, particularly at congestion hotspots such as	Noted and all these aspects are being taken into account in the

	the Four Elms roundabout, in order for services to remain attractive and reliable. Consideration should be given to providing a segregated route free of general traffic similar to sections of the Fastrack route in Kent Thameside. Consideration should be given not only to links with Strood railway station (the nearest railway station and importantly served by High Speed 1) and Strood town centre via the Medway City Industrial Estate and the proposed Strood Riverside Sustainable Transport Link, but also to/from other parts of Medway in particular Chatham town centre, railway station, new bus interchange and Rainham/Gillingham.	detailed planning of the proposals for the settlement.
	It is noted that the DCS Spatial Vision (bullet point 2 p.24) proposes that Chatham should be the main town centre of Medway and will be transformed with the necessary shopping, leisure and employment activities to become a centre of regional significance. High quality public transport links between Chatham and proposed residential and employment development at Hoo Peninsula is therefore crucial.	Noted.
	It is noted that the North Kent Multi Area Agreement (published by the Thames Gateway Kent Partnership in July 2009) indicated that it is unlikely that the Chattenen development on its own can support a frequent and high quality bus service of a Fastrack standard, but there are opportunities for a Lodge Hill service to integrate with other proposals in the local area. This potential issue is not recognised in the DCS. The Highways Agency suggests that in order to maximise ridership of Fastrack-style bus services through Lodge Hill that consideration could be given to extending services to large scale employment developments at Isle of Grain and Kingsnorth as previously discussed.	See response above in relation to Kingsnorth and Grain. Related matters are addressed in the Local Transport Plan 3.
	Transport and Movement - Park and Ride (DCS Policy CS24, p.87) DCS Policy CS24 indicates that four Park and Ride facilities are proposed at Horsted, Whitewall Creek, Strood and between Gillingham and Rainham. While the Highways Agency recognises the potential benefit of Park and Ride in reducing car use within the main Medway urban area, and the possibility for integrating the facilities with a wider Fastrack-style public transport system, it may be that the number of car trips will not reduce overall and could potentially increase on sections of the Strategic Road Network.	Noted but no evidence has been provided to justify this assertion.
	The Highways Agency recommends that a Transport Assessment is produced for each of the Park and Ride sites as and when they are brought forward which includes trip rate and trip transfer calculations in addition to details regarding proposed bus service frequencies, parking and fare arrangements.	Policy CS24 makes provision for all significant development proposals to be subject to an agreed transport assessment. This would include the

		park and ride sites.
	The Highways Agency requests clarification of whether the Park and Ride facilities have been reflected in the Medway Traffic Model.	When the initial modelling was taking place, an area wide parking strategy was still evolving and the park and ride element was not included. However, the modal split would have included some park and ride trips. A further model run, incorporating all proposals in the Core Strategy and LTP3 is planned and will be shared with the Agency.
	Area Policies – Lodge Hill, Hoo Peninsula (DCS Table 11.17 p.105) The Highways Agency requires clarification regarding the quantum of employment development proposed at Lodge Hill. DCS Table 11.17 (p.105) indicates that 43,353sqm is proposed, whereas the DCS Infrastructure Delivery Schedule (Table 12.2 p.127) indicates that 60,303sqm could be provided.	The development brief for Lodge Hill will make provision for a possible maximum of 70,000 sq.m. of employment floorspace. The Core Strategy sets an absolute minimum of 43,353.
	Infrastructure Delivery Schedule (DCS Table 12.2 p.127) In relation to the proposed Lodge Hill development, the DCS Infrastructure Delivery Schedule (p.127) indicates that further infrastructure schemes may be required by the Highways Agency, such as ramp metering access on the Strategic Road Network. Ramp metering could be a potential means of mitigating the impact of development on the SRN in particular at M2 Junction 1. The potential to implement ramp metering at the other M2 junctions may be more limited due to the required stacking space for traffic on the entry slip roads. There is a potential need for Integrated Demand Management on the A2 through Kent Thameside, a scheme which is being considered by the Highways Agency, the objective of which is to manage predicted high volumes of traffic on this section of the Strategic Road Network. The implementation of ramp metering on junctions upstream within Medway could help to manage traffic flows reaching the Strategic Road Network within Kent Thameside as well as helping to mitigate the impact of development	Noted.

	traffic on the Strategic Road Network within Medway.	
	The Highways Agency would like to continue to be involved in discussions relating to all development which could have an adverse impact on the Strategic Road Network and recommends that a holistic view is taken in terms of quantifying the cumulative residual impact of development after implementation of measures to reduce car dependency and minimise trips at source and formulating appropriate mitigation measures.	Agreed.
	Transport Evidence Base – Medway Traffic Model The Highways Agency understands that the Medway Traffic Model tests the preferred Option 1 strategic development strategy scenario. It is the Highways Agency's understanding that the alternative strategic development Options 2 to 5 as indicated in the 2009 Core Strategy Issues and Options document have not been tested using the Medway Traffic Model. PPS12 paragraph 4.36 indicates that Core Strategies must be justifiable and the most appropriate strategy when considered against reasonable alternatives. The preferred option put forward could be challenged in this respect. The Highways Agency is concerned that insufficient evidence has been presented which assesses the relative impact of each strategic development option, especially on the Strategic Road Network. The Highways Agency is concerned that the potential imbalance of housing and employment development across Medway in the preferred option with a large proportion allocated to Hoo Peninsula could adversely impact M2 Junction 1. An alternative spatial distribution of development growth within Medway may reduce the scale of impact on the M2.	The Council is concerned that this view is not backed by any objective analysis. All the other options considered have been rejected for sound planning reasons but it is also considered that all would have more serious and direct impacts for the motorway network – particularly Junctions 3 and 4 on the M2. Transport modelling is an exceptionally expensive activity and modelling every possible alternative is not considered realistic or proportionate.
	The Highways Agency requests detailed outputs from the Medway Traffic Model forecast scenario as soon as they are available so that an understanding can be gained of the predicted impact arising from proposed development in Medway on the Strategic Road Network. To reiterate paragraph 12 of this letter, where the impact to the Strategic Road Network is found to be material, detailed capacity assessments should be undertaken of the junctions and links affected. These capacity assessments should identify if the Strategic Road Network has sufficient spare capacity to accommodate Medway's development aspirations. Where the Strategic Road Network is found to be over capacity, suitable mitigation should be	The findings of the SATURN testing will be the subject of consultation with the Highways Agency.

	identified. In addition to assessing Medway's preferred option, consideration should also be given to the assessment of reasonable alternatives.	
	The Highways Agency would like to continue to remain engaged in all matters regarding Medway Council's LDF, any possible future stakeholder engagement required in respect of infrastructure schemes against which the Highways Agency is a named delivery agent or partner.	Agreed.
Historic Rochester Residents Association	The document would benefit from a more comprehensible structure in terms of chapter headings and content. It does not convey the importance of the individual issues, or how the different parts of the document lead on from one another.	Noted. Clearer signposting is being developed for the next version.
	The Core Strategy fails to adequately reflect the full analysis of the SOM reports as it fails to effectively analyse and identify key issues in local centres. The Rochester element appears thin on content and analysis.	Noted but the level of detail appropriate to a core strategy and the need to avoid repetition of information in other documents has been taken into account.
	The Retail, Leisure and Tourism SOM is revisited and clarified, and further qualitative evidence obtained in order to identify the strengths and weaknesses of Medway's tourist destinations, particularly Rochester.	Noted. Though the process of updating will continue if new evidence becomes available.
	There appears to be no evidence base assembled on the quality of the tourist experience of Rochester (nor other tourist destinations in Medway) to underpin policy CS18.	The 2009 Tourism South East Rochester Visitor Survey is part of the evidence base that supports the Policy CS18 and a copy has been supplied to the Association.
	Considers that the text is misleading as the night time economy of Rochester is likely to deter, rather than attract, visitors.	View noted. Policy CS17: Economic Development seeks to address Medway's economic development in all sectors and specifically identifies Chatham as a site for the development of a centre of regional significance and to have a diverse and vibrant evening economy, across the whole area. The focus on Chatham as the main centre would help alleviate Rochester's current role as the

			main evening economy offer.
		The importance of the image of Medway to tourism could be given greater emphasis, given that the Medway Economic Development Strategy 2009-12 cites image building as being one of five strategic priorities. Rochester does not figure strongly in the Core Strategy's projected image for Medway.	Medway has several town (5) centres; they have different scales and historical roots. Rochester has a historical prominence that is afforded the appropriate weight in the Medway Core Strategy.
		Policy CS27 lacks substance and vision. It should be revised and developed to include strategies to address identified problems and to outline a positive vision for the future.	The policy will be updated in the next version of the core strategy but the level of detail needs to be proportional to that appropriate for a core strategy.
Hoo St Werburgh Parish Council		It is mentioned in Para 3.16 that the BAe Sports and Social Club should be included as part of the housing provision. This site has already been refused because of recreational reasons and we see no reason now why it should be included. This area is protected within the current draft plan.	Noted.
		In Para 3.17 we are also of the opinion that there is no guarantee that up to 5000 dwellings can be delivered within the plan period. However if that were the case and the figure quoted becomes a reality then all the services, transport, education, medical and other major infrastructure must be in place before dwellings are extensively occupied.	Enabling infrastructure will have to be by part of the development as it proceeds. Less than 5,000 homes are expected to be delivered during the plan period.
		<u>Strategic Objectives: Para 1, Para 12.</u> In Para 1 we would like to see within those objectives protection of not only the area's many natural and heritage assets but also the protection and the non-use of 'Greenfield Sites'.	The identified 20% oversupply above the projected housing trajectory (16,500 dwellings) in the plan indicates that 'green field' sites are unnecessary; particularly as the identified sites are within the main urban mass and at Lodge Hill. The countryside is protected for its own sake in any event.
		In Para 12 we would like to feel that by 'complementing' does not mean to compromise at the expense of the existing villages of the Hoo Peninsula.	Noted.
		<u>Policy CS 2: Quality & Sustainable Design.</u> It is stated within the Policy that 'new build will respect strategic and local views and	The Council's adopted Building Heights Policy (2006) sets out in

	settings'. It is hoped this will be enforced as past history shows a different story – for instance the multi-stored development at the Akzo site in Gillingham Strand where the vista will be lost to all but those who are close to the waters edge.	Part 2 Appendix A of the document all the strategic views in Medway. It is an objective methodology that is applied through the Development Management process. The policy supports this approach that is as objective as it can be given the highly subjective interpretation of the matter of what constitutes a view or a strategic view and to what extent can these be retained for the benefit of the area collectively while allowing needed development to proceed.
	The development site known as Coes Green in Main Road, Chattenden where the highest point of the site overlooking the Medway is also taken up with a multi-storey block of apartments, this we believe is a travesty when it comes to site design.	The view from the lower area of the R.Medway valley below the Coes Green development is uninterrupted. There is no significant building visible above the tree line.
	The height of new build within the rural area must also be in keeping and in a manner that is sympathetic with its locality.	Policy CS2: Quality and Sustainable Design supports this objective.
	<u>Policy CS 6: Preservation and Enhancement of Natural Assets.</u> Because of its unique position and its incorporation with the Saxon Shore Way, its educational use by the Arethusa Venture Centre at Upnor and the exceptional panoramic views high above the River Medway we would like to see included within Para 5.59 the area known as 'Hoo Common' designated as a local nature reserve. (Hoo Common is in the ownership of Hoo Parish Council).	Given that the area is within the ownership of the Hoo Parish Council it could pursue this matter with the local authority if it so wished. Contact with the Greenspaces Team is recommended.
	Nearly 10 years ago a corner of Kingshill Recreation Ground off Four Wents Road, Hoo was planted with many native tree species to create an enclosed wood (Millennium Wood), the first Hoo had seen in many generations. This new wood is situated high up on the Hoo Ridge giving a panoramic view of the River Medway and to the far reaches of the Rainham waterfront. It is because of this that we wish	See above.

	to include the Millennium Wood as an additional part of Medway's local nature reserves. (Kingshill Recreation Ground is in the ownership of Hoo Parish Council).	
	<u>Policy CS 7: Countryside and Landscape.</u> There seems to be no definition of the land deemed to be Countryside within this policy. Because of recent over-development within the Hoo Peninsula land that is now designated as grade 1,2 & 3a agricultural land must be preserved and protected at all cost if we are to be sufficient in home production in the future and not be reliant on imported produced goods.	The policy supports these stated objectives. The countryside is, by definition, the non-rural area. The Medway Landscape Character Assessment, March 2011 has been adopted and is now part of the Medway Core Strategy evidence base. It details the varying character types in the rural area and will assist the policy's objectives as it underpins them with an objective analysis.
	<u>Policy CS 9: Health and Social Infrastructure</u> Because of the remoteness of the Medway Maritime Hospital to the Hoo Peninsula there is a necessity for patients, would be patients or visitors to patients to use private transport rather than non-existent public transport, especially at evening time. It is because of this that we feel that the Hospital Trust must not monopolise their position when extra new car-parking spaces become available (Para 5.103).	The use of the trust's private land is not a matter that the Medway Core Strategy, or the local authority has any influence over. Public transport to the hospital is far from non-existent. Starting at Hoo St. Werburgh Bus No. 191 (stops at St.John's Road, Hoo Marina and Five Bell PH) is every 20 minutes to Chatham Bus Station. From there Bus No. 176 to the Medway Maritime Hospital is every 12 minutes, Bus No. 116 is every 20 minutes, Bus No 156 is somewhat less frequent, and Bus. No 120 are every hour.
	Charging private vehicle users when other means of transport is not available is unreasonable. Until public transport is available to the Hospital by direct access to	The trust's parking charges are not a matter the Medway Core Strategy

	all including those folk on the Hoo Peninsula, car-parking charges should either be reduced or eliminated.	or local authority can address. Public transport to the hospital is available.
	<u>Policy CS 10: Sport & Recreation</u> We would like to include within the Policy Hoo Leisure Centre in Main Road as part of Medway's multi-sport facility although needing improvement and uplift serves the local area admirably.	The Medway Core Strategy's Policy CS10 does not identify any particular centre, but is a collective policy and all are included.
	The municipal Golf Course at Deangate with its subsidiaries we feel ought to also be included as a Medway multi-sport facility.	Noted.
	Both the Leisure Centre and the Golf Course if upgraded and improved could serve 'Lodge Hill' in addition to the new development's on-site recreational facilities.	Noted and this is being taken into account in the planning of Lodge Hill.
	We have this large catchment area of employment, housing development and potential tourism on the Hoo Peninsula supposedly without commitment to good reliable affordable public transport.	Increasing populations enables higher levels of public transport and a range of initiatives are being considered for the Peninsula related to the planned new developments there.
	We also request a feasibility study be set up to further the use of the local railway network on the Hoo Peninsula for the carriage of goods and materials and finally passengers.	The railway line is single track along the peninsula; to make it a full commuter service type would require an additional track and new station development. The demand, even with a fully occupied Lodge Hill settlement, would not justify the necessary investment that the track owners would have to finance. The line currently is a freight line (Thamesport containers and aggregates from Grain
	<u>Policy CS 19: Retail & Town Centres</u> There is growing concern that a convenience store at Lodge Hill and the new Superstore on the Medway City Estate, because of shopper's migration, could either eliminate or reduce some retail facilities within the village of Hoo. Additional large retail facilities should enhance the local economy not destroy it.	This is a recognised issue and is being addressed, in part, through the development brief for Lodge Hill.

	For those parishioners that are not easily mobile can there be assurances that this will not occur?	See above.
	<u>Policy CS 22: Provision for Minerals</u> This policy is suggesting that the land east of Hoo is the only viable area for aggregate extraction. If this is the case then there has to be limits set upon said extraction. If this parish is to witness the extraction of at least 1.2 million tons as so mentioned then a feasibility study has to be included within the policy to include the possible movement of aggregate by rail and by water wherever possible.	The mineral area of search east of Hoo is based on an assessment of the geological evidence and further investigations done by the quarrying industry. The site is well located to serve the new settlement at Lodge Hill and a significant proportion of it already has planning permission. View noted.
	<u>Policy CS 23: Waste Management</u> The Hoo Peninsula, a rural area of natural beauty has been a direction for anti-social type development for well over 50 years. If you were to include three Power Stations, an Oil Refinery, Natural Gas Storage Depot, Container Handling Depot, Waste Tips, Mineral Extraction Sites, Industrial Sites is there no suggestion that is more than what is felt to be reasonable. If we are to preserve and enhance our natural assets and to sustain development in the countryside then there must be a requirement to structure limitation or to bring some form of conclusion to the expansion of the Hoo Peninsula for waste treatment and mineral extraction.	View noted.
	We therefore have to have a rigorous development and enforcement policy on the dis Medway's Waste, but not at the expense of its rural areas.	View noted.
	<u>Policy CS 24: Transport & Movement</u> There must be some form of guarantee of a 'Fasttrack' style service before substantial inroads are progressed at Lodge Hill. To prevent peripheral localities becoming second-rate in the public transport stakes the 'Fasttrack' style service must be afforded to adjacent villages especially Hoo St Werburgh. It is mentioned that main line railway stations will be improved but not any improvement of the rail network to the Hoo Peninsula The single track could be	Noted and this is a planned feature of the new settlement. Options are being looked at that would incorporate Hoo within a loop service. See above.

	utilised close to Dux Court to serve the Hoo/High Halstow areas Kingsnorth Industrial Site and Lodge Hill.	
	Lowering car-parking standards will only alienate those users who wish to use their own transport. There is no alternative to the private car at unsociable hours and to those rural folk without public transport access.	The intention of the policy is to reduce domestic parking standards in the main urban centres, though car parking in town centres is to be rationalised but not reduced. Indeed contributions from developers are to be sought to develop new town centre car parking. No changes to the standard applying to the rural areas is currently proposed.
	It is mentioned good quality connections to key markets unfortunately that is not so for the Hoo Peninsula especially for those wanting to visit 'Bluewater', 'Hempstead Valley' and the Maritime Hospital all of which have no direct access by public transport.	Noted but new services from Lodge Hill should improve this situation.
	To harmonise with existing networks both sides of the River Medway walking and cycling networks ought to be made available to those users via the Medway Tunnel.	The tunnel is unsuitable for pedestrians and cyclists on health and safety grounds. Though the local authority is seeking resources with a transport bid to have a transit system to run through the tunnel at peak times so that it is able to transport bicyclists as well as pedestrians.
	Whilst the existing (Lafarge) Mineral excavation is taking place the wharf facility at Buttercrock Wharf could be made available to prevent excessive HGV road miles.	Buttercrock Wharf is assumed to be the coal-importing wharf that serves the Kingsnorth power station. This is dedicated to coal importation and is unlikely to be operationally suitable for dual use as an aggregate export conveyor and jetty.
	Policy CS 31: Hoo Peninsula and the Isle of Grain This policy has to be rigorously	Noted.

	enforced at all costs.	
	Although it is mentioned in Par 11.66 that 'the development at Lodge Hill creates a challenge to Hoo Saint Werburgh' that current role presently enjoyed by Hoo as a community, should not be at its expense because of that challenge.	This is the policy's intention.
	<u>Policy CS 33: Lodge Hill</u> We are mindful of the significance and the requirement in having a workable transport solution within the planning process at Lodge Hill. It is our belief that as part of that solution prevention is better than cure. Delays at Four Elms Hill are not going to be eliminated without a major prerequisite which should include at least one direct major road access westwards away from the A228 highway towards for example, the western end of the Wainscott bypass.	The direct linking of the site with the A289 with a new 'relief' road to 'bypass' the A228 and its connecting roundabouts would require the use of the protected open countryside. This area (Cliffe Woods Farmland, base of bald Top Hill and upper reaches of Hogmarsh Valley) is, in landscape terms, highly sensitive. Therefore the emphasis is on ensuring that the highway infrastructure improvements relate to the 'online' improvements at Four Elms Roundabout and the access/egress points onto the A228 to serve the new development. Improvements at known or predicted congestion hotspots are detailed in the Medway Local Transport Plan 2011-2026 page 37. Hoo St Werburgh is similarly served by 2 access/egress points off the A228 within a comparatively short distance. There is little to suggest that such an arrangement is inherently inefficient, it is more a matter of how the historic road systems can be adapted to meet the needs that they will have to serve as development progresses
	To have two access points onto the A228 separated by one mile is ludicrous, undesirable and unreasonable to Peninsula parishioners. Access to the eastern end of the site would cause 'rat-running' through villages if the A228 were inaccessible. A similar action would occur at the western end of the A228 if the junction of the A228/A289 were inaccessible. How would traffic management prevent this in the short to medium term?	

			into the future, at Lodge Hill and elsewhere.
		Bus priority measures on the highway network must be in addition and not be at the expense of private transport users.	Noted.
		Securing Section 106 agreements for burial provision and for community/recreational purposes within Hoo St Werburgh. If 4,600 dwellings are not forthcoming within the plan period will the reduction in dwellings because of the Section 106 agreements being pro-rata mean a reduction or even a stop in health and welfare, and education facilities and all the other infrastructure programmes? Most facilities should be put in place before the major influx of people is settled.	Infrastructure requirements (including such matters as burial space) to enable the development to progress will have to be phases such that the needs of the development are met progressively, whatever the pace of development.
Jennifer Owen & Associates Ltd		Policy CS23. Support the inclusion of provision for the identification of an inert landfill site.	Noted.
		Policy CS23. Object to the failure to include provision for the treatment and disposal of a proportion of London's waste and also the potential to provide a sub regional facility for the treatment of contaminated soils.	See responses above on these issues.
		Policy CS25. Support the retention and reuse of wharves along the Medway.	Noted.
Kent County Council		Para 3.38 & 3.39 Comment: During the Second World War Rochester Airfield was designated as an emergency landing ground and provided with limited facilities for refuelling and rearming. There are some important significant remains, including a light anti-aircraft position, machine gun 'butts' for test firing and a number of wooden huts. There are also significant survivals of both the Shorts bomber factory, the Elementary Flying School and ancillary buildings. It is hoped that the masterplan referred to in the text will take full account of the remaining heritage assets at this historic airfield. In the past several structures have been demolished without proper recording. Earlier archaeological remains may also survive.	Noted.
		Spatial Vision & Objectives Comment: The Vision and Objectives recognise the importance of Medway for the importation of minerals, but do not mention the need to safeguard existing economic land-won minerals and associated infrastructure, secondary and recycled aggregate sites or waste facilities that are required to meet the waste targets for the authority for the duration of the plan. Nor is there any mention here of an aim to push waste management up the waste hierarchy and rely	Objective 14 is to ensure that there are sufficient minerals and waste management/disposal capacity to meet local requirements and contribute to regional and national needs. This encompasses the

	less on disposal in the future. Consideration could be given to expanding the statements about minerals and waste here.	safeguarding of all relevant minerals.
	Page 24 Core Strategy 'Spatial' Vision Comment: The spatial vision states that Medway's rich built heritage will be valued and promoted but does not mention Medway's archaeological heritage or its historic landscape. These are also essential components of the area's historic environment and should be identified in the vision. The vision needs to emphasise the importance of conserving and, where possible, enhancing the historic environment such that it can contribute to the future growth, economy and social wellbeing of Medway. It should recognise the full range of heritage assets in the area: listed and historic buildings, archaeological sites and monuments, and historic landscapes. Kent County Council has two datasets that can support this. Historic Towns Survey reports exist for Chatham, Rochester and Gillingham. These were formerly adopted as part of the Kent and Medway Structure Plan (2006) as SPG3 guidance on Archaeology and Historic Towns and are still highly relevant guidance for development affecting the historic environment in these towns. The historic landscape has also been studied to produce the Historic Landscape Characterisation (HLC) Survey (2001) which provides an important tool for understanding the time-depth and historic character of Kent's countryside. It would be helpful if this strategic HLC could be deepened by more detailed analysis to support the LDF level of decision-making. English Heritage is carrying out a landscape assessment on the Hoo peninsula which will provide useful additional information on all areas of the historic environment. A study to help decision-making in relation to historic farmsteads is also being undertaken on behalf of English Heritage, KCC and Kent Downs AONB.	Agreed. In item 8 of the Spatial Vision, replace "rich built heritage" with "rich historic legacy". This is a wider term, which will encompass archaeology and landscape as well as the built environment.
	Key Diagram Page 27 Comment: The plan contains one strategic site, Lodge Hill (mixed housing, employment and community facilities); and two large employment allocations, Kingsnorth and Isle of Grain, but the latter are not referred to as strategic sites in the text but are on the key diagram, which is slightly confusing. Chatham Town Centre is also identified as the preferred location for significant retail expansion. By representing the sand/gravel resources and mineral wharves for safeguarding as stars on the key diagram, the reader is unable to estimate the extent or size of these areas. These would perhaps be better represented as cross-hatched areas, similar in style to the 'waste disposal to land resource areas'.	The size of the employment sites at Kingsnorth and the Isle of Grain qualify them as being of strategic importance. However, they are already allocated in the Medway Local Plan and have planning permission. Consequently, there is no need to allocate the sites again in the core strategy and the Key Diagram will be amended to replace "strategic" with "major"

		in relation to these two sites. The Key diagram is intended to be diagrammatic. The text includes two, more detailed, maps showing the waste disposal and sand and gravel resource areas and there is therefore no need to show greater detail on the key diagram.
	Policy CS2 Quality and sustainable design Support: The strong commitment to “<i>Respecting local context, townscape and landscape - including the character, scale, street and settlement patterns of the surrounding area</i>” is welcomed. The street patterns in particular are often neglected when considering appropriate development and it is encouraging to see that they will be respected and, hopefully, conserved. There is no reference to the Kent Design Guide despite Medway participating in the KDI Initiative. Medway needs to be part of whole Kent approach.	The Kent Design Guide is a ‘guide’ and is used as such on a daily basis
	Policy CS3: Mitigation and Adaptation to Climate Change Comment: Further work needs to be done around proposed policies CS3 and CS4 and the relationship between them. Given the time horizon of the plan, CS3 needs to cover the transition from where we are now i.e. Code 3 and BREEM Very Good to zero carbon and articulate this expectation for both residential and non-residential development. The policy as drafted does not do this at present. This policy focuses on the measures that developments will be required to attain in order to reduce the impacts of climate change. ‘PPS: Planning and Climate Change – supplement to PPS1’ states that spatial strategies should “<i>conserve and enhance biodiversity, recognising that the distribution of habitats and species will be affected by climate change</i>”. While the first paragraph of Policy CS3 could be interpreted to include biodiversity adaptations, it is quite broad in its terminology and KCC would like to see explicit reference to facilitating the ability of habitats and species to adapt to climate change.	These matters will be addressed in the next version of the core strategy.
	Policy CS4 Comment: In respect of CS4, it is well documented that addressing the energy performance of buildings is a key to achieving zero carbon. Renewable energy solutions, either building integrated or community scale will have an important role. The proposed 20% requirement is a step forward from the 10% figure which has been widely used and this is to be welcomed. However, it is unclear how this figure has been derived and how it fits in with progression towards zero carbon development. Reference is made to offsetting the requirement on nearby buildings	The 20% ‘Merton Rule’ is regarded as a general starting point for renewable provision for new development, subject to certain caveats. There is no evidence why this is inherently unacceptable as being ‘too high’. See also response

	where the obligation cannot be met on site. This is one possibility but the policy should really refer to offsetting into local community schemes which might include a range of initiatives to lower carbon.	above.
	Policy CS6: Preservation and Enhancement of Natural Assets Comment: This policy is welcomed as it aims to ensure that all the natural assets of Medway are protected and enhanced through land management measures and the planning and development process. KCC would though like to see the inclusion of the Kent Biodiversity Partnership's work on Biodiversity Opportunity Areas incorporated into Policy CS6, with particular reference to habitat creation schemes. Please contact William Moreno for further details on this (William.moreno@kent.gov.uk).	The Kent Biodiversity Opportunity Areas web-site states that biodiversity opportunity areas are a spatial reflection of the Kent Biodiversity Action Plan. Policy CS6 already refers to the action plan and there is therefore no need to include the opportunity areas.
	Policy CS8: Open Space, Green Grid and Public Realm Comment: Within the text associated with this policy there are several statements relating to green space planning and biodiversity conservation, however the policy itself is unclear in its use of the terms 'open space' and 'green grid'. The policy could be strengthened with regards to the provision and enhancement of natural habitats within the green grid that enables biodiversity to exist and move between areas. KCC and Medway need to work jointly in developing, implementing and marketing green spaces along the N Kent Marshes stretching from London to Swale. The idea of a 'necklace' of green sites that underpins the Parklands approach of the last government needs to be captured. Medway has important sites on the Hoo peninsula and the new enhanced wildlife site at Cliffe. The internationally protected SPAs and Ramsar Sites in the North Kent area are the subject of ongoing research into declining numbers of birds, coordinated through the North Kent Environmental Planning Group, of which Medway Council is an integral partner. If the research reveals that recreational disturbance is a key factor in the bird declines, there will be a need to ensure that policies within the Core Strategy are not causing an unmitigated increase in recreational disturbance and there may be a need to include more explicit measures within the Core Strategy to ensure that this is not the case.	Further clarification on these matters will be included in the next version of the core strategy.
	Policy CS8 and Figure 5.3 The Green Grid corridors are shown as extending from Medway into Kent and the text notes that projects will extend via Coastal and Valley of Visions. Beyond that there is no detail of any kind that sits at odds with the rest of the document, which goes into great detail about housing numbers, details of infrastructure etc. This network should extend into Kent.	Figure 5.3 will be amended to show more clearly and accurately the routes of the principal routes of the green grid , but a greater level of detail would be inappropriate in a core

	5.124 Heritage Assets Comment: There is a strong commitment to Medway's historic environment reflected in this section of the text, it is particularly pleasing to see that Medway Council is committed not only to the protection of designated heritage assets but also recognises that "the historic environment in Medway is much more widespread than this", listing historic street patterns and forms of development, unlisted buildings and areas of archaeological importance as valuable elements. The text does, however, suggest that the areas of archaeology range "from the Bronze Age through to the 20C (1st and 2nd World Wars)." In fact the archaeological heritage of Medway is significantly more ancient than this. Medway contains numerous sites dating to the Palaeolithic, Mesolithic and Neolithic periods especially along the Hoo Peninsula. In addition, Medway does contain a few sites that are more recent than the Second World War such as the Civil Defence Control Centre in Strood. Many of these are of considerable importance and the text should be amended to reflect this. At present the text underplays the importance of Medway's historic landscape. The modern landscape is a product of historical processes over a long period of time. The resulting historic landscape defines the 'grain' of existing patterns of settlement and landscape in Medway and as with urban development new development is more likely to be successfully integrated into area if it complements what has gone before. The layout of any new development should take account of the historic landscape of the area. Existing patterns of roads, lanes, paths and field boundaries can help to shape new development, allowing the older landscape to show through the modern development. Medway Council could consult the Historic Landscape Characterisation Survey (2001) that provides an important tool for understanding the time-depth and historic character of Kent's countryside. Policy C3 of the South East Plan states that in terms of the countryside, policy should "protect and conserve its distinctive qualities". If decisions are to be taken about which areas of the landscape are more important to conserve than others then this will require a more detailed assessment of the various options. Detailed historic landscape analyses will allow a comparison between different areas of the landscape for their historic importance and so enable decision-making to be more informed. Schemes should only be permitted where the design of the scheme complements any existing local historic character that the area may have, and the materials used in the design are appropriate to the existing character, if possible using locally sourced and traditional materials.	strategy. Agreed. The fourth bullet point of paragraph 5.127 be amended after "dating from" to read "the Palaeolithic, Mesolithic and Neolithic periods to the 20th Century." The second bullet point of policy CS12 provides for the assessment of new development within the setting of historic landscapes with a view to the preservation and enhancement of the special qualities of these areas. This policy, together with policy CS7, enables historic landscapes to be fully taken into account when development proposals are being considered.

	Policy CS 12 Heritage Assets Support: It is pleasing to see the historic environment awarded such prominence in the draft document. The historic environment is central to the future of Medway. Rochester is already a town steeped in history with many exceptional historic assets, an ancient road plan and a wide range of nationally important monuments. In Chatham the regenerating role of the dockyard and its surrounding fortifications is widely acknowledged to be one of the benefits of the World Heritage Site status that is being applied for. Gillingham has a less remarkable historic environment but the structures that do survive are therefore all the more important. Within the rural areas of Medway the historic environment is similarly important and the area is particularly important for its military and industrial survivals as well as its pattern of historic villages and lanes. This heritage must be properly cared for within the development control system but also provides a means by which Medway's sense of place can be fully developed as well as an important economic driver through tourism. Comment: At present the detail in the policy text only really discusses the built environment although the first bullet point does refer to the historic environment in general. As the supporting text states, the built environment is only one element of the historic environment and it would be helpful if the policy text reflected this by also referring to Medway's archaeological and landscape heritage assets. The first bullet point could be reworded to: <i>Supporting the conservation and, where appropriate, the enhancement of the historic environment, whether historic buildings, archaeological sites or historic landscapes, and the contribution it makes to local and regional distinctiveness and sense of place.</i>	The historic environment is defined in PPS5 as all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora. Given the all encompassing nature of the definition of the historic environment, there is no need to amend policy CS12 to include archaeology and landscape.
	The text states that design statements will be required where development impacts on the historic environment. Following on from PPS5 which requires heritage statements to be submitted with planning applications that affect heritage assets I would hope that these design statements would include an assessment of the archaeological impact and not solely the impact on the built environment which has been the traditional role of design statements.	Archaeology is covered sufficiently by the relevant Policy HE6 of PPS5. However, the supporting text (paragraph 5.127) will be altered to reference archaeology, historic landscape and historic development patterns.
	Page 60 Existing Housing Stock - The text currently states that "a significant proportion of Medway's housing stock dates from before 1919 and is not readily adaptable to modern standards in terms of thermal insulation and fuel efficiency. This presents difficulties in bringing the older stock up to modern standards and adds significantly to the incidence of fuel poverty. In the past the perceived	Noted.

	difficulties of making older buildings more energy efficient has been used as an excuse to demolish them and replace them with new construction. In fact, the historic environment has a significant role to play in the conservation of resources required for development and also in energy efficiency. Old buildings can often be more energy efficient than newer ones and of course have already been built. Thus it may take fewer overall resources to adapt an old building than to demolish it and build a completely new one. English Heritage has recently produced guidance ('Climate Change and the Historic Environment', 2008) that reviews the threats to the historic environment posed by climate change. The guidance also demonstrates that historic structures, settlements and landscapes can in fact be more resilient in the face of climate change, and more energy efficient, than more modern structures and settlements.	
	Policy CS17 Economic Development Comment: Port expansion and manufacturing (e.g. advanced manufacturing, low carbon technology) activity in Medway needs to complement activity in adjoining areas of N Kent. The new Medway Innovation centre needs to be part of a 'network' of innovation centres which can be marketed and work together. This joined up approach combining Medway and Kent is likely to become more important as Local Enterprise Partnerships develops and need for clear direction. Rochester Airfield, has some important remains from the during the Second World War, it is hoped that the masterplan referred to in the text will take full account of the remaining heritage assets at this historic airfield. Lodge Hill was formerly a barracks and training facilities for the Royal School of Military Engineering, there may be buried archaeological remains here and in the immediate vicinity and these will need appropriate treatment during redevelopment. Medway are keen to develop an 'environmental technologies cluster' and are developing an 'entreprise strategy' which will be looking to encourage all types of enterprise including social enterprise, this is very much supported and something that KCC would like to replicate across the County.	Noted.
	Policy CS20 Support: Medway Council has been successful in utilising universities to become effective economic drivers, and are good at promoting their university sector e.g. hoping to retain and expand new campus at Chatham Maritime for University of Creative Arts and this is to be applauded.	Noted.
	Para 8.9 to 8.31 Support: The recognition of both national minerals policy and the on-going need to make provision for economic mineral apportionments derived from	Noted.

	MPS1 and the current sub-regional apportionment is welcomed. Similarly, the recognition of the importance of the aggregate wharves in Medway, and the proposals to safeguard them, in accordance with MPS1 is considered to be a key issue here. The current joint Kent/Medway research being undertaken to update the Kent/Medway mineral import report from 2006 will provide an important part of the evidence base to inform the next stage of the plan.	
	Para 8.24 Comment: This para discusses the need to safeguard reserves of clay in Medway, but this does not appear to have been taken forward to a situation where these reserves have been mapped on an OS base. The mapping of economic mineral reserves for safeguarding is also something that could perhaps also be tackled as a cross border issue between Kent/Medway. Whilst 3 areas are shown on Figure 8.1 as 'Safeguarding Areas Sand and Gravel' there does not appear to be any reference to safeguarding of chalk reserves in Medway.	The London Clay is a massive deposit in Medway; much of the Hoo Peninsula is an outcrop of this formation. The level of detail sought is also inappropriate for a core strategy.
	Para 8.36 Comment: It would be helpful if the existing waste facilities (including HWRCs) which are required to provide capacity for the plan period could be identified on a plan and safeguarded by policy; It is recognised that it would be difficult for Medway to be self sufficient in all waste management streams, however the identification of potential final waste disposal to land resource areas on Figure 8.2 is welcomed as a step towards this goal. KCC would welcome the opportunity to discuss the possibility of joint working on other minerals/waste issues that have cross border issues.	A core strategy is not site specific. This is a matter for a subsequent DPD.
	Chapter 8 Energy, Waste and Minerals Comment: Mineral workings have the potential to impact on the historic environment in a very significant manner and where this occurs the applications will need to be dealt with in accordance with PPS5, which emphasises the importance of pre-application consultation and KCC Heritage Conservation team would be happy to advise at an early stage as to which sites should be avoided for mineral extraction, which will require further evaluation before a decision can be made and which can go ahead with mitigation measures. A staged process of desk-based assessment, field evaluation, archaeological excavation and/or preservation in situ is likely to be required. This possibility, together with the costs of post-excavation analysis and publication needs to be taken into account at the outset. KCC would be pleased to discuss the precise wording of policy statements in this area in more detail. There are many elements of the historic landscape that give character to Kent and which should be conserved	The importance of the historic environment with regard to mineral workings is understood.

	and if possible enhanced. The Kent Historic Landscape Characterisation (2001) has identified the broad historic character of the landscape of Kent and this study is an essential resource for consideration of the landscape impact of new minerals or waste proposals. Indeed, the consideration of sites for extraction could be usefully informed by more detailed and localised historic landscape assessment so that impacts can be more clearly identified and mitigated.	
	Figure 9.1 Comment: In Fig 9.1 congestion hotspots are defined as those junctions over 85% saturated in 2007 and in 2026. They have shown M2 J5 as a hotspot in 2026 but not 2007. It should however be referenced in both years, and is in fact more congested than all of the other junctions on the Motorway network they have identified as being worse.	Junction 5 is not in Medway and it would be inappropriate to reference it in the core strategy.
	Policy CS24 Comment: Rather than referring to The use of "Fastrack type bus services" this should be described with the technical term of "Bus Rapid Transit (BRT)" with "Fastrack in Dartford and Gravesham" cited as an example of BRT in a neighbouring authority. Fastrack is a brand name of that particular BRT. With this document being part of a Local Development Framework, the transport initiatives are very localised and therefore would have negligible impact on Kent. However, there could be impacts on neighbouring authorities in Kent. The links to surrounding districts in the Thames Gateway Regeneration Area and to Maidstone and other parts of Kent are not fully considered. There is very little mention of the high speed services to Medway and how they intend to better utilise this improvement to the transport network. Brief references are included in relation to design and parking standards and a brief mention of Manual for Streets and Shared Space, KCC significant amounts of information and intelligence on these which could be shared with Medway Council. There is no reference to the research into IGN3 for parking standards. A number of policies refer to improving walking and cycling and more widely quality of life/ healthy lifestyles etc. These are to be welcomed and will assist KCC in delivering joint projects where we have cross boundary issues - especially alongside the River Medway. However there is no reference to "Movement in Medway - Medway's Public Rights of Way Improvement Plan 2007. Large scale development is proposed for Lodge Hill, Hoo Peninsula and Isle of Grain, which are all close to the boundary with Gravesham and are likely to result in additional stress being placed on local roads and the A2/M2 corridor. Whilst the proposals within the Core Strategy if delivered may accommodate transport issues within the Medway area, this does not appear to spill over into the neighbouring area. In particular	References to Fastrack style services have been taken from the Medway Local Transport Plan. Consideration will be given to amending the terminology when the Transport Plan is next reviewed but in the meantime, in order to avoid confusion, the term Fastrack will continue to be used in both documents.

	Higham and Gravesend may be more attractive connections to rail services and with the potential increases of flows on the A2/M2 serving these development there is a real risk of displacement of vehicles onto the local road network by current through traffic in attempt to avoid congestion. Mitigation may therefore be required across boundary and this is not covered in the document.	
	Chapter 10 The River Medway Support: Reference is made to the historic nature of the river frontages in Medway, and in particular the military sites in Medway that is welcomed. It should be appreciated, however, that in addition to the major sites mentioned in the text (Chatham Dockyard, Grain fortifications), there are many other military sites along the river frontages that are less well known but that are nonetheless are of local importance and that contribute to local character. These include forts at Cliffe, Slough, Hoo, Darnet and elsewhere, pillboxes across the region and a range of observation posts, pillboxes, searchlight emplacements and others. There are also a number of important industrial archaeology sites including gunpowder works at Cliffe as well as a range of archaeological sites of all periods. The wharves, hards, jetties, sea-walls and drainage ditches that line the coasts are also often of historic importance. The river frontages are therefore of significant historic interest and KCC would wish to be consulted when any modifications or developments are planned so that we can advise of likely heritage impacts. It should also be remembered, however, that river valleys contain more than visible heritage assets. Valleys have been attractive locations of settlement for thousands of years and both the Medway and Thames valleys will contain numerous unknown archaeological sites that must be treated appropriately during any development. The river corridor also has high palaeoenvironmental potential with the likelihood of significant waterlogged buried archaeological remains in some areas.	Noted.
	Policy CS34 Para 12.14 to 12.16 Comment: Medway has a well developed SPD dealing with development contributions. The proposed Core Strategy policy CS34 and the accompanying text in para's 12.14 to 12.16 reflects the uncertain nature of the CIL proposals and will require some updating following recent government announcements. Policy CS 34 however correctly expresses the situation and is supported in principle. The SPD, which will also require some amendment, is a useful tool, and KCC have sought more information around the viability system as this may provide a guide that KCC might also find useful. One particular issue which KCC and adjoining districts need to be aware of is the possible economic implications where adjoining authorities operate slightly different charging	Noted.

	mechanisms under a CIL or tariff mechanism. This could have unforeseen consequences when developers decide to implement particular planning permissions. Medway is clearly having difficulties in bring forward some sites which have been damaged by previous industrial activity and thus are less commercially attractive than other sites beyond the borough boundaries. However it is notable that both Gravesham and Swale, also part of the Thames Gateway, may have similar issues. Whether it is economically viable to impose a CIL or tariff requirement on these areas is questionable. One obvious issue is how far the needs of the Medway area might impact on cross boundary service requirements. For example, parents may decide to send children to schools outside of the borough and located within the KCC area, if they offer a presumed better standard of primary and secondary education? This type of situation is experienced elsewhere in North Kent, which makes prediction of education places very problematic. Equally being a major provider of university and higher education, the implications for Chatham of absorbing some of the demands from the rest of Kent need to be appreciated. It is not clear how far other KCC community services might be considered to be discrete and how far they could impact upon, or be impacted by, needs arising from within Medway or within Kent generally, similar to that described for education. Spatially the three sites referred to above are at some distance from the Kent boundary so it is not expected that they will have a detrimental impact on KCC service provision. Rather it is incremental development in the other parts of the Medway area, which KCC need to be aware of.	
	Glossary Comment: A reference to the Thames Gateway Planning Framework is mentioned in the definition of Traffic Calming, which would appear to be a typo.	The glossary contains a definition of the Thames Gateway Planning Framework but the heading is not in bold typeface. The glossary will be amended accordingly.
	The State of Medway Report 'Waste' dated January 2009 Comment: Both this report and the one on Minerals are very informative. However, the section on C&D waste appears to have omitted 'Excavation' wastes in Para 2.1. For clarity it should be grouped with Construction and Demolition wastes.	Point noted.
	A section of this report discusses the South East Plan as 'emerging', so it will require some updating before the Pre-submission stage of the LDF is consulted upon.	Point noted.

	It does not appear to mention the Defra Review of Waste Policy, which was consulted upon during 2010. This has major implications for the waste hierarchy and discusses the ambition of working towards zero waste. Perhaps this should also be considered as part of the evidence base?	Point noted.
	Similarly PPS10, an important reference appears to have been omitted.	Accepted.
	Medway has significant recycling capacity – primarily at Pelican Reach on Medway City Estate – permitted recycling capacity is 0.67mtpa, which is in excess of its needs for its own C&I wastes.	Accepted.
	Medway also has an anaerobic digestion facility and a facility for treating animal waste from abattoirs (which receives waste from outside Medway).	Correct
	Medway has no composting facilities in its own area.	Correct
	Medway is estimated to be generating 300,000tpa of C&D wastes. However Cliffe KKB 3R Ltd process around 1mtpa of concrete, hardcore and road surfacing.	Accepted. Though as of early 2011 KKB 3R Ltd no longer operate from Cliffe
	State of Medway Report 'Minerals' dated 2009 Comment: This needs to be updated in the light of the 2009 Panel Report into the revision of Policy M3 of the adopted South East Plan.	Point noted.
	The sites listed in Para 5.5 would benefit from a location plan.	The Pre-publication Draft Core Strategy does show these locations.
	The following facts are noted: Permitted reserves of land won sand and gravel =1.4mt, though the big reserve (1.2mt) at Lafarge's site at Hoo was not implemented by 2009.	Correct.
	Importation of aggregates in Medway is regionally important. There are 3 operational wharves (at Grain Terminal, Brett at Cliffe and Hanson at Eurowharf), which have a combined potential capacity of 3mt.	Correct.
	One further site at Halling (Cemex) has planning permission but is not operational.	Correct.
	Cliffe imports only Marine Dredged Aggregates (MDA) and Grain imports only crushed rock from Glensanda. Eurowharf imports both crushed MDA and crushed rock for local markets, with no further transhipment, though the site has been subject of heavy investment recently.	Correct.

	Deep buried gravels centred on Cliffe and Grain are overlain by very deep overburden, but these could release circa 35-36mt, if ever exploited, however there are major environmental constraints. Comment: Consideration of identifying and safeguarding of these resources for future generations should be given in the next consultation of the CS.	This has already been considered and rejected given their location within areas of international importance for nature conservation..
Kent Downs AONB Unit		
	National and Local planning policies are very clear that highest priority should be given to the conservation and enhancement of Areas of Outstanding Natural Beauty. Policy Statement 7 (PPS7) (at present being revised and as amended currently by PPS4) confirms that AONBs are equivalent to National Parks in terms of their landscape quality, scenic beauty and their planning status. The status of AONBs has been enhanced through measures introduced in the Countryside and Rights of Way (CROW) Act 2000, which gave greater support to their planning and management. The statutory duties state that in exercising or performing any functions in relation to, or so as to affect, land' in these areas, relevant authorities "shall have regard" to their purposes (Page 3 of DEFRA guidance). The Act requires a management plan to be produced, and accordingly the first Kent Downs AONB Management Plan was published in April 2004. Subsequently the first revision management plan (2009- 2014) was published in April 2009. This has been formally adopted all the local authorities of the Kent Downs. The management plan may be viewed on our web site www.kentdowns.org.uk. Relationship of the Management Plan with production of Local Authority LDPs and Development Management (control) Under the CROW Act the AONB Management Plan must 'formulate the (Local Authority) policies for the management of the AONB and for carrying out their functions in relation to it'. The policies of the Kent Downs AONB Management Plan are therefore the adopted policies of all the Local Authorities in the Kent Downs. Whilst these policies should not be repeated in the Local Authority LDFs, LPDs and SPDs this relationship should be clear. Any KDAONB responses on consultations on LDF and planning applications under the agreed protocol will reflect the policies of the KD Management Plan and other Kent Downs AONB guidance.	Noted.
	Key issues:-	

	Landscape and importance of the natural environment as a context for Medway regeneration is important. It is not identified as a Key issue in para 2.22 et seq. as being important in its own right and for health and well being, leisure, amenity, tourism, etc. This is especially important as it is the context of centres of increasing population. The Kent Downs AONB and areas identified in the Medway Landscape Character Assessment 2010 could be mentioned in the context of Green Infrastructure (para 2.26) to help address this gap. Ideally we would like to see a policy specifically for the AONB, or the Landscape policy, which should mention our Management Plan. I understand this was accepted at your stakeholder meeting recently.	Agreed. Insert new bullet point in paragraph 2.26 as follows: “Safeguard and enhance the character and appearance of Medway’s diverse landscapes.” The Medway Landscape Character Assessment, 2010, is referred to elsewhere in the core strategy. An additional paragraph to be inserted prior to policy CS7, as follows: “The AONB Management Plan, 2009-2014, prepared under the Countryside and Rights of Way Act, 2000, contains policies adopted by all the local authorities in the Kent Downs, including Medway, for the management of the AONB. Medway Council will take these into account when implementing policy CS7.” The core strategy covers subjects dealt with in the South East Plan and will stand on its own when the South East Plan is abolished.		
	<u>The SE Plan:</u> Mention is made of the context of the SE Regional Plan. It is important that elements of the SE Plan regarding landscape and AONBs are not relied upon by mention of the context of the Regional strategy. It is likely that, despite the CALA ruling for the present, in the longer term the SE Plan will be revoked once the Localism Bill is passed. It is important that the Core Strategy stands on its own and is ‘future proofed’. SE Plan policies of importance to Landscape Character and Biodiversity should be stated in the Core Strategy and covered by Core Strategy policies. We have identified SE plan policies which relate to AONB interests, and which have been relied upon in previous plans, as set out below: Those highlighted are the most relevant.			
	<table><tr><td>SE Plan Policy</td><td>AONB Management Plan Policy</td></tr></table>	SE Plan Policy	AONB Management Plan Policy	
SE Plan Policy	AONB Management Plan Policy			

	POLICY KTG7: GREEN INITIATIVES	which relates	
	POLICY LF9: GREEN BELT MANAGEMENT - management plans for the Surrey Hills, Kent Downs and High Weald Areas of Outstanding Natural Beauty supported.	all	
	POLICY CC1: SUSTAINABLE DEVELOPMENT	all	
		Climate Change is acknowledged by all policies in AONB Mgt Plan. Particularly: GNR7-10 WT5 WT11 LCC VC3SDT policies	
	POLICY CC2: CLIMATE CHANGE	Climate Change is acknowledged by all policies in AONB Mgt Plan GNR7-10 WT5, WT11 LCC VC3 SDT policies	
	POLICY CC3: RESOURCE USE	GNR7-10 WT5, WT11	
	POLICY CC4: SUSTAINABLE DESIGN AND CONSTRUCTION	GNR policies	
	POLICY CC6: SUSTAINABLE COMMUNITIES AND CHARACTER OF THE ENVIRONMENT	SD5-SD12	
	POLICY CC7: INFRASTRUCTURE AND IMPLEMENTATION	SD5-SD12	
	POLICY CC8: GREEN INFRASTRUCTURE	AEU3,AEU4,AEU7, AEU9, AEU10, AEU12, VC2, SDT7-9 BD1	

	POLICY T2: MOBILITY MANAGEMENT	SDT policies	
	POLICY T6: COMMUNICATIONS TECHNOLOGY	VC policies	
	POLICY T7: RURAL TRANSPORT	SDT and VC policies	
	POLICY NRM5: CONSERVATION AND IMPROVEMENT OF BIODIVERSITY	BD policies	
	POLICY NRM7: WOODLANDS	FL policies	
	POLICY NRM10: NOISE	WT policies	
	POLICY NRM11: DEVELOPMENT DESIGN FOR ENERGY EFFICIENCY AND RENEWABLE ENERGY	LLC8 GNR5 SDT1	
	POLICY NRM12: COMBINED HEAT AND POWER	GNR policies.	
	POLICY NRM12: COMBINED HEAT AND POWER	SDT policies	
	POLICY NRM12: COMBINED HEAT AND POWER	VC policies	
	POLICY NRM12: COMBINED HEAT AND POWER	GNR policies.	
	POLICY NRM12: COMBINED HEAT AND POWER	SDT policies	
	POLICY NRM12: COMBINED HEAT AND POWER	VC policies	
	POLICY NRM15: LOCATION OF RENEWABLE ENERGY DEVELOPMENT	LCC policies	
	NRM 16 RENEWABLE ENERGY DEVELOPMENT CRITERIA	SDT policies	
	POLICY C3: AREAS OF OUTSTANDING NATURAL BEAUTY	LCC policies	
	POLICY C4: LANDSCAPE AND COUNTRYSIDE MANAGEMENT	SDT policies	
	POLICY C5: MANAGING THE RURAL-URBAN FRINGE	All	
		Particularly LLC2, LLC8, SDT1, SDT5:	
		LLC policies	
		BD policies	
		FL policies	
		WT policies	
		GNR policies	
		LLC2	
		SDT policies particularly SDT5.	
		SDT policies to be applied to developments within the setting – SDT5	
		As reflected by SE Plan policy C3	

	POLICY C6: COUNTRYSIDE ACCESS AND RIGHTS OF WAY MANAGEMENT POLICY BE5: VILLAGE MANAGEMENT POLICY BE6: MANAGEMENT OF THE HISTORIC ENVIRONMENT POLICY TSR2: RURAL TOURISM	AEU policies VC3 HCH policies AEU FL SDT VC	
	Setting In particular we would draw your attention to the issue of setting of the AONB which is addressed in <i>SE policy C3</i>. This is not covered by National policy. The detriment to the setting of the Kent Downs AONB was a determining factor in the recent Appeal Decision which upheld refusal of the Kent International Gateway proposal, determined on 5th August 2010. At the recent examination of Sevenoaks' Core Strategy Sevenoaks DC agreed to alter policy wording to include the setting of the AONB. We would suggest a suitable addition to your policy CS7: 'The distinctive character of the Kent Downs Area of Outstanding Natural Beauty and <i>its setting</i> will be conserved and enhanced <i>in accordance with the relevant statutory AONB Management Plan</i>.		
	Woodlands <i>SE Policy NRM7</i> and our management plan policies (WT policies) need reflecting specifically in the Core Strategy either in CS6 or CS7. The link between good woodland management and use of wood chip as a renewable energy resource could be made in para 5.26 by insertion of a paragraph supporting district heating systems based on locally sourced woodchip this would then be covered by the final sentence of CS4; an addition to Policy CS3 covering the use of renewable energy sources to be integrated into design of new build would also support this approach. In general we would wish the Core strategy to make use of and mention all the Kent Downs AONB guidance as applicable. (Refer above page 2) For instance use of the Farm Diversification Toolkit (policy CS17), Streets and Lanes Handbook, Kent Downs Landscape Design Handbook. (These all have mention in Tonbridge & Malling's Core Strategy and DPDs.)		
	The protection and enhancement of woodland , including ancient woodland, is already addressed in policies CS6 and CS7 and in paragraphs 5.64 and 5.65. Policy CS4 states that the Council will positively promote the installation of all forms of renewable energy systems. This would therefore include wood cp district heating. The policy also states that direction for which technologies would be most appropriate should be taken from the Medway Renewable Energy		
	Policy CS7 to be amended by the addition of "and its setting." To the 4th bullet point. Enhancement is already covered by the 5th bullet point.		

		Capacity Study, 2010. This includes wood chip energy generation. There is no need to list all the documents, which might be drawn upon in the implementation of policies in the AONB.
	Implementation There is no mention of the Kent Downs AONB or the Valley of Visions in Table 12.1 Monitoring and Implementation framework. Partnership working and support for the landscape and restoration work with the Valley of Visions and the AONB should be mentioned. (Refer comment above regarding 'Medway') Policies CS7,8,11,12,18,25,32 relate to our work.	Table 12.1 is being comprehensively amended to include all relevant monitoring indicators and implementation partners.
	Delivery Mechanisms An indication of how the Land Allocations and Development Management DPD will address implementation of each policy would be useful with specific reference to proposals for Master Plans, Landscape assessments, etc. This could include for instance working in partnership with Valley of Visions on production of the landscape master plan for the Medway Valley proposed by the Valley of Visions.	Work has not started on the preparation of the Site Allocations and Development Management DPD and consequently it is not known how it will address the implementation of each of the core strategy policies.
	'Conserving and enhancing' In the context of the AONB it is noted that wording 'maintaining' and/or 'protecting' is used. As a general point we would recommend replacing this with 'conserving and enhancing' to be in line with the CROW Act, Government Guidance, and the Kent Downs Management Plan.	Paragraph 15 of PPS7 refers to the protection and enhancement of the quality and character of the countryside, with particular regard being paid to areas designated for their landscape qualities. Paragraph 21 refers to AONBs as having the highest state of protection in relation to landscape and scenic beauty. Policy CS7 reflects these paragraphs in PPS7 and refers to protection, conservation, repair, enhancement, extension,

		maintenance and connection of landscape characteristics in the countryside, including the AONB.
Kent Police (DHA Planning)	In response to policy CS10, we are concerned that consideration should be given to maintaining a policy wording similar to that employed with policy L3 of the existing Local Plan regarding protection of Open Space. For example, if there is open land in the urban area, that does not have existing public access, consideration should be given to a policy which enables enhancement of that land and provision of some recreation facilities, available to the public, through redevelopment of a part of that land.	The principle of protecting existing open space is included in policy CS8 of the core strategy. This allows for the preservation and enhancement of open space. A more detailed policy will be included in the Site Allocations and Development Management Development plan document. In the meantime, policy L3 of the existing local plan will be carried forward.
	It is important that Core Strategy policy CS17 should be amended to include wording which supports the intensified use of existing industrial sites for use for construction and regeneration purposes as yards and open storage places. This will ensure that all sectors of Medway's workforce are appropriately catered for whilst complying with national and regional policy and guidance that promotes the sequential development of land, by minimising the need for the development of greenfield sites. I therefore also feel it would be appropriate to include reference to Rural and Peripheral Employment Sub-Areas, as it should be ensured that best use is made of such sites.	Insert "support higher density development where appropriate" after "protect established employment areas from other development" in the eighth paragraph of policy CS17.
	In relation to policy CS19 we consider that it is essential, due to the likely slow timescale and uncertainty of delivery of town centre retail sites that allowance should be made within policy for the expansion of existing out of centre retail and service sites such as that at Bredgar Road and Beechings Way in Gillingham. Additional retail floorspace should be provided at these locations in the short term by conversion of existing buildings to ensure that retail expenditure leakage from the borough is minimised whilst investment in major town centre redevelopments is undertaken. In the absence of this the local economy will suffer and it is significantly less likely that the Council's retail strategy will be effective.	The expansion of out of centre retail and service sites would not necessarily reduce leakage of expenditure from the borough but could lead to further competition with the existing town centres in Medway resulting in a further reduction in their vitality and viability. Consequently, no change is proposed to policy CS19.
	Given the significant cuts that have recently been made to public sector budgets, including Kent Police, it is now more important than ever that the needs of Kent	Given that policy CS34 depends upon section 106 contributions, it

	Police should be taken into account when agreeing developer contributions. It is therefore essential that the infrastructure needs of Kent Police should form part of Development Plan policy. Inclusion of such a policy within the Core Strategy would ensure that the document complies with South East Plan policy CC7, which requires Local Authorities to include policies which secure contributions to help facilitate the delivery of infrastructure. The South East Plan identifies the Police as a key infrastructure provider for which contributions should be sought. Without such a policy, Medway's Draft Core Strategy is currently contrary to the South East Plan and should be found 'un-sound'. It is our view that Medway Council have formed policy CS34 in a way which directs those contributions sought primarily towards services which the Local Authority provides. We do not consider it likely that this prioritisation of services accords with what Medway's residents would judge to be most important, and believe it likely that they would place the importance of fighting crime above that of, for example, library contributions. On this basis, Kent Police object to Draft Core Strategy policy CS34. In order to make the policy acceptable, Kent Police would wish to see a specific request for developer contributions towards infrastructure. The term infrastructure should then be defined within the policy or its sub-text, and this definition should include the Police and other emergency services. Kent Police therefore advocates the adoption of Secured by Design measures, and suggests that all new developments should be required to meet this standard as a minimum. On this basis, it is considered that Draft Core Strategy policy CS15, which seeks to create sustainable communities and sets out various requirements which new developments should seek to achieve, should include a specific requirement for new development to meet Secured by Design standards.	would be necessary to show that additional infrastructure is required to serve a need specifically arising from a particular development. No evidence has been presented in this representation to justify contributions to policing on that basis.	
		Whilst "Secured by Design" is taken into account when considering planning applications, together with advice from the police architectural liaison officer, this has to be balanced against other design considerations. Consequently, it would be inappropriate to require new development to comprehensively meet all Secured by Design standards. With these qualifications, it is remains the Council's intention to use design to minimize crime. Secured by Design Standards are desirable- but not at the expense of other requirements.	
	Policy CS8 , addresses public realm, currently requires that development should	Whilst "Secured by Design" is taken	

	“create or maintain attractive and safe streets and public spaces”. Kent Police suggest that the policy should go further than this, to require all new development to meet Secured by Design standards, with advice being provided by their local Architectural Liaison Officer to ensure that housing development layouts and public spaces minimise crime and fear of crime as far as possible.	into account when considering planning applications, together with advice from the police architectural liaison officer, this has to be balanced against other design considerations. Consequently, it would be inappropriate to require new development to comprehensively meet all Secured by Design standards. With these qualifications, it remains the Council's intention to use design to minimize crime.
Kent Wildfowling & Conservation Association (John Nottage)	Policy CS5: Development and Flood Risk - KWCA are pleased that while Medway have recognising that inter-tidal habitat could be lost due to coastal squeeze they have not specifically committed the three areas identified as potential mitigation sites (Cliffe, Cooling and High Halstow Marshes) as policy in the Core Strategy Plan. Until coastal squeeze and the area to be replaced have been fully investigated by the Environment Agency it would be inappropriate for the Council to offer up land. We must be careful to avoid the destruction of one good habitat for another.	Noted.
	Policy CS8: Open Space, Green Grid and Public Realm - Although KWCA support greater access to open green space we believe that it must be achieved sympathetically and not be at the expense of wildlife and fragile environments. We have many SSSI's, SPA's, and RAMSAR sites of international importance to overwintering wildfowl and waders in Medway. These birds are vulnerable to disturbance that could affect their feeding and roosting patterns. Disturbance effects include complete avoidance of an area and increased levels of vigilance, resulting in reduced foraging efficiency that may lower survival and breeding rates.	Agreed. Proposals to extend the Green Grid in policy CS8 will be balanced against the conservation and enhancement of wildlife habitats in policy CS6.
	Policy CS25: The River Medway – KWCA are concerned that increased leisure activity and access to the river, as noted in our response to Policy CS8, we have many SSSI's, SPA's, and RAMSAR sites of international importance to overwintering wildfowl and waders in Medway. These birds are vulnerable to disturbance that could affect their feeding and roosting patterns. Disturbance effects include complete avoidance of an area and increased levels of vigilance, resulting in reduced foraging efficiency that may lower survival and breeding rates. We are also	The increased access to and use of the river will need to be balanced against the support for measures to protect and enhance the river as a valuable resource for wildlife and biodiversity afforded by policy CS25.

	concerned that due consideration is taken to the potential loss of one habitat for another when replacement inter-tidal habitat. Inter-tidal mudflats are a U.K. Biodiversity Action Plan priority habitat and therefore of national importance, the high density of marine invertebrates in the mud providing good foraging habitat for a variety of bird species. Breaching the sea wall as part of flood defences does not create mud flats.	
Lafarge Aggregates (Heaton Planning)	Comments on its minerals site at Kingsnorth which has potential extensions which could ensure the security of land won aggregates supply to Medway throughout the plan period.	Noted.
Lafarge Cement UK (A Owen, LCUK)	Agree with Policy CS1 : Regenerating Medway - We support the emphasis given in Policy CS1 to regeneration in Medway, and welcome the identification of Temple Waterfront as a key site. This site, along with other regeneration sites, will play an important part in Medway's future, and their delivery should be supported.	Noted.
	Agree with Policy CS8 : Open Space, Green Grid and Public Realm - We support Policy CS8 and the commitment to delivering high quality green space in Medway. It is important, however, that investment in green space is supported by ongoing maintenance and management regimes which ensure that high standards are maintained. We suggest that the first sentence of policy CS8 is amended to read: "The Council will seek to provide equal opportunities for all people to enjoy accessible, high quality and affordable open space, and is committed to the long-term maintenance of its green space network. It will ensure.	Insert "well maintained" after "high quality" in the first paragraph of CS8.
	Agree with Policy CS13 : Housing Provision and Distribution - We support the approach set out in Policy CS13 of recognising that development sites subject to adopted Development Briefs should form part of the housing land supply for Medway.	Noted.
	Strongly disagree with Policy CS15 : Housing Design and Other Housing Requirements - Policy CS15 seeks, in the third bullet, to enforce standards which are open-ended in their scope and which are not yet defined in the explanatory text. Whilst we agree that delivering high quality and sustainable housing is critical to Medway's future success, it is unreasonable to set out policy which requires adherence to standards whose scope and detail is not explained in the Core Strategy and whose content will be agreed by way of a separate process not fully explained. Furthermore, the cost of establishing specific space and quality standards has been recognised by the government as a barrier to housing delivery, and so must be treated with caution. In the present (and foreseeable) economic	Not agreed. The draft Medway Housing Design Standards are available and have been consulted upon at the same time as the LDF in a fully transparent way. Examination of recent housing schemes in Medway has revealed that most house and flat designs either meet the proposed Medway standards or come close to meeting

	climate, it is quite likely that establishing mandatory higher internal and external space standards will translate directly into a higher build cost and hence higher property purchase costs. For those looking to purchase homes, either as their first home, or looking to trade from an older to newer homes, any additional cost may make the difference between being able to afford to buy or not. We believe that there is considerable risk, therefore, of new homes subject to these standards becoming less affordable and may preclude households from entering the property market. This will undermine affordability and housing take-up, and may lead to further stagnation of the local property market in Medway. In the current economic climate, we believe that it is in Medway's interests to seek to underpin market recovery by encouraging, rather than obligating, improvements in housing standards. We recommend that the third bullet of Policy CS15 be deleted.	them. Those designs that failed by a substantial margin were cramped and unfit for purpose. There may be a case for relaxing standards in specific cases where affordability is an issue. However, this is likely to apply to relatively few schemes and to only a proportion of dwellings within each scheme. This matter is best decided on a case-by-case basis upon the submission of specific and relevant information from developers.
	Disagree with Policy CS24: Transport and Movement - Whilst we support the Council's stance on transport matters, and recognise that the Council has limited influence on commercial bus operations, we are disappointed that no reference is made to the Council's role in coordinating new public transport investment which supports new development. Major regeneration sites will be expected to provide S106 contributions towards public transport provision, with procurement secured by the Council. This provides an opportunity for the Council to manage the procurement of services to ensure that new or amended services are coordinated and complementary and serve the widest public interest. We suggest that a further bullet point be added to Policy CS24 which reads: The Council will seek to coordinate and support the provision of public transport services through coordinated procurement of new services funded by planning obligation receipts and through its own actions.	Policy CS34 allows for the provision of infrastructure through section 106 agreements on larger developments. This includes the provision of new or extended bus services and there is therefore no need to include the role of the Council in policy CS24.
	Agree with Policy CS25: The River Medway - We support the regeneration objectives highlighted in Policy CS25. It is important that the Council coordinates its efforts in linking regeneration sites with its own investment in the public realm, and that it consults effectively with major landowners to deliver a coordinated and comprehensive public realm improvement strategy. This should include	Agreed.

	considerations of implementation and ongoing maintenance.	
	Strongly agree with Policy CS26 : Strood - We support Policy CS26 which identifies the important role of regeneration sites in the renewal of Strood. We also welcome the safeguarding of the future neighbourhood centre at Temple Waterfront, which will become an important asset serving future residents, visitors and those employed locally.	Noted.
	This response is made on behalf of Lafarge Cement UK (LCUK) and addresses aspects of Draft Core Strategy Chapter 8 (Provision for Minerals) as they relate to the permitted Medway Cement Works at Holborough. LCUK has recently responded to the Kent Minerals & Waste Development Framework consultation and aspects of this present response are concerned with consistent planning treatment across the boundary between Kent and Medway.	Noted.
	<u>Paragraph 8.14</u> - This states at point (4) that the Core Strategy will “Make provision at existing cement manufacturing facilities for at least 15 years of production, and 25 years at new sites.” This does not completely quote national policy. MPG 10 states (para 58) that a new cement plant on a green field site should be provided with a stock of permitted reserves lasting more than 25 years. At para 59 it states that sufficient land should be allocated to maintain this landbank <u>throughout</u>, and at the end of <u>the plan period</u>. The Core Strategy has a horizon of 2028 and therefore the cement works needs to have a landbank of reserves to 2043. In fact, the current planning permission just about meets that requirement, but subject to the comments below. Paragraphs 8.20/8.21 - These state that “<i>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.</i>” The following points arise. The new facility does not just “border” Medway. Both the 2001 planning permission, and the predecessor 1950 planning permission, lies astride the administrative boundary between Kent and Medway. Although the majority of the total permitted land area lies in Kent, some 15% lies in Medway, including in particular parts of the quarry and much of the road and rail sidings access. Therefore, Medway Council	It is noted that the reserve is estimated to be of a productive life of 35 years, though this is an economic assessment of the demand for the material as well as an assessment of the facilities designed output rate. To operate efficiently and to be cost effective it is understood that the reserve is calculated at some 35 years and not 40 years as it currently says in the Medway Core Strategy. MPG10 para 58 does indeed state that green field sites for cement production should have a stock of permitted reserves lasting more than 25 years. The Holborough consent has 35 years life some 28% above this national policy requirement. Para 59 states: 59 <i>Development plans should</i>

normally allocate sufficient land for mineral extraction for cement manufacture to provide for the maintenance of landbanks. Structure plans should set out the general principle of maintaining a landbank for cement plant, and mineral local plans should seek to identify areas where minerals will be worked. Sufficient land should be allocated to maintain this landbank throughout, and at the end of, the plan period. This part of the national planning policy for providing mineral reserves for cement production is significantly out of date. The Kent and Medway Structure Plan has been abolished, as will the South East Plan once the Localism Bill is enacted at primary planning legislation. The Medway Core Strategy has to set out the spatial strategy for the area, including mineral supply, in accordance with national planning policy and with local circumstances being taken into account. With regard to the Chalk for cement manufacture it can be stated that Holborough will have, at plan end in 2028, and assuming production started now some 18 years of reserves remaining.	has a full role to play as Mineral Planning Authority. It is correct that it is not yet known when the full plant might be constructed, but it remains LCUK's intention to do so as soon as economic conditions allow. The permitted chalk reserves are not "in excess of 40 years". They are 35 years. However, the life of the planning permission is limited to 40 years beyond 2001 i.e. to 2041. Because of the delay in bringing the development on stream, the current reserve life now extends to 2045, beyond the cut-off dates of 2041 in the planning permissions and also beyond 2042 (when under current policy all mineral planning permissions cease to have effect). Given the small differences between 2041 (when quarrying must cease under the current permission, 2043 up to when the Core Strategy should identify reserves, and 2045, which is the current reserve life, and acknowledging the uncertainty over when production will commence, LCUK would agree that there is today no justification for <u>allocating</u> specific further raw materials. However, it is possible that there will be a need to seek to extend the permitted life much sooner than 2041, because in the light of the delay in bringing the Works into production the limited "guaranteed" life to 2041 is now a deterrent to investing to complete the project. Any application to extend the date by which the project must cease might include amendments to the permissions. It could well be, therefore, that during the plan period there might be a need to reconfigure the parameters of the permissions, possibly including changes to the project's design or geographical extent of the quarry.	

		This is 7 years less than what can be reasonably be said to be the MPG 10 policy requirements. Therefore the securing of additional reserves would be able to be justified to enable continued production at the facility. The Medway Core Strategy is not a site allocation document but it should safeguard minerals that may be required from sterilising development. There is an absence of technical evidence that any of the surrounding Chalk reserves are suitable for cement production. The area around the site is already highly protected. Therefore the probability of significant new development in the vicinity of the works and quarry that would sterilise potentially valuable mineral reserves is negligible, now and well into the future.
Land Securities	Within Paragraph 1.15, it is noted that “The Council’s approach to SA incorporates the requirements of the Strategic Environmental Assessment (SEA) Directive”. Please see the separate response on behalf of Land Securities to the Draft Sustainability Appraisal that accompanies the Pre-Publication Draft Core Strategy for full feedback on SA/SEA issues. Paragraph 1.24 of the draft Core Strategy states that the Coalition Government has revoked Regional Spatial Strategies (RSSs), including the South East Plan, which covered Medway’s administrative area. Since the Pre-Publication Draft Core Strategy was published for consultation, the High Court has overturned the Secretary of State for Communities and Local Government’s decision to revoke RSSs, through its judgement on the CALA Homes judicial review case. The	Noted. Given that it is still in force, the core strategy will reintroduce references to the South East Plan and the Council will ensure that it is in conformity with that plan.

	implications of this are that RSSs have been re-established as part of the Development Plan at the present time, albeit that LPAs have been advised by CLG to have regard to the Government's intention to abolish RSSs as a material consideration in any planning decisions (given the Government's commitment to abolishing RSSs through the forthcoming Localism and Decentralisation Bill) – although this is now the subject of a further challenge by CALA Homes. The CALA Homes judgement referred to above highlights the constantly evolving planning policy climate, which has implications for planning policy at all spatial scales. Land Securities therefore considers that the Core Strategy must be capable of adapting and responding to these changing times, as advocated in PPS12. It is encouraging to see that paragraph 1.26 of the draft Core Strategy recognises flexibility to deal with changing circumstances as an important requirement, and it will be critical that future iterations of the Core Strategy are in conformity with the latest planning policy requirements. Land Securities would suggest that within the next iteration of the Core Strategy, which is due to be published in advance of the anticipated timescales for enactment of the Localism and Decentralisation Bill, the spatial strategy should be justified on the basis of being in conformity with the RSS, as well as being (in the absence of the RSS) justified in its own right based on evidence. This will effectively enable the Core Strategy to respond to changing circumstances in accordance with the requirements of PPS12.	
	Context and Issues Paragraph 2.6 of the draft Core Strategy notes that a wide range of key evidence studies has been produced in order to inform the Core Strategy, and includes a list identifying some of the main reports. Land Securities considers that this list could usefully be added to, to reflect non-Council generated evidence base reports, that Medway has sought to "take ownership of" to the extent possible. One example of such third party generated evidence is the suite of draft site-specific technical information reports prepared by Land Securities and its consultant team in respect of the Lodge Hill site. These reports were prepared following site investigation works, and engagement with key stakeholders, to inform Medway Council's Core Strategy evidence base in respect of the future planning policy context for the Lodge Hill site; specifically to support the identification of Lodge Hill as a Strategic Allocation within the Medway Core Strategy. PINS Inspector Simon Emerson visited Medway Council in June 2009 and advised Officers, amongst other things, that where the Council intends to rely upon studies undertaken by others, it should seek	The core strategy will be amended to include references to all relevant sources of evidence.

	to “own” this evidence as far as possible. Paragraph 5.5 of the Inspector’s advisory note to Medway Council states: <i>“It is for the Council to fully justify the submitted strategy. Where the Council is relying on evidence/studies undertaken by others e.g. consultants acting for the delivery body for Chattenden Barracks, [the site now known as Lodge Hill] it is essential that the Council can and does make that evidence its own and that it is part of the published evidence base accompanying the publication of the document.”</i> To seek to ensure Medway Officers could make the Lodge Hill-specific information reports their own as far as possible, Land Securities sought to engage Officers in the preparation of the technical documents. This process commenced at an early stage, when comments were sought on the scopes of the reports. Pursuant to this, the content of the draft reports was discussed at Medway Officer Working Group sessions attended by Land Securities and its consultant team, as well as at more discrete meetings focusing on particular topic areas. This has enabled Medway Officers to feedback on, and to seek to influence the content of, the site specific information reports. These reports are still evolving to reflect ongoing engagement with Officers and other relevant stakeholders. It is therefore considered that reference should be made to non-Council generated reports (for example the draft Lodge Hill-specific information reports) when referencing the Core Strategy evidence base. With reference to the Lodge Hill example, Land Securities is of the view that this suite of technical information presents the results of important “fact-finding” exercises that demonstrate the deliverability of a site critical to the Council’s emerging spatial vision for Medway.	
	Paragraph 2.26 of the draft Core Strategy relates to green infrastructure. The second bullet point under this paragraph states that the protection and conservation of open spaces should be protected, whilst the third bullet point confirms that the diversity and abundance of habitats and species should be conserved and enhanced. Land Securities agrees with this approach in principle, however considers that the wording of these bullet points should be amended to take account of site-specific circumstances, and instances where this may not be possible (but where suitable mitigation may be provided as a compensatory measure). Land Securities supports the last bullet point under paragraph 2.27 which relates to the creation and delivery of a brand new settlement at Lodge Hill that has strong links to the wider Hoo Peninsula.	Site specific circumstances are dealt with under policies CS6 and CS8.
	Options and Alternatives	Noted. The Medway Local

	Paragraphs 3.2 – 3.5 of the draft Core Strategy discuss the overall level of housing growth within Medway over the Plan period to 2028. It is noted that it is the Council's intention to "roll forward" the annual housing requirement for Medway proposed within the South East Plan (815 dwellings per year) to cover the period to 2028. It is considered that this approach is robust, given that the 815 figure is based on evidence gathered as part of the RSS process (and in view of the guidance issued by the Secretary of State for Communities and Local Government on 6 July 2010 that evidence that informed the preparation of the revoked Regional Strategies may be a material consideration). Now that (pursuant to the CALA Homes High Court judgment) the South East Plan remains part of the Development Plan, it is also considered appropriate that a housing target of 815 dwellings per year is proposed in the Core Strategy, to be in conformity with the RSS. We note that the Core Strategy will cover the period to 2028. Whilst we note that this extends beyond the RSS Plan period (which is to 2026), in order to meet the requirements of PPS12 paragraph 4.13, the Core Strategy must have a time horizon of at least 15 years from the date of adoption. We therefore agree with the approach that has been taken on this, although consider that the detail within the Council's Local Development Scheme should be amended to reflect the revised end date of the Core Strategy Plan period.	Development Scheme will be amended before the core strategy is submitted to the Secretary of State.
	In relation to employment targets we comment below on some general and specific issues. On the general issues we agree with the Council that the 21,500 jobs target (paragraph 3.10) is ambitious, and, given current economic uncertainty and the wide range of outcomes identified in tables 3.1 and 3.2, we query whether setting a single target in this way meets the tests of soundness set out in PPS12, most notably that the document must be founded on a robust and credible evidence base, and must be deliverable. Specifically we would question the use of the 21,500 figure given that this does not appear to tally with the numbers set out in Tables 3.1 and 3.2, which in turn differ from the scenarios set out in paragraph 4.2.48 of the Medway Employment Land Review Consolidation Study (MELRCS), 2010, which is cited as the evidence base document for employment land allocations. The Council needs to clarify these numbers and present a single set of assumptions. The MELRCS itself uses three methods to identify a potential employment target, one based on employment projections, one based on natural change in population and a low increase in economic activity and one based on a high increase in economic activity and a large reduction in out-commuting. The former two methods suggest growth of	It is accepted that the use of the 21,500 jobs target based upon an end date of 2026, combined with tables 3.1 and 3.2, which are based on an end date of 2028, is confusing and inconsistent. Given that 2028 is the end of the core strategy plan period, it is appropriate to use the most up to date figures and therefore paragraph 3.10 will be amended by the deletion of "21,500" and its replacement with "20,300" as the jobs target. Paragraph 7.14 will be amended by substituting "chapter"3" for

	approximately 6,500 jobs, and the latter 21,500 as proposed in the Core Strategy. Whilst Land Securities supports Medway's aspirations for the higher rates of growth it must be accepted that there is a reasonable possibility that growth will be lower and possibly require different types of land than can currently be forecast. We would therefore suggest that the Council needs to adopt an approach which allows for flexibility and contingency as set out in paragraph 4.46 of PPS12 should monitoring identify a lower growth rate.	"chapter 2". Paragraph 7.15 will be amended by replacing "21,500 jobs" with "20,300 jobs". Paragraph 7.16 will be amended by deleting the second sentence after "2008" and replacing it with "and the jobs target is now lower. Given that the Study has yet to be reviewed, the floorspace provision is therefore slightly higher than is required for this lower jobs figure but sufficient land is already committed to meet this requirement." Given that the core strategy draws upon information in the Consolidation Study, paragraph 7.18 will be amended by substituting "392,610 sq.m. on 54.44 hectares" for "348,963 sq.m. on 49.9 hectares" and Table 7.1 will be amended by changing the figures as follows: <table><tr><th>Floorspace</th><th>Land</th></tr><tr><th>Sq.m.</th><th>Ha</th></tr><tr><td>150,352</td><td>11.37</td></tr><tr><td>183,747</td><td>32.25</td></tr><tr><td>31,121</td><td>4.29</td></tr><tr><td>27,389</td><td>6.53</td></tr><tr><td>392,610</td><td>54.44</td></tr></table> Table 7.2 will be amended by changing the figures as follows:	Floorspace	Land	Sq.m.	Ha	150,352	11.37	183,747	32.25	31,121	4.29	27,389	6.53	392,610	54.44
Floorspace	Land															
Sq.m.	Ha															
150,352	11.37															
183,747	32.25															
31,121	4.29															
27,389	6.53															
392,610	54.44															

		F-space Req F-space Surplus/Deficit Supply 150,352 76,376 - 73,876 183,747 49,505 - 134,242 31,121 666,290 +635,169 27,389 4,827 - 22,562 392,610 796,998 +404,388 NB. Tables 5.6a and 5.6b of the Consolidation Study, the source of these figures is erroneously headed 2021 instead of 2026.
	Paragraph 3.15 confirms that Option 1 in the Core Strategy Issues and Options Report (new settlement at Lodge Hill, Chattenden) was the only option supported by the Council in terms of strategic locations for development. Land Securities submitted representations in July 2009 confirming support for this strategic option. Land Securities considers that within the next iteration of the Core Strategy it would be helpful to articulate that the reference to the site within the RSS is one of a number of reasons for being the most appropriate option compared to the reasonable alternatives.	Paragraphs 3.12 to 3.15 contain references to the Issues and Options and Sustainability Assessment which set out in detail, the reasons for the selection of option 1. There is therefore no need to expand upon these in the core strategy.
	Paragraphs 3.16 – 3.21 of the draft Core Strategy detail a summary of the variations to the strategic options proposed at Issues and Options stage, and the Council's response to the variations proposed. With regard to the first bullet point under paragraph 3.16, which includes the consultation response that claims Lodge Hill could only deliver 3,000 dwellings during the Core Strategy Plan period, Land Securities would like to emphasise the existence of a comprehensive suite of site-specific information which demonstrates that 4,600 dwellings can be delivered over the Plan period. In accordance with the evidence-based approach advocated by PPS12, it is therefore considered that the choice made by the Plan (in referring to	Noted.

	4,600 dwellings at Lodge Hill over the Plan period) is sufficiently supported by the background facts. This quantum of development is also essential for the necessary economic growth anticipated to be delivered, and to create the critical mass to support the delivery of a new settlement in terms of the full range of uses and facilities required for a balanced community. The approach to residential sales rate assumptions forms an important element of the draft site-specific information submitted to Medway Council on behalf of Land Securities. Within this evidence, it is noted that the sales rates assumed for Lodge Hill over the Core Strategy Plan period are the delivery of 4,600 private and affordable residential units within 15 years (average 306 private and affordable units per annum, 25.5 per month). Assuming a scenario whereby between 4 and 6 housebuilders are on-site at any one time and are each achieving sales rates of 5-6 dwellings per calendar month, this would equate to an absorption rate of 240 – 432 dwellings per annum. This range supports the case that there are good prospects of Lodge Hill comfortably achieving annual sales rates in excess of 250 private units per annum, particularly in light of the unique selling points of the Lodge Hill site. The third bullet point under paragraph 3.16 notes that at the Issues and Options stage of consultation on the draft Core Strategy, it was claimed that development at Lodge Hill was likely to take place at the “tail end” of the Plan period. Land Securities is aiming to commence development on the site in 2013 (with early infrastructure expected to start in 2012). The identification of the site as a Strategic Allocation within the emerging Core Strategy will provide the development plan policy framework to facilitate the early delivery of the site. As per the representations recently submitted to Medway Council’s draft Strategic Land Availability Assessment (SLAA), Land Securities envisages the first phase of Lodge Hill coming forward within the first five years of the Plan period, thereby contributing to the growth agenda within Medway from an early stage.	
	Paragraph 3.17 of the draft Core Strategy notes that even if Lodge Hill were to deliver 3,000 dwellings up to 2028 instead of the 5,000 estimated by the Council in the draft SLAA, Medway’s housing trajectory has identified a surplus of over 1,700 dwellings, which would compensate for the shortfall without the need to identify further land for housing development. Land Securities acknowledges that this is a potential ‘fallback’ position consistent with the need to consider contingencies set out in PPS12. Leaving this aside, Land Securities would like to comment on the	By reviewing the strategic land availability assessment annually, Medway Council can reconsider sites whose planning permission has lapsed and take into account new sites, which have been granted planning permission. With

	“surplus” of supply identified by the Council. The housing supply evidence produced by Medway Council demonstrates, in terms of the overall quantum, a 15 year supply of “deliverable” and “developable” (PPS3) sites. In this regard, the approach is consistent with the requirements of paragraph 53 of PPS3. However, with reference to the “tests” for deliverable sites (paragraph 54 of PPS3) and the approach set out at paragraph 58 of PPS3 in terms of extant planning permissions, Land Securities is uncertain based on the evidence of there being reasonable prospects in terms of the “deliverability” of some of the sites that are assumed to be delivered within the first 5 years of the Plan period. This uncertainty is explicitly to do with the assumptions on the delivery of: (i) extant planning permissions in advance of them lapsing; (ii) sites which currently do not benefit from planning permission; and (iii) allocations carried forward from the Local Plan. In our view, the robustness of the spatial strategy would be strengthened very simply by categorising these sites as “developable” to be delivered within the 6-15 year time horizon of the Plan period if it is appropriate to do so.	regard to sites without permission, the Council has taken into account the views of landowners/developers on when they expect to bring their sites forward for development. Lodge Hill is such an example. Given that Land Securities has not identified the specific sites which are causing it concern, the Council is not in a position to respond in detail to this representation and it would be illogical to re-programme all the sites in the three categories identified in the representation. The SLAA will be reviewed before the core strategy is submitted to the Secretary of State and concerns regarding specific sites can be investigated and any necessary amendments made to the SLAA.
	Paragraph 3.21 of the Core Strategy confirms that none of the alternative strategic options suggested have been considered further. Land Securities welcomes the Council's interrogation of the alternative options put forward at the Issues and Options stage of consultation, in terms of the robustness of the approach and the “testing” of alternatives as advocated by PPS12, and supports the Council's continued preference for a new settlement at Lodge Hill. Central to the approach for town centre development is the retail hierarchy of the area which establishes where development should be directed to ensure that the vitality, viability and function of centres is not adversely affected by new development.	Noted.
	Paragraph 3.29 of the emerging Core Strategy confirms that this has been considered, and based upon an up-to-date evidence base concluded that the established hierarchy of town centres need not be re-evaluated. However, as development comes forward at Lodge Hill, Land Securities is of the view that due regard should be given to the role and function of the Lodge Hill District Centre.	Agreed.

	Paragraph 3.40 sets out the history of Lodge Hill's potential to contribute to employment within Medway, focusing on the content of the Kent and Medway Structure Plan 2006, which is no longer adopted planning policy. Planning Policy Statement 4: Planning for Sustainable Economic Growth clearly states that "Existing site allocations should not be carried forward from one version of the development plan to the next without evidence of the need and reasonable prospect of their take up during the plan period" (Paragraph EC2.1(h)). The MELRCS (2010) is the most up to date evidence base and does not confirm the Structure Plan allocation set out in paragraph 3.40. The detailed numbers should therefore be removed as they are no longer relevant. Land Securities is committed to ensuring that Lodge Hill has a thriving economy (see Paragraph 11.94 of the Core Strategy) and believes that consideration of employment uses on the site should be in the context of the definition of economic development as set out in PPS4 paragraph 4, which as well as "B Class uses", includes public, community and main town centre uses.	The Kent and Medway Structure Plan considered that provision should be made for a wide range of employment uses at Lodge Hill. It also considered that it could also help to meet Medway's wider strategic objective of reducing out-commuting. This is relevant because the question of whether Lodge Hill should meet more than local needs was carried forward into the Issues and Options report. It is accepted that the floorspace requirement in the structure plan is no longer relevant given that the plan is no longer extant and as a consequence, paragraph 3.40 should be amended by deleting "at least 20 hectares (70,000 sq.m.)" and inserting "land".
	Paragraph 3.42 of the draft Core Strategy notes that a "balance of provision" is proposed at Lodge Hill in respect of employment development, broadly matching the employment floorspace to be provided with the size of the resident workforce. We believe that this needs to be revised to be in line with Policy CS33 which refers to "Employment opportunities generally in balance with the resident working age population" which allows for the employment generating uses which are comprised within the up-to-date PPS4 definition.	Delete the second sentence of paragraph 3.42 and insert "Accordingly, provision will be made for employment opportunities to be generally in balance with the resident working age population."
	4. Vision and Strategic Objectives Paragraph 6 of the Core Strategy "Spatial" Vision on page 24 sets out the economic vision for Medway. This appears to be limited to educational and "B Class" employment uses, not properly reflecting the broader definition of economic development in PPS4. Sub section (e) of this paragraph identifies Grain, Kingsnorth and Lodge Hill as locations for environmental technologies and building products/construction, amongst other activities. It is considered that in the case of Lodge Hill, this is too narrow, and should include reference to the broader economic	Insert "and higher value, higher quality, prestigious economic activity" after "construction" in paragraph 6e of the Spatial Vision.

	role set out in Policy CS33 and paragraph 11.94.	
	Land Securities supports Paragraph 9 of the Core Strategy "Spatial" Vision , which states that by 2028, "the new settlement at Lodge Hill will have been substantially completed and recognised as a beacon of best practice in terms of its design and sustainability. It will provide a new focus for services on the Hoo Peninsula, whilst relating sensitively to nearby villages".	Noted.
	Paragraph 4 of the Strategic Objectives on page 25 of the consultation document seeks to focus employment growth at certain locations, including Lodge Hill. Land Securities considers that the Council should instead consider referring to the Lodge Hill site as playing a specific role within Medway for employment growth and economic regeneration.	Insert "economic and" after "to focus" in paragraph 4 of the strategic objectives.
	Land Securities welcomes the identification of Lodge Hill/Chattenden as a new settlement on the Core Strategy Key Diagram (Figure 4.1) , although considers that for completeness it would also be appropriate to identify the site as a "Strategic Allocation" on this Plan, in accordance with PPS12.	It would be inappropriate to refer to the diagrammatic representation of Lodge Hill on the Key Diagram as a strategic allocation as it is not site specific. The precise boundaries of the allocation are shown in Figure 11.3.
	5. Cross-Cutting Themes	
	Paragraph 5.2 of the draft Core Strategy confirms that the effective regeneration of Medway's town centres and urban waterfront is the single biggest challenge facing the area and must therefore be the priority for this Core Strategy. It is recognised that this established regeneration programme is of critical importance, however is considered to represent one of a series of priorities. Given the strategic importance of the Lodge Hill site to the Council's growth agenda, Land Securities is of the view that reference should also be made to this Strategic Allocation as one of the Council's priorities over the Plan period and beyond.	Because of the length of time that the regeneration process has been taking place in Medway, since the closure of the Royal Navy dockyard in 1984, the complexity of the regeneration sites, the level of upfront expenditure already incurred, the need to revive Chatham as a vibrant sub-regional centre and the need to enhance the overall image of Medway, the completion of the existing regeneration programme must remain the overriding priority of the core strategy.
	Within Paragraph 5.12 of the Pre-Publication Draft Core Strategy, it is noted that for,	Agreed in part. The term design

inter alia, large sites (100 dwellings or more, or 10,000 sq m commercial development), good design will best be ensured by agreeing design principles with the Council via a design brief for each site. Land Securities would welcome the opportunity to understand the need for these design briefs in more detail, in terms of legislative requirements and whether it is the Council's intention to apply this requirement to all large sites. If the Council is minded to retain this requirement, Land Securities would welcome confirmation of who will be expected to produce the design briefs (i.e. LPA or applicant), together with clarification on the status and scope of these briefs, as well as their role relative to Design and Access Statements (which are submitted alongside planning applications).	brief infers the production of a supplementary planning document to be adopted by the Council. Whilst this may be relevant in some circumstance this is too prescriptive. However, agreeing basic design/ development principles with the Council and carrying out extensive consultation on these principles prior to the submission of planning applications is an important part of ensuring that consultation is real and meaningful. The precise form of the information that forms the basis of consultation can be agreed on a site by site basis. The term 'design brief or statement', loosely applied, allows for flexibility. In the absence of a detailed, site specific development proposal the statement should normally be prepared by the applicant or by the Council-dependant upon circumstances. In many cases the information that will be of relevance will be similar to that which might normally be contained within a Design and Access Statement. It is realised that the above goes beyond statutory requirement. However, given the extent or regeneration that will occur in

		Medway, it is good practice. Paragraph 5.12 will therefore be amended to read as follows: “...For significant regeneration sites (100 dwellings or more, over 10,000m² of commercial development, or sensitive sites which will be visible or prominent within the surrounding area or in close proximity to important heritage assets) good design will best be ensured by agreeing basic design principles with the Council. These principles should normally be laid down in a pre- application design statement or brief to be produced by the applicant. Consultation should take place on this prior to the submission of planning applications. Consultation will be expected to conform with the Council's statement of community involvement.” See comments above. Final paragraph of policy CS2 to be amended as follows: “Applications for significant regeneration sites, should be preceded by a design brief or
	Draft Policy CS2 relates to quality and sustainable design. This confirms, amongst other things, that applications for major sites (25 houses or more) should be accompanied by an Accessibility Assessment and a Design Statement. The draft Policy goes on to state that applications for significant regeneration sites, large sites or sensitive sites should be accompanied or preceded by a design brief that is subject to a public consultation process. In common with its response to the principle of design briefs (see comment in respect of Paragraph 5.12, above), Land	

	Securities queries the need for a requirement for stand-alone Accessibility Statements, Design Statements, and design briefs. If it is the Council's intention to pursue a requirement for these documents, Land Securities would like to understand more about the proposed content, scope, purpose, hierarchy and inter-relationship of each of these documents, not least to avoid any unnecessary duplication with Design and Access Statements.	statement that is subject to an extensive consultation process."
	Draft Policy CS3 confirms that residential development will be required to achieve at least Level 3 of the Code for Sustainable Homes, and that commercial buildings over 1,000 sq m will be required to meet the BREEAM "very good" standard. Land Securities considers that, in order to provide sufficient flexibility over the lifetime of the Core Strategy, reference should be made within Draft Policy CS3 to meeting "relevant standards", in recognition of the fact that technologies and standards may change over time.	See responses to previous representations on this matter
	Draft Policy CS4 states that all new development will be expected to show reduced energy loads through passive design and the inclusion of energy efficiency measures. The draft policy goes on to state that in developments of 10 dwellings or more, or over 1,000 sq m of floorspace, it will be expected that 20% of the remaining on-site energy loading will be delivered from renewable energy sources. The draft Policy notes that the direction for which technologies would be most appropriate should be taken from the Medway Renewable Energy Capacity Study, and that if it is demonstrated that this target cannot be met economically, compensatory measures will be sought and applied to current buildings in the locality. It is understood that the 20% target for renewable/sustainable energy is based on the Renewable Energy Capacity Study undertaken by Scott Wilson, et al. That study identified the availability of 641MW of energy from low and zero carbon technologies. The Council's desire to achieve 20% of energy from renewable sources alone is acknowledged, however Land Securities is of the view, given the evidence within the Scott Wilson study, that the requirement within Policy CS4 should be amended from 20% renewable energy sources to renewable or low or zero carbon sources (or 20% carbon emission reductions, since differing sources of energy have different carbon factors). The Scott Wilson report also emphasised that district heating systems should be considered by Medway in association with gas CHP and biofuel. In line with this approach, the energy solutions for the Lodge Hill site involve investigating decentralised energy solutions, and district heating is one	The 20% 'Merton Rule' is regarded as a general starting point for renewable provision for new development, subject to certain caveats. There is no evidence why this is inherently unacceptable as being 'too high'.

	potential option. Should this option be pursued, the fuel source for the primary infrastructure heat network would not be reliant on any one source, nor would it specifically address renewable energy targets (i.e. the strict 20% renewable energy requirement within Policy CS4 as currently drafted) but it would be determined by an Energy Services Company (ESCo) in such a way as to be financially viable and to maximise the carbon reduction opportunities. Having regard to the findings of the Scott Wilson report, which states that district heating systems are a key element that should be investigated further, Land Securities considers that Draft Policy CS4 should be amended to refer to a 20% reduction in carbon emissions, in order to provide sufficient flexibility to enable the recommendations of the Scott Wilson evidence base study to be investigated. Land Securities also considers that reference to the “reduce, reuse, recycle” energy hierarchy could usefully be made within Policy CS4.	
	Emerging Core Strategy Policy CS6 confirms that any negative impact on recognised wildlife habitats or other biodiversity features should be avoided or minimised through the appropriate siting and/or design of development. Where the negative impact cannot be avoided, environmental compensation will normally be sought on more than a like-for-like basis. Land Securities considers that where compensation is deemed appropriate, it should be calculated on a site-specific basis, according to the scheme in question and the nature of the new habitats proposed to be created.	Noted.
	It is recognised within Paragraph 5.67 of the draft Core Strategy that in PPS7, the Government no longer accepts the need for local (landscape importance) designations that may unduly restrict development and economic activity, but that the Council is taking a flexible approach to the drafting of a policy dealing with the countryside and landscape in order to be able to respond appropriately to announcements by the Coalition Government on such matters. Land Securities supports this flexible approach, and reserves the right to comment on any future iterations of this draft policy as they emerge. To avoid ambiguity as to the delivery of a new settlement in the context of emerging Core Strategy Policy CS7, Land Securities consider that explicit reference should be included within Paragraph 5.67 relating to Lodge Hill. Land Securities also considers that paragraph 5.72 should go further in terms of the provisions within PPS4 for development in the countryside to set the context for the Lodge Hill Strategic Allocation, given that PPS4 explicitly recognises (at Paragraph 6) that the policies for economic development in the	In order to avoid ambiguity as to the delivery of a new settlement at Lodge Hill, a paragraph will be inserted after paragraph 5.73, as follows:” The core strategy is proposing a new settlement at Lodge Hill which conforms with paragraphs 36 and 38 of PPS3, in so far as it takes the opportunity for the provision of housing on surplus public sector land, it gives priority for development on previously developed land and it takes up the option for

	statement apply to rural areas as they do to urban areas. Furthermore, PPS7 sets out the Government's objectives for rural areas, which include good quality, sustainable development. Land Securities is also of the view that the last sentence of paragraph 5.73 should be amended to acknowledge – in a Medway context – the focus of housing on existing settlements and a new settlement at Lodge Hill.	accommodating new housing growth through the creation of a new, free-standing settlement. Consequently, the planning and control of the development of Lodge Hill will take place through the implementation of policy CS33 and the masterplan and development brief which will be prepared in accordance with that policy.”
	Policy CS7 concerns countryside and landscape matters. Land Securities welcomes the use of the Medway Landscape Character Assessment in the formulation of the policy, in its role as an important element of the Core Strategy evidence base. For the avoidance of doubt, Land Securities considers that it would be useful to include a reference to the strategic allocation of the Lodge Hill site for a new settlement on the Hoo Peninsula, within the text of the policy.	A new paragraph to be inserted after paragraph 5.73 adequately explains the position with regard to Lodge Hill and there is therefore no need to amend policy CS7.
	Draft Core Strategy Policy CS10 relates to sport and recreation. The emerging policy states, inter alia, that the Council will safeguard existing facilities for sport and leisure. Land Securities agrees with the principle of this approach, however considers that the draft policy should be amended to include a caveat that seeks the safeguarding of existing facilities unless these facilities form part of a package of wider improvements that include new sports facilities. This would better reflect circumstances where, as recognised in PPG17 (paragraph 13), development may provide the opportunity to exchange the use of one site for another to substitute for any loss of open space, or sports or recreational facility (where the new facility should be at least as accessible to current and potential new users, and at least equivalent in terms of size, usefulness, attractiveness and quality). It would also reflect the statement within Paragraph 13 of PPG17 that wherever possible, development should aim to achieve qualitative improvements to open spaces, sports and recreational facilities.	This issue is addressed in policies L1 and L3 of the Medway Local Plan, 2003. These policies will be carried forward and will be applied alongside policy CS10 until replaced by the Site Allocations and Development Management DPD
	Emerging Policy CS12 (Heritage Assets) includes a requirement for Design Statements which accompany new development proposals to demonstrate an understanding of how the historic environment has informed the development of the	The requirement to ‘demonstrate an understanding of how the historic environment has informed

	design. In common with Land Securities' response to draft Policy CS2, further clarification on the proposed scope/content/responsibilities in respect of the Design Statements proposed is sought, particularly relative to the existing requirement for Design and Access Statements, Heritage Statements and Listed Building and Conservation Area Assessments. The policy refers to 'valuable heritage assets'. The inclusion of the word 'valuable' would appear unnecessary given the clear definition of Heritage Assets in Annex 2 of PPS5. Paragraphs 5.129 and 5.128 reflect national policy with recognition that change in the historic environment is managed and that it may not be possible or desirable to maintain all aspects of the historic environment. Policy CS12, however, is based on the premise that Medway's heritage assets, including undesignated assets, may only be preserved or enhanced. The policy, it would seem, has the potential to be at conflict with national policy on this matter. Policy CS12 refers to the 'local list'. Land Securities seeks clarification on whether it is the Council's intention to maintain, or indeed add to, the local list over the Core Strategy Plan period, or whether the introduction and use of 'Heritage Assets' will supersede this.	<i>the development of the design'</i> does not set out to impose further information requirements. Its purpose is instead to focus the designers' minds on the historic environment. Agreed- the word "valuable" will be deleted from the first line of policy CS12. It is the Council's intention to compile a 'local list' over the plan period. PPS 5 and its reference to 'heritage assets' have not superseded the concepts of 'Local lists'. English heritage is in the process of forming new guidance on local lists and is encouraging Councils to compile such lists.
	Housing Land Securities welcomes the confirmation in Paragraph 6.6 of the draft Core Strategy that the new settlement at Lodge Hill will be a key component for housing supply in Medway going forward. Paragraphs 6.9 – 6.11 of the draft Core Strategy confirm that the Council has a "healthy surplus" with regard to the overall housing supply requirement over the Plan period to 2028, even without any windfall assumptions. Land Securities would like to comment on the "surplus" of supply identified by the Council. The housing supply evidence produced by Medway Council demonstrates, in terms of the overall quantum, a 15 year supply of "deliverable" and "developable" (PPS3) sites. In this regard, the approach is consistent with the requirements of paragraph 53 of PPS3. However, with reference to the "tests" for deliverable sites (paragraph 54 of PPS3) and the approach set out at paragraph 58 of PPS3 in terms of extant planning permissions, Land Securities is uncertain based on the evidence of there being reasonable prospects in terms of the "deliverability" of some of the sites that are assumed to be delivered within the first 5	By reviewing the strategic land availability assessment annually, Medway Council can reconsider sites whose planning permission has lapsed and take into account new sites, which have been granted planning permission. With regard to sites without permission, the Council has taken into account the views of landowners/developers on when they expect to bring their sites forward for development. Lodge Hill is such an example. Given that Land Securities has not identified the specific sites which

	years of the Plan period. This uncertainty is explicitly to do with the assumptions on the delivery of: (i) extant planning permissions in advance of them lapsing; (ii) sites which currently do not benefit from planning permission; and (iii) allocations carried forward from the Local Plan. In our view, the robustness of the spatial strategy would be strengthened very simply by categorising these sites as “developable” to be delivered within the 6-15 year time horizon of the Plan period if it is appropriate to do so.	are causing it concern, the Council is not in a position to respond in detail to this representation and it would be illogical to re-programme all the sites in the three categories identified in the representation. The SLAA will be reviewed before the core strategy is submitted to the Secretary of State and concerns regarding specific sites can be investigated and any necessary amendments made to the SLAA.
	Draft Policy CS13 relates to housing provision and distribution. This emerging policy states, inter alia, that the sources of housing provision should include sites allocated in the Medway Local Plan 2003 not already having the benefit of a planning permission. It is considered that, as with new sites proposed, sites allocated in a previous (and to be superseded) iteration of the Development Plan should be assessed against the key deliverability tests within PPS3 (which was first published some three years after the adoption of the Medway Local Plan) as they would not have previously been required to have been considered against the criteria within PPS3. PPS12 requires evidence that the choices made by DPDs are backed up by the background facts, and therefore Land Securities considers that sites allocated in the Medway Local Plan 2003 that do not benefit from a PPS3 paragraph 58 “developable” extant planning permission should only be included within the Council’s housing supply schedule where there is sufficient evidence of either their deliverability over the first five years or their developability over the longer Plan period. Land Securities considers this is particularly relevant given that some Local Plan allocations date back to the mid-1990s and still have not been delivered. Land Securities supports the third bullet point within draft Policy CS13, which confirms the Strategic Allocation of land at Lodge Hill will contribute 5,000 dwellings (with approximately 4,600 to be delivered during the Plan period) towards the supply of new homes in Medway. In respect of the fourth bullet point within draft Policy CS13 (and also reflected within paragraph 6.12), this states that “other sites identified in the Medway Strategic Land Availability Assessment 2010” will contribute towards housing provision. As currently drafted, this implies that all the housing sites within	The housing allocations in the Medway Local Plan which have been carried forward are listed in table 6.3 of the core strategy. These have all been reassessed in the Strategic Land Availability Assessment. All the sites identified in table 1 of the SLAA have been assessed as being suitable for development for housing. This is the reason for preparing the SLAA. The SLAA clearly states that the inclusion of a site does not imply that it will be allocated or granted planning permission. However, it does demonstrate that sufficient land has been identified for housing to meet Medway’s requirements during the plan period of the core strategy. At present, Medway Council is not aware of any reasons why those sites should not be allocated but

	the SLAA are suitable for residential allocations. Land Securities considers this reference should be “tightened”, given that inclusion of sites within a SLAA document does not automatically guarantee that they will be allocated within the Development Plan. The policy should be drafted to recognise this.	the SLAA will be regularly reviewed and the precise allocations will be subject to the circumstances prevailing when the Site Allocations and Development Management DPD is prepared.
	Paragraph 6.19 confirms the Council’s intention to maintain the current affordable housing policy target of 25% within the existing urban area boundary and at Hoo St Werburgh, but that elsewhere a 30% policy target will apply. It is noted that Paragraph 6.16 reiterates some of the findings of the Medway Council Affordable Housing Viability Study. It should also be noted that, within that Study, sample 1 Hectare sites were tested with a limited set of assumptions concerning Section 106, Infrastructure and Code for Sustainable Homes costs, the introduction of which remains mandatory at Code Level 6 in 2016, during the Core Strategy Plan period. The nature of the assumptions used in the study may not therefore entirely reflect the specifics of developing the Lodge Hill site, which Paragraph 11.89 acknowledges “is defined as “previously developed” due to its military use, including ordnance manufacture” and at paragraph 11.101 will require remediation early in the development process. In part these issues were previously recognised in the South East Plan Policy KTG4 and its supporting text Paragraph 19.13, which considered that the target of 30% affordable housing “is the maximum judged practical in the sub-region.” It is for this reason that the flexibility to negotiate affordable housing levels through Policy CS14 having due regard to viability and other considerations is supported. This flexibility is considered to be consistent with the requirements of PPS12. It is important to consider that The Medway Affordable Housing Toolkit (as noted in Paragraph 6.19), whilst being useful to aid the negotiation of the majority of sites coming forward within Medway, may not offer the flexibility required to consider major developments such as Lodge Hill. It is therefore recommended that, subject to discussion with the Council, other viability models may be proposed to assist in planning negotiations where appropriate, and provision should be made for this within the Core Strategy.	The use of other viability models will be a matter for negotiation at the detailed planning stage.
	Policy CS14 (Affordable Housing) should incorporate the reference within the supporting text to provision on alternative sites or financial contributions where the Council and applicant both consider this to be preferable to on-site provision and where to do so would contribute to the creation of mixed communities. As Paragraph	The provision on alternative sites or financial contributions will be a matter for negotiation at the detailed planning stage.

	29 of PPS3 notes this should follow the principle of broad equivalence, a principle also followed in the Medway Council Affordable Housing Viability Study (reported in Paragraph 4.14 of the Study). Further, 'The quantum of' should be inserted to the second paragraph (i.e. "The quantum of affordable housing to meet local needs...") to aid understanding and clarity of the policy. We understand the use of the word "mix" in the last bullet point to mean size, type and affordability, although this should be clarified in the next iteration of the Core Strategy.	Add "The provision of" to the beginning of the second paragraph of policy CS14. Housing "mix" is defined in policy CS15 as size, type, tenure and affordability. There is therefore no need to repeat it in policy CS14.
	Paragraph 6.38 of the consultation document confirms that Health Impact Assessments will be sought in relation to larger housing proposals. As the Council will be aware large planning applications are accompanied by voluminous documentation covering a wide range of issues, including most of what is contained within a health impact assessment although not necessarily presented as such. In order to avoid unnecessary duplication of information we would suggest that the Council makes clear that such assessments might form part of the scope of other reports such as the socio-economic assessment section of an Environmental Statement or a Social Infrastructure report, rather than necessarily be a stand-alone document.	This is appropriate for a significant new settlement/proposal; this approach is gaining greater importance in understanding the health implications of new development and their linkages with the wider community. An important material consideration for the local authority in exercise of its planning responsibilities.
	Emerging Policy CS15 relates to housing design and other housing requirements. The first paragraph within the draft policy refers to the ways in which sustainable residential communities can be created, and notes that regard should be had to the North Kent Strategic Housing Market Assessment (SHMA). It is considered that reference should also be made here to the fact that, as an important component of the LDF evidence base, the SHMA should be updated on a regular basis, and that it will be equally important to review additional evidence if sustainable residential communities are to be considered holistically. The first bullet point of draft Policy CS15 states that the Council will seek to ensure that housing developments help to balance the size, type, tenure and affordability of the local housing stock. When creating a free-standing settlement (in line with guidance in Paragraph 38 of PPS3) such as that proposed at Lodge Hill, it is considered to be critical that regard is had to site-specific circumstances and the making of place, and that this should be reflected within the policy. The third bullet point of emerging Policy CS15 states that Medway will seek to ensure that housing complies with space and other standards laid down in the Medway Housing Design Standards. It is considered that this bullet point would also benefit from increased flexibility to recognise site-specific circumstances, and that in exceptional cases it may be permissible to deviate from	Medway Council is aware of the need to keep all relevant sources of evidence up to date and there is therefore no need to make specific reference to that need in the core strategy. The need to have regard to site-specific circumstances and place making is addressed in policy CS2. Deviation from housing design standards will be a matter for negotiation at the detailed planning stage of a development. The sixth bullet point in Policy CS15 will be amended by the addition of "or which can be made accessible to public transport."

	the design standards where there is a justifiable reason for doing so. Bullet point 6 of draft Policy CS15 seeks the effective use of land so that higher densities are achieved in locations well served by public transport. It is considered that the policy should be expanded so that it also includes reference to higher densities on sites that can be <i>made</i> accessible to public transport (as per the guidance in Paragraph 46 of PPS3 that encourages Councils to have regard to current and future accessibility when developing housing density policies), and those with current or future access to a range of amenities.	
	7. Economic Development Land Securities has been working with the Council and Higher education partners to assess the potential economic role of Lodge Hill and supports the statement in the third bullet point of Paragraph 7.5 that it could house educational functions, and higher value added activities. Whilst strongly supportive of the Universities of Medway, we feel that this reference alone may be too specific and that there may also be opportunities to work with other institutions in Medway, Kent and possibly further afield. We would therefore suggest that the paragraph is amended to read “The location is also suitable to accommodate smaller further and higher education functions, for example, satellite operations from the Universities at Medway at Chatham Maritime, and higher value activities associated with the developments at Kingsnorth and Grain”. In relation to Chapter 7, Economic Development, we re-iterate our points above relating to the employment target and data sets out in paragraphs 3.6 to 3.11 of the Issues and Options section which deal with the employment target. Paragraph 7.4 of the Draft Core Strategy confirms the significant uncertainty in current economic prospects, and paragraph 7.15 states that “a number of factors point towards the lower end of the [job targets] range unless a step change occurs in employment and out commuting patterns.” The text then goes on to set an ambitious jobs target at the top end of the range which is seemingly inconsistent with the scenarios set out in paragraph 7.14. Whilst the desire for Medway to maximise its economic potential is strongly supported, Land Securities is of the view that where targets are proposed there should be a reasonable and demonstrable prospect of achieving them and/or monitoring, flexibility and contingency where there is significant uncertainty. The Council should consider what its response would be to lower rates of employment growth occurring than the proposed target. In relation to Lodge Hill, Land Securities would question the appropriateness of its definition as an “M2 Access site”. As is noted elsewhere in the	The third bullet point of paragraph 7.5 will be amended by the insertion of “smaller, higher and further education functions, for example,” after “accommodate”.

	document it is more likely that it will provide specific markets for certain occupiers and businesses rather than a “generic” business park offer. In this context we support the identification of Lodge Hill, in Policy CS17 , as having the potential to create a high quality environment for the development of employment. We would add that this will be as “part of a wider mixed use development which helps develop a new image for Medway.”	
	Draft Policy CS18 concerns tourism and confirms that local tourism will be supported by, inter alia, encouraging proposals for new hotel accommodation and conference/exhibition facilities in locations which complement regeneration opportunities, particularly along the urban waterfront. It so considered that this bullet point within the policy should also refer to encouraging new hotels in locations which have (or which will have) access to services and facilities to create a mix of uses and encourage visitors. The proposed freestanding settlement at Lodge Hill is considered to be an excellent opportunity to provide additional visitor accommodation on the Hoo Peninsula, which complements the Council’s objectives for the urban waterfront and supports the development of the rural tourist economy.	Paragraph 11.99 and Table 22, associated with policy CS33, both include proposals for hotels at Lodge Hill. These proposals will be incorporated into the masterplan and development brief and there is therefore no need to make specific reference to them in policy CS18.
	Paragraph 7.37 of the draft Core Strategy sets out the current hierarchy of town centres in Medway. Areas defined as Regional or District Centres are noted within the text, however Local, Village and Neighbourhood Centres are undefined. Land Securities considers that for completeness it would be beneficial to list these existing centres.	Local centres, villages and neighbourhood centres are identified in chapter 11: Area Policies. Bullet point three of paragraph 7.37 will be amended by adding (identified in chapter 11).
	With regard to Policy CS19 , Land Securities notes that there is an inconsistency between emerging Core Strategy Policies CS19 and CS33 (and Table 11.22) with regard to the quantum of retail floorspace at the Lodge Hill site. Policy CS19 identifies a higher quantum, which Land Securities does not consider to be inappropriate, having regard to the fact that Lodge Hill will be a new settlement which is expected to develop incrementally over time. It will be important for the retail element of the settlement to be appropriate in terms of the scale of development it will serve, particularly in the context of national guidance in PPS4 and PPG13 which, inter alia, promote linked trips. Land Securities is of the view that Policies CS19 and CS33 need to be consistent with regard to retail quantum. (Please refer to our comments elsewhere in these representations for detailed comments on Policy CS33). Bullet point 3 of Policy CS19 refers to ‘smaller scale	Noted. The fourth bullet point of policy CS19 will be amended by the insertion of “5,000 sq.m.” after “Rochester and”. As it stands, the third bullet point of policy CS19 is unclear. Paragraph 7.51 makes it clear that a range of comparison shopping facilities and serves will be provided catering for the immediate catchments of the district centres. It also refers to small scale provision. It is not clear,

	comparison goods floorspace' in certain areas. Land Securities considers this to be inappropriate, given the acknowledgment in the same bullet point to Lodge Hill being a district centre. PPS4 defines a district centre as comprising groups of shops often containing at least one supermarket or superstore, and a range of non retail services, such as banks, building societies and restaurants, as well as local public facilities. Lodge Hill is a new settlement that will evolve over time. PPS4 and PPS12 emphasise that policies should be flexible enough to accommodate sectors not anticipated in the Plan and allow a quick response to changes in economic circumstances. To ensure this flexibility, as well as to ensure due consideration is given to appropriateness of scale and sustainable economic growth, it is considered that reference to 'smaller scale' within Policy CS19 should be replaced by 'appropriate scale'.	in the paragraph, that small scale refers to the unit sizes rather than the overall floorspace. Consequently, the second sentence of paragraph 7.51 will be amended to read "Opportunities to develop additional, small scale shop premises will be encouraged," The third bullet point of policy CS19 will be amended to read "Smaller scale comparison goods shopping units at the district centres with a cumulative total floorspace as shown."
	8. Energy, Waste and Minerals Paragraph 8.8 of the draft Core Strategy sets out opportunities for the future in the context of energy generation. Land Securities considers that, particularly in light of recent announcements from EON in respect of the Kingsnorth Power Station, provision should be made within the next iteration of the Core Strategy for alternatives/contingencies to be considered in order to demonstrate an appropriate level of flexibility. Where large-scale district heating projects are not a viable solution, Land Securities is of the view that the focus should be alternative local decentralised energy schemes and funding to promote strategic sustainable low carbon developments and Community Energy Projects. Paragraph 8.34 of the Draft Core Strategy refers to the provision for the disposal of a certain amount of London's waste to landfill and to the reduction on the demand for this. However, Paragraph 8.50 notes that the Home Counties, including Medway, are no longer required to make provision for a proportion of London's waste disposal needs following the revocation of the South East Plan in terms of landfill. It is considered that it would be helpful to expand on this in Paragraph 8.34 to gain an understanding of what has been required and what will be required. Furthermore, sufficient flexibility is required within the text to deal with changes in planning policy at all spatial scales (most notably the fact that the South East Plan now (for the time being at least) forms part of the statutory Development Plan once more). It is considered	The second paragraph of Policy CS4 will be amended by the insertion of "or alternative local and community energy projects, decentralized energy schemes." After "conventional power generation." The South East Plan has not been revoked, though the Localism Bill will, once it has received Royal Assent, will abolish regional spatial strategies. London waste exports to Kent and Medway were never formally disaggregated. The Localism Bill, once enacted will revoke the South East Plan. Till then the requirement of Kent and Medway to have regard for London's waste exports will

	that Paragraph 8.34 of the Draft Core Strategy would benefit from additional background information on the waste hierarchy, and that Paragraphs 8.34 and 8.50 should be consistent in terms of the disposal of London's waste. It is considered that Paragraph 8.39 of the Draft Core Strategy would benefit from additional background evidence on the recycling and recovery rates and how it is increasing in Medway. This paragraph also states that landfill will continue as the only option for certain types of waste and that this can also be expected to continue to decline as costs for this disposal method increase and new methods of recovery are introduced. Land Securities is of the view that priority should be given to new strategic development opportunities that can target waste reduction practices at a community scale, thus further reducing the amount of waste requiring to go to landfill.	continue.
	With regard to Policy CS23, Land Securities is of the view that the start of the policy should include a reference to moving construction waste up the waste hierarchy. As well as ensuring all new built developments make appropriate provision for the separation, storage and collection of waste materials, the inclusion of reused and recycling materials and on site reuse and recycling of construction, demolition and excavation waste should be encouraged.	The State of Medway Report details the waste hierarchy and the need for an intergraded approach to waste management into new development. The amended waste hierarchy will be discussed in the updated State of Medway Report on waste.
	11. Area Policies Paragraphs 11.56 – 11.72, Tables 11.16 – 11.18, and emerging Policy CS31 all concern development over the Plan period on the Hoo Peninsula and the Isle of Grain. It is noted that the Lodge Hill site is considered separately elsewhere in Chapter 11 given the scale of development proposed, although there are some references to Lodge Hill within the Hoo Peninsula section of this chapter. In particular, paragraph 11.66 states that “the development of Lodge Hill creates a challenge to Hoo’s current role. The impact of Lodge Hill on Hoo St Werburgh and the surrounding villages will need to be carefully managed so that existing services and facilities are not undermined.” Land Securities and its consultant team are acutely aware of the need to integrate proposals for the redevelopment of the Lodge Hill site into the existing area, and the masterplanning work that continues to be undertaken is alive to these sensitivities. It is therefore considered that Lodge Hill should not be identified as a “challenge” to Hoo’s current role; it should instead be highlighted as an opportunity to enhance the facilities that already exist. The remainder of Chapter 11 of the Pre-Publication Draft Core Strategy from Paragraph	Lodge Hill will be both an opportunity to expand the facilities on the Hoo Peninsula as a whole and a challenge to the role of the individual settlements. Both should be reflected in the paragraph. Paragraph 11.66 will be amended by inserting “both an opportunity to enhance the services and facilities on the peninsula and” after “Lodge Hill creates” and at the end of the paragraph inserting “to the detriment of local residents”.

	11.88 concentrates on the Lodge Hill site, and is the focus for the majority of our comments on the area policies, given Land Securities' interest in the site.	
	Paragraph 11.95 of the draft Core Strategy confirms that Lodge Hill is identified as a Strategic Allocation, and this is supported by Land Securities. The text goes on to note that Policy CS33 (Lodge Hill) will be expanded on by a site-specific development brief and a masterplan for the site, which will guide detailed planning decisions (see also bullet point 4 of draft Policy CS33). There is a requirement within Paragraph 11.95 for the masterplan to 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. Land Securities considers that there are two considerations in terms of a review mechanism, and the Core Strategy ought to clearly distinguish between the two. The first relates to a review mechanism of a development brief. Land Securities is of the view that the need for and merits of this would be for the Council to determine, given that it would be undertaken by the Council. The second relates to a review mechanism attached to (without prejudice) a planning permission for the redevelopment of Lodge Hill. Land Securities maintains that any such review mechanism should not require a cyclical, automatic review of the masterplan; rather it should provide the flexibility to facilitate reviews if and when one is required, for example to enable the development to respond to changes in the market over the lifetime of the development. Critically, whereas a "development brief" review mechanism would be controlled by the Council, a "permission" review mechanism should be controlled by the applicant/developer. Land Securities therefore considers that paragraph 11.95 should be amended as it currently implies that the masterplan would be subject to regular review even following the grant of consent for the redevelopment of the scheme; this provides a high degree of uncertainty to developers which may affect the attractiveness of the site. Land Securities requests that the reference to three yearly reviews of the masterplan for the Lodge Hill site is omitted from Paragraph 11.97, as this provides a high degree of risk to potential developers by introducing an unspecified level of uncertainty as to the future nature of the Lodge Hill site, which it is considered will have a direct negative impact on values and therefore the viability of the scheme.	Given that the development of Lodge Hill will take place over about 20 years, it is appropriate to keep both the masterplan and the development brief under review. If a review proves not to be necessary at any particular time, it can be determined at that time that it will not take place. It is acknowledged that once planning permission has been granted, it is a matter for the developer whether to implement it or not. The Council would not contemplate a review of planning permissions without the cooperation of the developer as this would undoubtedly result in costly compensation. Such a review process has been used successfully in the past, often with the initiative being taken by the developer.
	With regard to emerging Policy CS33 that concerns the Lodge Hill site specifically, the first bullet point notes that the provision of 30% affordable housing will be sought. Land Securities considers it important to also link this requirement of Policy CS33 to Policy CS14 and its supporting text for the purposes of decision making to	All relevant policies of the plan will apply and there is therefore no need to link policy CS33 to CS14 in the text.

	avoid having to repeat it here, and to ensure consistency and clarity in approach throughout the Core Strategy. Table 11.22 re-iterates that 30% of the residential dwellings on the Lodge Hill site should “be provided as affordable housing,” though Land Securities considers that “provided” should be replaced with “sought” to ensure consistency with Policies CS33 and CS14. Paragraph 11.97 also refers to a Viability Study suggesting that the 30% requirement should be achievable. The Viability Study was undertaken incorporating the baseline that development was to Level 3 of the Code for Sustainable Homes and that Infrastructure and Section 106 obligations amounted to no more than £11,000 per unit. It should be further noted that limited sensitivity testing was carried out within the Viability Study with regard to the impact that the mandatory imposition of Code Level 6 will have in 2016 and of the nature of the Infrastructure and Section 106 contributions that a major site like Lodge Hill will need to make. It is considered that any references within the Core Strategy to the findings of the Viability Study should be qualified to reflect this. The second bullet point of Policy CS33 refers to “employment opportunities generally in balance with the resident working age population”. Land Securities considers that the Core Strategy should acknowledge that future residents at Lodge Hill will be able to access employment opportunities beyond the site via sustainable modes of transport. Please also see the other comments that we have made on employment issues within these representations. The third bullet point of Policy CS33 states that the Lodge Hill site will provide retail floorspace of around 5,000 sq m GEA. It is considered that this element of the policy should be amended to refer to “at least” 5,000 sq m GEA so that the development of retail floorspace to serve the resident population is not unduly limited, and to provide the necessary flexibility required by PPS12 over the Plan period. It is also considered that the reference to retail floorspace within Table 11.22 should be amended in the same way. Lodge Hill will be a new settlement which is expected to develop incrementally over time. It will be important for the retail element of the settlement to be appropriate in terms of the scale of development it will serve, particularly in the context of national guidance in PPS4 and PPG13 which, inter alia, promote linked trips. The district centre needs to be of a sufficient size/critical mass to ensure the proper functioning of the centre, and therefore it is important that sufficient flexibility is included within the wording of the policy to achieve this. In planning for sustainable economic growth, Local Planning Authorities should ensure that their development plans set out a clear economic vision and strategy for their area, which positively and proactively	30% is the target for affordable housing at Lodge Hill. As with all affordable housing, its provision is subject to negotiation, taking into account viability and other considerations. Consequently, policies CS33 and CS14 allow for this by using the word “sought, rather than “provided”. It is therefore considered appropriate to amend the first sentence of Table 11.2, by substituting “with a target of 30% being affordable” for “and with 30% of the residential dwellings to be provided as affordable housing.” Rather than include details of the Viability Study methodology in the text of the core strategy, that methodology can be the subject of detailed negotiation in relation to the level of provision of affordable housing at the detailed planning stage. By balancing employment provision with the working age population, the core strategy is increasing the opportunities for people to work within the community. However, it is recognized that people can take up employment anywhere and it is not necessary to state that fact in the text.

	encourage sustainable economic growth. It is considered that ensuring an appropriate level of flexibility within the emerging policies will be essential to achieving the economic vision for Medway.	5,000 sq.m. of retail floorspace is considered to be an appropriate level to meet the needs of the local population whilst “at least” 5,000 sq.m. could be construed as an open ended commitment. However, a review of the masterplan at three year intervals will provide an opportunity to reconsider the level of provision if warranted by the circumstances at the time. Paragraph 11.99 will be amended by deleting “a significant business offer” and inserting “business premises”. The Kent and Medway Structure Plan, 2006, made provision for 70,000 sq.m. of employment land at Lodge Hill. Now that the structure plan no longer exists, that figure has dropped to 43,000 sq.m. Medway Council is not prepared to allow this figure to be further eroded as it considers the employment component to be an essential part of the overall strategy for Medway and a rare opportunity to create high quality employment location. In the economic profile in chapter 2 of the core strategy, it is stated that the Medway Sustainable Community Strategy highlights a whole range of evidence to support the contention that Medway
		Paragraph 11.99 concerns the Lodge Hill site in the context of economic growth and employment opportunities. It refers to a “significant” business offer, which is considered to be somewhat ambiguous. Land Securities is of the view that reference to “business premises” would suffice here, particularly as the quantum of floorspace sought is referred to elsewhere in this paragraph. The reference to an “absolute minimum” space for business uses within Paragraph 11.99 is considered to be particularly onerous, and at odds with the flexible approach demonstrated elsewhere within the Core Strategy in line with PPS12 to enable the Plan to deal with changing circumstances. For this reason, it is considered that the wording “absolute minimum” should be amended to refer to a minimum floorspace requirement with a caveat that this applies unless there is robust evidence to justify a lower figure. As for the “need” to establish Lodge Hill as a high quality business location over time, if this statement is to remain within future iterations of the Core Strategy there needs to be sufficient evidence to demonstrate that a need exists.

		remains a relatively low wage area with high numbers of people commuting out of the area to work, skill shortages and business start-up rates remaining well below regional and national rates. Consequently, the core strategy is seeking to attract higher quality employment development to help address these problems.
	Paragraph 11.104 of the draft Core Strategy references the Lodge Hill site-specific evidence base for possibly the first time within the document. Land Securities is of the view that it would be worth providing a brief introduction of this work here, for clarity (see also our comments made in respect of the “Context and Issues” section of the draft Core Strategy). With regard to timescales, it is noted that Paragraph 11.105 of the emerging Core Strategy refers to commencement of the first phase of development on the Lodge Hill site in 2013. Land Securities notes that the delivery of infrastructure may commence in advance of this date (i.e. 2012), consistent with Draft Policy CS33 which makes provision for applications for preparatory works such as infrastructure provision in advance of the adoption of the development brief for the site. The fourth bullet point within the first “Target” box in Table 11.24 of the draft Core Strategy refers to reviews of the masterplan for the Lodge Hill site every three years or more frequently is required. Please refer to our comments made earlier in these representations objecting to this requirement.	The text will contain a footnote with a link to the relevant evidence documents.
	12. Implementation, Monitoring and Review Paragraph 12.4 within Chapter 12 of the consultation document confirms that as new developments are built, developers are expected to contribute towards a range of facilities through Developer Contributions. Land Securities is of the view that, for the avoidance of doubt, reference should also be made here to contributions being required which accord with Regulation 122 of the Community Infrastructure Levy (CIL) Regulations issued in 2010 (which provides for three statutory tests that planning obligations must meet in order for them to be deemed lawful).	Paragraph 12.4 to be amended by the insertion at the end, of “in accordance with Regulation 22 of the Community Infrastructure Levy (CIL) Regulations, 2010,”
	With regard to the third bullet point of Paragraph 12.5, this confirms that the Council has “well developed systems in place to assess the viability of sites and negotiate in a transparent and consistent way with developers”. It would be helpful to expand on	This will be a matter for negotiation at the detailed planning stage and there is no need to enlarge upon it

	this, to gain an understanding of what these systems entail.	in the core strategy.
	Paragraph 12.15 of the consultation document refers to the Coalition Government's intention to replace CIL with a system of local tariffs. It is our understanding that the Coalition Government is now intending to maintain the previous Government's proposals for CIL, and the next Core Strategy should be sufficiently flexible to reflect this (or alternative approaches).	Paragraph 12.16 will be deleted and paragraph 12.15 will be amended by the deletion of the second sentence and its replacement with "The Council has not yet decided whether to adopt the CIL and in the meantime, will continue to use the Guide to Developer Contributions The following policy is consistent with that."
	Paragraph 12.20 of the draft Core Strategy refers to work undertaken to prepare an Infrastructure Plan. Land Securities would be grateful for confirmation of the status and an update on timescales towards finalising Medway's Infrastructure Delivery Plan (IDP), given that its preparation is a requirement within PPS12.	The Infrastructure Delivery Plan will be published in parallel with the Pre-Submission draft of the core strategy.
	Draft Policy CS34 relates to developer contributions and states that, amongst other things, where the need arises directly from development, the Council will seek to enter into a legal agreement with the developer(s) to provide for certain infrastructure/facilities/mitigation. It is considered that reference should be made here to the other statutory tests planning obligations must meet (in addition to being directly related to the development) to ensure compliance with national guidance and regulations; namely ensuring the obligation is necessary to make the development acceptable in planning terms, and is fairly and reasonably related in scale and kind to the development.	There is no need for core strategies to repeat the contents of other statutory documents as the provisions of these will be known to all parties when negotiations take place in relation to developer contributions.
	Table 12.2 sets out the Council's Infrastructure Delivery Schedule (IDS). Land Securities notes that there is a detailed section on the infrastructure requirements for the Lodge Hill site within the IDS, which differs quite considerably from the "Infrastructure Requirements for Lodge Hill" table included at Table 11.23 within Chapter 11 of the Core Strategy. The most noticeable differences are the different start and end dates assumed for the phases and as a consequence there is a different scale of development quoted within each phase. Furthermore, it is noted that a range of floorspace figures have been included for flexibility, although in some instances these ranges are rather vast - for example, the range of employment floorspace in one particular phase reads "2,400 - 17,590 sq m". Land Securities is of	Table 12.2 is being revised and amendments relating to Lodge Hill both here and in table 11.23 will be subject to consultation with Land Securities before the tables are finalized.

	the view that there needs to be consistency between the IDS and Table 11.23 in the next iteration of the Core Strategy, having regard to any revisions that may have been made (by then) to the indicative masterplan for the site, in the context of ensuring amendments to the IDS are made as and when new information is available.	
	Appendix B	
	As referred to elsewhere in the consultation document, Appendix B contains the Council's housing trajectory over the Plan period, however is not labeled as such. It is considered that this table would benefit from a title, together with additional background evidence on how the numbers have been reached. This would enable interested parties to better understand the Council's approach to, and assumptions underpinning, the housing delivery rates identified. In order for the Core Strategy to be found "sound" at the end of the independent Examination process, it is considered critical that a robust and transparent housing trajectory is presented within the Core Strategy.	The housing trajectory in Appendix B is appropriately labelled. However it is derived from the SLAA and this source will be identified in a footnote. The SLAA has been reviewed and the information in Appendix B and Figures 6.2 and 6.3 will be updated accordingly.
Medway Countryside Forum (David Murr)	Policy CS7 & 5.67 – There is a strong presumption in the text that it is no longer appropriate to designate Areas of Local Landscape Importance (ALLI's). PPS7 is used as the justification for this. The Forum believes that ALLI's should be retained and refutes the argument that they are not "criteria based", or that they have hindered economic development or the provision of affordable housing in rural areas. It is essential that they should be protected as essentially open spaces.	Paragraph 25 of PPS7, states that local landscape designations should only be maintained where it can clearly be shown that criteria based policies cannot provide the necessary protection. However the Government has indicated it will bring in a new system of local designations and appropriate references to this will be made.
	5.59 – Considers that the Motney Hill reedbeds should have a specific reference given their importance.	Paragraph 5.59 lists existing and proposed nature reserves and Motney Hill reedbeds does not fall into either of these categories. Paragraph 5.58 explains that local nature reserves are designated by local authorities and have to be in the ownership or under the control of local authorities. Motney Hill reedbeds is partly owned by the

		Kent Wildfowling and Conservation Association and consequently fails to meet the ownership requirements for designation.
	6.6 & 6.11 – In relation to the Lodge Hill development it is essential that the very important natural features of the area are fully protected. In addition to the Lodge hill woodlands and parts of the adjoining training grounds, there are extensive areas of ALLI's and SSSI's which could be adversely affected. The woodland fringes include extremely important habitats for breeding nightingales. Urbanisation of the countryside needs to be resisted.	Practical measures for the protection the SSSIs at Lodge Hill are being addressed in the preparation of the masterplan. The core strategy is not retaining ALLIs and wider protection for the countryside will be provided by policy CS7.
Medway Magna (Graham Warren Ltd)	A letter dated 5 th December 2010 has been sent to the DP&R Team asking a number of questions regarding infrastructure. Consequently, the comments submitted in this response are interim until there has been a greater degree of clarification.	Noted.
	PPS12 states that a core strategy should be supported by evidence of what physical, social and green infrastructure is needed and its costs, phasing of development, funding sources and responsibility for delivery.	Noted.
	Failure to deliver the objectives for Lodge Hill and the riverside sites will result in failure to deliver the vision for Medway set out in the DCS.	Noted.
	Lodge Hill is not sustainably located, it is removed from the centres of Medway and requires substantial investment in public transport if it is to be a sustainable free standing settlement, as well as considerable improvements to the highway network.	Lodge Hill is the only major, previously developed site outside the urban area and as such, priority has been given to its development over other, large, greenfield sites. This accords with paragraph 36 of PPS3, which states that consideration should be given to the opportunity for housing provision on surplus public sector land and priority for development should be previously developed land. Both of these criteria apply to Lodge Hill.

	Policy CS33 refer to 5 main delivery phases for the main settlement, but these are to be determined by the planning application process, which is unknown in terms of the timetable for delivery.	The submission of planning applications will be programmed to allow sufficient time for decisions to be made to bring forward the phases in accordance with Table 11.23 of the core strategy.
	No indication of the detailed infrastructure required, when it will be provided, by whom and at what cost, thus making the document unsound.	The infrastructure requirements are set out in table 11.23 of the core strategy and in the infrastructure delivery schedule in table 12.2. Further details will be included in the separate Infrastructure Plan.
	Other Lodge Hill issues include: how much of lodge Hill is brownfield as against Greenfield timing of release/disposal by the MoD provision of a public transport corridor on the Hoo Peninsular to serve Lodge Hill, Grain and Kingsnorth the level of community provision proposed e.g. schools – and when they will be provided	About 50% of Lodge Hill consists of undeveloped or Greenfield land. Release by the MoD is 2012. The provision of public transport is being considered in the preparation of the masterplan. The level and timing of the provision of community facilities is set out in the infrastructure delivery schedule in table 12.2.
	Rochester Riverside – delivery numbers and viability are questioned.	No reasons have been given to support the questioning of the delivery numbers and viability.
	The lack of specific highway improvements necessary to deliver Lodge Hill and the effect of this and the Kingsnorth and Grain developments will have on junctions 1 and 2 of the M2 Motorway are not detailed.	The provision of highway improvements is being considered in the preparation of the masterplan.
	Medway's economic problems result from a lack of high quality, well located employment sites. Kingsnorth and Grain are not well located.	Medway's economy is not based solely on employment sites but includes a wide range of sectors such as tourism, higher education and retailing. Kingsnorth and Grain

		now have the benefit of planning permissions and preparatory investment is taking place.
	There should be a hierarchy of employment land based upon quality, not quantity.	The employment sites identified in the SLAA, demonstrate a variety of differing qualities.
	Clarification is required upon the forecast relating to the number of jobs anticipated to be created up to 2028.	See response to Land Securities representation on employment targets.
	Correlation in Bakers Associates report between floor space available and job creation is a flawed concept as land quality does not appear to have been factored into the assessment.	The Baker Associates Consolidation Study points out in paragraph 4.3.13, that the land requirements are only indicative and will largely be determined by the employment density of development proposals as they come forward.
	Table 7.1 confirms a greater requirement for M2 access with the lowest of the sub-area requirements on the Peninsular	Noted.
	There is little justification for the 21,500 new jobs identified to 2028, as the employment allocation are contrary to the evidence base which shows demand is elsewhere.	The core strategy does not allocate any employment land. That will be a matter for the Site Allocations and Development Management DPD. Policy CS17 only states that a supply of land has been identified which will meet Medway's requirements. These sites are contained in the Strategic Land Availability Assessment.
	The employment trajectory identifies no take up of employment floor space in 2009/10 but over 200,000 m2 taken up in 2010/11.	The take up rates are based upon information supplied by site owners/developers.
	The employment trajectory to 2020 anticipates circa 780,000 m2 of floorspace taken up when the evidence suggests at best, a need for 349,000m2 (Table 7.2).	The high figure is based upon the current employment development committed through extant planning

		permissions, adopted development briefs and owner/developer expectations. The substantial surplus provides a significant cushion, should take up rates fail to materialise as envisaged, enabling the required floorspace figures to be achieved.
	The chosen Employment Strategy is diametrically opposed to the evidence base in terms of both quantum and location	The strategy reflects the existing employment land commitments and the strategic priority of concentrating development on previously developed land.
	Medway Magna has concerns about the following: relationship between the level of housing completions and the number of jobs anticipated to be created over the plan period the effect of allocating large areas of employment land that are not close to and well served by Medway's population over reliance on regeneration sites to secure housing provision and employment growth failure to achieve a balance when allocating poor quality employment land and identifying and allocating well located, high quality employment land as part of a planned urban extension in the Capstone Valley. discounting development in the Capstone Valley that could improve environmental capital rather than detract from it failure to acknowledge the transportation advantages, particularly public transport arising from the provision of a Southern Relief Road the extent to which Lodge Hill takes the best and most versatile agricultural land out of production and encroaches on land of local landscape importance.	The jobs target is higher than that which would be required to match housing completions to allow for a higher employment rate and lower out-commuting. The substantial areas of employment land at Kingsnorth and the Isle of Grain are already committed as they both have planning permission. The priority given to the redevelopment of previously developed sites reflects national priorities. High quality employment land has been identified at Lodge Hill, Chatham Centre and Waterfront, Temple Mars , Rochester Airport and elsewhere. The strategy is to develop a new settlement on previously developed land at Lodge

		Hill instead of urban extensions at Capstone and elsewhere. It is not clear how environmental capital would be improved by building on open countryside. Neither Medway Council nor Kent County Council, as the relevant highway agencies, consider that there are transport advantages in developing a southern relief road. Notwithstanding that the core strategy no longer includes land defined as being of local landscape importance, the level of encroachment on both the existing landscape and on agricultural land is relatively modest.
	What are the robust arrangements to ensure that the site is brought forward effectively and in a timely manner	Land Securities has been appointed to oversee the disposal and development of the site at Lodge Hill. It has commissioned all the necessary background studies and is preparing a masterplan. It intends to apply for planning permission at the earliest opportunity and plans to engage up to five developers to undertake simultaneous development of the site.

Medway Swale Estuary Partnership	Agree with Policy CS25: The River Medway - The title of this policy should read 'The River Medway & Estuary. Introduction 10.1 Would be good to include something about the fact that the estuary supports international and nationally important populations of breeding and passage birds. 10.7 Part of the estuary is also a SSSI Policy Summary Box Whilst the policy supports leisure activities 'as long as they will not harm the environment...', there is nothing to suggest that the same will also need to apply to the industrial usage of the river. It is very likely that the Medway Estuary will become a Marine Coastal Zone, and this will potentially curtail certain activities (yet to be confirmed). Increased public access to the river can also have a negative effect on the river/estuary's wildlife if it is not managed correctly. Will the measures to 'enhance the river as a valuable resource...' include areas of remaining saltmarsh, within the urban centre of Medway? There is no mention of the promotion of green tourism. There is no mention of the river's/estuary's archaeological importance.	The River Medway encompasses the estuary and there is therefore no need to change the title. Paragraph 5.52 already describes the importance of the Medway and Thames Estuaries and there is no need to repeat that description here. Overall protection for wildlife habitats is afforded by the sixth bullet point of policy CS24 and by policy CS6 and there is therefore no need for further specific references in relation to industrial development. Enhancement measures will apply wherever they are deemed to be necessary along the river. Policy CS8 makes provision for green tourism through the development of a Green Grid. Archaeology is addressed in broad terms in policy CS12.
	Agree with Policy CS29: Gillingham & Summary Box - I would like to see mention of the area north of Gillingham and Rainham, known as Lower Rainham. This area is highly distinctive, in terms of local architecture (including the C17 Black House), local ecology (BAP habitats and species), important landscape characteristics (Saltmarsh, Mudflats, Reedbeds, traditional orchards, hedgrows, etc), shoreline archaeology and offers unrivalled access to the Medway Estuary. As a result this area needs protection, to ensure that it remains free from urban encroachment. General comments Improvements should be made to allow pedestrian access to the estuary (and Saxon Shore Way) from local centres of population at Twydall and Rainham. This would link in with Medway's Green Grid and LTP aspirations and could reduce traffic along the Lower Rainham Road.	Policy CS29 deals with development proposed in the Rainham area. No development is proposed at Lower Rainham and therefore, there is no need to include it in the policy. Policies CS6,7 and 8 deal with the protection of the area and the Green Grid.

Medway Urban Parks & Green Spaces Forum (Mark Agate, Chairman)	Is there adequate protection for urban greenspaces? We should identify areas deficient in this respect and suggest new areas for open space. <u>Outdoor Spaces</u> are under threat when not used and / or “owned” by the local community and this is down to lack of management and budgets. They are often small areas left as a result of larger developments and fenced for “play” but become abused. Initial examples quoted were Gillingham South and Rochester East and we are reviewing further examples: Appropriate schemes which could involve the local community are: Otway Street, (Gillingham North), Middle Street, Brompton and Jubilee Fields. <u>Is designation of potential open space an adequate safeguard e.g. Copperfields, The Paddock, Chatham and Nursery, Priestfields.?</u> <u>Concerns re sea level change</u>; we cannot assume Medway coastline will be the same in 2026. Some green spaces may be lost under water. Noted that Medway Council is in close contact with Environment Agency and is awaiting an update. Shorne Marshes may cause concern. EA South East coastal website link to flood information required. <u>Issue raised of gardens being sold off to build new houses</u> Government advice was previously for escalating higher density; new rules from there indicate need for planning permission to tarmac your drive. Suggest use grasscrete as remains permeable. Core strategy could establish a policy to protect character of existing neighbourhoods. Gardens can be part of that character and offset heat effect from hard surfaces 1.5 <u>Need for more than just a token green space in new developments</u> Rochester Riverside plans praised. 1.6 <u>We oppose encroaching on land with no satisfactory replacement</u> Example given of Kings School buying up land next to Watts Meadow and no access to residents. If a school disposes of land then continuity of use for young people should be ensured	Noted, If open spaces are neglected they are likely to be under greater threat than well used and maintained spaces. Policy CS8 not only seeks to protect open space but also to enhance poor quality open space. View noted. The Environment Agency is considering managed retreat along parts of the coastline but have not reached any final conclusion. Consequently, the core strategy neither contains proposals nor safeguards land for managed retreat. Gardens are no longer defined as previously developed land in PPS3 and are therefore afforded greater protection. Agreed. Policy L3 of the Medway Local Plan, 2003, allows for the development of small parts of an open space provided that such development will help to safeguard or improve the remainder of the site. It also allows for the replacement of open space on

1.7 <u>How is development control monitored ?</u> <u>Where does LAA Indicator 28 "Protect and improve Medway's green and open spaces" now sit ?</u> What major improvements in the way of key projects and areas should we be seeking by 2026 ? 2.1 <u>117,000 new homes are planned in Medway by 2026 to house Government requirement of an extra 50,000 population.</u> Likely indication of an average of two adults and one young person. 2.2 This leads to the <u>issue of density of development on new sites</u>; standard proportion of greenspace per development needed. Heat sink effect discussed - gardens important. Discussion on need for Greenspace Services to link into <u>Community Cohesion pack for new residents</u> to inform them what there is; through <u>Estate Agents</u> and / or with Council Tax bills. Also <u>Welcome Ambassadors</u> for newcomers needing to know more about the area. <u>Need to plan for (a) expansion and retention of play areas and (b) facilities for young people.</u> What is perception of young people? They should not be seen as threatening. 2.5(a) Forum involvement with Play Partnership to be continued. . 2.5(b) Expansion of Playbuilder Scheme for eight to 13 year olds. Community facilities are needed especially for evening activities after dark. <u>Need to ensure open spaces are welcome and safe for young people who are major</u>	alternative, accessible site. This policy will be carried forward in parallel with the core strategy until it is replaced with the Site Allocations and Development Management DPD. The Government has withdrawn LAAs Noted. Noted. Noted. Noted Noted. Noted. Noted.

users.	Noted.
Noted young people represent 66,000 of our 250,000 population and need a better voice. 41,000 up to 13 years old, 25,000 13-19 years old. (Medway Youth Parliament).	Noted.
Need to encourage older people talking to young people.	Noted.
<u>Parks should not be locked at night and should be well lit.</u> Note cemeteries suffer from vandalism.	Noted.
Encourage presence of <u>Community Focal Points</u> such as Cafes.	Noted.
<u>Need to trial lights in a Greenspace</u> and then use as best practice on other sites. Consultation has taken place about lighting of Hillyfields play area. Majority in support except residents close to the site. Police looking to take it forward. Eco Lighting Project didn't proceed at Woodlands Road / Rookery Fields although Police in favour	Noted
Youngsters crawl under the fence at Wigmore Park when locked. Residents complain. Therefore <u>suggestion is to leave it open with youth worker locking it when leave i.e. with young people supervised.</u>	Noted.
Look at <u>Youth Bus</u> touring a different area each night staffed with relevant workers.	Noted.
Leafleting of potential Friends Groups in appropriate areas, prior to Road Show and Events with pre-publicity.	Noted.
What facilities are needed as part of new greenspaces development ? <u>We all share goal of Medway being a better place to live and work. - BUT who for ?</u> Different aspirations at different ages. World in 17 years time can no longer rely on high energy consumption. See also 6.	Noted.
<u>Smaller communities such as Brompton prove to work – quite crowded but not so large that individuals do not know each other. . Who owns this process to make it</u>	Noted.

	happen? If left to experts it could work but not part and parcel of every day lives. Ongoing work to make it happen is as important as end result. In a lower energy world and varying density of habitation community is key – listening to other people's needs and considering them as well as own. <u>Include Pilot scheme involving young people / MYP as part of new "village" developments</u> - Chattenden for instance - where a sustainable community could be delivered with allotments, local shops, green spaces etc. Include existing residents. Provide local services within those neighbourhoods, sustainable maybe smaller communities Primary Care Trust commendably working on a local level, measuring health and vitality; four new surgeries opening. 3.5 We are advised Medway has the youngest average population in the UK. Best ratio in England of population increase due to more births than deaths, yet by 2026 will have twice as many over 75 than currently but will still be young compared to many other areas. Medway will still have a sizeable economically active population. Council Officers can try to be representative but need to think about everyone. <u>How do we encourage existing over 75's to enjoy the outdoors at the moment? How do we cater for additional 100%?</u> MYP has 60-70 active members and has to seek people to attend; the Forum and Council Officers are taking up offers. 3.7 <u>MUP&GSF could add a section on engaging young people to its Resource Pack. Project for discussion with Medway Youth Parliament.</u> <u>Schools should be opened up more to engage parents more in school life and to help build major community facility.</u> LDF needs to support local community groups wishing to work with schools who want to allow access to their grounds. Some starting to do this, for example Chatham Girls Grammar School. 3.9 <u>Royal Horticultural Society. has a Gardening for Schools campaign;</u> are all Schools aware of it? Some Ward Councillors are putting in lots of money but Schools should not be having to go cap in hand to Councillors to fund allotments.	Noted and being taken forward. Sustainable neighbourhoods are a key element of the core strategy Demographic changes have been taken into account. Noted. Noted. Core strategy promotes schools as community hubs. Noted.

	3.10 All schools should be encouraged to be eco-schools. We recommend collaboration with Medway Youth Parliament Environment Panel. Silverbank / New Brompton College / Brompton Westbrook Primary advised as examples of good practise. <u>Suggestion to encourage Unemployed people to supervise youngsters out of school hours through training of them such as Forest Schools scheme at Capstone.</u> <u>Play Parks should be encouraged and expanded on site if not as near as possible to users. We learn in the final stages of preparation of this Report that 13 existing play areas are to be closed.</u> <u>Planners need to be more aware of full range of open space potential to the local community</u> Compass Close development at Copperfields an example of poor planning decision. Positive outcome is that a Friends Group now formed for Copperfields. Should a Green Grid for Medway be promoted? <u>Key issue for open space is promotion of connecting access by:</u> Walking to sites – Grid to recognise all routes including seamless links between small greenspaces Cycling – routes need to go through green spaces Example of Riverside Country Park – Strand - Chatham link but hits Dockyard lack of access. Target to make pathway coherent and through routes. How to link new settlement at Chattenden to main urban area – Green Grid five fingers radiating out from the Great Lines to outskirts of Medway <u>Should it be linear / radial / star shaped ?</u> <u>Keep alleys open and clean rather than gating when residents want this and are consulted.</u> <u>Another issue of how to link into the Green Grid is lack of bus service and cost</u>	Noted. Noted. Noted. A full audit is maintained. View noted Noted. These are key features of the green grid. Noted. Detailed work is progressing on this. Noted.

	4.6 <u>Suggestion of "Round Robin" vehicle and trailer to transport cyclists, car owners and pedestrians between sites so they can enjoy open spaces on bike or on foot once there. For example, Capstone Country Park to Ranscombe Farm; other sites on each side of the River Medway.</u> Has Medway got the balance right between improving sites and protecting our open spaces, yet ensuring public access? <u>Walking Festivals</u> introduce people to spaces on their doorstep taking them to areas they would not normally go so must feel safe. Embarrassing if not well maintained. Community and authority respect for sites <u>Other ideas to encourage people into our open spaces</u> include Events, publicity, parks / green areas seen to be well-cared for, mutual co-operation between users (litter, dog-owners, good behaviour etc.) 5.3 <u>How to accommodate additional allotment plot requirements as major shortfall reliably estimated at 1,000 ? This equates to need to provide almost 100% more plots. This is the major issue as it is understood there is no revenue budget to provide the extra plots (also bearing in mind planned population increase of 20% in the time-frame of this Strategy).</u> Voluntary bodies need devolved power to run but sites must be in a good condition to devolve. Initial cost of setting up allotments is the biggest issue with them not revenue. New sites could have devolved management from the start and form part of the community especially young families. Devolved management is an option not a priority, priority being to provide extra plots. <u>We must provide facilities for teenagers after school</u> Previously noted there are 66,000 young people in Medway. For example those on GCSE and A level finish school early. What do they do then ? <u>Example of bad practise - being moved on for grouping together on a green</u> 5.5 <u>Review projects post-implementation</u> MUP&GSF has agreed to do this if	Noted. Noted. There is a well established walking festival. Noted. An allotment standard is being introduced and new provision can be secured in conjunction with new developments. A range of services are provided by the Youth Service and others.

	relevant Friends Group not in place. Big vision projects <i>Communities need to be involved</i> <u>Water Park</u> possibly Cliffe – water skiing, boating, windsurfing. Inland Lake as River Medway is a prime feature but being tidal limits use. 6.3 <u>Military History sites linked by tours for instance HMS Wildfire tunnels.</u> <i>“Chatham Defence Lines Heritage Trail – Medway’s Military History Uncovered”</i> signed with 14 explanation boards in its 3.5 miles an example of good practise. Re-use ex / spare military land - Interreg projects. <u>Bringing General History</u> of the area to the public. Medway Council to actively encourage and use local enthusiasm and expertise. <u>Sustainable energy sources need to be considered</u>.but balanced and compatible with use of urban parks and greenspaces Local knowledge must be utilised.	Noted. Likely to conflict with the SPA. Noted. Noted. Noted. Noted and policy in the core strategy.
Medway Watersports Trust Ltd (Colin Fuller)	10.6 - Navigation & dredging remains a critical issue on the Gillingham Waterfront especially at the Strand. Local agitation methods continue to be used by Gillingham Marina and in the Gillingham Pier rather than removal from the river and depositing on Hoo Ness Island as previously carried out by the MoD when the dockyard was in operation. This has caused silting over a twelve month period to a depth of 0.6m over the top of the causeway known as Commodore’s Hard. This is the only all-tide public landing on the River below Rochester Bridge. Unless the causes are investigated and remedial action taken over the next twelve months then this unique access will only be available from half-tide and rising. This precarious situation has been brought to the attention of Medway Council (owners of the public causeway) and Peel Ports (The Harbour Authority with responsibility for all dredging activities. Little or no direct action has been taken to date. The matter can be remediated by removing the fuel jetty at Gillingham marina which has adversely affected the flow of the river downstream from their lock entrance. Alternatively a more substantial elevated structure could be provided at this point although a hydraulic survey and modelling would identify the key causes and effects. We consider the Council and Peel Ports should fund such a study and propose a solution to provide a clean access to the River at this point for all boat users (The Trust, MCC, Segas SC and numerous casual users).	This matter can be pursued separately from the preparation of the core strategy.

	10.10 - Regeneration – We would seek for greater emphasis to be placed on the Gillingham Waterfront since it has as much presence close to the River as the Rochester and Chatham Waterfronts. It appears to be the ‘Cinderella’ of the Waterfronts! We fully support any proposals to improve the access to the River and the promenade at the Strand which will in turn increase the popularity of the Strand Leisure Park to the local community. 10.11 - Marine Leisure – The public dock/marina at Gillingham Pier needs much needed investment with a half-tide cill on the boating side to provide much needed arrival and temporary mooring facilities for east coast and continental visitors at affordable rates. The forgotten waterfront at The Strand at Gillingham remains an untapped revenue source with a minimal amount of investment. We believe that greater priority should be given to this area as highlighted in the Donaldsons Report to Medway Council (circa 1999) which has never been properly assimilated into the Core Strategy. We believe there are development opportunities along the lines of the Southampton Ocean Village which need to be investigated.	Paragraph 10.10 does not describe the features of the Medway riverside. This is done in paragraph 10.9, which sets out what is contained in the Medway Waterfront Strategy of 2004. It would be inappropriate to amend this as it would then no longer represent that which is contained in that document. Substantial redevelopment is already taking place at Gillingham riverside on the site of the former Akzo Nobel site. The Strand will continue to function as at present.
	10.13 - Wharves, Piers and Jetties – We fully support any improvement to the pierhead on the eastern arm of Gillingham Pier for use by Pleasure Steamers. Again the silting due to agitation dredging has reduced the draught in this area at low water springs to practically zero metres. We fully support any improvement to Sun Pier since it could be used as a further access to the river for our users when boating in this stretch of the River. This should become a vital facility for use during Olympic Year 2012 with additional temporary local moorings and a trot boat service. Such facilities when co-joined with the HS1 link to Stratford International from Chatham, Rochester or Strood would provide an unrivalled support for the many continental visitors that propose to use their boats for accommodation whilst attending the Olympics. The legacy of this opportunity could remain in place for many years after as Rochester and Chatham Waterfronts begin to be developed.	Noted.
	10.15 - We support the use of Chatham Docks for berthing large Cruise Ships to provide accommodation for continental and overseas visitors during the Olympics with shuttle bus access to HS1.	Noted.
	10.16 - We consider that Peel Ports is not the appropriate body to promote Policy CS25 since it lacks any interest in the environmental and leisure needs of River Users. In fact it regards boat users as a nuisance to be tolerated due to their role as the Harbour authority. We support the idea of a new body championed by the	Noted.

	representatives from, all the marinas, clubs and other establishments with an interest in leisure boating on the rivers Medway and Swale. The Medway Yachting Association is already in discussion with Medway Council about issues that are of concern to its members and is working with the Council to promote the use of the river for leisure purposes. The MYA would be pleased to establish a more consultative dialogue with Medway Council regarding the potential for improving/increasing the use of the river for leisure purposes. The residential houseboat moorings that are located at various points along the river, but in particular at Hoo and Strood, are a health hazard and urgent measures need to be taken to enforce the regulations that apply regarding, in particular, the discharge of untreated sewage into the river from these vessels. 10.12 More use could be made of the number 2 basin at Chatham Docks for leisure use. The Arethusa Venture Centre, a registered charity that already makes use of this basin for sail training and canoeing, is applying for a Lottery funded grant to improve the facilities it provides there. Provision could be made that would allow this facility to be developed so that other water sports, such as rowing, could be offered from this dock. 10.13 The decline/closure of the local piers, especially Gillingham Pier, Sun Pier, Strood Pier and Rochester Pier, all of which facilitated public access to the Medway Towns before they were closed, coupled with the lack of any visitor mooring facilities other than at the marinas at Gillingham and Chatham Dockside, does nothing to attract visiting boats to the area. 10.15 There are numerous boat clubs in the area that are happy to accommodate visiting leisure craft on vacant moorings but many of these clubs are run on a voluntary basis, their facilities are only open at weekends and often there is limited or no direct access to the shore from their moorings or, because they are situated in rural or isolated locations, there is very little public transport provision, which prevents visitors from exploring the wider area from these locations. Facilities for visiting boats, especially those from continental Europe where the facilities offered in almost every town are the envy of the British boaters that visit them, are essential if tourist visitor numbers are to be increased. Policy CS25: The River Medway The Medway Yachting Association supports the objectives of this policy, especially the protection and development of the existing infrastructure that provides access to the river and the foreshore, and the promotion of leisure activities on and along the river. There is a thriving boating and sailing community in the river Medway which would benefit from support and	Noted.
		Policy CS24 seeks to protect existing piers and encourage the provision of new ones.
		Noted.

	encouragement in terms of preserving existing access to the water, making available new access points and the provision, or permitting the provision, of support facilities such as Clubhouses, boat storage and associated infrastructure. It is often the case that development plans for housing or industry actually reduce the existing access to waterfronts and impact adversely on access to the water for sport or leisure usage. The preservation of such facilities will not only provide leisure and recreation opportunities for local residents but will also encourage waterborne visitors to the area bringing associated expenditure and helping to support the local economy. This view is supported by a British Marine Federation study that suggests that a visiting yacht typically spends about £400 per visit in terms of berthing, provisions, meals and ancillary expenditure.	
Michael Dakers (Michael Gill Ltd and Dakers Marriott Solicitors for various clients)	Decisions have previously been taken which hinder turning Chatham into a city centre (e.g. changes to the road system which have created major traffic problems). Thus reducing the viability and vitality of Chatham as a retail centre.	The detailed proposals in the Chatham Centre and Waterfront Development Brief, the Pentagon Development Brief and the Chatham High Street/Best Street Area Masterplan, seek to address current problems and to develop Chatham as a sub-regional centre.
	Development of Chatham waterfront should not be looked at in isolation, or developed prior to sorting out the problems of the centre. The strategy does not set out a prioritisation, which is practical to achieve the goal of creating a worthwhile city centre out of Chatham.	Noted.
	A new central square needs creating (at the back of the Brook Street car park).	Priorities have been established through the work of Medway Renaissance and others.
	There should be no further waterside housing (enough already).	New public squares are included as proposals in the High Street and Best Street Masterplan.
	Residential development at Strood Esplanade is completely inappropriate (should be for employment instead).	Housing will continue to be part of the mix of uses to be provided on the waterside and elsewhere. Medway Council is committed to the development of housing at Strood Esplanade and has no plans

		to reverse this decision.
	Wrong to rely upon 450,000 m2 of employment floorspace at the Isle of Grain and Kingsnorth (unattractive to employers due to their remoteness from the main road network), thus leaving an inadequate supply.	The fact that the owners of the sites at the Isle of Grain and Kingsnorth have now obtained planning permission, involving not insubstantial costs, demonstrates a high degree of confidence that they can bring forward development.
	Chatham centre has few sites attractive to employers.	Medway Council is bringing forward land in its ownership for development in Chatham which will play its part in improving Chatham's image and attractiveness to investors.
	Development at Rochester Airfield is constrained.	Whilst there are height restrictions on development in the vicinity of Rochester Airport on safety grounds, there are still opportunities for high value, high quality development.
	The use figures in policy CS17 are not sustainable	The high employment requirements in policy CS17 reflect the Council's aim to meet the needs of a growing population, improve the employment rate and reduce out-commuting. They are ambitious, but, on the advice of the Medway Employment Land Review Consolidation Study, it was considered that simply making provision for the continuation of past trends would ensure that these aims would not be achieved.
	Lodge Hill is mainly a residential proposal	The site is a mixed use development with employment and

		retail provision. Thereby ensuring a more sustainable pattern of development.
	Concerned about Strood town centre (and the new Lodge Hill development) being undermined by the planning consent for the new Sainsbury's at Whitewall Creek.	The Council is confident that the modern Morrisons and the proposed Tesco stores in the centre of Strood will be able to compete with the proposed Sainsbury at Whitehall Creek.
	Concerned about Strood town centre's highway network.	Noted. The Medway Local Transport Plan addresses the issue of Strood's highway network.
	Would like a meeting given that he is a key stakeholder	Noted.
Mineral Products Association (David Payne)	Agree with Policy CS22 : Provision for Minerals - We support the Policy to provide for 0.2mtpa of secondary (should also include ' and recycled') aggregates, and of 0.18mtpa of primary land won aggregates. A Paragraph 8.16 refers to the revocation of RSS and there not being a need to make provision for the figures contained therein. RSS is currently part of the development plan and so notwithstanding that statement Medway's Policy is in conformity with the RSS and will make an important contribution to ensuring a steady and adequate supply of materials locally and regionally. We also support the intention to maintain a landbank of at least 7 years for sand and gravel throughout the Plan period, but this should be 1.26mt (0.18mtpa x 7). Add 'and recycled' to 'secondary' aggregates. Check landbank calculations (0.18mtpa x 7).	Noted. Policy CS22 will be amended to include the reference to recycled and reused aggregates. The supporting text will make the appropriate reference to the RSS and the development plan and the 1.26mt figure for the maintenance of a 7 year land bank is correct and will be used as the figure for land bank calculations.
	Agree with Policy CS24 : Transport and Movement - We support the Policy to safeguard wharves that are critical for the import of aggregates. The Policy or supporting text should set out how safeguarding will be implemented, including through not permitting non-wharf development that may compromise the existing operation or constrain future expansion in operations.	Noted and there are references to inappropriate development in a safeguarding context.
	Agree with Policy CS25 : The River Medway - We support the safeguarding of wharves to enable continued and greater use of the Medway for transporting freight including aggregates. The policy or supporting text should state how safeguarding will be implemented through not permitting development that may compromise or constrain current or future operation of the wharves.	Policy T10 of the Medway Towns Local Plan, 2003, prevents development which would result in the loss of wharves or access to wharves and identifies those

		wharves on the Proposals Map. This policy will be carried forward in parallel to the core strategy until it is replaced by the Site Allocations and Development Management DPD.
National Grid (Entec)	Overview	The overview contains background information on the scope of the national grid's operations and its infrastructure that will be a valuable source of evidence. However, the submission does not address the contents of the draft core strategy.
National Grid (Alister Henderson, Planning Perspectives)	Disagree with Page 24, Paragraph 6.e - Whilst we have no objection to the land at Grain being identified as a location for 'environmental technologies and building products/construction, amongst other activities,' It should be noted that this should not be at the expense of wider employment uses and other strategically important energy generating facilities. National Grid's landholding at the Isle of Grain is designated within the existing Local Plan for Class B1 (Business), B2 (General Industry), Class B8 (Storage and distribution), special industrial uses and industrial uses not in a use class. These allocations should remain in place to allow the greatest flexibility for future uses of the site to encourage occupiers to locate their businesses on the Isle of Grain in order to maximise its employment and strategic potential. These uses could include environmental technology and related activities, but should not be limited to these elements. The amongst other activities' should be expanded upon to incorporate all future potential uses at this strategically important site.	The allocations in the Medway Local Plan will remain in place and the relevant policies will be carried forward in parallel with the core strategy. There is therefore no need for the allocations to be repeated in the core strategy. Furthermore, policy CS17 makes provision for the expansion of the existing economic functions of the Isle of Grain and Kingsnorth. The intention of paragraph 6 is to highlight locations where new, higher value activities and jobs will grow. This does not rule out other types of economic activity.
	Strongly Disagree with Page 36, Figure 5.1 - Flood zone plan should also show flood areas which are protected by coastal defences. Flood zone plan should be amended to show flood protection areas, as are shown on the Environment Agency website.	The flood zones in Figure 5.1 have been taken from the Environment Agency website. The Agency does not provide maps showing areas protected by existing flood

		defences. Consequently, the consideration of any planning proposals within the flood zones would need to take flood defences into account on a site-by-site basis based upon the advice of the Environment Agency at the time.
	Strongly Agree with Policy CS17 : Economic Development - Strongly agree with the reference to the development of the Isle of Grain as an employment location and energy and port related area. The encouragement of energy and environmental technologies and engineering and manufacturing is welcomed. However, the inclusion of an employment allocation at the Isle of Grain as per the planning permission for 464,930 sqm should be treated within Medway's targets very much as a maximum figure for employment floor space on the site. Ultimately, it will be for the market place to determine how much of this land is taken up for B1, B2 and B8 uses, but it is likely that there will be demand for other uses listed within the policy (as mentioned above and in Policy CS21). Therefore, the Core Strategy should be sufficiently flexible to respond to market demand and secure a suitable balance of uses on the site.	Noted.
	Agree with Policy CS21 : Conventional Energy Generation - Proposals for additional power generation and energy storage capacity are supported at the Isle of Grain. This is a strategically important site with existing power generation facilities of national significance and this policy is a welcome inclusion to the Core Strategy.	Noted.
	Disagree with Page 105, Table 11 17 -The inclusion of an employment allocation at the Isle of Grain as per the planning permission for 464,930 sqm should be treated within Medway's targets very much as a maximum figure for employment floor space on the site. Ultimately, it will be for the market place to determine how much of this land is taken up for B1, B2 and B8 uses, but it is likely that there will be demand for the other uses listed within the Core Strategy (including Policy CS21). Therefore, the Core Strategy should be sufficiently flexible to respond to market demand and secure a suitable balance of uses on the site. However, it is noted that the table refers to the employment elements as potential development and also recognises that the 464.930 sq.m figure as the 'capacity' of the site. These references are	Table 11.17 shows the potential for employment development on the Hoo Peninsula. Consequently the figures represent the maximum that could be developed. Given the support in policy CS 21 to the development of conventional energy generation, it is accepted that some of the land could be used for that purpose and ultimately, the

	welcomed.	floorspace in table 11.17 may not be achieved. A similar situation has arisen at Kingsnorth with the grant of planning permission for a power station. Given the huge surplus of potential employment land in Medway as a whole, such a loss is not a problem. Noted.
Natural England	Welcomes vision and strategic objectives, and cross-cutting policies. Policies have the potential to cause an adverse impact on the integrity of international designated wildlife sites for North Kent, in particular the estuarine SPA's and Ramsar sites. It is Natural England's view that a policy covering the need, timescales and mechanisms for delivery of evidence and appropriate mitigation in relation to these is required in order to comply with the Habitats Regulations. Natural England, Kent Wildlife Trust & the RSPB intend to produce a joint position statement shortly. Chattenden Woods SSSI is not identified as a constraint on the Key Diagram map. It also comprises a number of other woods, which should not be identified as separate SSSI's.	Medway Council is undertaking an Appropriate Assessment that will address this issue.
		The Medway Core Strategy Key Diagram deals with the strategic issues facing the area into the future, its key components and opportunities. SSSI can be at very local scales, their absence on the diagram does not mean that they are unimportant; merely they are not represented at this scale. Other documents will detail the extent of the SSSI coverage in Medway, and they are an established part of the evidence base for the plan. An amendment has been proposed elsewhere in this document to address this issue.
	Policy CS6 should identify locally specific intentions and mechanisms to achieve the broad aspirations set out. Suggests that a link is made to the South East Biodiversity Forum's Biodiversity Opportunity Areas to identify what habitat opportunities would be most appropriate for Medway, in addition to the Kent Biodiversity Action plan targets.	

	Policy CS7 should recognise that the enhancement of local landscape character and good design is as important in urban as rural areas. Policy CS8 should be reworded to make it clear what the intentions are, particularly for the latter bullet points.	Policy CS2 takes into account the importance of landscape throughout Medway as a whole and seeks to achieve good design. There is therefore no need to repeat this in policy CS7.	
	Policy CS18. Enhancement of the natural environment will be a key consideration in development of leisure use in the Medway and the implications of this policy will need to be considered in the Habitat Regs Assessment.	Noted.	
	Wants to see flood risk management schemes that work with physical processes, involving creation of wetlands and washlands, and restoration of river and coastal floodplains.	Noted.	
	Whilst welcoming recognition of the potential conflicts between leisure, commercial and environmental roles, would like to see solutions that recognise the inter-relatedness of these roles, not just the balance between them, taking account of the Habitat Regs Assessment.	Noted.	
NHS Medway (Jill Norton)	Firstly, the document needs to be amended on page 45, 5.1000. The 7 th line down should have "are considered likely" changed to "may", and the list of locations that may be affected by relocation schemes at the end of this paragraph should have Wisdom Hospice deleted.	Paragraph 5.100 will be amended by deleting "are considered likely" in the seventh line and replaced by "may" and the deletion of "Wisdom Hospice" from the last sentence.	
	Other than this, there are only positive comments on the comprehensive draft strategy. The NHS Medway Estates Strategy is well summarised and there is good emphasis on the importance of health in delivering sustainability, and how public health will improve the overall life expectancy in Medway. The development of extra care housing in Medway is also welcomed.	Noted.	
	The likely reduction in the number of houses included in the Lodge Hill development is noted. The reduced number of houses, 3000, will still need to be supported by the inclusion of a health facility.	The core strategy is not proposing a reduction in the number of houses proposed at Lodge Hill.	
	To summarise, your proposed strategy is comprehensive forward planning for the benefit of Medway, and the Property Office of NHS Medway fully supports this.	Noted.	
Nordic Recycling Ltd	Policy CS3: Mitigation and Adaptation to Climate Change - This policy contains a range of worthwhile aspirations, but should also make reference to the viability of	The measures set out in the bullet points are suggested for	

(Michaela Sullivan, Head of Planning, Forth Ports PLC)	proposed developments. There will be instances where, as a consequence of a range of possible factors, these aspirations can be met only partially, and it would be regrettable if the policy were used in a way that could prevent otherwise viable development from proceeding. Nordic requests that the plan is modified to acknowledge that the viability of development is an important consideration, and that the policy requirements will be reconsidered where they affect the viability of a development and could prevent it from going ahead. Policy CS4: Energy Efficiency and Renewable Energy - The acknowledgement in this policy that the renewable energy aspirations may not be capable of being met economically is welcomed. If that is demonstrably the case, then the requirement to make contributions for 'compensatory measures' appears unreasonable. In particular it is unreasonable to expect these to be made so that they can be applied to unrelated buildings in the surrounding area. This proposal is also likely to fail a number of the tests set out in Circular 05/05 Appendix B paragraph B5 including test ii) that the measures are "necessary to make the proposed development acceptable in planning terms", and particularly test iii) that requires such contributions to be "directly related to the proposed development", and test v) that the requirements are to be "reasonable in all other respects". Nordic requests that this policy is modified, such that the reference to compensatory measures being sought and applied to buildings in the locality is deleted. The policy should still, however acknowledge that the viability of development is an important consideration, and that the policy requirements should be assessed in relation to the overall economics of each development proposed, to be met where it is viable to do so. The policy also supports renewable energy systems, but states that this support is conditional on there being 'no significant adverse effects'. Where an Environmental Impact Assessment is undertaken, the range of effects and proposed mitigation measures will be set out. The decision-maker must weigh these in reaching a decision. There may be instances where, in the wider balance, a project may be approved despite some residual significant adverse effects. The absolute nature of the policy wording is inappropriate in the context of the decision-making process. Nordic requests that the policy is re-worded to state that <i>subject to careful consideration of all identified effects, and particularly any residual significant adverse effects, the Council will promote the installation of all forms of renewable energy systems.</i>	consideration and are not requirements. Agreed. The viability of providing 20% on site energy will be a matter for negotiation at the detailed planning stage. This point is in any case covered by policy CS34. Policy CS4 will be amended by the deletion of "if it is demonstrated that this target cannot be met economically, compensatory measures will be sought and applied to current buildings in the locality." The question of whether the Council will promote the installation of all forms of renewable energy turns upon the judgement of how significant any adverse effects will be. This will need to be taken into account together with all other issues applying to a proposal and the recommended amendment to the wording will not make any difference to this judgemental process. Consequently, no amendment is proposed.

	Policy CS23: Waste Management - Policy CS3 and supporting text makes reference to recycling facilities in two locations, Medway City Estate and Kingsnorth. Nordic is an important recycling business in the area, however, and therefore requests that the policy and supporting text are altered to include Chatham Docks as a preferred location for recycling.	The policy does refer to “the existing established employment areas are the preferred locations for such activities”. Chatham Dock is one such area and is recognised as having significant potential for waste management activity. Noted.
Open Spaces Society (Pat Wilson)	Comments on safety of pedestrian routes, improving health benefits, waymarking improvements, signage, walking, footpath signs, electric vehicles, retaining ALLI's, Local Nature Reserves, Medway Landscape Character Assessment.	
	Lodge Hill housing numbers are excessive, and the surrounding highway infrastructure is inadequate. Questions what is meant by affordable open space (p.48).	With regard the scale of the new settlement it is considered that the approximately 5,000 dwelling units will ensure a degree of 'critical mass' required to ensure a sustainable pattern of development that will support a range of services enabling the settlement to have at least semi-autonomy from other established centres on the Hoo Peninsula that are currently serving their respective communities. It is recognised that the existing highways network around Lodge Hill (particularly Four Elms roundabout and the A289) is a congestion hotspot. This is shown on Figure 9.1. Policy CS33 requires a comprehensive access strategy which includes a requirement to contribute towards improvement of the off-site highways infrastructure. There is no reference to affordable open space on page 48.

Peel Group (NLP)	A 10.5 hectare parcel of land at Chatham Docks should be developed for employment/mixed-uses (600 dwellings) in order to ensure the long-term viability of the Docks.	The Medway Core Strategy is not a site allocation document. Ongoing discussions between the authority and Peel Group (NLP) will not be impeded by the ongoing formulation of the document.
Peel Environmental (Kieran James)	Supports policy CS23 and identifies land at Perry Farm at the Isle of Grain as a potential waste facility proposal that could deliver the additional landfill capacity that is required.	Noted.
Penshurst Planning (Peter Cooper)	CS7 is overly prescriptive and unwieldy. It is unclear as to which areas of the Plan area the policy applies. It should be deleted and replaced with two separate policies relating to landscape and countryside.	The policy addresses the whole of the rural area, with its component landscapes. Figure 5.2 is of illustrative value; it demonstrates where the different classifications of agricultural land are on the Hoo Peninsula.
	CS8 makes the assumption that existing open space will be preserved. No up to date assessment of standards is available. It may be that certain areas of open space perform no viable function and do not need to be protected from development.	The Open Space Study 2011 details the open space and its value to the area. This evidence will underpin the Medway Core Strategy.
	CS13 – Provision should be made for a wider variety of sites as it is over-dependent on large strategic sites (many of which are in need of major up-front infrastructure) and sites identified in the SLAA. It is doubtful whether they will be capable of delivering the level of executive housing required, as it is a strategy largely based on flat based developments. The policy also seeks to prejudice the sit allocation process.	The SLAA details the sites available, the Medway Core Strategy will identify the key sites that will deliver the housing strategy over the plan period. Executive homes are not identified on a site-by-site basis. To do so would not be appropriate at the Core Strategy level. Policy CS15 recognises the need for this type of development to provide a balanced range of housing in the area.
	CS15 should be amended to state that executive housing may be permitted on Greenfield sites within or adjacent to urban areas, in appropriate circumstances.	The SLAA demonstrates that greenfield release is not required to

		deliver the housing numbers required to meet the housing trajectory defined in the plan. This should be the case for all housing types. Sustainability principles should apply equally to all housing.
PRP Architects (Phillip Wright)	Disagree with Policy CS7 : Countryside and Landscape - We support the promotion of sustainable development in the countryside and the criteria based approach to landscape protection. However, weight should be attached to support the conversion and re-use of existing buildings on brownfield land located within rural areas that currently detracts from the openness and character of the countryside. Where buildings have a negative effect on the countryside there should be a presumption in favour of redeveloping such buildings in order to improve the character of the countryside. It is therefore proposed to include a further point into the policy as follows: "Where existing built form has a negative impact on the countryside, any development that has a positive impact will be supported.	Policy BNE27 of the Medway Local Plan allows for the re-use of buildings in the countryside. This will be carried forward in parallel with the core strategy until it is replaced by the Site Allocations and Development Management DPD. There is therefore no need to include it in policy CS17.
	Agree with Policy CS8 : Open Space, Green Grid and Public Realm - We support the Council's strategic objective to enjoy accessible, high quality and affordable open space. In order to develop the Medway Green Grid outlined in Figure 5.3, the Council should have regard to sustainable development proposals and the opportunities to bring private land into public ownership and improve accessibility to Medway's natural assets. This could be achieved by permitting sensitive development proposals that make effective use of vacant and underused buildings in order to deliver environmental improvements. "Proposals that transfer private land into publically assessable open space are supported."	Policy CS8 already allows for the provision of open space associated with development proposals.
	Disagree with Policy CS9 : Health and Social Infrastructure - We support the provision of additional health and social services the plan intends to deliver. Health and Social infrastructure should include a range of specialist housing tenures including opportunities for retirement villages in suitable locations at a scale and mass that enables a range of communal facilities that respond to site specific constraints and local need. Therefore a flexible approach to the location of Health and Social infrastructure will help deliver purpose built facilities. Such a flexible approach should support the development of vacant and underused, land and buildings. "The redevelopment of existing vacant and underused buildings for specialist housing are supported in areas that extend beyond the settlement	Specialist housing is addressed in policy CS15. The development of vacant and underused buildings is dealt with in Policy BNE27 of the Medway Local Plan.

	envelopes."	
	Disagree with Policy CS14: Affordable Housing; Paragraph 6.33 page 60 - We support the Core Strategy's need to bring forward new extra care and elderly housing provision. However, to secure delivery of special care accommodation requires a flexible and balanced approach to development in all locations. Special care accommodation of a suitable size can become a self contained retirement village providing a continuing care community. Therefore where urban brownfield sites are not suitable, viable or deliverable in facilitating specialist accommodation, appropriate rural locations should be taken into consideration. Sites such as Walnut Tree Farm, which can accommodate a comprehensive retirement village with supportive and independent living models, should therefore be identified.	The Site Allocations and Development Management DPD, which will be prepared after the core strategy has been adopted, is the appropriate vehicle for considering proposals for Walnut Tree Farm. No amendment to policy CS14 is therefore considered necessary.
	Disagree with Policy CS15: Housing Design and Other Housing Requirements - We agree with the need to ensure support is given to the provision of specialist housing, in particular residential care facilities. The variety of housing care typologies requires a flexible approach in determining the location of such provision in accordance with the scale of the development proposal. Where schemes propose self contained retirement villages, rural sites such as Walnut Tree Farm should be considered. We propose the following bullet point to be added into Policy CS15: Support is given to the provision of housing for vulnerable people and specialist housing, including nursing homes, residential and extra care facilities, in appropriate locations and should include those which maximise the use of currently vacant buildings.	The Site Allocations and Development Management DPD, which will be prepared after the core strategy has been adopted, is the appropriate vehicle for considering proposals for Walnut Tree Farm. No amendment to policy CS15 is therefore considered necessary.
Rochester Airport Consultative Committee (Dick Searle, Chairman)	<u>Sections 3.38, 3.39 & 3.43</u> We are pleased to see acceptance of the concept of a fully functioning General Aviation Airport remaining on the site with appropriate use being made of surrounding land for the development of a technology cluster and associated employment facilities. However, we are surprised that no mention is made of the plans developed by Rochester Airport Ltd (in which Medway Council has had full involvement) or their involvement in future planning for the site. As the Airport Operator, Rochester Airport Ltd. has a vital role to play as a partner in the creation of any development plan as such a plan will require the seamless integration of both aviation and employment facilities and opportunities. Any future users of a technology cluster as envisaged will regard the availability of aviation facilities as an invaluable attribute. Indeed the existence of an aviation hub in the Medway Area (and the ease of access that such a facility provides) should be regarded as a significant advantage for any technology focussed business development. We note	Noted and work is continuing in drawing up suitable proposals for the area.

	and support the concerns of Rochester Airport Ltd regarding the impact of the proposed closure of Medway Renaissance. We trust that steps will be taken to ensure that the Masterplan currently in their care will be completed before their closure.	
	<u>Section 5.118</u> RACC note the aspiration that Medway Council should “actively realise the opportunities presented by...the Olympic Games in London in 2012”. However, we have seen little evidence of the existence of any clear plan to actually capitalise on these opportunities. Indeed the LTP totally failed to recognise the importance of Rochester Airport as a transport hub to the Olympic Site – and the attendant advantages of collateral tourism to the Medway area. We refer you to our response to the latest LTP which is appended to this letter as Appendix 1. For your convenience, we have pasted below our specific comments on the potential importance of the Airport in respect of the Olympics: “The 2012 Olympics will be a truly International event so it is very surprising that the LTP addresses only the issue of car parking! Whilst the facilities in Medway of themselves may be admirable, their accessibility for international visitors will be of great importance to the users and the positioning and existence of the Airport will be a major “selling point” to potential users. In addition, the Airports’ importance will emerge over the coming months as a hub for visitors to the Games who wish to travel by light aircraft. The airport is in a unique location with its proximity to Ebbsfleet station (minutes by train to the Olympic station at Stratford – the preferred arrival method.) Tourism (not only from airport arrivals but those visitors to the Olympics who wish to stay in the Medway area rather than stay in London) is a great opportunity for Medway and the availability of transport facilities must be considered on a truly holistic basis”.	The promotion of Rochester Airport in relation to the Olympic Games is a matter for Rochester Airport Plc. in conjunction with Medway Council’s 2012 team and no further amendments to the core strategy are required.
	<u>Sections 5.124.... – Heritage Assets</u> We fully agree with the comments of Rochester Airport Limited on the failure to recognise the Cultural and Heritage importance of the existence and work of the unique and world renowned Medway Aircraft Preservation Society (MAPS) which is based at Rochester Airport and who are themselves represented on the RACC. We have pasted below the comments of Rochester Airport Limited:	Policy CS12 and its associated text has not attempted to list all of Medway’s heritage assets but to establish a policy to ensure that they are all preserved and enhanced, irrespective of whether

	“Culture and Leisure and Heritage Assets - Rochester Airport Limited feel that the Medway Aircraft Preservation Society (MAPS) based at Rochester Airport have been ignored. This is a very special organisation financially supported by the operator and the only approved aircraft restorer for RAF Hendon. They work from a cluster of sheds/portakabins in one corner of the airport. Their profile in the community has never been higher having had three visits from the Lord Lieutenancy of Kent one to present a volunteers award on behalf of HM The Queen culminating in a visit from HRH the Duchess of Cornwall who viewed their newly opened visitor centre. In our master plan allocation has been given for a working museum which in itself will have employment, tourist and educational value. MAPS were unanimously applauded in a recent MC full member's council meeting¹. The policy should include this previously hidden asset which is now towards the forefront of Medway's heritage”. <u>Sections 7.5, 7.13, 7.23 & CS 17</u>	they are named in the core strategy.
	RACC fully support the symbiotic development of the Airport environs as a focal point for innovation, technology and advanced manufacturing. The existence of a developed and thriving aviation facility in the centre of such a cluster will significantly enhance the attractiveness of such a development to potential investors and employers. Accordingly, any such initiatives must fully involve the Airport Operators if the opportunities are to be maximised. <u>Section 9.14</u>	Noted.
	We are astonished at the naivety of the statement that the LTP3 “does not consider aviation issues as these have very localised impacts and no scheduled services operate from Rochester Airport”. We understand that these views are somewhat out of date and that the role of the Airport in supporting the attractiveness of Medway as a “place to do business” is now rather better understood and that the LTP will be amended to reflect this. Nevertheless, we have appended (Appendix 1) our response to LTP3 in order to emphasise our profound disagreement with the statement made in Section 9.14. <u>Sections 9.20 & 9.21</u>	This is a matter for the next review of the Local Transport Plan.
	RACC are pleased to see the confirmation that the Airport is subject to “airspace safeguarding by the Council”. We trust, in particular, that this will be borne fully in mind when the application for development of the Horsted College site is presented	Noted and see response above.

	to Medway Council. Section 9.21 recognises the dialogue that is taking place between the Council and Rochester Airport Limited on the development of the Airport and the surrounding site. It is, therefore, rather odd that Section 3.38 makes no mention of Rochester Airport Ltd in the development of a Masterplan – referring as it does only to BAe Systems!	
	<u>Policy CS24</u> Again, RACC are pleased to see confirmation of the Council's intention to work with Rochester Airport Ltd on the development of the Airport and its co-located strategic employment opportunities.	Noted.
	<u>What's in a Name?</u> Rochester Airport or Airfield? The Draft Strategy refers to Rochester Airport as Rochester Airfield on several occasions. For the sake of accuracy (and consistency), we suggest that all references should be to Rochester Airport as this is the correct and historical name for the facility. It will also make PDF word searching a lot simpler!	Rochester Airport is taken as referring to the operational airport. Airfield to the wider area surrounding that facility.
Rochester Airport Ltd (Paul Britten, Director)	4.88 - I will be responding on line to the draft strategy in due course. However, I am extremely concerned at one of the answers in the above document summarising all the responses received to the issues & options consultation, a copy of the extract (from page 51) is attached. The recommended response to para. 4.88 is: 'planning consent for residential development has already been issued and construction has commenced on the site.' This is simply untrue, the last planning application is and therefore construction cannot have commenced. I believe a fresh application is to be presented shortly but it is no means guaranteed that this will be approved. I believe this is material to the strategy in view of the number of dwellings involved (400+?) and the affect it has on the local area, it should not be dismissed.	This representation appears to relate to the Issues and Options report and not the draft core strategy.
	2.23. Economy and learning - We support the work to retain the University for Creative Arts but would add that with the aeronautical/high value cluster being developed at Rochester Airfield the Universities should be encouraged to develop courses/campus in this sector. Interest was shown by Greenwich and Imperial Universities on presentation of the Rochester Airport Limited Masterplan.	The universities have expressed no interest in developing in the vicinity of Rochester Airport.
	2.24. Transport – Medway is very lucky to have an airport which should be considered an important piece of its transport infrastructure. The airport has other positive effects on the local economy. The emerging Local Transport Plan (LTP3) is currently in draft form and Rochester Airport fully expects to be included in the final version. A small modern local airport is also a key driver for regeneration.	Noted.

	2.28. Miscellaneous – Hidden away in this section is this comment “Improve the overall image of Medway.” We believe this should have a higher priority. Medway is being developed on many levels and it is paramount if you wish to attract inward investment that a positive message is sent. Would suggest “With Medway pushing for city status and with exciting developments in education, employment, tourism and culture the overall image will improve which should be encouraged.”	Paragraph 2.28 is part of a section on issues that need to be addressed. The issue in this case is Medway’s poor image. Proposals for addressing the issues are set out elsewhere in the core strategy.
	2.29. Evidence – The Future of Aviation White Paper 2003	Noted.
	3.38. Potential designations Rochester Airfield – Rochester Airport Limited presented a professionally produced Masterplan 7 years ago, as per the Government White Paper 2003 which despite excitement from Medway Council (MC) has been largely ignored. Rochester Airport Limited supports the Masterplan currently under development but is cautious, as it is being prepared by Medway Renaissance who is earmarked for closure in March 2011. As one of the leading development and employment opportunities in Medway, pressure must be exerted to ensure the work is completed. We would like to see the airport operators acknowledged as a partner to any Masterplan as without an operational airport or the operators’ expertise to plan around it the development brief may not work.	See response to RACC above.
	Strategic Objectives (5) – We support maximisation of development opportunities created by the universities. MC also has a vision for a technology cluster at and around Rochester Airfield. The universities should be included within these developments joining up regeneration, education and employment.	The universities have expressed no interest in developing in the vicinity of Rochester Airport.
	CS10. Sport and Recreation - We support the strategy in respect of the Olympics 2012. Our sources (which include the Civil Aviation Authority (CAA) and National Air Traffic Services (NATS)) expect Rochester Airport to be extremely busy with visitors during the games. So much so that the operators are developing an aircraft occupants park and ride scheme to Ebbsfleet station. To encourage touring visitors to stay in Medway MC may wish to consider a similar scheme to those travelling by car to the games from Europe. Car parking is currently an issue at Ebbsfleet Station and may not be wholly in order by that time.	This is a matter for Medway’s 2012 team.
	CS11/12. Culture and Leisure and Heritage Assets – Rochester Airport Limited feel that the Medway Aircraft Preservation Society (MAPS) based at Rochester Airport have been ignored. This is a very special organisation financially supported by the operator and the only approved aircraft restorer for RAF Hendon. They work from a cluster of sheds/portakabins in one corner of the airport. Their profile in the	Policy CS12 and its associated text has not attempted to list all of Medway’s heritage assets but to establish a policy to ensure that they are all preserved and

	community has never been higher having had three visits from the Lord Lieutenant of Kent one to present a volunteers award on behalf of HM The Queen culminating in a visit from HRH the Duchess of Cornwall who viewed their newly opened visitor centre. In our master plan allocation has been given for a working museum which in itself will have employment, tourist and educational value. MAPS were unanimously applauded in a recent MC full member's council meeting ¹ . The policy should include this previously hidden asset which is now towards the forefront of Medways heritage	enhanced, irrespective of whether they are named in the core strategy.
	7.5 (Bullet 1) & 7.13 (Bullets 5 & 6) Economic Development - Both schemes are supported but should be considered together. Pride of place at the proposed cluster should be the Innovation Centre which will encourage small businesses to incubate and flourish. It could become marginalised if the northern and southern areas are not considered together albeit they are some way apart.	Noted.
	CS17 Economic development - Ignores the influence of the airport on any development. Not only is the airport considered a good address rentals are higher on the fringes of the airport, particularly for aeronautical businesses. There is also the opportunity to capture companies which will use the operational airport for its business.	The potential of the airport to develop a technology and knowledge based cluster is recognised in policy CS17.
	CS18. Tourism - See comments above for CS11/12.	
	9.14. Other transport Related Issues - The strategy must consider aviation issues. Not only are there advanced plans to modernise the airport the affect on any development on its fringes must not ignored, particularly the aviation offering. We are led to believe that the airport will be a component of the published LTP3.	The last paragraph of policy CS24 addresses the issue of general aviation.
	CS24. Transport and Movement - The final bullet is written in very strange terms. "Considering the future of the facility" can be read in a number of ways. It could read "...to consider how the airport can be modernised in conjunction with and considering its co-location with a strategic employment opportunity. The Rochester Airport airspace safeguarding policy should not be compromised by any development."	The safeguarding of the airspace is a matter that is always taken into account in the considerations of planning applications in the vicinity of the airport.
Rochester Bridge Trust (Mr D.J. Slack, Agent for)	Strongly Disagree with Policy CS7 : Countryside and Landscape; The protection of 'versatile' and good quality agricultural land East of Rainham.	Noted.
	The agricultural land to the East of Rainham has variable agricultural quality and is not versatile for agricultural purposes by any stretch of the imagination. Sensitive and appropriate development should be allowed on the poorer quality land and	The agricultural land classification is a matter that the Council has no control over. It is maintained by the

	especially that on the urban fringe.	Department of Environment, Food and Rural Affairs. Any potential re-classification of the agricultural grade of the land, in any event, would not be a suitable justification to allow green field release of land as an urban edge expansion. Significant areas of PDL remain to be redeveloped over the life of the Medway Core Strategy. These areas are to come on stream in advance of any greenfield releases.
	Agree with Policy CS24 : Transport and Movement; The provision of Park and Ride facilities at Rainham - The provision of a Park and Ride facility at Rainham is sensible and could be provided on land owned by The Rochester Bridge Trust at Westmoor Farm, Rainham as the farm is well located in the traffic flow and subject to the lifting of policy CS7 could be a viable site for this purpose.	Park and Ride provision at Rainham is not considered to be viable by Medway Council.
Ropemaker Properties Ltd (Turley Associates)	We have been asked by our client Ropemaker Properties Limited (RPL) to respond to the aforementioned document. RPL are the owners of Strood Retail Park in the centre of Strood. They therefore have a particular interest in the policy approach towards retail development in the town. Having reviewed the consultation material, we would like to make representations on two emerging policies.	Noted.
	Policy CS19 Retail and Town Centres . CS19 states that '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'. The policy then sets out target figures for new comparison retail provision during the plan period. This includes 50,000 sq m for Chatham and 9,400 sq m for Strood. Whilst we recognise that CS19 is not intended to set an upper limit for comparison retail development, we recommend that the policy is amended to make this clear and so ensure consistency with national planning policy in the form of PPS 4, which is necessary for the policy to be sound. We also suggest that the policy is amended to clarify whether the figures provided relate to Town Centres only or to a separate geographic definition. Secondly, while recognising the Council's aspiration to upgrade Chatham, it is our view that the policy must specifically state that retail	The Medway Retail Needs Study, 2009, advises that its projections should be indicative rather than setting minimum or maximum targets. Consequently, the Council agrees with the need to clarify this. Consequently, a new paragraph will be inserted after paragraph 7.53 as follows. " The floorspace figures shown in policy CS19, reflect the findings of the Medway Retail Needs Study, 2009 and the Medway Land

	development in other towns will not be precluded on the basis of this policy, unless the available information suggests that it will have significant adverse impacts on Chatham. This may again be necessary to ensure consistency with national planning policy in the form of PPS 4, which is necessary for the policy to be sound.	Availability Assessment First Review, May, 2011. The figures are indicative only and should not be treated as the maximum floorspace which will be permitted.” Policy CS19 explains that town centre and edge of centre sites will be the preferred location for retail development. These will be as defined on the Medway Local Plan Proposals Maps. There is no need for further amendment. Policy CS19 does not solely aim to safeguard the vitality and viability of Chatham but also to substantially increase its retail offer in order for it to fulfil its function as a sub-regional centre. Consequently, it would be inappropriate to introduce criteria into the policy which could result in major retail development being developed elsewhere in the borough.
	Policy CS26 Strood The objective of CS26 is to strengthen Strood by <i>inter alia</i>, ‘improving the quality of retail provision and improving links between the retail areas and accessibility to the rail station and waterfront’. We note however that neither CS26 nor the supporting text explore what improving the quality of retail provision might involve. This may be necessary for the policy to be effective and therefore sound. We feel that improving the quality of provision might involve smaller retail units suitable for high street fashion and restaurants and cafes. Unlike the previous iteration of the Core Strategy, we note that neither CS26 nor the supporting text of this iteration refer to better ‘knitting’ the Centre together. We feel this evocative phrase particularly helped the reader to understand the Council’s aspirations for Strood and that it would be worthwhile reintroducing this phrase into the policy or	Retail quality is a generally understood term and can apply to the range, choice and standard of goods, services and retail outlets, the amount of vacant floorspace and the design and maintenance of buildings and the public environment. The provision of small retail units, restaurants and cafes would fall into this description. The quality of retail provision is included

	supporting text.	in the last paragraph of policy CS19 and improvements to the quality of the environment are included in policy CS26. Consequently, no amendments to the policy or text are considered necessary.
	Masterplan Objectives Masterplan We support the inclusion in the supporting text to CS26 of the 8 key objectives for Strood that were previously set out in the Strood Town Centre Masterplan (September 2009), especially those of improving the retail circuit and of improving the appearance of the Town Centre, including sites on prominent corners. We also support the inclusion of Figure 11.1 Strood Town Centre, which reproduces the Strood Masterplan. We continue to feel however that this Masterplan should be amended so that the purpose of annotating sites is specifically stated. For example, it might be stated that the areas highlighted for retail development are areas where development for this use that will optimise the potential of the site and support the objectives for Strood set out in CS26 will be supported in principle.	Figure 11.1 is included for illustrative purposes only and does not constitute an allocation map. Site specific allocations will be included in the Site Allocations and Development Management DPD to be prepared after the completion of the core strategy.
	Demarcation of Town Centre Boundary While our understanding is that Officers accept that Strood Retail Park represents a 'functional' part of the Town Centre, we are concerned that the existing town centre boundary, tightly drawn in the adopted Proposals Map, is unlikely to be updated to reflect this change in thinking until after the Council's Land Allocations and Development Management document is adopted. We understand this is unlikely to be before 2013. In this context we recommend that a passage is inserted into the Core Strategy that specifically comments that the defined Town Centre boundary no longer reflects Strood's functional Town Centre and that this boundary will be formally amended at the earliest available opportunity so that it includes other surrounding town centre uses.	The Medway Retail Needs Study, 2009, acknowledges that whilst the Core Retail Centre and Strood Retail Park are separated in planning policy terms, they effectively function as a connected centre and as a single attractor. However, the retail park is closely bounded by an industrial area along Knight Road and Priory Road. Were the boundary of the central area be extended to include the retail park, the provisions of policy CS19, that town centres and edge of centre sites will be the preferred location for retail development, would put pressure on those industrial areas which the

		Council wishes to retain for employment development and could lead to both the loss of employment land and the uncontrolled expansion of retailing beyond a reasonable walking distance of the town centre. Consequently, no amendments are proposed to the boundaries of the core retail centre at Strood.
	Restaurants and Cafes Finally, we note that there is no longer reference made in this iteration of the Core Strategy to the under-representation of restaurants and cafés in Strood. We recommend that CS26 is amended to support in principle an increased level of A3 and A5 class uses in Strood, on the basis that: this would help diversify and qualitatively improve the town's offer; this could attract more visitors to the town and potentially result in increased local expenditure; and more linked trips with more journeys being made on foot.	Both policies CS17, Economic Development and CS18 Tourism, seek to promote the development of the evening economy throughout Chatham. This includes the development of restaurants and cafes. Consequently there is no need to repeat this policy in the individual policies for each of the towns, including Strood.
RSPB	Direct and indirect impacts from the Lodge Hill Development threatens a nationally important nightingales site.	Land Securities are addressing the need to safeguard the habitat of the nightingales in the preparation of the masterplan for the site.
	Housing provision total could threaten SPA / RAMSAR sites, an additional policy is required (Natural England, KWT & RSPB to publish joint policy statement).	All potential impacts of development on the SPA/Ramsar sites are being taken into account in the preparation of the Appropriate Assessment.
	Wants Code for Sustainable Homes Level 4 (not 3)	There is a need to remain consistent with the government's timetable for the Code for Sustainable Homes; Policy CS3: Mitigation and Adaptation to

			Climate Change is being amended in a number of ways.
	Replace 'Compensation will be sought' with 'Compensation will be provided'		Agreed. This amendment has been proposed elsewhere in this document.
	River Medway policy should also apply to the Thames		The River Medway faces far more pressures from development than the Thames and a specific policy for the Medway is therefore warranted. The Thames coastline is largely protected by its SPA/Ramsar status.
St. Mary's Island Residents Association (Alan Pestell, SMIRA Director)	Strongly disagree with Policy CS14 : Affordable Housing & 6.19 - As a Director of SMIRA (St. Mary's Island Residents Association) I am passing on the feeling of the residents that Affordable Housing should be at 25% for St. Mary's Island and not the proposed 30%. Change the level of Affordable Housing to 25%.		St. Mary's Island falls within the defined boundary of the urban area and is therefore subject to a 25% affordable housing requirement.
Sainsbury's (WYG Planning & Design)	Supports policies CS13, CS19, CS26-30 and CS33 (including all area policies).		Noted.
	Advise the Council to increase flexibility when applying the sequential approach to site selection (PPS4 Policy EC15).to ensure that sites, including edge-of-centre and out-of-centre sites, are fully taken account of in site selection for retail uses. In-centre sites may not offer the right opportunities in terms of site size or configuration for such development and as such the opportunity for increased provision in a centre should not be lost as a result in centre sites being pursued without reward.		All relevant sites will be taken into account when applying the sequential approach and the requirements of PPS4 will be applied.
Scottish Power (Dalton Warner Davis)	Previous comments have largely been taken on board.		Noted.
	Supports policy CS21 provided that the reference to large scale district heating being provided by waste from new power plants is qualified such that they will be pursued where they are both feasible and viable (this is partly recognised in policy CS4).		Policy CS21 to be amended by the insertion of " The feasibility and viability of " at the beginning of the third bullet point.
	Welcomes policy CS17's support for the development of energy and environmental		Policy CS17 supports the

	technologies. But reference should also include conventional energy generation plants, which are designed and consented to facilitate future CHP and/or carbon capture and storage.	development of the energy sector at the Isle of Grain and Kingsnorth irrespective of the specific type of generation.
	There is also potential for renewable energy generation in the Hoo Peninsular / Isle of Grain.	Priority will continue to be given to the protection and enhancement of the wildlife habitats in the internationally important Ramsar sites and Special Protection Areas on the Hoo Peninsula. Consequently, the core strategy cannot give unqualified support to renewable energy generation on the Peninsula.
	Welcomes the SLAA's identification of a healthy employment land supply (Kingsnorth & Isle of Grain sites).	Noted.
	Policy CS4 should make clear support for renewable technologies.	Policy CS4 states that subject to there being no significant adverse effects in terms of the natural environment and residential amenity, the Council will positively promote the installation of all forms of renewable energy systems. There is therefore no need to amend the policy.
SEEDA (Jane Griffin, Planning and Infrastructure Policy Manager)	We note the following:	
	That you will deliver 815 dwellings per year until 2028. This takes account of the currently successful housing market (914 delivered in 2008/9). In addition you are increasing the affordable housing threshold to 30% from 25% in the main new housing areas.	Noted.
	You will provide sufficient employment land to deliver 21800 jobs - a high growth target to potentially reduce out commuting and grow the economy.	Noted.

	New employment will be focussed at Kingsnorth and Isle of Grain where there is potential for environmental technology jobs.	Noted.
	In addition Technology and Knowledge based jobs will be based at Rochester Airfield.	Noted.
South East Marine Association	The Association has taken an active part during the steps taken in advance of this document including:- regular attendance at meetings of the Medway Executive Local Strategic Partnership Transport Group a specific consultation concerning the draft transport plan (at which it was promised further discussions with members) attendance at the presentation by the councils' economic consultants including follow-up correspondence attendance at the presentation by the councils' transport consultants including follow-up correspondence submission of a full response to the draft transport plan	Noted.
	The Association has received no response whatever from the Council or its consultants and is therefore reluctantly forced to agree with the view that Medway Council's idea of consultation is to hold many meetings and issue various documents designed to "tick the boxes" confirming that it has gone through required procedures without taking any notice of the results particularly those emanating from the business sector and those addressing strategic problems.	This does not address the draft core strategy.
	The draft acknowledges some of the issues that need to be addressed. It fails to acknowledge others some of which are even more important. Above all it does nothing to identify realistic solutions to those issues.	This paragraph does not state what the other issues are.
	The document fails to put Medway into the context of neighbouring authorities when considering investment opportunities that will arise during the plan period. It ignores the economic problems which stem from the identified issues of deprivation and social problems in significant parts of Medway; it fails to put forward any solutions to the problems associated with out commuting and the fact that many of the most affluent residents have little association with Medway. Its policy on employment land is unsustainable and unrealistic. Its policies for Chattenden are muddled. Major development is already taking place at Ebbsfleet to which Chattenden residents will be attracted. During the plan period a new Lower Thames crossing will be constructed with dramatic effects on the economy of North Kent but this is ignored.	The Medway Core Strategy is fully evidenced and has cogent policies to address social inequalities through physical and economic regeneration of the towns. The affect of London will never 'go away' as it is a reality and its attractive effects will continue to assert themselves on Medway as it does for much of the South East. Chattenden is being planned to

		have a sustainable pattern of development with employment and physical and social infrastructure necessary for it to be reasonably self-sustaining without being 'separate' from the rest of the area. The possible advent of a lower Thames crossing is too uncertain to be taken into account in any significant way. Though the LDF system enables an updating to occur if circumstances significantly change over the life of the plan.
	The references to the River Medway are superficial and in particular ignore:- the need to provide opportunities for sustainable river transport to divert traffic from the highway system particularly in respect of wharves, warehouses and associated businesses upstream of Chatham Docks; the draft conflicts with national policies for coastal and short sea shipping of which the document makes no mention.	The ability of the R.Medway to respond to any economic drivers such as increased use of the river for transportation is not hindered by the policies of the Medway Core Strategy. The assertion that it is a mode of transport that is sustainable, or more sustainable than land based public transport systems is not evidenced. Both use fossil fuelsThe coastal shipping activity at the river's lower reaches are recognised by the plan, as is Chatham Docks. Policy CS25 supports the greater use of this facility, as well as Thamesport at Grain. Indeed they are safeguarded by the policy so this important feature of the area's overall commerce activity is not lost.
		The need to regenerate significant

	policies have evicted, the business having been driven elsewhere, in some instances to the near continent.	tracks of declined riverside industrial land is very apparent. This does not mean that all the traditional maritime employment along the river has gone, or is it necessary or desirable for it to go in its entirety; as its continued existence helps maintain a diversified economic base.
	The need for houseboat facilities.	The MCore Strategy does not impede the ability of houseboat facilities to continue to be maintained and developed. The site allocations DPD would be the appropriate document to address this matter.
	The references to the River Medway and Rochester Airport are disingenuous since in both cases the council has consistently ignored reports which it itself commissioned from consultants who have specifically set out the steps which the council should take (but which it has ignored). Sun Pier (the most prominent rail/water interchange facility in Medway) has been unlawfully shut down by the Council.	View noted.
Southern Water	In its present form of the draft Core Strategy is no more acceptable than the first draft which had to be withdrawn following examination by a government appointed inspector. If this second effort meets the same fate it will surely be time for Medway Council to have its planning powers withdrawn or for the council to be amalgamated with Kent County Council.	This paragraph does not specify why the core strategy is unacceptable.
	With regard to area policies CS26, CS27, CS28 Have identified a lack of: Sewerage (underground) capacity at: Strood Riverside, Civic Centre and East of Higham Road Wainscott. Water (mains) capacity at: Strood Riverside, Civic Centre and Temple Waterfront. Sewerage (underground) capacity at: Rochester Riverside and R/O 329-377 High Street. Water (mains) capacity at: Rochester Riverside and R/O 329-377 High Street. Sewerage (underground) capacity at: RSME Kitchener Barracks, Mid Kent College,	All proposals in the core strategy will need to be matched by the provision of adequate infrastructure, including water supply and disposal. This will be addressed in the Infrastructure Plan. The provision of adequate water

	Horsted, Land at St Mary's Island Maritime Way, South of Basin 1 and St Mary's Island Maritime Way, Between Cross Street & The Brook, Sir John Hawkins Car Park, Chatham Waterfront, 2-8 King Street and 1-11 Queen Street and Wickes. Water (mains) capacity at: RSME Kitchener Barracks, Mid Kent College, Horsted, Land at St Mary's Island Maritime Way, South of Basin 1 and St Mary's Island Maritime Way, Between Cross Street & The Brook, Sir John Hawkins Car Park, Chatham Waterfront, 2-8 King Street and 1-11 Queen Street and Wickes. Sewerage (underground) capacity at Gillingham Retail Core. Water (mains) capacity at Gillingham Retail Core. Sewerage (underground) capacity at: Lodge Hill. Water (mains) capacity at: Lodge Hill These assessments are based on just these developments any further developments would need separate assessments. Suggests the inclusion of the following policy wordings: <i>Where additional water or sewerage capacity is required to accommodate a development, the developer must connect to the system at the nearest point of adequate capacity, as advised by Southern Water.</i> <i>Development proposals will be permitted provided existing underground water mains and sewers on site are protected, or appropriate arrangements are made for their diversion.</i> <i>Development proposals will be permitted provided existing underground water mains and sewers on site are protected, or appropriate arrangements are made for their diversion.</i> Proposes the following text is included in policy CS33 to recognise the requirement for adequate utility infrastructure to serve the proposed development: <i>Additional water or sewerage capacity is required to accommodate this development, the developer must connect to the system at the nearest point of adequate capacity, as advised by Southern Water.</i>	infrastructure is normally secured through legal agreements between developers and the water companies under separate legislation and there is therefore no necessity for additional policies in the core strategy to achieve the same ends. However, policy CS34 does make provision for developer contributions to secure adequate infrastructure required as a result of new development.
	Section 5 of the Core Strategy- cross cutting themes should contain an additional policy to protect the amenity of residents:	Policy BNE2 of the Medway Local Plan, 2003, safeguards the amenity

	Development proposals in proximity to existing waste infrastructure, including wastewater facilities, will only be permitted if there is no unacceptable impact on the amenity of future occupants. In the case of wastewater facilities, the distance between the infrastructure and the development must be sufficient to allow adequate odour dispersion. Section 5 of the Core Strategy- cross cutting themes should contain a policy to recognise the need for adequate utility infrastructure to serve the proposed development. <i>New residential and commercial development will be permitted only if sufficient water and wastewater capacity is either available, or can be provided in time to serve it.</i>	of occupants. This policy will be carried forward in parallel with the core strategy until it is replaced by the Medway Site Allocations and Development Management Plan.
	Section 5 of the Core Strategy- cross cutting themes should contain a policy to recognise the need for adequate utility infrastructure to serve the proposed development. <i>New residential and commercial development will be permitted only if sufficient water and wastewater capacity is either available, or can be provided in time to serve it.</i>	It would be inappropriate to include policies for each form of infrastructure that may be required to serve a development. Planning permissions are usually conditioned to ensure that infrastructure is provided and/or legal agreements are made to secure such provision.
	Southern Water is very pleased that the Council supports its Water Resources Management Plan in Policy CS3: <i>“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...”</i> However, we would request that the policy is amended to read: <i>“...maintain supplies at the level required to meet local and sub-regional needs”</i> This is because water resources are planned over an area larger than the Council's boundaries. So, infrastructure required within one Council's boundaries may serve consumers in a number of other Council's boundaries. This addition would be in line with PPS 12 paragraph 4.17 which states that: “infrastructure capacity and planning may be more effectively and efficiently carried out over a larger area than a single local planning authority”.	Policy CS3 will be amended by the insertion of “and sub-regional” after “local” in the final paragraph.
	Supports policy CS3 Mitigation and Adaptation to Climate Change.	Noted.
	We have concerns regarding inconsistencies in the plan, the tables in section 11 showing main developments are not consistent with those listed in table 12.2 of the Infrastructure Delivery Schedule.	The Medway Core Strategy may well have an implementation policy that makes clearer the

	The following sites are listed in the tables in section 11 but not in the Infrastructure Delivery Schedule: East of Higham Road (Strood) St Bartholomews (Rochester) South of Basin 1 and St Mary's Island, Maritime Way (Chatham) There are also a number of sites listed in the Infrastructure Delivery Schedule table 12.2 but not in the tables in section 11. An accurate schedule of future development sites is important for Southern Water's investment planning. At this stage it is not clear to us which sites we should include in future investment plans.	infrastructure that will be required for most sites that area anticipated to come forward over the life of the Core Strategy.
Sport England	Sport England has an established role within the planning system which includes providing advice and guidance on all relevant areas of national and local policy, as well as supporting local authorities in developing the evidence base for sport. The principal aim of Sport England's strategy is the creation of a world class community sport system which ensures that: a substantial, and growing, number of people from across the community play sport; talented people from all backgrounds are identified early, nurtured and have the opportunity to progress to the elite level; and everyone who plays sport has a quality experience and is able to fulfill their potential.	Noted.
	Sport England's role is focused exclusively on sport, although it is recognised that sport can, and does, play an important role in achieving wider social, community and economic benefits, most notably in the context of health. Sport England also recognises the vital part that the planning system has to play in assisting with the delivery of its strategy. In addition, the development of sport within a local area can provide significant benefits to assist local authorities with the implementation of their Sustainable Community Strategies and Local Development Frameworks. As highlighted by PPG17 well designed and implemented planning policies for open space, sport and recreation are fundamental to the delivery broader Government objectives. The overall focus of Sport England's own planning policy objectives is that a planned approach to the provision of facilities and opportunities for sport, based on a robust evidence base, is necessary in order to ensure that the sport and	Noted.

	recreational needs of local communities are met.	
	Given the above, Sport England welcomes many aspects of the Pre-Publication Draft Core Strategy, in particular the commitment to the protection and development of sport, along with the recognition of its benefits in enhancing the quality of life and enabling people to lead healthier lifestyles. However, the concerns raised in response to Issues and Options Report regarding the evidence base supporting the Core Strategy remain. Further to these comments please find below Sport England response to particular areas of the Pre-Publication Draft Core Strategy. <u>The Core Strategy ‘Spatial’ Vision Point 13 (Page 25)</u> - Agree with suggested amendment. Sport England supports the inclusion of point 13 within the vision but would expect the Core strategy to seek to ensure, rather than just promote, healthier lifestyles. Consequently, it is suggested that this point could be amended to read: <i>‘Residents will lead healthier lifestyles as a result of enhanced opportunities to participate in sport and recreation along with the active promotion of intelligent design, walking and cycling’</i>.	Agreed. Vision Point 13 will be replaced with: <i>“Residents will lead healthier lifestyles as a result of enhanced opportunities to participate in sport and recreation along with the active promotion of intelligent design, walking and cycling.”</i>
	<u>Strategic Objective 10 (Page 26)</u> - Agree with suggested amendment. Sport England supports the principle of the tenth objective but would suggest that the wording should be strengthened and reference to ‘sporting activities’ be added. The amended point could read: <i>‘To enhance the quality of life of local people by enabling them to lead healthier lifestyles through improved cultural, sporting, leisure and tourism provision and activities, including along the river Medway.’</i>	Agreed. Objective 10 will be replaced by <i>“To enhance the quality of life of local people by enabling them to lead healthier lifestyles through improved cultural, sporting leisure and tourism provision, including along the River Medway.”</i>
	<u>Strategic Objectives (Pages 25 & 16)</u> - Suggested additional objective. Sport England suggests that an additional objective should be added which relates to the requirement of a number of the proposed policies and in particular CS34. The objective should seek to ensure that the demand for social and community infrastructure, generated by existing residents along with the projected population and housing growth, is adequately met. An objective covering this point could read:	The proposed amendment is not sufficiently comprehensive because it does not include physical infrastructure. An alternative objective 15, will be inserted as follows:

	<i>'To ensure that sufficient social and community infrastructure is available to meet the needs of existing and future residents through new provision or enhancing the capacity of existing facilities.'</i>	"To ensure the provision of all necessary infrastructure to match the needs of development at the right time and in the right place."
	Policy CS 2 & Paragraphs 5.10 & 5.11 (Page 30) - Agree with suggested amendment. Sport England welcomes the tenth bullet point in the policy text and the final sentence of paragraph 5.10, which highlight the role good urban design has to play in enabling sustainable lifestyles by ensuring easy connection to open space, recreational facilities and local services. However, further to the above comments and to ensure consistency with a number of areas of the Core Strategy, Sport England would suggest the wording of this bullet point, and the sentence in paragraph 5.10, are amended. The relevant text should read along the lines of: <i>'Good urban design, by ensuring easy connection and access to sufficient high quality open space, sport and recreational provision and local services, has a key role to play in enabling the development of sustainable and healthier lifestyles.'</i> Along with the guidance set out in the policy text and paragraph 5.11, reference could be made to Sport England's Active Design Guidance. For more information on the guidance please refer to our previous response to the Issues and Options Report. The guidance is available to download via our website at www.sportengland.org/activedesign.	Paragraph 5.10 and the tenth bullet point of policy CS2 will be amended by the insertion of: "sport and" before "recreational facilities".
	Policy CS8 & Paragraph 5.83 (Pages 42 & 43) - Agree with suggested amendment. Sport England welcomes Policy CS8 and the commitment to protect, provide and improve access to open space. It is also pleasing that to see that the text within paragraph 5.83 highlights the importance of greenspace in relation to providing opportunities for healthy exercise, sport and recreation. Whilst linking with Policy CS10 it is assumed that the requirements of Policy CS8 will apply to outdoor sports provision and in particular playing field land. The third bullet point of the policy which seeks to preserve and enhance open space is therefore welcomed. However, it would be useful for the supporting text to provide some guidance on the interpretation of the wording <i>'unless an improved provision can be made by new development to the benefit of the local population'</i>, in line with the guidance in PPG17. Regarding the fourth bullet Sport England would expect the development of any standards to cover a range of relevant outdoor sporting provision. It would be useful for the supporting text to outline the process and timescale for developing	The open space standards will be included in the review of the Medway, Wildlife, Countryside and Open Space Strategy, which is currently underway and incorporated into the Site Allocations and Development Management Document, which will be prepared after the core strategy. The term "recreational" already encompasses "sporting".

	these standards along with the evidence base on which they will be based. Further to the above, Sport England would also suggest that the word 'sporting' should be included in the seventh bullet point within the policy alongside recreational, amenity and civic space. Paragraphs 5.91 & 5.93 (Page 44) - Agree with comment. Sport England welcomes both paragraph 5.91 and paragraph 5.93 making particular reference to sporting facilities. It is noted that paragraph 5.91 refers to the Infrastructure State of Medway Report regarding the distribution of existing facilities. Sport England appreciates that the report is only intended to establish a baseline for further work and highlights gaps in the information base. However, whilst reference is made to the 2005-2010 Sports Development Strategy limited information is provided on the evidence base for indoor sports facilities and any update to the 2005-2010 strategy. In addition, as set out in response to the Issues and Options Report Sport England is concerned at the reference to and use of the information from the 2002 Playing Pitch Strategy. Regarding these points please see the below comments on the evidence base for sport.	
	Policy CS9 (Page 47) - Agree with suggested amendment. Sport England welcomes Policy CS9 but in line with the above comments would suggest that text is added to ensure the enhancement of provision which enables people to lead healthier lifestyles. The second bullet point in the policy could be reworded to read: <i>'Protecting and enhancing existing, along with providing new, facilities, services and amenities that enable residents and visitors to lead healthier lifestyles.'</i> The above suggested amendment to the second bullet omits the text relating to the quality of life as this is referred to in the first sentence of the policy.	Healthy communities are already referred to at the beginning of the policy and there is therefore no need to qualify the bullet points separately. The fifth bullet point seeks the timely provision of new health and social facilities.
	Policy CS10 (Page 48) - Agree with suggested amendment Sport England welcomes the inclusion of the 'Sport and Recreation' section within the Core Strategy. This section and Policy CS10 clearly demonstrates the Council's commitment to the protection and improvement of sporting provision, along with the recognition of its wider benefits in relation to quality of life and enabling healthier lifestyles. Whilst Policy CS10 is therefore welcomed Sport England would suggest the following amended wording for the first sentence and the first bullet point: <i>'The quality of life of existing and future residents of Medway and their ability to lead healthier lifestyles will be improved by: safeguarding and enhancing existing sport and recreational provision; providing new provision which supplements the existing provision, meets identified</i>	As the policy already makes provision for new facilities to meet a broad range of needs, it will enable residents to increase their participation in sport and recreation without having to state it within the policy. Sport England's playing field policies will be taken into account in the preparation of the Site Allocations and Development

	<i>needs and enables residents to increase their participation in sport and recreation.</i> Regarding the implementation of both policies CS8 and CS10 I would like to remind you of Sport England's statutory consultee status regarding planning applications affecting playing field land. In developing these policies further it may be useful to look further at both our adopted Playing Fields Policy and paragraph 15 of PPG17. Full details of our statutory consultee status and policy can be found on our website at www.sportengland.org > Facilities and Planning > Putting Policy into Practice > Playing Fields. With regard to our Playing Fields Policy Sport England welcomes the strategy's dismissal of playing field sites put forward in the call for sites for the SLAA, as indicated in paragraphs 3.16 and 3.44.	Management Development Plan Document.
	The Evidence Base for Sport (Pages 47 & 48) - Disagree As you will be aware in response to the Issues and Options Report Sport England raised concerns with the evidence base for sport that currently supports the Core Strategy. It is unclear from reading this version of the strategy, and looking at the evidence base documents available on LDF pages of your website, whether this evidence has developed any further. Rather than repeat the comments made in our previous response regarding the requirements and compliance with PPS12 and PPG17 I would refer you to the letter dated 18th September 2009. The principle of setting out the key deficiencies in sporting provision within the Core Strategy is welcomed. However, any such statements and all relevant policies should be supported by a robust and up to date evidence base. Therefore, in addition to referring to the previous letter please see the key points set out below regarding sections of the pre-publication draft:	Medway Council is currently updating its evidence base for the core strategy including a review of the Medway Wildlife, Countryside and Open Space Strategy and paragraphs 5.113, 5.115 and 5.117 will be amended when the results are available. In the meantime, paragraph 5.115 will be amended by the deletion of the last sentence.
	Paragraph 5.115 (final sentence) – Disagree. There appears to be no source provided for the statement referring to the need for four additional 4 court halls or any spatial guidance regarding meeting this need. In addition, it is unclear why this detail only focuses on sports halls rather than also including other types of provision. Sport England is aware of your authority's Sport and Recreation Strategy 2009-2016 which it is assumed supports this statement. However, as set out in our response to the Issues and Options Report, Sport England holds concerns with the methodology used to assess the supply and demand of provision on which the strategy is based.	Medway Council is currently updating its evidence base for the core strategy including a review of the Medway Wildlife, Countryside and Open Space Strategy and paragraphs 5.113, 5.115 and 5.117 will be amended when the results are available. In the meantime, paragraph 5.115 will be amended by the deletion of the last sentence.

	Paragraph 5.117 – Disagree. There appears to be no source provided for the statements made regarding the provision of playing pitches within Medway. It is assumed that the detail is taken from the ‘Medway Wildlife, Countryside and Open Spaces Strategy (2008-2016)’. If this is the case then as set out in the response to the Issues and Options Report, Sport England is concerned that this evidence base is out of date and not sufficiently robust. As you will be aware the playing pitch information within this strategy is based on the results of the 2002 Playing Pitch Strategy. The Wildlife, Countryside and Open Spaces Strategy itself states on page 51 that: <i>‘the Playing Pitch Study, which informs this part of the strategy, requires a review, which will be undertaken in the first delivery phase of the strategy’</i>. In addition, Sport England is concerned at the reference to, and apparent use of, the National Playing Fields Association (now ‘Fields in Trust’) standards in assessing provision. As set out in paragraph 6 of PPG17 open space standards are best set locally as national standards cannot cater for local circumstances, such as differing demographic profiles and the extent of existing built development in an area.	Medway Council is currently updating its evidence base for the core strategy including a review of the Medway Wildlife, Countryside and Open Space Strategy and paragraphs 5.113, 5.115 and 5.117 will be amended when the results are available. In the meantime, paragraph 5.115 will be amended by the deletion of the last sentence.
	Paragraphs 5.115 & 5.117 – Disagree. Given the above comments, Sport England is concerned with the reference within both paragraphs to ‘Sport England advice’ and the indication that this advice suggests certain levels of provision. It is assumed that these references relate to input to the outdated 2002 Playing Pitch Strategy, and the use of our spatial planning tools, albeit potentially incorrectly, in the development of the 2009 Sport and Recreation Strategy.	Medway Council is currently updating its evidence base for the core strategy including a review of the Medway Wildlife, Countryside and Open Space Strategy and paragraphs 5.113, 5.115 and 5.117 will be amended when the results are available. In the meantime, paragraph 5.115 will be amended by the deletion of the last sentence.
	Despite welcoming many aspects of the Pre-Publication Draft Core Strategy we remain concerned that the evidence base, of which we are aware, does not meet the requirements of both PPG17 and PPS12. The absence of a robust and up to date evidence base is likely to compromise the soundness of the Core Strategy and the implementation of the positive sport related policies commented on above. As set out in our response to the Issues and Options Report, Sport England would be pleased to assist your authority to develop this evidence base further.	Medway Council is currently updating its evidence base for the core strategy including a review of the Medway Wildlife, Countryside and Open Space Strategy and paragraphs 5.113, 5.115 and 5.117 will be amended when the results are available. In the meantime, paragraph 5.115 will

		be amended by the deletion of the last sentence.
	Policy CS15 & Paragraph 6.38 (Page 61) – Comment. Sport England welcomes both the statement in paragraph 6.38 that <i>‘housing developments that encourage and deliver healthy living should be the norm’</i>, and the inclusion of sports provision and playing pitches in the list of means by which this can be done. However, it is disappointing that text regarding this point does not appear in the policy wording itself.	Policy CS8 refers to the establishment of a set of consistent open space standards that will apply to new development. These standards are being drawn up as part of the review of the Medway Wildlife, Countryside and Open Space Strategy and will be set out in the Site Allocations and Development Management DPD.
	Policy CS20 (Page 71) - Agree (3rd Bullet). Sport England welcomes the third bullet of the policy, which promotes management arrangements for schools that fully exploit their potential as community hubs.	Noted.
	Policy CS33 (Page 109-110) - Suggested amendment. Sport England welcomes the commitment within the policy to the provision of green infrastructure, open space and community facilities. However, in line with the comments above, the vision and objectives of the Core Strategy and a number of related policies, Sport England would suggest that the final bullet under ‘Design Solutions’ is amended to read: <i>‘The need to create liveable neighbourhoods where the built form and layout of development enables future residents to achieve a good quality of life and lead healthy and active lifestyles’</i> Sport England notes the references in paragraphs 11.103 and 11.104 to site specific evidence base studies. Further to our concerns regarding the evidence base for sport, set out above, we are aware that a study commenced to assess the sporting infrastructure requirements of the proposed Lodge Hill development. We would be pleased to assist this study to help ensure the development meets the Core Strategy commitment to provide for the needs of existing and future residents, the promotion of opportunities for sport along with enabling residents to lead healthier lifestyles.	A good quality of life can encompass healthy and active lifestyles and there is therefore no need to add these to the policy.
	Policy CS34 (Page 119) - Agree with suggested amendment. Sport England welcomes Policy CS34 but would suggest that rather than the Council seeking to enter into an agreement the policy should be amended to read: <i>‘Where the need</i>	Policy CS34 will be amended to read “The developer will be required

	<i>arises directly from development, the developer(s) will be required to enter into a legal agreement with the Council to provide for...</i> In addition, to ensure consistency with the wording used elsewhere in the document it is suggested that the word 'sporting' is included alongside recreation and community facilities. Table 12.1 (Page 121) - Suggested amendment. It is suggested that the 'increasing participation in sport' indicator should be included under Policy CS10 rather than Policy CS11. In addition, an indicator could be added under Policy CS10 which measures the amount of new or enhanced sporting provision provided. Table 12.2 (page 127) – Comment. It is noted that Table 12.2 provides limited detail on specific infrastructure requirements relating to indoor and outdoor sporting provision. As mentioned above, Sport England would be pleased to assist your authority with developing the evidence base for sport further. This assistance could help to address the concerns raised along with assessing the likely infrastructure requirements for the key development sites e.g. Lodge Hill.	to make provision for infrastructure where the need arises from development and the Council....”. CS10 does make reference to increased sporting activity. Table 12.1 page 20 details with the monitoring of the policies delivery; that would be supported by delivery partners set out in the monitoring and implementation framework. The draft Medway PPS17 Open Space and Recreation Report 2011 will provide further evidence of the requirements for the area. If the Medway Core Strategy needs to reflect further provision is required over the life of the plan it will do so. Sufficient land has been identified in the Medway Strategic Land Availability Assessment to meet Medway's development requirements without the need to identify additional Greenfield sites outside the boundary of the urban area.
SSR Planning for Abbey Developments Ltd (Laura Tilston)	Policy CS7 - Whilst we recognise the importance of protecting the countryside and key landscape areas from large-scale significant development, we do however consider that this should not mean that no development takes place adjacent to the existing urban areas. We consider that any parcel of land put forward for development, which is adjacent to the existing urban area, should be assessed in terms of its contribution towards ecology, bio-diversity, agricultural production and settlement separation. If through this assessment it is found that these sites do not meet any of the above criteria we consider that they should be included within the urban area. Our clients land to the East of Rainham lies adjacent to the existing urban area; the site does not contribute to the ecology or bio-diversity of the area and is not used for any agricultural purposes. As per the criteria set out in Policy CS7 the site does not contribute to the openness and intrinsic character of the countryside in the area, nor it would it significantly cause the erosion or separation of individual settlements. This is because urban sprawl would not occur due to the site's defined boundaries. The site does not extend beyond the existing built urban area and we consider that development on the site would actually better define the	

	edge of the built up area. As can be seen from the attached aerial photo Meresborough Road bound the site to the East and to the South there is a strong field boundary. Development on this land would not extend development further East towards Sittingbourne past the existing line of development. Therefore it would not conflict with the aims of the policy.	
	Policy CS13 sets out that it is the aim of the Council to provide at least 17,930 new homes between 2006 and 2028 in the Medway area. As set out in paragraph 6.5 the Council therefore propose to deliver 815 dwellings per annum over the time period up to 2028. Whilst they note in paragraph 6.5 that despite the adverse economic conditions completion rates have been high up to 2010, forward monitoring suggests that if there is no early recovery in the national economic picture this figure will fall. Due to the current economic climate we consider that a fall in the number of dwellings brought forward in Medway is likely. We therefore suggest that in the current economic climate serious consideration has to be given to bringing forward sites that are less complex in terms of their planning, infrastructure and re-mediation. The complex nature of several of the urban regeneration sites and the costs associated with these, which are exceptional, is likely to lead to viability issues in the current economic climate which may delay or prevent these sites from coming forward and delivering the housing numbers. Smaller and less complex sites within and adjacent to the urban area which have considerably lower costs are more likely to be able to come forward in the current economic climate. These sites will be sustainable due to their location adjacent to, and within, existing developments and their size would mean that the level of additional infrastructure required would be minimal. We consider that releasing small sites would not have a detrimental impact on the viability of the larger Brownfield sites as any viability issues associated with these sites are more likely related to re-mediation costs and extensive infrastructure requirements rather than a lack of demand for reasonably priced homes. Smaller Greenfield sites could provide family housing, adjacent to existing family units in a sustainable location within a shorter time period. This would accord with the Council's Strategic Objective No 8 to ensure that there is sufficient housing to meet people's needs by providing for a range, mix, type and affordability of housing in locations that contribute to the regeneration and sustainability of the area. Our client has a small Greenfield site that is available for development. The site is located close to existing transport links, services and facilities due to its size, location and previous uses it would only	The SLAA has identified a surplus of over 1600 dwellings compared with the requirement up to 2028 and this would help to offset those sites that may not come forward as expected. Therefore, no additional sites need to be identified.

Swale Borough Council	require minimal infrastructure improvements and would be able to deliver housing within a short time frame. As neighbours of Medway, Swale would wish to see more specific reference to the cross-boundary issues affecting both authority areas – particularly in light of the recent and anticipated changes to regional and national planning policy which actively encourage cross boundary working as part of the Localism Agenda. Whilst Swale notes the reference to water supply constraints within the Sustainability Appraisal it would be good to see an acknowledgment of the constraints on water supply as water companies' areas, waste water treatment works and abstraction areas cover both authorities. Reference should also be made to the impact Swale residents have on Medway by way of services users for further education facilities, Medway Maritime Hospital, retail and employment opportunities and in particular transport networks. Both authorities share the A2/M2 corridor and the associated congestion and air pollution that brings.	It is not clear what specific changes are sought from Swale in what part of the core strategy. Medway Council are not aware of any proposals in the document that raise cross boundary issues. Policy CS9 supports the continued redevelopment of Medway Maritime Hospital and efforts by the Trust to make the hospital a centre of excellence. Policy CS24 aims to develop a bus network with increased capacity, reliability and quality. There is a two-way flow of people between all the North Kent authorities and beyond, for employment and recreational purposes and Medway Council does not consider it necessary to refer specifically to each of them. In relation to employment, the strategy is seeking to increase opportunities within the Borough in order to reduce the level of out-commuting.

TBH Ltd	<u>General:</u> Paras 1.7, 2.6 & 2.29, Chapter 7 and para 11.39: the “evidence base “for the Core Strategy is unclear. All those wishing to read and understand the Core Strategy, both while it is an emerging development plan document and when it is adopted, need to have clarity about the information that has led to the vision, strategy and policies that Medway Council are pursuing. However, certain documents such as the “Employment Land Review Consolidation Study” (see para 3.9 and elsewhere), considered by Cabinet in September 2010, are not identified on the Council’s website as part of the evidence base and have not been subject to previous public consultation. The Council’s Cabinet approved the Strood Town Centre Masterplan in December 2009 as a “work in progress” on which there would be further opportunities for engagement with stakeholders but this further engagement has not occurred. Likewise the High Street/Best Street Masterplan, although subject to public consultation, has no statutory significance but its findings are relied upon within the Draft Core Strategy. There are within the Draft Core Strategy other examples of documents not identified or inadequately identified as part of this evidence base. TBH considers that the Core Strategy should not proceed to the next consultation stage or formal submission for public examination until these inadequacies are rectified by the Council comprehensively identifying what constitutes the evidence base and then allowing an appropriate period of time for those concerned to comment further.	The evidence base will be identified in full by the time that the Pre-Submission draft core strategy is published for public consultation.
	Chapter 1: Introduction: Paras 1.24 & 1.25: the recent High Court judgement in the case of Cala homes – v- The Secretary of State for Communities and Local Government has determined that the Government’s revocation of regional spatial strategies (RSS) was unlawful. There is uncertainty over the timetable for the enactment of the Localism Bill that will pave the way for any lawful revocation of RSS. In the meantime, the Council’s Core Strategy should identify which parts of the RSS it is in conformity and which parts it is not in conformity with and why. Where the Core Strategy is not in conformity with the RSS, the Council should identify why not and the alternative evidence base relied upon to justify that departure.	Before the Council submits the core strategy to the Secretary of State, it will ensure that it is in conformity with the South East Plan.
	Chapter 2: Context and Issues: Para 2.23: this paragraph identifies a range of economic and learning issues that need to be addressed. However, the Draft Core Strategy fails to assess to what	The core strategy will be amended to more closely identify the links between the issues,

	extent the development plan is capable of addressing these issues, and where that capability is considered to assist specifically how each of these important issues will be addressed. TBH Ltd considers that it is important that the capability of a development plan to meaningfully address these issues in the period to 2028 is assessed so that Core Strategy has an appropriate focus.	objectives and policies that address them.
	Chapter 3 Options and Alternatives: Employment; paras 3.6-3.11: this section of the chapter fails to set out any options relating to future provision for employment but rather sets out a deterministic view of how the Council wishes to see future employment and economic growth. Given current national issues relating to uncertainty about future economic growth, the Council's employment objectives may take longer to achieve than previously thought, but in the meantime there will be a continuing need to generate new employment opportunities. This chapter of the Draft Core Strategy currently represents a "missed opportunity" to consider a flexible employment strategy as a basis for economic development and employment policies in the current economic climate.	Policy CS17 sets out the employment strategy for Medway and includes the provision of additional land for new development and for the expansion of existing economic functions, the growth of new sectors, the growth of Chatham as a regional hub, an emphasis on higher value activity including a technology and knowledge based cluster of businesses, the improvement of skills and training, the expansion of the higher education sector and its links with local employers, the creation of a high quality working environment at Lodge Hill, the improvement of Medway's image and the encouragement of rural enterprise. This represents a multi-faceted approach to economic development with sufficient flexibility to ensure continuing robustness in the face of changing circumstances.
	TBH considers that splitting paras 3.6 to 3.11 and 3.30 to 3.47, all of which deal with employment, is confusing and that these sections should be consolidated.	Paragraphs 3.6 to 3.11 are part of a section on the overall level of growth, whilst paragraphs 3.30 to 3.47 are part of a section dealing

		with the location of development. There is therefore no need to consolidate them.
	Options for Urban Medway; paras 3.22 to 3.28: there is a lack of clarity in this section about the status of the supplementary planning documents that are being relied upon to support the strategies for the main urban area. Some of these planning documents have not been subject to formal adoption procedures prescribed in PPS12 and some, such as the Strood Town Centre Masterplan, are emerging planning documents. The extent to which each of the supplementary planning documents have been consulted upon and formally adopted should be specified in the emerging Core Strategy so that appropriate weight can be attached to them at any public examination.	The documents referred to in paragraphs 3.22 to 3.28 fall into four categories: the Medway Local Plan which was adopted in 2003, following a public inquiry; a valid planning permission for development at Rochester Riverside; the Strood Town Centre Masterplan, which is a technical document informing the core strategy and which has been the subject of public consultation and subsequent adoption by the Council in 2009; and a number of supplementary planning documents and guidance, all of which have been subject to public consultation and adoption by the Council.
	Rochester Airfield; paras 3.38 & 3.39: TBH Ltd considers that it is unsatisfactory that preliminary assumptions have been made as to the amount of new employment floorspace that may come forward at this location. There is no evidence base that sets out these assumptions. Rochester Airfield and land adjacent was identified as a strategic employment opportunity in the RSS in 2009 and before that in the Kent and Medway Structure Plan of 2006, both of which the Council must have supported. The Council has consequently had ample opportunity to assess the development potential of the site and publish its findings and this should be done to provide clarity at the next consultation stage of the Core Strategy.	The location of employment sites around Rochester Airport and the amount of floorspace capacity of those sites can be found in the Medway Strategic Land Availability Assessment, 2010. Work is progressing on a masterplan for the area, jointly with the airport operator and BAe
	Chapter 5: Cross Cutting Themes: Policy CS 1: Regenerating Medway: incorporates land use proposals that have emerged in non-statutory planning documents that have not been subject to formal adoption procedures, in particular scrutiny as to whether and when the regeneration proposals that they contain are deliverable (e.g. Best Street and Strood Town	The documents supporting the development proposals in policy CS1 have all been subject to public consultation and adoption by the Council and with the exception of

	Centre).	the Strood Masterplan are all based upon policies in the Medway Local Plan. Deliverability is being addressed in the Infrastructure Plan.
	Policy CS 7: Countryside and Landscape: the Medway Landscape Character Assessment on which this policy is partly based has not been subject to previous public consultation but has potentially important consequences for development opportunities on the urban edge of the Medway Towns.	The Medway Landscape Character Assessment is a technical document that does not require a statutory period of public consultation. However, prior to its adoption in 2010, consultation took place with the following bodies:

		Organisation
	1	Environment Agency
	2	Natural England
	3	English Heritage
	4	Gravesham BC
	5	Tonbridge & Malling
	6	Medway Swale Estuary Partnership
	7	Greening the Gateway Kent & Medway
	8	Land Securities
	9	Kent Wildlife Trust
	10	RSPB
	11	Kent Downs AONB
	12	Valley of Visions
	13	Cliffe & Cliffe Woods Parish Council
	14	Friends of North Kent Marshes
	15	Allhallows Parish Council
	16	Isle of Grain Parish Council
	17	Frindsbury Extra Parish Council
	18	Maidstone BC
	19	Swale BC
	20	KCC - Heritage
	21	Cuxton Parish Council
	22	Groundwork Kent & Medway
	23	Countryside Forum

	Chapter 7; Economic Development: TBH welcomes the recognition by the Council that retail development can contribute to economic growth, reflecting the advice in PPS4, and should therefore be included in the Economic Development chapter of the Draft Core Strategy.	Combining the retail and economic development policies would make the resulting policy too long and unwieldy. All relevant policies should be read together to get a complete picture of economic development proposals.
	With respect to the local development opportunity represented by BAe Systems at Rochester Airfield, TBH considers that the Council has focussed too narrowly on this one location and company while giving very little information about the actual development potential of the BAe site and existing buildings. There is a much wider economic development opportunity available on land close to Rochester Airfield, including provision for technology based companies with synergies with BAe. The Core Strategy should recognise and make provision for these wider development opportunities which would contribute to the strategic employment objectives, including amending Policy CS17: Economic Development to read "...and the continuing opportunities at and in close proximity to Rochester Airfield to develop a knowledge and technology based cluster".	See above response in relation to Rochester Airfield
	The local opportunity within Central Chatham is insufficiently specified in the Draft Core Strategy. In so far as this opportunity may depend on other regeneration opportunities it is unclear how deliverable these will be (see objection to Policy CS1 above and Chapter 11 Area Policies below).	The opportunities for development in the centre of Chatham are set out in detail in the Chatham Centre and Waterfront Development Brief, 2008, the Pentagon Development Brief, 2005 and the Chatham High Street/ Best Street Area Masterplan, 2010.
	Paragraph 7.13 states that the Council and its partners will promote employment and economic activity through a range of measures. However, many of these measures are beyond the scope of a development plan document such as the emerging Core Strategy to directly influence. TBH considers that the Core Strategy should focus on those measures that it could influence through land allocations and development control decisions in terms of delivery of employment locations and floorspace in order to ensure that it remains focussed on matters relevant to and achievable through the planning system.	Medway Council is already involved, with other bodies, in the promotion of the measures in paragraph 7.13 and it is therefore appropriate to include them in the broader aspects of the economic strategy.

	Paragraph 7.17: the Draft Core Strategy places reliance on the employment sub-areas identified in the Employment Land Review Consolidation Study (the Study). The origin of these sub-areas is not explained and so therefore cannot be understood. For example, what does the location “M2 Access” mean and on what planning criteria have the areas with this title been chosen? In Figure 7.1, some of the M2 Access areas appear to be in the urban area but the area between the M2 and Hoo is wholly rural, and consequently it is not clear how new employment development is intended to occur in such a diversity of locations. It is unclear what the presentation of the M2 Access Areas in this figure is intended to convey, therefore.	The M2 Access sites are those with relatively close proximity/quick access to junctions 1 to 4 of the M2. All the sites identified by a solid circle are specifically identified existing sites in the Employment Land Review Consolidation Study. The boundaries are purely to group those sites together and to encompass the relevant main roads leading to the motorway junctions. The boundary leading from junction 1 of the M2 does not contain a site because Lodge Hill is a proposed rather than an existing site. The fact that it is in the rural area does not mean that it will not be developed.
	The findings of the Study have been incorporated into the Draft Core Strategy but with no opportunity for stakeholders such as TBH to consider, raise questions about and comment on its findings. Those parts of this Study that TBH has reservations about and objects to, at least until further clarification can be obtained from the Council, are: The derivation of the figure to provide for 21,500 jobs up to 2026; The derivation of the floorspace requirements by sub-area in Table 7.1; How the floorspace requirements by sub-areas in Table 7.1 relate to the economic objectives and outcomes, and wider planning objectives such as regeneration, that the Council is seeking to achieve in the period to 2028; The derivation of the employment floorspace supply in Table 7.2 which appears to indicate a very high density of development (a density that is considered undeliverable as well as being contrary to Government guidelines and other comparators); The evidence base for the Study conclusion that development of new sites with access to the M2 would undermine investment in more central locations and the implications of this finding for the employment land strategy;	The Employment Land Review Consolidation Study is part of the evidence base of the core strategy and is available on Medway’s web site for public inspection.

	The evidence base for the conclusion in para 7.26 that “Not only is there sufficient floorspace overall to meet the employment requirements but that there are also a range of locations and types of sites to cater for all likely growth sectors over the plan period” including the assumptions relating to what will be employment growth sectors.	
	Paragraphs 7.36 to 7.44 and Policy CS19: Retail and Town Centres; these paragraphs need amending to reflect the Council’s decision to grant planning permission for a food superstore at Medway City Estate and the reasons why justification for this additional convenience floorspace was considered to exist.	Noted and minor textural changes proposed.
	Paragraph 7.48 and Policy CS 19: Retail and Town Centres need amending to reflect the Council’s decision to grant the foodstore permission at Medway City Estate and that this site will no longer be available for the development of 15,000 sq m of bulky comparison goods floorspace. This quantum of bulky goods floorspace will now have to be re-allocated to other sites within the Medway Towns in an amendment to the emerging Core Strategy. The site at Temple Park (formerly Alloy Wheels) at Priory Road, Strood owned by TBH provides an opportunity for such bulky goods retail floorspace development.	See response above.
	Chapter 11: Area Policies: TBH as the owner of the former Alloy Wheels site at Priory Road, Strood, considers that the provision of 8494 sq m of employment floorspace on this site, as set out in Table 11.2, is not achievable without flexibility as to the mix of development on the site. A mixed development of the site of employment floorspace and bulky goods retail could be economically viable and enable an early start on regeneration of the site which has been a Council objective for over 10 years. It would also enable a re-allocation of part of the 15,000 sq m of bulky goods retail floorspace from Medway City Estate for end users wanting a presence in Strood, or not currently represented in the Medway Towns, so improving the retail offering without adversely impacting on existing retailers in Strood town centre. TBH would seek recognition of this mixed redevelopment opportunity at the former Alloy Wheels site in the emerging Core Strategy Tables CS19 and Table 11.3.	View noted.
	Without some economically viable mix of development at the former Alloy Wheels site it will be very uncertain that the Council’s employment floorspace allocation here will be provided and instead the site will only be suitable and available for open storage or similar use requiring little or no new capital investment.	The site has significant potential as additional employment land for the area as a whole and Strood in particular. The right type of uses,

		where they may be workshop, creative industries or research and development would have to be carefully worked up with a focused analysis on the site's potential in connection with the wider Medway economy and other site opportunity. The Medway Core Strategy will not focus down to individual sites in this way. Other, subsequent Development Plan Documents will do this.
	TBH would wish to be assured that the Council's redevelopment proposals for the High Street/Best Street area of Chatham, which anticipate significant central area regeneration with provision of major new retail floorspace and employment floorspace, are realistic and deliverable. The Council's own SLAA put the development timescale of these areas as not before 2021 and, while this is within the Core Strategy timeframe to 2028, it is towards the latter part of that timeframe. There are significant constraints to delivery of that redevelopment even within that timeframe, namely: - the economic climate and investor and lender confidence particularly with respect to complicated multi-million pound developments; and multiple ownerships and tenancies some of which have more than 5 years to run; If these Chatham redevelopment proposals do not come forward by then there will be implications for the delivery of needed retail development and employment floorspace on alternative sites in the Medway Towns.	The Medway Core Strategy will set the parameters for the regeneration of the Chatham High Street/Best Street that will accord with the adopted masterplan for the area.
	Chapter 12: Implementation, Monitoring and Review: TBH has concerns about the justification for the level of developer contributions that the Council sometimes seeks, for example air quality monitoring. The new Community Infrastructure Levy and its proposed replacement by a system of local tariffs create an opportunity for a comprehensive review by Medway Council of its Developer Guide to Contributions, not least to ensure that there is no duplication or conflict between these existing and proposed methods of seeking developer contributions. TBH therefore seeks a commitment from Medway Council for a comprehensive review of its Guide to Developer Contributions when details of the	Noted. The CIL system will involve a review of contributions.

	new government local tariff system are available.	
	Conclusion: TBH considers that the representations set out above have implications for the test of the soundness of the emerging Core Strategy and need to be comprehensively addressed by the Council (including a meeting with TBH) prior to the next stage of consultation. No specific comments to make at this time.	Noted.
The Coal Authority		Noted.
The Theatres Trust		
	Key Issues Para.2.27 Neighbourhoods - We <u>agree</u> and support the bullet point regarding a new waterfront arts complex, which will include the Brook and Central theatres and would be interested to learn how this is to be achieved.	The Brook and Central theatres will not form part of the waterfront arts complex but will fall within a wider cultural area.
	We suggest that numbering or Roman numerals are used for ease of reference instead of bullet points for individual items.	Noted
	Policy CS11 Culture and Leisure - We <u>disagree</u> with this policy as it provides no guidance for the future of leisure and cultural activities in Medway. Para.5.123 states that the Cultural Strategy 'outlines a number of further aspirations to work with partners to promote and develop the cultural offer.' We would therefore expect the salient elements from the Cultural Strategy to be put in this policy as the Core Strategy is the bedrock on which other strategies are based. We also recommend a paragraph in this policy to promote and protect your <u>existing</u> facilities and venues as without such a statement it could become difficult to retain an essential community asset particularly where land values become higher for an is other work will be influenced by also state that the loss of an existing facility will be resisted unless it can be demonstrated that the facility is no longer needed, or it can be established that the services provided by the facility can be served in an alternative location or manner that is equally accessible by the community.	View noted. The core strategy affords strong protection to existing facilities.
	Policy CS18 Tourism - We <u>agree</u> with this policy although we are surprised to see a bullet point for the new waterfront theatre and cultural hub here. We suggest that it would be more relevant to Policy CS11 as a guide for planning applications.	The mater can reside in either policy.
	Policy CS19 Retail and Town Centres - We <u>agree</u> with this policy because the policy text acknowledges the main uses for town centres in line with PPS4, and states that these will be maintained and enhanced. However we would have expected specific	Noted but implies a level of detail that is not appropriate to a core strategy.

	guidance for the evening economy to be within this particular policy even though the topic appears in Policies CS17 and CS18 but these only contain general references to support an evening economy.	
Tourism South East	Having read through the tourism relevant sections of the strategy we are generally very supportive of the approach taken. One of the six ambitions arising as part of the vision for Medway is: ' <i>Medway to be recognised as a Destination for Culture, Heritage, Sport and Tourism</i> '. We commend the fact this is included as such an important strand of the strategy. All too often developing an area as a destination for tourism is neglected or, at best, subsumed within the economic development sections of the strategy.	Noted
	The 'Regenerating Medway' section and Policy CS1 demonstrate a clear commitment to redevelop civic space and increase the provision of amenities that will benefit residents and visitors alike. These actions will undoubtedly improve the desirability of Medway as a destination for leisure tourists and business visitors.	Noted
	Quality and sustainability are vital considerations for any destination that wishes to maximise the potential of its tourism sector. We commend the policies in CS2 as an excellent approach toward achieving this aim.	Noted
	Improving the provision of culture and leisure opportunities is a key element to any strategy for an enhanced tourism economy. Similarly it is important to maintain the heritage assets in areas such as Chatham. Therefore we fully support policies CS11 and CS12.	Noted
	We support the aspiration in the economic development chapter to increase the value of local jobs and reduce the reliance on net out commuting. In fact by addressing the first issue you will go a long way toward correcting the second problem. We recognise that there is a desire to grow the micro and small businesses in the area but we would like to point out that these small businesses do bring with them numerous benefits and spread financial risk. Areas with a reliance on large businesses (such as factories) run the risk of large disruptions to the local economy. Therefore we would urge you to recognise the importance of fostering conditions that also assist small and micro-businesses.	Agreed. Policy CS17 to be amended by adding the following to the 4 th paragraph: "This will include the development of incubator and grow on space for new and expanding businesses."
	We fully support the Medway Economic Development Strategy which identifies tourism as one of the most significant opportunities for Medway.	Noted
	The aims in CS17 of developing tourism and of developing Medway as a genuine	Noted

	and connected 'city break' tourism destination receive our support.	
	Policy CS18 is the most important policy for Tourism South East. It amply sets out a vision for the future of the tourism sector and Medway and includes important aims that, if enacted, will benefit the tourism sector. We generally support policies that encourage retention of existing accommodation businesses; that promote a high level of quality and which support new visitor focused initiatives.	Noted
	References to tourism in Core Strategies all too often give the impression that the sector is separate to all other aspects of the local area. This Core Strategy clearly recognises that this is not true and that the tourism sector plays a vital role in assisting the wider local economy. Three quarters of visitor spending goes to enterprises outside the accommodation sector- to shops, pubs, restaurants, garages, train operators, museums, cinemas and theatres etc. These enterprises in turn support other businesses across a wide range of sectors. Tourism South East is supportive of this excellent strategy. We hope that our comments have been useful.	Noted
Trenport Investments Ltd (Vincent & Gorbings – R Lewis, on behalf of Mr C Hall)	Strongly Disagree with Paragraph 3.18 (re: Cliffe) - The paragraph suggests that Cliffe has no obvious advantages over Lodge Hill and advises that the SLAA effectively concludes that the overall conclusion of the evaluation, in so far as it relates to an expanded Hoo option including Cliffe, was that there were a number of "high negative impacts compared to Lodge Hill". However, this statement overlooks a significant advantage of Cliffe over Lodge Hill, in that Cliffe is an existing long established settlement with an established range of existing services and facilities, including primary school, health centre, village hall, shops and public houses, sports and recreation facilities, as well as public transport services etc and is therefore already a sustainable location for development. Lodge Hill on the other hand would be starting from a lower base in terms of services and facilities. Unless new services and facilities are to be provided by the development on day one, which is very unlikely, Lodge Hill would be a much less sustainable location for development, with less sustainable travel patterns being established at the start of the development which would be difficult to change later on. We have reviewed the evaluation set out in Section 5 of the Core Strategy Issues and Options Report (July 2009) and again query whether the evaluation, particularly for options 1 and 2 was option get very similar comments but the expanded. Hoo option has existing services whereas the Lodge Hill option does not, so there should be a clear distinction in favour of the expanded Hoo option. However, the summary assessment gives the impression that	In identifying Lodge Hill as the location for a new settlement, Medway Council has given the greatest weighting, in its assessment of alternative strategic options, to the national policy in paragraph 36 of PPS36, of considering housing provision on surplus public sector land and giving priority to the development of previously developed land. These policies are reflected in the South East Plan policy CC9, which requires Government Departments to undertake strategic reviews of their land with a view to disposal, taking into account the need to bring forward land for housing. This has already taken place at Lodge Hill and the process of land

	the opposite is the case. Also, there is no assessment of the impact of the options on existing services. With the same examples, the Hoo Expansion option may help support existing rural services, whereas Lodge Hill may compete with them leading to a decline elsewhere, and making the existing villages less sustainable as custom is drawn away from them. If this evaluation had been more balanced it should have shown that Option 1 would make less efficient use of existing infrastructure and would require more substantial investment in new infrastructure, and significant disruption of existing networks, whereas Option 2 could make more use of existing infrastructure with less need for significant investment in new infrastructure, although some upgrading may be required, which will give rise to some disruption to existing networks. Comparing the two Options would have resulted in Option 1 having a high negative impact and Option 2 having a minimal or moderate impact. Similar conclusions can be drawn for other issues in the evaluation, so in our view the basis of the exercise and therefore the conclusions are flawed and weighted in favour of Lodge Hill and the supposed ££high negative impacts compared to Lodge Hill' is not correct. In support of this we note that paragraph 4.26 of the interim sustainability appraisal refers to the significant benefits that either Extended Hoo or Lodge Hill would have in terms of the social and economic objectives, and that paragraph 4.27 states that in terms of sustainability both the Chattenden and Extended Hoo options are considered to have benefits on social, economic and environmental objectives. Though there may be a greater level of work to be done for construction to occur at Chattenden in comparison to an Extended Hoo, this could potentially, be easier due to it being a blank canvas whereas it would be likely to be more problematic trying to mesh with the existing services around the villages. The differences are not so clear cut with Lodge Hill having a clear advantage as suggested in the draft Core Strategy. We refer to the statements and accompanying plans which were submitted on behalf of Trenport Investments limited in response to the SLAA in January 2009 and April 2010, which provide further information about their proposals for land at Cliffe. A further copy of the statement and plans accompanies these representations. Further comments: Also, in commenting on this paragraph we note that the SLAA (Map 6) incorrectly identifies the land at Cliffe which Trenport has suggested is suitable for development and also query the stated reason for rejecting the sites. The area shown for site 0836 is incorrect. The actual area being suggested as appropriate for development and shown on the submitted plan lies to the west of this area, fronting Church Street. The site area shown is	disposal has been set in train. The Lodge Hill proposal also conforms with policy KTG1 for the Thames Gateway, which requires priority to be given to making full use of previously developed land. Paragraph 19.5 of the South East Plan states that the main locational effects of KTG1 and related policies will be the concentration of new dwellings, employment and services within Medway at riverside sites and to the north on Ministry of Defence land at Chattenden. (i.e. Lodge Hill). Table 11.22 of the core strategy provides a long list of services and community facilities that will be included in the comprehensive development of the new community at Lodge Hill and provided on a phased basis as development proceeds. Were substantial development to take place at Cliffe, a larger scale of services and facilities would also need to be provided there. The error in the site boundary at Cliffe has now been corrected in the SLAA.

	actually being suggested as playing fields and open space rather than development. The area shown for site 0837 is actually the area being suggested for development (southern part) and playing field / open space (northern part). Table 6 gives the reasons for rejecting the sites as it fails proximity assessment / greenfield' However, the proposals would meet the proximity criteria set out in the Council's methodology / checklist (Stage 7 of the SLAA) i.e.: Within 800m walking distance of a bus stop or railway station providing two or more services per hour. Within 800m walking distance of a convenience store, a primary school and a GP surgery. Within 30 minutes public transport time of a hospital/health centre, secondary school, employment area, town or district centre. Although we accept that much of the land is greenfield, we query whether this has been applied consistently as the land East of Church Street has similar characteristics to much of site 0520 at Hoo St Werburgh which has passed the assessment and is included in Table 1. The strategy for accommodating Medway's development needs should be reviewed on a less partial basis and a wider variety of sites provided, including Trenport's proposals for land at Cliffe, with less reliance on the proposals for Lodge Hill.	
	Medway Council considers that the weighting given to the policies supporting Lodge Hill render the need for a reassessment unnecessary.	
	The first review of the SLAA has identified a cumulative surplus of over 2,000 dwellings suitable for development up to 2028. Medway Council considers that this surplus will offset any sites, which do not come forward as a result of the recession. It also considers that the release of additional, constraint-free, greenfield sites would result in their early development at the cost of harder to develop previously developed sites and substantially undermine the whole regeneration strategy of the LDF.	Disagree with Policy CS13: Housing Provision and Distribution; Paragraphs 3.3, 3.4 and 6.3 (re: level of growth - housing) - We note that paragraphs 3.3 and 3.4 indicate that it is intended that 815 dwellings per year are to be provided and that this is based on the South East Plan. We have concerns that this level of housing will not be able to be achieved bearing in mind the current economic climate and that levels of housing completions of 815 or more have only been achieved on two occasions in the last 18 years (ie 1991/2 and 2008/9) unless a wide variety of sites is provided in terms of locations, sizes and types (ie greenfield / brownfield etc.). We also consider that there is too much reliance on the Lodge Hill development and that if this proposal does not deliver the required housing it will affect the overall level of housing provided in Medway. A strategy with a more diverse range of sites will be better able to meet the suggested housing requirement. Such a strategy should include Trenport's proposals for land at Cliffe, which is not subject to significant planning and environmental constraints, is in a sustainable location relative to existing services and facilities, and is available for development. The strategy for accommodating Medway's development needs should be reviewed and a wider variety of sites provided, including Trenport's proposals for land at Cliffe, with less

	reliance on the proposals for Lodge Hill.	
	Disagree with Policy CS31: Hoo Peninsula and the Isle of Grain, Paragraphs 11.61, 11.65 and 11.69 - We note that paragraph 11.61 advises that 'the villages face the pressure of sustaining services and facilities needed to underpin the quality of life for their residents and surrounding countryside...' We also note that paragraph 11.65 states 'in line with wider national trends, there are increasing pressures on village services and facilities, such as shops, post offices, health facilities, pubs and village halls. These services together with good public transport, are essential to the wellbeing of the communities, in order to reduce the need to travel and to sustain a vibrant quality of life...' Paragraph 11.69 advises that 'the countryside is a working environment, and villages need local employment to support village life and vibrancy of their communities. Small employment sites are part of the fabric of villages, and these need to be encouraged'. Trenport supports these statements. Policy CS31: Hoo Peninsula and the Isle of Grain advises that 'the council will seek to secure the viability of the rural communities on the Hoo Peninsula and Isle of Grain by supporting the retention and development of local services and facilities needed to sustain village life to reduce the need to travel...' The policy and explanatory text stress the importance of services and facilities for the wellbeing of village and rural communities and that the council will seek to secure their viability by supporting their retention. However, there is no indication how the council will help support the viability of the services and facilities and it is unclear how this is intended to be achieved. We suspect that the 'support' will be limited to restricting the change of use of premises used for services and facilities to other uses and that there will not actually be any positive and meaningful support for the services and facilities. As the Core Strategy paragraphs hint at, the number of rural shops and services has declined in recent years. This has been brought about by a range of factors including reductions in household sizes; greater mobility; more centralisation of services; greater competition, particularly from larger retail units located in the towns; and more recently internet shopping. These have all contributed towards reducing the number of customers/users and therefore the viability of the services. This trend will inevitably continue unless the decline in the number of potential customers / users is reduced or reversed and more potential customers provided to improve their viability. Simply avoiding this fact and simply introducing policies to protect rural shops and services is unlikely to provide support for the shops and	The issue of support for rural services will be addressed on a village by village or village group basis through the development of neighbourhood plans.

	services and help to ensure that they are viable and remain open. A decline in the number of rural shops and services will mean that the rural area will become less sustainable as residents are forced to travel further for services, usually by car. One of the most effective and best ways to protect rural shops and services and help maintain or improve their viability would be to accommodate more housing and employment at appropriate rural settlements as this would give rise to more potential customers and more spending power to support the local businesses and services. One village which we consider would be appropriate for accommodating some residential development to support local services and facilities would be Cliffe (see representations on other policies for further information). Unless this difficult issue is properly addressed there will inevitably be a continuing reduction in the level of services and facilities in rural villages, such as Cliffe, and the 'support' offered by the current policy will do little, if anything, to address the decline, which will continue, making the settlements less self-sufficient and sustainable than they are at present. The explanatory text also advises that small employment sites need to be 'encouraged'. This statement is supported, assuming that it refers to new small employment sites as well as existing employment sites. If it only relates to existing employment sites Trenport would object because this interpretation would be too restrictive and in order to maintain local employment to support village life and vibrancy there is a need for a variety of sites suitable for a range of uses which need to be located in rural areas or would serve rural areas and provide local employment opportunities.	
	In order to address this issue and halt the reduction in rural services and facilities the LDF and this Core Strategy should permit some residential and/or employment development in appropriate rural villages (such as Cliffe), which have a role as rural village service centres. This would require more than just a slight modification to policy CS31 but would require a rethink of the strategy for accommodating the housing and employment needs of Medway and the distribution of housing and employment across Medway, with a proportion of the housing and employment being allocated to suitable rural settlements. However, policy CS31 should be modified to add the following (see underlined text): "The Council will seek to secure the viability of the rural communities on the Hoo Peninsula and Isle of Grain by supporting the retention and development of local services and facilities needed to sustain village life and reduce the need to travel and by allocating land for housing and employment in appropriate locations in suitable settlements, where this would	The issue of support for rural services will be addressed on a village by village or village group basis through the development of neighbourhood plans.

	help support local services and facilities. It will work with local communities to prepare and implement village plans and other initiatives in order that they can become more self-supporting and can respond to local needs and changing circumstances, including identifying possible locations for housing and employment development and the scale of development which might be appropriate ...etc	
	Strongly Disagree with Policy CS32: Medway Valley & Paragraph 11.76 - We note that paragraph 11.76 refers to the proposed Medway Crossing that will link Halling and Wouldham. The proposed bridge, which has the benefit of planning permission, was allocated in the adopted Medway Local Plan and is shown on the Proposals Map (Policy T20). The importance of the new crossing should be recognised in the Core Strategy. Trenport Investments is committed to providing the bridge in connection with the Peters Village development, which is a strategic development in the Medway Valley. Although it is located in Tonbridge and Malling Borough it is very close to the boundary with Medway Council. The LDF (including Core Strategy) should continue to maintain the Council's commitment to the proposed crossing in accordance with the current adopted Local Plan.	Given that the proposed river crossing now has planning permission there is no need to refer to it in the core strategy.
	The following should be added to policy CS32: Medway Valley: The council maintains its support for the proposed Medway river crossing (A228 to East Bank of the River Medway) which will serve the Peters Village development which is of strategic importance for the Medway Valley.	Given that the proposed river crossing now has planning permission there is no need to refer to it in the core strategy.
	Policy CS33: Lodge Hill – In responding to the Core Strategy Issues and Options Report (July 2009) Trenport stated that it did not support the option for a new settlement at Lodge Hill. The Expanded Hoo option, modified to include Cliffe, was supported, for the reasons given in response to questions 52 and 94 of the submission (see below). Alternatively an option was suggested which involved the expansion of key rural service centres, including Cliffe. Response to Question 94: 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 propose 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	See preceding responses. The SLAA review has identified 177 sites suitable for residential development and the Council considers that this provides a range of sites which will meet Medway's housing requirements up to the end of the plan period.

	making them less sustainable. Response to Question 52: 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. This position is maintained. Notwithstanding Trenport's concerns at the overall strategy we query whether the 4,600 dwellings suggested at Lodge Hill could be completed in the plan period (i.e. by 2028 or an 18 year period). This would mean an average of 255 dwellings per year being completed. Although this number may be achievable during a boom period in the middle stages of development they would be unlikely to be achieved during times of economic downturn, as at present, or during the start-up period of the development, when completions are likely to be significantly less. There is inevitably likely to be another downturn in the 18 year period bearing in mind the cyclical nature of the property market. Overall we consider that the development programme is too optimistic and that this number of dwellings is unlikely to be achieved. The policy of concentrating most development at 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 could complement the proposals for Lodge Hill would be Trenport's proposals for Cliffe. We refer to the statements and accompanying plans which were submitted on behalf of Trenport Investments limited in response to the SLAA in January 2009 and April 2010, which provide further information about their proposals for land at Cliffe. A further copy of the statement and plans accompanies these representations.	
	Reference made to previous SLAA Call for sites submissions:	Noted.
University for the Creative Arts	UCA might want to locate to a site other than the Interface Land. Therefore, the Strategy should indicate that other specific sites in Medway would be suitable for	Neither the University for the Creative Arts nor any other

(John Sharkey Associates)	higher/further education use. Would like a meeting with the Council to discuss this further.	university have put forward other specific sites for consideration as locations for university or other higher education development. A meeting would be welcomed.
	Infrastructure Delivery Schedule: UCA is disappointed that there is no reference to any development (especially the proposed Lodge Hill settlement) needing to contribute to the higher and further education sector.	Neither the University for the Creative Arts nor any other university have put forward other specific sites for consideration as locations for university or other higher education development.
	Surprised that there is no reference to the creative industries in the Core Strategy vision or policy CS28.	The University for the Creative Arts is specifically included in policy CS20. If a site specific proposal comes forward after the core strategy has been adopted, an allocation could be made, if appropriate, in the Site Allocations and Development Management DPD.
	Further references should be inserted within the text regarding education.	This representation is too broad and does not identify where such amendments should be made.
Viridor (Entec)	Waste management is not always confined to authority boundaries and should be considered as a cross border issue in spatial planning terms.	Agreed and it is considered that the text reflects this.
	Would like a definition of the types of environmental technologies to be encouraged and how this links with waste management uses.	These are evolving rapidly and it would not be appropriate to employ a narrow definition.
	Medway City estate should be regarded as a suitable location for environmental technologies.	Policy CS23: Waste Management does include Medway City Estate as a preferred location.
	Any requirement for 20% on-site renewable energy generation is unlikely to be viable if it is in situ.	View noted.
	Policy CS4 should encourage low carbon energy sources alongside renewable	What is meant by 'low carbon'

	energy sources.	energy sources is not defined. Conventional energy generation should become increasingly 'low carbon' through efficiency improvements. While more carbon neutral and carbon free technologies slowly displace fossil fuelled generation.
	Policy CS17 should recognise Medway City Estate as also being a preferred location for energy and environmental technologies.	The policy is generally permissive; Grain and Kingsnorth are mentioned given that they have significant opportunities to develop. Other more 'mature' locations like the Medway City Estate are not excluded from being an area that has potential for energy and environmental technologies.
	Policy CS23 should give a clear definition for both 'preferred location' and for 'waste infrastructure safeguarding'.	Technology will change with time; it is not appropriate to identify 'preferred' locations or 'safeguard' existing sites. This would pre-judge the situation; also it is not a role the Medway Core Strategy to identify particular sites for waste infrastructure safeguarding. That would come later in a site allocation DPD.
	It is not clear how specific site allocations for waste management will be brought forward over the plan period.	There are no specific site allocations for waste management technology. This would be the role of a site allocation DPD.
	If the Council decides to include strategic waste management sites in the Core Strategy then Viridor's existing Pelican Reach site should be listed.	Noted.
	Any cross-river link to Medway City Estate needs further investigation to ensure potential conflicts are addressed between pedestrians and cyclists and existing	The Local Transport Plan3 has this linkage as a long term aspiration..

	users of the Estate, which is industrial in nature.	The factors listed would be fully assessed at the time a scheme is being developed.
Respondent (Individual) Geoff Orton	One major concern is that the scope of the proposed Development Strategy for the Lodge Hill /Chattenden site gives insufficient protection to the important SSSI sites in this area and rather than being the “exemplar” of Sustainable Development that is intended by Medway Council, damage will be caused to the wildlife of this exceptional site, in particular to breeding Nightingales, which will reduce the “Exemplar” value of the development. Once ancient woodland is destroyed, it cannot be simply replanted to achieve the original biodiversity and is therefore not “sustainable” and not available to future generations.	The buffer zone imposed between the SSSI and the development should provide sufficient protection to the species listed. Also the Medway Core Strategy will have policies to preserve and enhance natural assets (Policy CS6) and specifically for the development at Lodge Hill (Policy CS33) that will have to coincide rather than conflict. Indeed Policy CS33 seeks to enhance biodiversity within the site and in its close proximity. The area that is planned to be lost to development has recognised habitat value but would be replaced with an area of equal value. The masterplan for the development will detail this more comprehensively.
	Suggests that much greater emphasis is given researching and incorporating proven buffer zones between the developed and Natural areas even if this means a reduction in the area allocated to housing and other development.	The site masterplan will detail how the natural assets of the site and its immediate surroundings will be protected.
	I feel that Medway Council is missing an opportunity for maintaining protection of green space in Medway (in planning terms) by retaining the concept of ALLIs (Areas of Local Landscape Importance). From recent government announcements, it seems that there is no real case for disbanding the concept of ALLIs in Medway.	The countryside is protected for its own sake. See also responses to other parties on this issue.
	Re Chapter 12, I'm sure you picked up the error in “Implementation” in the heading.	Noted.
	Glossary of Terms could benefit from the inclusion of LNRs, ALLIs and differentiation of “Country Park” and “Countryside Park” which appears in the “Lodge	Paragraph 5.58 explains the meaning of LNRs or Local Nature

	Hill Key Development Principles” diagram between Wybornes Wood and Lodge Hill Wood. Not everyone might understand these terms.	Reserves and there is no need to repeat the explanation in the Glossary of Terms. The core strategy is not proposing to include Areas of Local Landscape Importance and there is therefore no need to explain their meaning. It is not intended that the land at Lodge Hill will be a country park as defined by statute but it will be designed to meet the specific requirements of the new settlement and its surroundings. Hence, the term countryside park has been used.
	Policy CS8 – Open Spaces, in view of this good policy presumably no part of Temple Marsh Open Space will be taken for the planned housing development.	Temple Marsh is the subject of an outstanding planning permission for housing and other development and development is therefore expected to proceed.
John Hill	Policy CS24 – Transport Movement, assumes that given the policy both Strood Pier and Sun Pier, Chatham will fairly soon be re-opened.	The council manage Sun Pier but it is owned by the port authority and managed by the Council. The council have no immediate plans to replace the pontoons that were required due to failure some time ago. Strood Pier is owned by the port authority and effectively removed as a functioning pier some time ago. There is no intention on bringing this structure back into use. River taxi operation does not appear to be viable in the short term. Redevelopment of Chatham centre may well increase the

		demand for this type of transport service over the life of the Core Strategy.
	Policy CS27 – Rochester, in view of this good policy presumably work will be carried out in the city centre conservation area to bring it up to a satisfactory standard.	The Council has done assessment work on the area and has adopted a Historic Rochester Conservation Area Management Plan 2010. This plan will be the instrument by which identified problems within the conservation area can be addressed.
Owen Sweeney	<u>1st letter:</u> These comments are from a local Medway resident and a member of Medway Countryside Forum(MCF). As such, I should like them to be treated as complementary to the separate submission on this draft Core Strategy by our Chairman, David Murr, on behalf of the Forum as a whole. For an ordinary resident, it is very difficult to comment adequately on a lengthy and important document - which will greatly affect our lives and those who follow us - in such a short timescale and in a season when we are all so busy (a few extra days' grace is virtually meaningless). So these comments will be confined to three topics viz. Areas of Local Landscape Importance (together with Protected Open Space), the proposed Lodge Hill/Chattenden development and Motney. ALLIs Policy CS7. Over recent years our Forum has stoutly defended the existence of ALLIs, particularly for Medway, and for very good reasons. Attached is a copy of comments contributed on-line to the Issues and Options consultation Qu. 67 which still stand as a convincing justification for the continuance of ALLIs in Medway. Please note the decision of the Inspector at the last Kent&Medway Structure Plan Examination in Public who, against opposition, agreed with our case and accepted	Noted. Noted. There was a normal six week consultation period for a core strategy DPD. Further time to respond due to personal circumstances was granted to enable a response to be made as an extra dispensation due to personal circumstances. Noted. Paragraph 25 of PPS7, states that local landscape designations should only be maintained where it can clearly be shown that criteria based policies cannot provide the necessary protection. No evidence

has been provided of this and therefore the local landscape designations will not be retained. The Kent and Medway Structure Plan has been abolished. To remain in accordance with national planning policy the retention of local landscape designations is not possible; unless a combination of landscape character assessments and criteria based protection policies do not afford the necessary protection. No evidence has been presented that this will not occur. The intention to protect is still as strong as hitherto, the mechanism has changed, as required by national planning policy. The Landscape Character Assessment as adopted in March 2011 is a strong tool. Criteria policies should ensure the same level of protection to Medway's rural areas.	our amendment for their retention in that plan. And we draw your attention to our Cabinet's support for them in a late amendment to the introduction of the more recent Wildlife, Countryside and Open Space Strategy. We respectfully ask our Council to retain Medway ALLIs (and Protected Open Spaces) in Policies CS7 and CS8 as valid and delineated protection designations in the Core Strategy and hence strongly object to their removal in this Pre-Publication Draft. The reason we are so disappointed with this draft's position (on ALLIs) is that it recognises early on at para.1.24 that there are likely to be changes in planning policy and particularly under the "localism" agenda. And at para. 5.67 that "the Coalition Government has indicated that it may re-introduce local designations". Given that there are no longer any top-down housing target figures, and given the greater freedom which this gives to an area like Medway to make decisions about its own future, we do not follow that this draft should pre-empt the removal of ALLIs when - as the attached submission argues - Medway, of all areas in Kent, desperately needs to protect its remaining green lungs, buffer zones, urban green fringes, "separations". (In passing, we are also troubled by a paper, we understand, to the Cabinet at this time on Landscape Character Assessment; we hope that its acceptance, during this consultation period, would not in any way preclude the continuance of ALLIs.) The previous para. gets to the heart of the matter for those who wish to retain ALLIs. We have heard for some time from Council representatives that protection of these existing green areas will be as good, if not better, under the new arrangements and policies. We beg to differ. All we can see is a weakening of the delineations leading to inevitable encroachment, "trimming" and "enabling" developments precisely because of the removal of that clear act of designation which was the strength of ALLIs - as experienced at the Public Inquiries which debated the Medway Local Plan and also quoted as recently as this year by an Inspector ruling on a case at Cliffe. The only outcome of this change in policy is that our remaining green lungs will be increasingly vulnerable and under greater pressure than hitherto since developers will recognise an increased and easier opportunity to encroach onto these currently protected areas. We therefore ask our Council to think again, please,

	and retain them. Lodge Hill/Chattenden Policy CS31 and Table 11.16 and Policy CS33 and Figure 11.4. MCF have written two important letters dated 4 October 2010 and 18 November 2010 to Land Securities on this proposed development and copied them to the MOD, local MPs, local party Leaders and various parts of Medway Council, including planning. They summarise our position and show how consistent we have been in our advice to our Council over recent years. There is, of course, a connection between the case for ALLIs generally and our views on this particular development. In truth, there should not be any development at Lodge Hill/Chattenden because of all the sites discussed in the Issues and Options process, this ALLI is undoubtedly the richest in biodiversity terms, rather ironic in this UN International Year of Biodiversity. The pressure on the people of Medway to accept this development was unreasonable, not least because all of our remaining green lungs considered in that paper should have continued to enjoy protection in line with the Local Plan. Sadly, it was in effect verging on a form of "blackmail" on the people of Medway and now that there is no longer a specific housing target laid down by Government, it is up to our Council to reconsider its support for this excessive development.	Noted. The ALLI in the Lodge Hill area is, like others across the area, is not an ecological designation. The landscape importance is understood and the adopted Medway Landscape Character Assessment identifies the whole area as Chattenden Ridge, which includes the SSSI and the area covered by the redevelopment masterplanning work. The ALLI designation does not preclude development, given that the central 'white' undesignated area is PDL, and surplus to MOD requirements, it should be seen as a developable area. In order to ensure a sustainable pattern of development a certain 'critical mass' has to be achieved. A dwelling number of some 500 with a population of approximately 12,000 plus are anticipated to give this magnitude that will ensure the services and

infrastructure (such as potentially district heating, waste recycling and medical and retail services etc) are justified. Therefore there would be take up of some of the land currently designated as ALLI and protected open space. However, to ensure biodiversity is largely unaffected none of the SSSI areas will be directly affected and a buffer zone between these areas and the new development will be imposed. Also, those areas that are potential habitat but not SSSI and will be lost due to development are to be replaced with new habitat with equal value if not area. The masterplanning of the site will have to accord with national planning policy advice contained in PPS9: Biodiversity and Geological Conservation in that habitat should be conserved enhanced and restored.	
Noted.	If against this renewed "localism" freedom from Government, our Council is intent on some development at Lodge Hill, it is vital that such development is less extensive and confined to the area E/NE of Lodge Hill/Chattenden Lane ie within that element of the MOD-fenced and hitherto private area, inaccessible to the general public both by entry and in terms of a visual amenity. It is not right to build on the biodiversity-rich areas to the W/SW of that road which is currently protected by the ALLI and POSs designations - and should remain so protected (see above). We should like to explore this proposal against deeper values. Given the popularity of programmes like Springwatch, Autumnwatch (which recently featured the UK
The buffer zone imposed between	

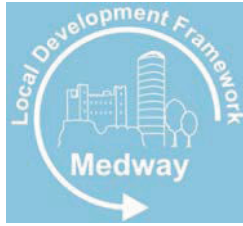
decline of the nightingale), any David Attenborough, Andrew Motion on the delights of the nightingale in Birds Britannia etc, why is it that our Council is so immune to responsibility for these treasures? In that this is a nationally important site for nightingales, one of the top five in Kent itself the top county in UK, it is barely an exaggeration to wonder if this is not Governmental (MOD) and/or municipal (Medway Council) vandalism in terms of the destruction of and damage to such a beautiful, iconic and fast declining UK species. But we all know, don't we, that it is not only the nightingales that will be sent packing for such scarcities as the turtle dove, bee orchid and yellowhammers etc will also suffer from this intrusive and excessive development.	We are sorry to say this but we are beginning to wonder if Medway Council's recent mind-set is such that to destroy an SNCI/LWS level habitat for reptiles like slow-worms and lizards (Copperfields Wildlife Site) for housing; the infilling of the last remaining freshwater lake and reedbed in urban Medway with its stunning biodiversity (on Medway City Estate) for un-needed warehousing when "To Let" signs abound; the plundering of designated Protected Open Space at Temple Marsh against the Local Plan, again for housing; the riding rough-shod over an ALLI for the Wainscott Training Ground; all have become so common-place that such dreadful losses seem no longer to have the capacity to concern our Councillors and Planners. All attempts by MCF members and many other residents, whether in groups or individuals, to influence their thinking are routinely disregarded.	the SSSI and the development should provide sufficient protection to the species listed. The Medway Core Strategy will have policies to preserve and enhance natural assets (Policy CS6) and specifically for the development at Lodge Hill (Policy CS33) that will have to coincide rather than conflict. Indeed Policy CS33 seeks to enhance biodiversity within the site and its close proximity. View noted. Continuing work on the Lodge Hill masterplan is being done collaboratively with Natural England and others to ensure that full account is taken of the SSSI and all other areas of nature conservation within the site and in areas adjoining.

	would also prevent free movement of other important mammal species and moats would be ineffective as the nightingale breeding sites are fragmented. And it is arrogant of humans to claim that we can always cajole species to breed where we want them to breed. Because nightingales in UK are contracting into the SE corner, all present and potential sites will be needed. Open our eyes and ears, please; we have a biodiversity gem at Lodge Hill/Chattenden and we are honoured by the nightingales' presence. Let's preserve it, not destroy it. It is very rare for the Kent Ornithological Society to involve itself in planning matters, the only recent precedent being the Cliffe Airport proposal. Yet this reputable organisation with hundreds of members has come out against the intended damage to the nightingale sites in a letter to Land Securities. 14. Motney Policy CS6. We ask for the inclusion of Motney Reedbed and Motney Marshes at para.5.59. These were in our Local Plan 2003 and given their biodiversity richness even as compared to other proposed LNRs we ask that they are included here too, please.	The successful designation of a LNR greatly depends on ownership. Medway Council do not own the land and the owners apparently are fully engaged with managing the area as part of their wildfowling activity. The authority is looking at allotment standards across the area in terms of protecting the existing stock and setting standards for new development. With regard to Lodge Hill the development brief for the site will set standards for the development. The area based policies address the Hoo Peninsula, particularly CS31: Hoo Peninsula and the Isle of Grain. Figure 10 1 River Medway will show the peninsula's relationship with the R.Thames. The masterplanning of the new settlement at Lodge Hill will include
Vivienne Parker	There is no land use provision for extra allotment sites anywhere in Medway, and especially at Lodge Hill	
	The River Medway has been given its own chapter, but not the Thames. What about Cliff, All Hallows and Grain?	
	Preference should be given to Chattenden rather than Hoo for new health facilities, especially given development at Lodge Hill.	

		health care to ensure the area has adequate provision. The existing residents of Chattenden will be able to access these facilities. The population of Hoo St Werburgh will continue to enjoy their level of existing of health care provision. View noted.
	Strongly disagree that Chatham should be the regional hub in the centre of Medway. University students are closer to Gillingham.	
	Chatham should be more tourist and employment orientated.	That is what is sought in the strategy for Chatham.
	Another risk with Chatham is that it is at increased risk of flooding.	Noted and this is dealt with in the core strategy.
Yelena Sherwood-Jenkins	Suggested measures for attracting more visitors to Rainham Shopping Centre.	Noted.
Faye Murison	Strongly Agree with Policy CS31: Hoo Peninsula and the Isle of Grain.	Noted.
	We have a piece of Land at the Isle of Grain Suitable for 5 + Dwellings would like to be Considered for Building in Your Plan. 2028. (We do not Understand what your Policy is all about we would like a representative to explain to us in more detail as everything seems confusing to us)	Officers would be pleased to have a meeting to explain the core strategy and discuss the proposal at the Isle of Grain.
Brendan Weaver	Disagree with Policy CS17: Economic Development & Appendix D.	Noted.
	The projection of employment floor space included in Appendix D seems somewhat hopeful for the next couple of years. I'd suggest that this projection is revised to present something more realistic. 220,000sqm for floor space in one year, for context, is equivalent to something like 20 Tesco Extras opening in Medway in one year - unrealistic in any economic climate.	CS17: The job target is explained in paragraphs 4.2.28 of the Medway Employment Land and Review Consolidation Study, 2010. This states that in Medway, a key objective is to increase employment, especially higher value employment, reduce out commuting and improve economic activity rates to levels closer to the South East average. Baker Associates analysis has lead to the conclusion that planning for lower economic growth would not deliver

		the strategic objectives for the wider area and undermine sustainability objectives in Medway and ultimately be self fulfilling by limiting supply and undermining potential economic growth. Consequently, a high growth scenario was adopted by the study, consisting of natural change, (5,600 jobs), increased economic activity (8,600 jobs) and reduced out-commuting (7,300 jobs). (see paras. 4.2.48 and 4.2.49).
Unknown	Disagree with Policy CS21: Conventional Energy Generation. E. On announcement on Kingsnorth has thrown this one up in the air	Noted.
Dr M C Barbara	Policy CS30: Rainham: Residents of Mierscourt Road, we have been trying to have our little parcel of land changed from rural to urban since 2002. Although we have made many representations in various forms, we never seem to get to the core of the matter and the problem solved. We find that the programmes are often couched in language that we are unfamiliar with as it is technical and relevant to your area of work only.	Noted The opportunity to change the status of the land is limited given that it is outside the defined boundary of the extant urban area. It is a rural location, and as such is protected from development for its own sake. Green field releases for development are not required given the substantial amount of previously developed land being available for development elsewhere in the area.
Sean Delay	No Opinion with Policy CS24: Transport and Movement; Economic Development/Transport/Sustainable Communities.	Noted.
	Medway City Estate: This site is practically inaccessible, if one does not have ones own transport' (usually defined as a car). The bus services are very patchy, and, in any case, will get trapped in the traffic jams at the limited exit points from the peninsula; This geography, having a limiting effect, on the traffic flow, at this location. Since the Medway City estate is in the centre of the towns, geographically, the poor pedestrian links are perverse. The site is unsustainable, by virtue of this,	The Council's Local Transport Plan 3(LTP3) 2011-2026 sets out a 15-year program to deliver a range of transport infrastructure improvements totalling £52.8 million in secured funding terms.

	with the associated car generated pollution, congestion, and associated risk, to other Road-Users. The provision of a pedestrian bridge, from the Gun Wharf, New Bus station site, in Chatham Town Centre would have the following effects: the easing of pedestrian access to the MCE; the reduction of vehicle generated pollution, and the associated health problems, for both car-users, and those outside the vehicles. In addition, some of the companies on the MCE might well then be able to recruit some of the long-term unemployed, in the Chatham Area, thus having a beneficial effect on employment chances, and with that, life chances, in Medway. In order to permit ship navigation, of the Medway, beyond Rats Bay, the bridge would have to be either: a. High enough for ocean-going vessels to pass beneath it b. Have a raise able centre section, in order to permit ship navigation.	This does not include a pedestrian linkage with Medway City Estate and Gun Wharf. It remains a long term aspiration.
	Â Pedestrian Access, in general: an effort needs to be made to ease pedestrian use of the urban environment. For example, the configuration, of fencing, at traffic islands, in Chatham Town centre, which obstructs pedestrians, which makes their journeys less convenient. The stopping up of links between adjoining areas, making pedestrians walk a circuitous journey; these all need to be tackled. A practical example: ASDA, at the Bridgewood Roundabout; there is an unofficial short cut, into Taddington Valley, from the corner of the car park. There should be an official path, so that those wishing to walk to the store, from adjoining areas can do so. Agree with Policy CS25: The River Medway and 10.11 Marine Leisure. Whilst supporting the general thrust of the policy, I would like to remind the Council that some of the river users are afloat in rowing boats. There is no mention of this form of leisure use but it provides a real opportunity for those who cannot afford motor or sailing boats to access this wonderful resource in the area. In particular we would wish to preserve our access point to the river, on the slipway at the southern end of Rochester Esplanade and trust that the assurance that such facilities will be "generally" preserved will include those of Medway Towns Rowing Club. Please add rowing to the list of leisure.	The ongoing reconfiguration of Chatham has greatly reduced pedestrian confinement. .
Liz McVeigh		Noted.
		Slipways and launching points are given protection in the core strategy and 'saved' local plan policies.
David Murr	CS24 & Paras 9.20-9.21 – There should be a specific reference supporting the continued long-term operation of Rochester Airport as a flying facility, and recognising its potential value for tourism, light business aviation and promoting interest in Medway's aviation heritage.	The core strategy supports general aviation at Rochester Airport.



Medway Local Development Framework:

Core Strategy

Interim Diversity Impact Assessment

August 2011



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1. Medway Council's approach to the LDF and Diversity Impact assessment.

- 1.1 The Race Relations (Amendment) Act 2000 introduced a requirement to conduct race impact assessments. By law all policies and major service changes that could have an impact on black and minority ethnic (BME) groups need to be assessed.
- 1.2 Since then, similar statutory duties have been introduced in relation to disability and gender and the potential barriers to people having fair access to council services or employment.
- 1.3 The legal duties on local authorities¹ currently cover race, disability and gender only. However, the Diversity Impact Assessment (DIA) process at Medway Council has been designed so that it can consider other groups in the same way. Medway will identify impacts for customers due not only to their racial/ethnic group but, also, to their gender, or disability and asks about possible discrimination due to sexual orientation, age, religious belief and other factors.
- 1.4 The Core Strategy is the key document in the Local Development Framework (LDF) as it sets out the overall vision and strategy for place making and will provide the context for all subsequent Development Plan Documents and their policies. It sets out what Medway wants to achieve in different parts of the area to 2028 and how it will get there.
- 1.5 The information used to inform the Core Strategy is formed from two key elements, participation and studies. These are collectively referred to as the evidence base. This has included a number of background studies, community consultations, working with the Local Strategic Partnership, community groups and developers and agents.
- 1.6 The views of the local community and others who have a stake in the future of the area have helped influence the spatial strategy and vision set out in the Core Strategy, particularly through the Sustainable Communities Strategy. To ensure that participation has been constructive, the principles of effective community engagement in planning have been followed. This has meant that at each stage during the progress of the Core Strategy engagement has been continuous, proportional and appropriate².
- 1.7 To help produce an Equalities Impact Assessment an additional Code of Practice has been produced by the Equality and Human Rights Commission³ that details the procedure to enable a Local Authorities to

¹http://connections.medway.gov.uk/index/yourcouncil/businesssupport/8315.html/13053/10960/38810/38811.htm#downloadable_guidance_forms

² Worthing Borough Council EIA April 2010.

³ http://www.equalityhumanrights.com/uploaded_files/PSD/equality_impact_assessment_guidance_quick-start_guide.pdf

carry out an Equalities Impact Assessment that addresses the needs of all diverse communities.

- 1.8 There are two main sections to the procedure, the first being the Screening of relevant policies and once assessed if they do have an impact on BME groups, a full assessment.

Screening

- 1.9 A screening process is used to: identify the main aims of the policy; collect information and decide if the policy is relevant. Authorities should work on the assumption that all proposed policies are relevant to the race equality duty, until it has had a chance to screen them. Any changes a local authority makes to a policy should also be screened, to see if they have implications for meeting the duty. If a policy is relevant then a full assessment should be carried out on its impact on BME groups.

2. Medway Council's approach to the LDF and Initial Screening of Policy

- 2.1 Before any policies were formed or even considered an initial screening of issues took place in the spring of 2009. This included the following matters:

- Housing
- Retail
- Neighborhoods and Town Centres
- Sustainability and Climate change

- 2.2 Any race equalities relevance

At this early stage owing to the very general areas of possible policy under consideration, none of the topics could be assessed to have any direct race/equalities relevance. Nevertheless, key priorities and sustainability issues were put together using the documents contained in table 2 of the SAR⁴. This document was taken to the Advisory group of the Local Strategic Partnership who confirmed that subject to a few minor amendments, the Scoping report could go out to consultation to the bodies listed in Annex E1 of PPS12⁵. In the Scoping report a number of key documents were considered that relate to equalities and diversity matters. These included:

PPG3 (Housing): Meeting the housing needs of the entire community; and creating mixed communities

PPG17 (Planning for Open Space Sport and Recreation): Promote Social inclusion and community cohesion.

PPS1 (Delivering Sustainable communities): Ensuring development supports existing communities.

Sustainable Communities: Building for the Future: To ensure all social tenants have a decent home by 2010. To improve conditions for vulnerable people in private accommodation.

⁴ <http://www.medway.gov.uk/pdf/sustainability%20appraisal%20scoping%20report.pdf>

⁵ Office of the Deputy Prime Minister 2004 Planning Policy Statement 12 : Local Development Frameworks <http://www.odpm.gov.uk/index.asp?id=1143847>

Securing the Future: UK Sustainable Development Strategy: Social progress that recognises the needs of everyone. Reducing the level of social exclusion.

Bringing Britain together: A national strategy for neighbourhood renewal: investing in people, not just buildings; involving communities, not parachuting in solutions; developing integrated approaches with clear leadership; ensuring mainstream policies really work for the poorest neighbourhoods.

A new commitment to neighbourhood renewal — national strategy action plan: In all the poorest neighbourhoods, to have common goals of lower worklessness and crime and better health, skills, housing and physical environment. To narrow the gap on these measures between the most deprived neighbourhoods and the rest of the country.

For a full list of these documents and objectives see figure 4 of the SAR⁶.

3. Collection of Data and the Issues and Options Report

- 3.1 Through the collection of baseline data and examination of sustainability issues, a series of key issues were highlighted. In addition, discussions were held with external organisations and Medway Council officers to help to identify potential issues and options. These formed the basis of the Issues and Options Report⁷, which was published in July 2009 for consultation with those organisations listed within the Statement of Community Involvement (SCI)⁸. The Issues and Options Report outlined the main issues for Medway in relation to the Core Strategy and provided details of options for dealing with them. The Document contained a set of comprehensive questions addressing the main matters for consideration. In relation to community diversity and equalities matters questions were asked about Neighbourhoods, Cultural facilities, Social Care, Affordable Housing and Regeneration.
- 3.2 The above document was also accompanied by the Initial Sustainability Appraisal Report (ISAR) that sought to appraise these potential options. Each Strategic option was then assessed against the Sustainability Appraisal objectives.
- 3.3 A range of bodies concerned with race, gender, disability, age and religion were consulted such as:

Ahmadiyya Muslim Association	Age Concern Medway Ltd
Alzheimer's Society (Rainham (Kent) Support Group)	Apnar Ghar
Hindu Sabha	Ethnic Minority Forum
Kent Bangladesh Welfare Association	Frindsbury Hall Nursing Home
Kent Multicultural Community Association	Kent Association For Spina Bifida & Hydrocephalus
Kent Ramgarhia Darbar - Gurdwara	Kent Association For The Disabled
Kent Turkish Welfare Association	Kent Ethnic Minorities Disabilities Forum

⁶ <http://www.medway.gov.uk/pdf/sustainability%20appraisal%20scoping%20report.pdf>

⁷ http://medway-consult.limehouse.co.uk/portal/issues_and_options_report?pointId=794820

⁸ http://www.medway.gov.uk/sci_march_2006_statement_wl.pdf.

Medway Access Group	Kent Malayalee Association
Medway Afro Caribbean Association (Gillingham)	Kent Muslim Welfare Association
Medway Arthritis Self Help	Kent Refugee Action Network
Medway Hindu Centre	Kent Youth
Medway Mencap Society	Medway Inter Faith Action
Medway Racial Equality Council	Medway Towns Gurdwara Sabha
Punjabi International Cultural Society	Multiple Sclerosis Society (Medway Towns Branch)
Royal Association For Deaf People	Medway Ethnic Minority Forum
Showman's Guild of Great Britain	Sikh Sangat Gurdwara Association
Siri Guru Nanak Gurdwara	Sri Guru Ravidass Sabha
Strood Youth & Community Centre	Women's National Commission
Women's Aid	
Women's Support Service	

- 3.4 A copy of all the responses to the Issues and Options Report can be found at the Councils web page⁹ together with Officers responses.

4.0 Policy Formulation

- 4.1 As a result of the Issues and Options consultation¹⁰ and together with the Sustainable Assessment of the main strategic options the most sustainable option was chosen and draft policies written for the Pre-Publication Draft Core Strategy.
- 4.2 The general nature of Core Strategy policies means that their impact is wide-ranging and difficult to quantify. This is particularly so with regard to equalities matters. The significance of impacts is dependent on the location of development, as well as the magnitude and duration of those effects. Therefore, uncertainty exists in determining the precise nature and significance of some of the impacts identified for the generic policies.

5.0 Pre-Publication Draft Core Strategy (PPDCS)

- 5.1 In November through to December 2010 the PPDCS underwent its public consultation. For a full list of bodies see Appendix A. A Pre-Publication Draft Core Strategy consultation was carried out between Monday, 1st November 2010 and Friday, 10th December 2010. The results of this consultation can be seen in the Councils PPDCS Consultation document.
- 5.2 This included a range of bodies concerned with race, gender, disability, age and religion. A full list of consultees can be found in the PPDCS Consultation document. In addition to this some libraries and shopping centres had a one-day manned exhibition showing the documents and areas affected.

6. Draft Core Strategy

⁹<http://www.medway.gov.uk/environmentandplanning/developmentplan/localdevelopmentframework/issuesandoptionsreport.aspx>

¹⁰<http://www.medway.gov.uk/environmentandplanning/developmentplan/localdevelopmentframework/issuesandoptionsreport.aspx>

- 6.1 All the responses from the PPDCS consultation were examined and responses made. Any equality issues were then highlighted and amendments made where necessary. However, as with previous rounds of consultation the policies and issues that were raised in the documents were exceptionally general and related to the population in Medway as a whole. Therefore, no equalities issues were identified.

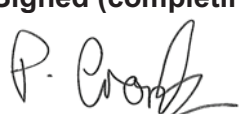
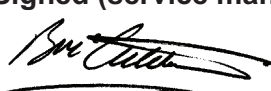
7. Diversity Impact Assessment: Screening Form

Directorate RCC	Name of Strategy Medway Core Strategy (LDF)		
Officer responsible for assessment Paul Cronk	Date of assessment July 2011	New or existing? Existing	
Defining what is being assessed			
1. Briefly describe the purpose and objectives	To provide a spatial planning framework for Medway up to 2028. Medway's Core Strategy will be the main part of the Local Development Framework. It will: • Establish the pattern of development over the next 17 years • Provide the basis for all key planning decisions • Tackle a range of issues that are relevant to local people and with the overall aim of improving our quality of life • Set out what needs to be done, by whom and how • Allocate land for 'strategic' developments • Set out a local environmental agenda • Provide the basis for significant improvements in our economic performance. A Communication Plan will provide regular information to people in Medway about progress on LDF (in conjunction with SCS and LTP3).		
2. Who is intended to benefit, and in what way?	All residents, businesses, employees & visitors. Providing an improved environment to work, live and visit, and a framework to deliver a range of different strategies together.		
3. What outcomes are wanted?	An attractive Medway that meets the needs of Medway residents. Delivery of high quality homes, jobs, shops leisure. A safe environment for all.		
4. What factors/forces could contribute/detract from the outcomes?	• Contribute • Active participation and buy in from the different parts of Medway Council. • Partnership working with outside bodies.	• Detract • Economic downturn • Medway's existing image	
5. Who are the main	Residents, Workers, Visitors, Developers, Businesses,		

stakeholders?	Community groups, Charities, Council (departments), LSP, National Organisations, Other Kent L.A.'s
6. Who implements this and who is responsible?	Development partners / infrastructure providers Medway Council - RCC

Assessing impact		
7. Are there concerns that there <u>could</u> be a differential impact due to <i>racial groups</i> ?	YES	Brief statement of main issue
	<u>NO</u>	
What evidence exists for this?	Medway Racial Equality Council was consulted. No adverse comments have been received. The views of relevant groups have and will be sought at appropriate stages of the strategy as it progresses. So far no adverse comments have been received.	
8. Are there concerns that there <u>could</u> be a differential impact due to <i>disability</i> ?	YES	Brief statement of main issue
	<u>NO</u>	
What evidence exists for this?	The Housing Strategy has elements within it that will meet the needs of disabled people. The views of relevant groups have and will be sought at appropriate stages of the strategy as it progresses. So far no adverse comments have been received.	
9. Are there concerns that there <u>could</u> be a differential impact due to <i>gender</i> ?	YES	Brief statement of main issue
	<u>NO</u>	
What evidence exists for this?	We have projected demographics for Medway covering the lifespan of the Core Strategy. The priorities as identified so far enable both males and females to benefit. The views of relevant groups will continue to be sought at appropriate stages of the strategy as it progresses. So far no adverse comments have been received.	
10. Are there concerns there <u>could</u> be a differential impact due to <i>sexual orientation</i> ?	YES	Brief statement of main issue
	<u>NO</u>	
What evidence exists for this?	The views of relevant groups have been and will be sought at appropriate stages of the strategy as it progresses. So far no adverse comments have been received.	
11. Are there concerns there <u>could</u> be a have a differential impact due to <i>religion or belief</i> ?	YES	Brief statement of main issue
	<u>NO</u>	

What evidence exists for this?	The views of relevant groups have been and will be sought at appropriate stages of the strategy as it progresses. So far no adverse comments have been received.	
12. Are there concerns there <u>could</u> be a differential impact due to people's age?	YES	Brief statement of main issue
	<u>NO</u>	
What evidence exists for this?	The Youth Parliament was consulted. No adverse comments have been received. The views of relevant groups have been and will be sought at appropriate stages of the strategy as it progresses. So far no adverse comments have been received.	
13. Are there concerns that there <u>could</u> be a differential impact due to <i>being trans-gendered or transsexual</i> ?	YES	Brief statement of main issue
	<u>NO</u>	
What evidence exists for this?	The views of relevant groups have been and will be sought at appropriate stages of the strategy as it progresses. So far no adverse comments have been received.	
14. Are there any <i>other</i> groups that would find it difficult to access/make use of the function (e.g. young parents, commuters, people with caring responsibilities or dependants, young carers, or people living in rural areas)?	YES	If yes, which group(s)? A key feature of the Core Strategy is to improve the living and work conditions of more deprived areas of Medway. Although a wide range of consultation methods are used we do not always get as much feedback as we would like. We let people know about the Core Strategy via a variety of means including the Council website, press releases, newspaper adverts/articles, exhibitions and workshops. We also use these means to keep people informed about what is happening. We also use LDF database and online consultation software to keep in touch with stakeholders. Medway Ambassadors have been used to help get the message passed on, as have a range of different community forums and groups.
	NO	
What evidence exists for this?	There are hard-to-reach groups that are more difficult to actively involve in the production of the Core Strategy.	
15. Are there concerns there <u>could</u> have a differential impact due to <i>multiple discriminations</i> (e.g. disability <u>and</u> age)?	YES	Brief statement of main issue
	<u>NO</u>	
What evidence exists for this?	The views of relevant groups have been sought at appropriate stages as the strategy progresses. So far no adverse comments have been received.	

Conclusions & recommendation		
16. Could the differential impacts identified in questions 7-15 amount to there being the potential for adverse impact?	YES	Brief statement of main issue There could be adverse impacts if there is a failure to engage with and take on board the needs and requirements of particular groups.
	<u>NO</u>	
17. Can the adverse impact be justified on the grounds of promoting equality of opportunity for one group? Or another reason?	<u>YES</u>	Please explain Regeneration activity will seek to reduce deprivation, raise skills levels
	NO	
Recommendation to proceed to a full impact assessment?		
NO	This policy change complies with the requirements of the legislation and there is evidence to show this is the case.	
Action plan to make improvements		
Outcome	Actions (with date of completion)	Officer responsible
Wider consultation to get better information upon which to plan	Seek views of e.g. Women in Enterprise and Medway Older People's partnership groups	Paul Cronk
Better quality information upon which to plan	To ensure analysis breaks down all survey data by equality strand (ethnicity, disability, gender, age etc)	Tim Stephens
Planning ahead: Reminders for the next review		
Date of next review	Prior to next stage.	
Areas to check at next review (e.g. new census information, new legislation due)	Legislation Changing demographics	
Signed (completing officer/service manager) 	Date	21 st July 2011
Signed (service manager/Assistant Director) 	Date	27 July 2011

Related Documents:



Medway Local Development Scheme

August 2011

Medway Local Development Scheme August 2011

1. Introduction

- 1.1 This, the latest revision of Medway's Local Development Scheme, came into effect on 2 August 2011. In effect, it sets out a summary project plan that guides the preparation and review of the Local Development Framework – the long-term spatial plan for Medway.
- 1.2 The Medway Local Development Scheme first came into effect in April 2005. It was subsequently updated in March 2007, then in September 2008 and again in December 2009.
- 1.3 The detailed reasons for this update of the Scheme are set out below.

2. Background

- 2.1 The Planning and Compulsory Purchase Act, 2004 and associated Regulations¹, requires the council to prepare and maintain a local development scheme (LDS). It must identify the local development documents that will be prepared over the next three years as part of the local development framework (LDF). It must also set out the timetable for the preparation and review of these documents.
- 2.2 Local development documents, with one exception, will contain the Council's policies and proposals relating to the development and use of land in Medway. The exception deals with public participation in the plan making process and this is called the Statement of Community Involvement (SCI). Medway's SCI was adopted in December 2006 and was revised in August 2011.
- 2.3 Local development schemes have three main purposes:
- To inform the public of the documents that will make up the local development framework and the timescales they can expect for the preparation of these documents.
 - To establish and reflect council priorities and to enable work programmes to be set for preparation of the documents.

¹ The 2004 Act was partially amended by the Planning Act 2008. The 2004 Town & Country Planning (Local Development) (England) Regulations were partially amended by the Town & Country Planning (Local Development) (England) (Amendment) Regulations 2008.

- To set a timetable for the review of the documents once they have been prepared.

2.4 They must specify:

The documents that are to have the status of what are called local development documents (LDDs).

- The subject matter and geographical area to which each document relates.
- Which LDDs are to be development plan documents.
- Which LDDs, if any, are to be prepared jointly with one or more other local planning authorities.
- Any matter or area in respect of which the authority has agreed (or proposes to agree) to the setting up of a joint committee with other local planning authorities, and
- The timetable for the preparation and revision of the LDDs.

3. **Reasons for this Revision of the LDS**

3.1 Since the Local Development Scheme was last revised, a number of changes have occurred:

- Following the publication of the Issues and Options Report in July 2009, the Council decided to introduce an additional period of public consultation on a pre-publication draft core strategy, which set out a vision, objectives, strategy and policies for the future planning of Medway. This took place in October 2010
- The Government revoked the South East Plan, which required references to that plan to be removed or reworded from the pre-publication draft core strategy and a reassessment of the evidence base to ensure that the core strategy could stand on its own in the absence of the South East Plan policies. This plan was subsequently reinstated as a result of a legal challenge
- The delays caused by these issues took the plan programme into the “purdah” period of the May 2011 local elections and reprogramming had to take place to ensure that public consultation on the publication draft core strategy took place after that period
- The Government has introduced a system for the introduction of a Community Infrastructure Levy or CIL by each council responsible for a local development framework. This will be an important means of funding local infrastructure in the future and so the charging schedule needs to be reflected in the LDS.

3.2 Taking these and a number of other factors into account it was therefore considered beneficial to revise the Local Development Scheme.

4. Resources & Management

- 4.1 The overall responsibility for the preparation of Local Development Documents lies with the Planning Policy & Design Manager on behalf of the Assistant Director. The team responsible for the production of the LDF is the Development Plans & Engagement team under the supervision of the Development Plans and Engagement Manager. The team currently comprises five senior planners, two planning officers and a technical assistant. This staffing structure is subject to review. A temporary Project Manager has also been appointed.
- 4.2 The Council has installed the Limehouse data processing and report generating system in order to streamline the processing and production of the LDF. This is widely used in other local authorities and by Government departments and agencies.
- 4.3 Also contributing regularly to the work are the Design and Conservation team, the Integrated Transport team, Greenspaces, the Housing Strategy team and the Development Management team.
- 4.4 Other teams from across the Council also contribute and specialist consultants are used when there is insufficient expertise or capacity within the Council to carry out a particular piece of work. Where opportunities occur work is undertaken jointly with adjoining authorities.
- 4.5 Close working with the Medway Local Strategic Partnership is also of critical importance and close links are maintained with both the Partnership and a range of statutory agencies and service providers.
- 4.6 Necessary decisions, which need to be made during the LDF preparation process, are the responsibility of the Cabinet, which meets every four weeks. Submission of documents to the Secretary of State and their adoption require approval of the full Council. Medway has an eight-week cycle of Council meetings.
- 4.7 Day to day activity is managed using the following mechanisms:
- Fortnightly team meetings
 - Monthly Project Board meetings
 - Bi-monthly LDF Extended Officer Group meetings
 - Monthly LDF Advisory Group meetings (a formally constituted Cabinet Advisory Group with membership drawn from the two main political groupings on the Council).

5. Documents Covered in This Revision

- 5.1 There are two development plan documents covered in this revision:
- The Core Strategy, on which work is well underway
 - A Site Allocations and Development Management document. Work on this will commence following examination in public of the Core Strategy.
- 5.2 The Core Strategy will:
- Cover the period to 2028 as it must cover a period of at least 15 years from the date of adoption
 - Propose a Strategic Allocation at Lodge Hill, Chattenden
 - Identify broad locations for a range of strategic developments, including within the town centres and along the urban waterfront
 - Include an Infrastructure Delivery Schedule for Medway. A full Infrastructure Plan will be prepared in parallel with the Core Strategy and will inform the content of the Delivery Schedule
 - Include proposals from an indicative masterplan for Central Strood to illustrate how a town centre strategy can be taken forward
 - Replace a number of 'saved' Medway Local Plan policies.
- 5.3 The Land Allocations and Development Management Development Management document will:
- Deal with all relevant issues to carry forward the overarching policies for the area set out in the Core Strategy
 - Allocate land for a variety of land uses
 - Set out a limited range of policies to govern the effective use of land and guide detailed development management decisions
 - Replace all currently 'saved' Medway Local Plan policies not already superseded by the Core Strategy
 - Be accompanied by a comprehensive Proposals Map to replace that originally produced for the Medway Local Plan.
- 5.4 It should also be noted that the Council publishes a further document each December. This is known as the Annual Monitoring Report. It reports on key changes in the area and charts progress in preparing the LDF against the milestones set out in the Local Development Scheme.
- 5.5 Local Authorities are now required to prepare a Community Infrastructure Levy that sets out a schedule of charges to be applied to all new development to cover the provision of infrastructure. This has to be embedded within the LDF and has therefore been included in the Local Development Scheme.

6. Medway LDS: Summary Schedule

Document Number and Title	Status	Resources	Brief Description	Conformity	Key dates
1. Medway Core Strategy	Development Plan Document	Development Plans & Research Team assisted by other teams across the Council	The document will provide a spatial vision for Medway and include strategic policies and proposals, including those for waste and minerals. It will include overarching policies for specific areas within Medway	Consistent with national planning policy statements, and in general conformity with the Regional Spatial Strategy (South East Plan) [pending its abolition]	Submission March 2012 Hearings July 2012 Adoption October 2012
2. Land Allocations & Development Management DPD	Development Plan Document	Development Plans & Research Team assisted by other teams across the Council	The document will replace detailed policies 'saved' from the Medway Local Plan and allocate land for a variety of uses	Consistent with national planning policy statements, and in general conformity with the Medway Core Strategy	SEA/SA scoping June 2013 Submission May 2014 Hearings Sep 2014 Adoption Jan 2015
3. Annual Monitoring Report	Non Development Plan Document	Development Plans and Research Team	Monitors the implementation of the local development scheme and the extent to which policies in local development documents are being achieved.	Not applicable	December annually
4. Medway Proposals Map	Development Plan Document	Development Plans & Research Team	This document will illustrate the policies and proposals in the other development plan documents	With the relevant development plan documents	When DPDs are adopted

5. Community Infrastructure Levy	Non Development Plan Document	Development Plans & Research Team assisted by others	on an ordnance survey base The document will provide a schedule of charges to be applied to all new qualifying development for the provision of infrastructure	Not applicable	Preparation July 2012 Public Consultation on draft CIL Jan 2013 Examination June 2013 Adoption Sep 2013

7 Details of Local Development Documents and Timetable for Preparation

7.1 Document 1

Name of Document:	Medway Core Strategy		
Subject of Document:	The document will provide a spatial vision for Medway and include strategic policies and proposals, including those for waste and minerals. It will include overarching policies for specific areas within Medway.		
Geographical Area:	Medway administrative area.		
Development Plan Document:	Yes		
Joint Preparation:	No		
Timetable/Milestones:	Pre-Production Survey	Jan-Aug 2008	
	Formal start of continuous engagement	Dec. 2008	
	SEA/SA scoping Consultation	Nov/Dec. 2008	
	Publication of the Pre-Publication Draft Core Strategy	Nov 2010	
	Publication of the Draft Core Strategy	Aug 2011	
	Submission to Secretary of State	March 2012	
	Hearing sessions	July 2012	
	Inspector's report	October 2012	
	Adoption	October 2012	

Note: Timetable after submission subject to range of issues selected for examination

Review: Ongoing from adoption

7.2 Document 2

Name of Document: **Site Allocations and Development Management DPD**

Subject of Document: To allocate land for a variety of uses, including waste and minerals. To set out policies to inform detailed development management decisions. To replace 'saved' policies from the Medway Local Plan

Geographical Area: Medway administrative area

Development Plan Document: Yes

Joint Preparation: No

Timetable:	Pre-Production Survey	From July 2012
	Formal start of continuous engagement	Sept 2012
	SEA/SA scoping consultation	June 2013
	Publication of Draft DPD	October 2013
	Submission to Secretary of State	May 2014
	Hearing sessions	September 2014
	Inspector's report	December 2014
	Adoption	January 2015

Note: The indicated programme extends beyond the three year programme covered in this revision of the LDS. Dates are therefore indicative and provided for information only

Review: Ongoing from adoption

Chain of Conformity: With the Core Strategy

7.3 Document 3

Name of Document: **Annual Monitoring Report**

Subject of Document:	The document monitors the implementation of the local development scheme and the extent to which policies and proposals in local development documents are being achieved.
Geographical Area:	Medway Administrative Area
Development Plan Document:	No
Joint Preparation:	No
Timetable:	Preparation and adoption of report Apr-Dec annually
Review:	Ongoing annual report
Chain of Conformity:	Not applicable.

7.4 Document 4

Name of Document:	Medway Proposals Map
Subject of Document:	The document will illustrate the adopted policies and proposals in the other development plan documents on an ordnance survey base map.
Geographical Area:	Medway administrative area
Development Plan Document:	No
Joint Preparation:	No
Timetable:	Following adoption of Core Strategy and Land Allocations and Development Management DPD
Review:	Ongoing
Chain of Conformity:	Development Plan Documents.

7.4 Document 5

Name of Document:	Community Infrastructure Levy
Subject of Document	A charging schedule to be applied to all new qualifying

Geographical Area:	development to be used for the provision of infrastructure Medway administrative area	
Development Plan Document:	No	
Joint Preparation:	No	
Timetable:	Start Preparation	July 2012
	Public consultation on Preliminary Draft CIL	Dec 2012
	Consultation on Draft CIL	Mar 2013
	Consultation on Modifications	May 2013
	Examination	June 2013
	Adoption	Sept 2013
Review:	Ongoing	
Chain of Conformity:	Not Applicable.	

8. Risks and Contingencies

8.1 A number of factors could affect the programme for delivering the documents described above. The most significant of these are considered to be:

- **Staffing Changes:** The Development Plans and Research team is currently undergoing a fundamental review. It is not yet known what the effect of this will be on the programme for the local development framework.
- **Work Load:** Reduced staffing levels, both within the team and beyond, are likely to impact on the work programme. Further demands may also arise once the Localism Bill becomes law and a new tier of neighbourhood plan making is introduced into the planning system.
- **Resources:** The cost of producing local development frameworks has proved to be higher than expected. In particular the wide range of studies and surveys required to create a robust evidence base has caused difficulty for many authorities.

For example, the costs of transport modelling alone can easily reach several hundreds of thousands of pounds.

The core team producing the LDF also has to rely on significant contributions from services across the Council and from a wide range of external organisations. If staff resources are not available at the appropriate time this can impact on the planned programme.

However, with substantial progress being made with the Core Strategy adequate resources have been assembled to complete the evidence base by the end of 2011. A high level of co-operation has also been forthcoming from services across the Council and beyond.

Other strong pressures on public finances forecast over the next few years could impact negatively on the programme as set out.

- **Alignment with other plans and strategies:** Revised Government guidance and policy announcements can have significant implications for the local development framework. The Government is currently preparing a National Planning Policy Framework, which will replace planning policy guidance and planning policy statements in a more streamlined, comprehensive format. This could have a significant impact on the underlying foundations of the LDF.

As a unitary authority, the Council is responsible for preparing a wide range of plans and strategies. These have varied time horizons and review periods, so that it can be difficult to reflect all considerations into each stage of the Core Strategy's production.

- **New requirements:** Since the introduction of the LDF system in 2004 many new requirements have emerged, not all of which arise from changes in Government policy and guidance. A range of bodies, including statutory agencies, have issued their own guidance and associated requirements in relation to LDFs. This can cause considerable difficulties depending on their timing in relation to the LDF programme. In extreme case they can cause significant delays or even a repeat of key stages as well as having resource implications.

- 8.2 To manage these factors careful monitoring is undertaken of progress with LDFs across the country and of emerging material and best practice. The process being followed also closely reflects the Plan Making Manual issued by the Planning Advisory Service.

9. Saved Documents

- 9.1 The development plan documents proposed in this Scheme will eventually completely replace the previous local development plan.

- 9.2 Under the Planning and Compulsory Purchase Act 2004

(www.opsi.gov.uk/ACTS/acts2004/ukpga_20040005_en_1.htm), all Structure and Local Plan policies were saved for three years from the date of the commencement of the Act or from the date the plan was adopted, if later. As all of Medway's Local Plan policies were in force when the Act commenced, they were due to expire after three years, on 27 September 2007.

- 9.3 If there were no appropriate Local Development Documents adopted which could replace Local Plan policies, local planning authorities could apply to the Secretary of State to issue a direction to save policies until such time as they were replaced. Medway Council consequently applied to the Secretary of State to save those policies that remained in conformity with national and regional planning policies and the Secretary of State issued a direction on 21 September 2007. Copies of the direction letters are available at <http://www.medway.gov.uk/index/environment/9995.html/70194.htm>
- 9.4 The Core Strategy will identify all the policies in the Medway Local Plan, which will be superseded once the core strategy is adopted and those which will be "saved" and carried forward to be replaced by the Land Allocations and Development Management DPD.

10. Further Information

- 10.1 Further information about Medway's local development framework can be obtained from: www.medway.gov.uk/ldf or by contacting the Development Plans & Research Team:

Address:
Development Plans & Engagement Team,
Regeneration, Community & Culture,
Medway Council,
Gun Wharf, Dock Road,
Chatham, Kent ME4 4TR

Telephone: 01634 331629

Email: ldf@medway.gov.uk or
localdevelopmentframework@medway.gov.uk

- 10.2 More general information about local development frameworks and the planning system can be found at:
<http://www.planningportal.gov.uk/england/genpub/en/1115311947782.Html>
http://www.planninginspectorate.gov.uk/pins/appeals/local_dev/index.htm



ATTACHMENT 7

Medway Local Development Framework

Draft Revised Statement of Community Involvement

(Cabinet Version)

August 2011



Summary

This document is a new draft version of the Statement of Community Involvement or SCI for Medway. It sets out how the Council will involve local people in planning and development issues affecting Medway.

The Council first adopted its SCI in 2006. Since then there have been further changes to the development planning system and consultation bodies have come and gone. For these reasons it is appropriate to update and refresh it now.

It includes a short description of the development planning system and Medway Council's role. However most of the document describes the methods the Council will use to engage with the public and other stakeholders and it lists the main organisations that have expressed an interest in being involved.

We welcome views on it before it is adopted and ways to do this are set out below.

Ways to Give Your Views on the Document

Representations on the document are invited during a six-week period from 30th August 2011 to 10th October 2011. Representations must be received by 5 p.m. on 10th October 2011 in order to be considered.

There are a number of ways in which you can give us your views, check progress on the preparation of this and other LDF Documents and view many background documents.

- **Telephone:** 01634 331629 (Office hours are 9 a.m. – 5 p.m. Monday to Thursday and 9 a.m. – 4.30 p.m. Friday)
- **Email:** 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, our Limehouse system etc.
- **Limehouse:** This is an online consultation system and we would strongly encourage you to "register" as a user. If you do you will receive email alerts when new consultations are underway, you can submit your views in a structured way and see our responses to all representations we receive. To register please go to: <http://medway-consult.limehouse.co.uk/>

Further Advice

If you would like any further advice on this document or the planning system in Medway the Development Plans & Research Team will always be pleased to help. The contact details are as above.

If you would like more general and independent advice the Planning Aid service is available.

Planning Aid South East

Planning advice

The planning system is often seen as complex and difficult to navigate. Planning Aid are able to explain the complexities of it and help you get involved, whether it is by explaining how to comment on a planning application or a national policy statement. If you would like advice or information on any aspect of the planning system call their Planning Advisor.

Planning Advisor

Tel: 0870 850 9806

email: secw@planningaid.rtpi.org.uk

email: secw1@planningaid.rtpi.org.uk

Community Planning

Planning Aid also provides training, workshops and seminars for community groups, schools and voluntary groups who would like to learn more about the planning system. If you would like to get more involved in the planning of your area then Planning Aid, through its programme of community involvement in planning and regeneration, can help. Please contact their Community Planners for more information.

Community Planners

Tel: 01634 831167 **email:** secp@planningaid.rtpi.org.uk

email: secp1@planningaid.rtpi.org.uk

Specific people in the Development Plans and Research Section that you might find it useful to talk to are listed below. Please phone 01634 33**** followed by the relevant extension number:

Paul Cronk
Morgan Slade
Bryan Geake

Development Plans and Research Manager ext 8146
Senior Planning Officer ext 1028
Senior Planning Officer ext 1025



Email

ldf@medway.gov.uk

or visit our
website at

www.medway.gov.uk/ldf



Minicom

(01634) 333111

This information is available in other
formats from (01634) 331629

If you have any questions about this leaflet and you want to speak
to someone in your own language please ring (01634) 331629

এই লিফলেট সম্পর্কে আপনার যদি কোন প্রশ্ন থাকে এবং এ ব্যাপারে আপনার নিজের
ভাষায় কারো সাথে আলাপ করতে চান, তাহলে দয়া করে এই নম্বরে টেলিফোন করুন:

**331780
(Bengali)**

如果你對這本小冊的內容有任何疑問，且想與會說你的語言的某人談
話，請打這個電話號碼

**331781
(Chinese)**

જો તમને આ પત્રિકા વિશે કોઈ પ્રશ્નો હોય અને તમે તમારી માતૃભાષામાં કોઈની
સાથે વાત કરવા માગતા હો તો કૃપા કરીને આ નંબર ઉપર ફોન કરો

**331782
(Gujarati)**

यदि आपने इस लीफलेट के बारे में कुछ पूछना है और उस व्यक्ति के साथ आप अपनी
भाषा में बात करना चाहते हैं, तो कृपया निम्नलिखित नंबर पर टेलीफोन करने करें:

**331783
(Hindi)**

ਜੇ ਤੁਸੀਂ ਇਸ ਲੀਫਲੈਟ ਦੇ ਬਾਰੇ ਕੁਝ ਪੁੱਛਣਾ ਚਾਹੁੰਦੇ ਹੋਵੋ ਅਤੇ ਤੁਸੀਂ ਉਸ ਵਿਅਕਤੀ ਦੇ ਨਾਲ
ਆਪਣੀ ਬੋਲੀ ਵਿੱਚ ਗੱਲ ਕਰਨੀ ਚਾਹੁੰਦੇ ਹੋ, ਤਾਂ ਕਿ੍ਪਾ ਕਰਕੇ ਅੱਗੇ ਲਿਖੇ ਨੰਬਰ ਤੇ ਟੈਲੀਫੋਨ ਕਰੋ:

**331784
(Punjabi)**

اگر آپ اس کتابچے کے بارے میں کوئی سوال پوچھنا چاہتے ہیں اور آپ کسی فرد سے اپنی زبان میں بات کرنے
کے خواہشمند ہیں تو براہ مہربانی اس نمبر پر فون کیجئے۔

**331785
(Urdu)**

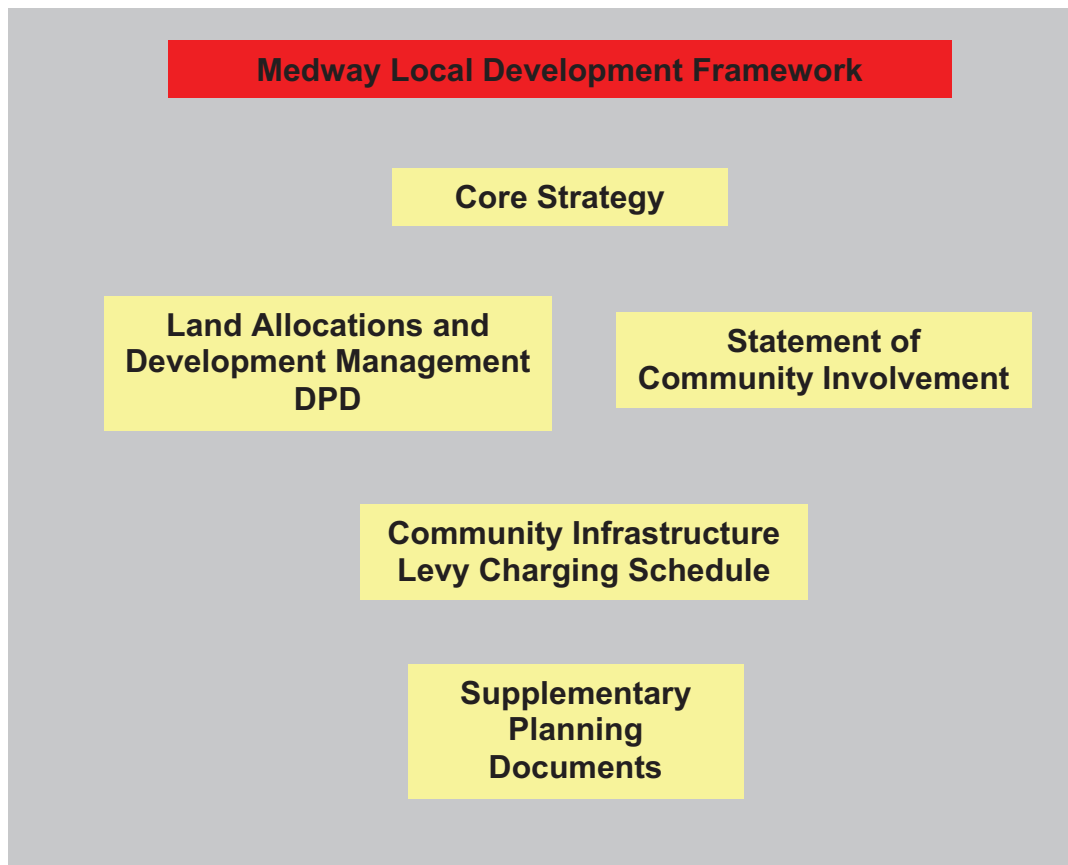
Elinizdeki bu yazılı duyuru ile ilgili herhangi bir sorunuz varsa ve dilinizi
bilen birisi ile konuşmak istiyorsanız, lütfen 331786 numaraya telefon edin.

**331786
(Turkish)**

1. Introduction

The new planning system

- 1.1 The Planning and Compulsory Purchase Act 2004 replaced a system of Structure and Local Plans with Regional Spatial Strategies (RSS) and Local Development Frameworks (LDF). Some further changes were made in the Planning Act 2008.
- 1.2 Further changes were also announced when the Coalition Government was elected in 2010. These are focussed on the Localism Bill that is currently going through Parliament. Perhaps the most significant change being proposed is the abolition of regional spatial strategies. In the case of Medway this is known as the South East Plan. Pending its abolition Medway's local development framework or LDF has to be in 'conformity' with that plan.
- 1.3 The Government is also moving to rename local development frameworks 'local plans'. This is potentially confusing as some old style local plans dating from before 2004 are still in place. Such changes make preparing Medway's local development frameworks difficult but the Council considers it important to make progress and as quickly as is prudent.
- 1.4 The current system is described in a Government publication Planning Policy Statement 12: 'Local Spatial Planning' (PPS12):
(<http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningpolicystatements/pps12/>).
The following website also contains useful information about the current system and emerging changes:
<http://www.planningportal.gov.uk/planning/planningsystem/localplans>
- 1.5 PPS12 contains the following:
"The Local Development Framework is the collection of local development documents produced by the local planning authority which collectively delivers the spatial planning strategy for its area. The Core Strategy is the key plan within the Local Development Framework."
"The planning system has been substantially reformed to embed community responsive policy-making at its heart and to make contributing to the achievement of sustainable development a statutory objective. The new spatial planning system exists to deliver positive social, economic and environmental outcomes, and requires planners to collaborate actively with the wide range of stakeholders and agencies that help to shape local areas and deliver local services." (paras 1.4 and 1.5)
- 1.6 This stresses the importance of community involvement in the plan-making process and hence the role of this document – the Statement of Community Involvement.
- 1.7 It forms part of Medway's LDF as illustrated on the diagram below.



2. Aims and objectives of the SCI

- 2.1 The aim of the process of community involvement is to produce consensus, as far as possible, on the form and content of the local development documents which Medway Council is preparing. Where this is successful, it will help to achieve broad support from local communities and minimise the need for lengthy public examinations.
- 2.2 Sometimes the Council has to make difficult choices as to what policies or proposals should be in the LDF. For example these must conform with national policies. In these cases it may not always be possible to achieve consensus but it is important that local people understand the reasons for decisions reached and have every opportunity to express their views. To achieve this there should be meaningful involvement by all of those with an interest in the future of the area throughout the preparation of all local development documents.
- 2.3 The process by which we aim to achieve this is set out below.
- 2.4 The SCI covers Medway Council's policy for involving the community not only in the preparation, alteration and revision of local development documents but also key planning applications. It aims to be a clear public statement that enables the community to know when and how it will be involved. The Government has set minimum requirements for public involvement, with which local planning authorities must comply. The SCI shows how these requirements will be met and exceeded.
- 2.5 Medway Council's standard is to seek participation from as wide a section of the community as possible that work, live and use the Medway area. It also aims to

use the results of that participation in a positive way to shape the future for Medway.

- 2.6 The Council considers this to be a 'living' document and it will further amend it when required. Importantly it will always look to devise new methods to positively engage with the public and to learn from them. As such the standards and approaches set out below are intended to set a minimum standard that will be frequently exceeded.
- 2.7 The Council consults the public on many issues, not just planning ones. As a result there is sometimes a danger of consultation 'fatigue' or 'overload'. To overcome this consultation exercises will be co-ordinated where this is practicable and results shared so that work across the Councils is informed.
- 2.8 Medway has a wide range of community and voluntary groups operating in the area. It has been estimated that including all the small community groups, there are well over 500 organisations. These range from very large, professionally staffed organisations to small community based groups. Very often these groups are established to address particular needs such as those of disabled children, older people and so on.
- 2.9 A particular challenge is to engage effectively with what are termed 'hard to reach' groups and sections of the community with specific needs but no organised groups to represent them. The approaches detailed below reflect this.
- 2.10 Transparency is crucial to community engagement and an important element of this is ensuring that the public can access relevant information, reports and research. The ability to do this has been transformed by the growth of the worldwide web and for this reason the Council will continue to invest in its website and ensure that all planning documents, including all those relating to the LDF, are accessible.

3. Medway's Approach to community Involvement

Bodies to be consulted

- 3.1 The Council is required to meet a minimum level of public involvement under the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended). The Regulations specify that the following bodies must be consulted if the Council considers that body will be affected by what is to be covered in a development plan document.
 - Adjoining local planning authorities
 - Environment Agency
 - Natural England
 - English Heritage
 - Secretary of State for Transport
 - Relevant telecommunications companies
 - Primary Care Trust
 - Highways Agency
 - Relevant electricity and gas companies
 - Relevant sewerage and water undertakers
- 3.2 At appendix A is a list of bodies, some of which the Council is required to consult, plus other bodies which it may consult should it be thought necessary to do so.

This list is not exhaustive. The Council may also consult with the following bodies in relation to the LDF and SCI:

- Voluntary bodies, some or all of whose activities benefit the whole or part of the authority's area;
- Bodies representing the interests of:
 - Different racial, ethnic or national bodies in the area;
 - Different religious groups in the area;
 - People with disabilities in the area;
 - Persons carrying on business in the area.

3.3 The Council has identified that there are a number of key issues for the community and voluntary sector in gaining effective community involvement. Many of these issues relate to groups who may find it difficult making their views known, such as:

- People on low incomes
- The unemployed
- Lone parents
- Homeless people
- Older people
- People with disabilities
- People wanting to improve their basic skills
- People with English as a second language
- People with illnesses or addictions.

3.4 One of the aims of the SCI is to ensure that all sections of the public, including local groups and organisations, are actively involved throughout the plan making process. The Council considers that a framework of different methods should be used to contact different sections of the community in Medway. In this way the the LDF in general can be developed in an inclusive way.

Dissemination, Participation and Response

3.5 There are three key elements, which are considered fundamental to involving the public in the plan making process.

3.6 *Dissemination* of Information. The following methods may be used:

- Statutory notices in the local press
- Making all documents available on the web site
- Deposit of documents in Council Offices
- Staffed exhibitions in locations throughout the Medway Area. These will usually be in village or community halls, church halls, schools or other public buildings according to availability
- Press releases containing sufficient information for an article to appear in the local press. The actual appearance of an article will depend upon the editor
- Articles in Medway Matters the Council's newspaper and in the Council's monthly e-mailed newsletter.
- Send notification and documentation to individuals and bodies as necessary.
- Making available large print versions of documents, Braille and different languages if requested. A system is in place that can cope with requests from people who don't have English as a first Language (EFL)

- Specifically identify and communicate with ethnic minorities and disability groups
- Use of site notices for site-specific issues
- Using social network sites in order to publicise events and consultation documents.

3.7 *Participation* or continuous Community Involvement. This will be achieved through the use of the following methods:

- Discussions with the Local Strategic Partnership
- Programme of public meetings, round tables or forums on large or controversial sites or issues
- Discussions and correspondence with developers and other interested parties seeking to promote or object to specific development or specific policies
- Workshops to provide an early input into the formulation of proposals for a specific site or area. The Council has already used these workshops as methods of public participation
- The Local Development Framework Advisory Group that has been established by the Council. This consists of officers and Councillors. It has responsibility for overseeing the progress of the LDF. Necessary decisions, which need to be made throughout the LDF process, will be the subject of resolutions by the Cabinet and Council after consideration by the Advisory Group.

3.8 *Responses*. The main methods of considering responses will be:

- All representations will be considered by the council and reasons given for accepting or rejecting them
- When considering representations, they will be measured against national and locally adopted guidance and other local circumstances
- A report on council responses to objections and representations and recommended amendments to documents will be published
- Revised documents will be published and further opportunities for consultation and participation will be made available in accordance with the regulations.

3.9 Different documents may require a combination of these consultation methods.

Other Methods

3.10 At each stage where community involvement is required stakeholders should be asked whether or not they felt that they had been fully involved and how they think the process could be improved. Where appropriate, new approaches will be implemented at the end of each consultation stage. In this way the community will have a significant input into developing a community consultation process that suits them and which adapts to changing needs.

3.11 This SCI will be widely distributed and other methods that the Council may use to involve the community are:

- *Opinion poll* carried out annually consisting of 1100 people in a face-to-face survey to see how people in general feel about certain issues. This is run by an agency that has experience of this method. It is run with a particular key issue in mind. The poll is usually run around September/October time

- *Citizen Panel* involving a panel of 1500 who are representative in age gender and area etc. and every year a third is replaced by new individuals. They are held 4-5 times a year and consider key issues such as the Community plan. The survey is usually in the form of a questionnaire that goes out to individuals
- *Corporate Focus groups* where hard to reach groups such as Ethnic Minorities, Age groups, Disability groups, Young peoples groups, Lesbian, Gay and Transsexual groups and the Youth Parliament can participate. Agents are used to find individuals to participate and the venues are held in local halls. A discussion paper is produced and a 1-2 hour discussion takes place. The whole of the meeting is transcribed and the discussions analysed. Feedback is given via Medway Matters or some other forum
- *Online Consultation* using our Limehouse electronic consultation system. Registered users receive e-mail alerts when new consultations are about to commence. Views can be submitted in a structured way and all responses viewed.

Specific Groups

- 3.12 The needs of the working population can be catered for by creating involvement opportunities outside normal working hours but there are a number of other groups within Medway, highlighted below, which the Council would like to be more involved in the planning process.

Young People

- 3.13 Young people represent both the present and the future of Medway, although it has sometimes been difficult to involve them in a way that is meaningful to them. Working with youth groups has strengthened there relationships in recent years and enabled many young people to contribute their views - for instance to the preparation of the Sustainable Community Strategy - on issues such as leisure, transport and nightlife. The Youth Parliament meets on a regular basis and is made up of 13-18 year olds. In partnership with a number of local organisations, the Council hosts an annual youth Parliament conference. 'MiX it Online' is a web page dedicated to the youth of Medway and is planned by a group of young people. It is a site where young people are encouraged to raise their views.

Older People

- 3.14 Senior organisations working with the Council and others have enabled many older people to contribute their views, for instance on issues such as practical assistance, fear of crime, and transport.

Equalities Working Group

- 3.15 The Council established a Race Equality Review Working Group in July 2008 to review the actions taken in response to the Race Equality Review and comment on further actions needed. The terms of references of the Working Group were extended to involve the Black Workers Forum, the Disabled Workers Forum and other equalities groups as appropriate on a regular basis. The name of the Working Group be changed to the Equalities Working Group to reflect its

inclusive remit. This is the group where wider equalities matters are raised and co-ordinated.

- 3.16 The Council has established a consultation database where all the consultation carried out by the council goes onto one database. Results of consultation are available to all Council departments and duplication of survey work is avoided where possible. In this sense a corporate approach to public participation on the LDF can be achieved.
- 3.17 The advantages are that additional resources can be accessed at a corporate level and used where appropriate timetables can be met, and resources will not be wasted by duplication of survey work.
- 3.18 In addition, all relevant LDF documents are published on the Council's web-site, and people have the opportunity to make representations both in writing and by e-mail. The Council will also use the Local Strategic Partnership (LSP) as a forum to consult the wider community, for raising issues and making representations, where appropriate.

4. Resources & Management

- 4,1 The overall responsibility for the preparation of the Local Development Framework lies with the Planning Policy and Design Manager on behalf of the Assistant Director. The team responsible for the production of the LDF is the Development Plans and Research team under the supervision of the Development Plans and Research Manager. Also contributing to the work, at key stages, are the Design and Conservation team, the Integrated Transport team, and the Development Management team. Some elements of work will be resourced by the use of external consultants. The use of consultants on specific projects is required where there is a lack of expertise or capacity in house. Based on the division's current service planning, sufficient staff and budgetary resources are in place to ensure delivery of the LDF and these resources can be managed in such a way as to deal with most unforeseen circumstances and peaks in workload required to meet the timetable.

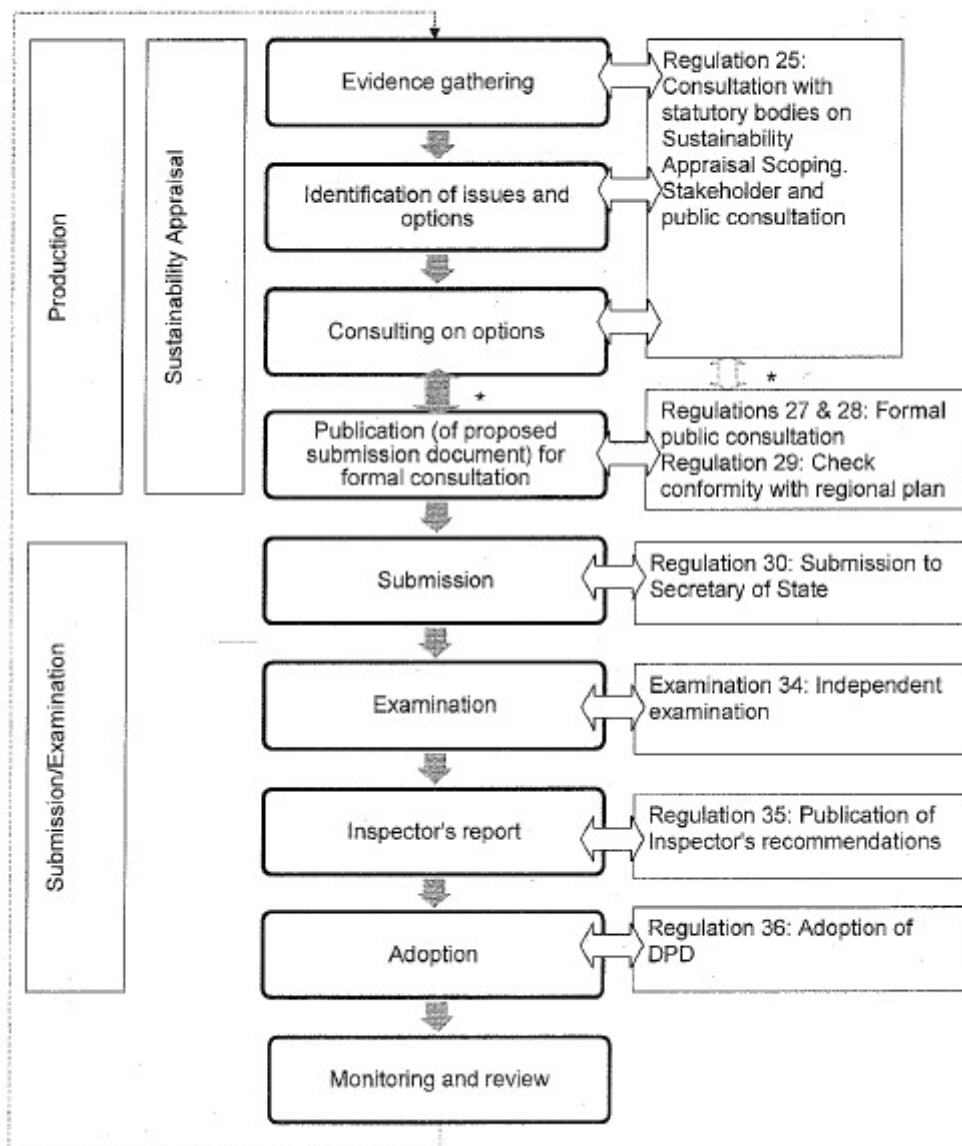
5. Public Participation During the Main Stages of Preparing the LDF

- 5.1 The process for the preparation and adoption of development plan documents is illustrated below and essentially involves four stages.

The Development Plan Document Process

Development Plan Document Preparation Process

Note: The regulations referred to are the Town and Country Planning (Local Development) (England) Regulations 2004 as amended 2008 & 2009.



5.2 **The Pre-production and survey** stage includes the preparation of the LDS, which describes the various documents to be produced, the timetable for their preparation and adoption and the resources needed to prepare them. In each case the Council has to collect the necessary data to develop a robust evidence base for the plan and provide the baseline for the Sustainability Appraisal process. This is usually referred to as the SA/SEA.

5.3 There are benefits in involving the community at this stage to begin informal discussions around key issues. These are carried out with the Local Strategic Partnership and others as necessary asndappropriate. The Partnership is made

up of almost 200 partner organisations, representing a wide cross section of the community. The participation of the Partnership at both a formal and informal level will be carried through all stages of the LDF process.

- 5.4 **The Production stage** involves developing with stakeholders and the community, the vision, objectives and spatial options for the plan. These need to be developed through public consultation and participation. There are three categories of documents involved at this stage, the SCI, Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs).
- 5.5 Methods of engagement to be used for each of these categories are described below.

Statement of Community Involvement

- 5.6 This is the first draft of the revised SCI and is subject to full public participation. It will be publicised by a notice in the press, published on the council's web site and placed on deposit in the Council's offices (See fig 2) Notification of the public consultation, together with a weblink to all relevant documentation, will be sent to the bodies identified in Appendix A.
- 5.7 All views on the draft of the SCI will be considered and the document amended where necessary. The Council will publish its reasons for accepting or rejecting the points raised. The final draft of the SCI does not need to be examined nor submitted to the Secretary of State. The final draft of the SCI will be adopted by the Council and placed on the Councils web site and in Council Offices and Libraries.

SCI Consultation Methods		
	Consultation stage	Adoption
<u>Dissemination of information.</u>		
Statutory notice in Press	√	√
All documents available on the web site.	√	√
Deposit of documents in Council offices and Libraries	√	√
Staffed exhibitions in locations throughout the Medway Area.	√	
Press releases	√	√
Articles in Medway Matters		
Send notification and web link to documents to individuals and bodies as necessary	√	√
Making available on request for large print version of documents, Braille and in different languages.	√	√
Specifically identify and communicate with BME and disabled groups.	√	√
<u>Participation - Continuous Community Involvement</u>		
Discussions with LSP		
Programme of public meetings, round table or forums on large or controversial sites or issues.		
Discussions and correspondence with developers and other interested parties seeking to promote or object to specific development or specific policies.	√	
Workshops with interested groups and stakeholders.		
Discussion with LDF Advisory Group	√	

Development Plan Documents (DPD)

- 5.8 Written notification of draft documents will be sent directly to the bodies identified in Appendix A and published on the Councils web-site. The methods for Public participation are contained in the table below. All views received will be considered and if appropriate, subsequent drafts will reflect upon and take on board the comments and issues raised. The Council will publish its reasons for accepting or rejecting points made.
- 5.9 All will be subject to full public participation. They will be publicised by a notice in the press, published on the Council's website and placed on deposit in Council offices.

- 5.10 Medway Council will make representations about site allocations available for inspections at public libraries and at council offices. It will publish such representations on its website and advertise them in a local newspaper stating that the representations are available for inspection and the places and times at which they can be inspected. Copies of all representations will be sent to the Secretary of State before the independent examination takes place.
- 5.11 Following each stage of public consultation, all views will be taken into account in the preparation of subsequent versions of the Development Plan Document being prepared. The Council will publish a summary of responses and the reasons for accepting or rejecting the points raised at the end of each public consultation .

Development Plan Documents (DPDs)					
	Options Stage	Preferred Strategy	Proposed Submission	Exam	Adopt
<u>Dissemination of information.</u>					
Statutory notice in Press	√	√	√	√	√
All documents available on web.	√	√	√	√	√
Deposit of documents in Council offices and Libraries	√	√	√		√
Staffed exhibitions in locations throughout the Medway Area.	√	√			
Press releases	√	√	√		
Articles in Medway Matters					
Send notification and documents to individuals and bodies as necessary	√	√	√	√	√
Making available on request for large print version of documents, Braille and in different languages.	√	√	√	√	√
Specifically identify and communicate with BME and disabled groups.	√	√	√		
<u>Participation - Continuous Community Involvement</u>					
Discussions with LSP	√	√			
Programme of public meetings, round table or forums on large or controversial sites or issues.	√	√			
Discussions and correspondence with developers and other interested parties seeking to promote or object to specific development or specific policies.		√			
Workshops with interested groups and stakeholders.	√	√			
Discussion with LDF Advisory Group including officers and members.	√	√			

Supplementary Planning Documents (SPD)

- 5.12 SPDs are not a statutory requirement and it is a matter for each local planning authority to decide whether to prepare them. Consequently, they do not need to follow the full procedure set out for other parts of the LDF. Only one period of public participation is required and they are not subject to an independent examination before being adopted.
- 5.13 Forthcoming SPDs may justify the targeting of specific groups depending on what topic and location the SPD is intended to cover. It is difficult to set out the key organisations that may be contacted in advance. However, in a recent consultation event for Lodge Hill a number of key stakeholders and organisations were contacted. A list of these groups can be found in Appendix B.

Supplementary Plan Documents (SPDs)	
A) Dissemination of Information	
A1. Statutory notices in the local press.	✓
A2. Making all documents available on the website.	✓
A3. Deposit all documents in Council Offices	✓
A4. Staffed exhibitions in locations throughout the Medway Area. These will usually be in village or community halls, church halls, schools or other public buildings according to availability.	
A5. Press releases containing sufficient information for an article to appear in the local press. The actual or other public buildings according to availability.	✓
A6. Articles in Medway Matters the Councils newspaper, which is circulated free to all local households every 6 weeks.	
A7. Send notification and documentation to individuals and bodies as necessary.	✓
A8. Making available large print version of documents, Braille and different languages if requested: a system is in place that can cope with requests from people who don't have English as a first language (EFL)	
A9. Specifically identify and communicate with ethnic minorities and disability groups.	
A10. Use of site notices for site-specific issues.	✓
B) Participation- Continuous Community Involvement.	
B1. Discussions with Local Strategic Partnership.	✓
B2. Programme of public meetings, roundtables or forums on large or controversial sites or issues.	✓
B3. Discussions and correspondence with developers and other interested	✓

parties seeking to promote or object to specific development or specific policies.	
B4. Workshops involving schools and other interested parties to provide an early input into the formulation of proposals for a specific site or action area. The Council has already used these workshops as methods of public participation.	✓
B5. The LDF Advisory Group has been established which consists of Councillors and officers. It has responsibility for overseeing the progress of the LDF. Necessary decisions which need to be made throughout the LDF process will be the subject of resolutions by the Cabinet and Council after consideration by the LDF Advisory Group.	✓

- 5.14 **The Examination** is an assessment of the soundness of the DPD in terms of its content and whether the correct processes and procedures have been followed.
- 5.15 If representations were made at the publication stage, a statement setting out the number of representations received and a summary of them will be submitted with the document to the Secretary of State.
- 5.16 An independent planning Inspector holds a Public Examination into the "soundness" of the document. The Inspector will determine the procedure for the examination and those who have made representations may be invited, by the Inspector, to participate in the Examination. Afterwards the Inspector will prepare a report setting out recommended changes the Council should make to the Development Plan Document before adopting it.
- 5.17 The examination and Inspector's Report will be the subject of publicity and notification.
- 5.18 **Adoption** and entry of a DPD into the LDF will follow receipt of the Inspector's report. The adoption of these documents and of a SPD will be the subject of publicity and notification.
- 5.19 Monitoring will be carried out annually of the progress against the timetable in the LDS, the effectiveness of LDF policies, the rate of housing provision, and the need for changes to the SCI. This is done through the Annual monitoring report which is published and formally reported to the Council.
- 5.20 A copy of the most up to date Local Development Scheme that shows the programme and timetable for the preparation of Medway's Local Development Framework can be found at:
[http://www.medway.gov.uk/pdf/Medway%20local%20development%20scheme.p
df](http://www.medway.gov.uk/pdf/Medway%20local%20development%20scheme.pdf)

6. Consultations on key planning applications

- 6.1 Pre-applications discussions are particularly important for key planning applications. Some applications will be of such importance that the Secretary of State (SoS) will designate them as a major infrastructure project. They will be subject to an inquiry process. However they are very few in number.
- 6.2 The Government also intends to make pre-application consultation with local communities a statutory requirement. When this is brought in it may supersede this part of the SCI. Notwithstanding this, the Council advocates this approach utilising a tiered approach originally advocated in guidance issued some years ago.

Tiered Approach

- 6.3 The tiered approach relates to the setting and use of indicative thresholds for determining which applications are to be subject to different types of community involvement and the level of community involvement required at each stage of the planning process. The level of consultation that will be undertaken for the various types of planning application will vary accordingly. The tiered approach sets out an indicative framework for those planning applications, which should be subject to wider community involvement.
- 6.4 In summary, these 'tiers' are as described below.

Tier Level 1

- 6.5 Major planning applications classified as tier 1 may be expected to allow the widest level of community involvement. The following types of applications are likely to be considered tier 1:
- Major Development Plan Departures - those that are seen to depart from the Development Plan
 - Schedule 1 developments – those schemes where an Environmental Impact Assessment is always required as they are likely to have significant effects on the environment
 - Applications that include the provision of gross shopping floor areas of 20,000 square metres or greater; or gross shopping floor space of not less than 2,500 square metres, which will exceed 20,000 square metres.

Tier Level 2

- 6.6 Those major applications referred to as tier 2 are likely to be subject to wider community involvement except where the council can reasonably justify why, for a particular application, the approach to wider community involvement can be waived. These may include the following:
- Schedule 2 developments – those applications where an Environmental Impact Assessment may be required as they are likely to have an effect on the environment by virtue of factors such as their nature, size or location
 - Development proposals that relate to a site of 5 hectares or more of Greenfield land, or comprise 150 dwellings or more regardless of the size of the site
 - Development proposed on playing fields as set out in the Town and Country Planning (Consultation) (England) Direction 2009 – any proposal for development of any playing field owned by the Council or used by an educational institution

Tier Level 3

- 6.7 Tier 3 major applications are likely to be determined on a 'site-by-site' basis at a local level:
- Applications of a local significance such as those which: fall marginally below the thresholds identified under Tiers 1 and 2
 - Applications that fall within sites that are 'sensitive' to development pressures – development adjoining a listed building; substantial demolition in a Conservation Area; loss of allotment land; loss of employment land for housing; and development on windfall sites
 - Other applications – to encompass lower thresholds for non-conforming uses and other types of specific development. For example, small employment/business development within residential areas, change of use of A1 retail uses to other 'non-retail' uses in neighbourhood centres and telecommunication development in 'sensitive' areas
 - Applications that will have transport implications and will require a Transport Assessment to accompany the submitted planning application.

Consultation approach to the three tiers

	Tier 1: Applications where there are considerable issues of scale and controversy or contrary to or out of line with Development Plan (LDF or Area Action Plan) policy (as defined by Regulation 3 (a)-(c) in Annex 1 of circular 07/99 ²⁸	Tier 2: Applications broadly in accordance with Development Plan BUT raising controversial issue or detail and 'other' Departures not covered by Regulation 3 (a)-(c) in Annex 1 of circular 07/99 ²⁸	Tier 3: Applications of a scale or development area for which a LPA requires wider community involvement; applications that fall within sites that are 'sensitive' to development pressures and allocated sites that may not have generated significant objection through the local plan process ³⁰
APPROACH			
Public Meetings	✓		
Public Exhibition	✓	✓	
Surgeries	✓	✓	
Development Briefs	✓		
Workshops	✓		
Enquiry by Design and/or Planning for real	✓	✓	
Citizen Panels	✓	✓	✓
Consultation Panel	✓		
Parish Councils	✓	✓	✓
Media	✓		✓
Website	✓	✓	✓
Local architectural or Design Panel	✓	✓	✓
Planning Aid	✓	✓	

- 6.8 Given the range and types of available consultation approaches, the table above provides an indication of the methods for community engagement that may be appropriate for each 'tier' of application. For example, it is expected that 'Tier 1' applications will, by their very nature and 'significance', call for a higher level of community engagement when compared to an application which may fall in 'Tier

3'. Therefore the 'ticks' in the boxes in figure 5 are merely illustrative as to the means of consultation and should not be interpreted as being prescriptive.

Protocol

- 6.9 Medway Council intends to follow a specific protocol that will enable developers to provide a good level of pre-application community involvement in their major proposals. The protocol involves two main stages:
- The Pre-application stage; and
 - The formal planning application stage.

Pre-application stage – Meetings with developers to discuss the protocol

- 6.10 On a site specific basis developers will be asked to produce a method statement which details how they will consult with the local community in advance of a formal planning application being made. This must detail how they are to reach local groups and a wide cross section of the local community who will be affected by the development. The document will detail the methods the developer will use. For example, workshops with community groups, questionnaires, 1 to 1 meetings and wider consultations. It must allow for a wide debate within the community and have realistic aspirations. The Developer can involve a third party to undertake this consultation work on their behalf. Before a formal planning application is submitted the developer will be strongly encouraged to submit a fully detailed report to Medway Council confirming the consultation methods used, the results of the consultation and how the developers intend to take these views into account when submitting a formal planning application. The results of any such consultation will be publicly reported and taken into account in decisions made by the Council.
- 6.11 Some pre-application 'basic' measures for major applications are recommended at appendix C. It is considered that this approach should be adopted and developers are expected to apply all 10 methods of community involvement as set out.
- 6.12 It may be that applications are unlikely to fall into the 'nationally significant infrastructure' category as defined within the Planning Act. However, developer's attention is drawn to the requirements of Part 5 of the Planning Act 2008 (Duty to consult local community) that requires the applicant to produce a consultation report, and for this report to accompany the application. The report must include details of any relevant responses received by the applicant. These requirements are placed upon promoters and are recommended as best practice within this SCI for major applications that fall under the nationally significant threshold.

Formal planning application - check how the pre-application consultations feeds into the application process

- 6.13 The planning process generates a wide-ranging requirement for consultations in connection with the various types of planning applications that are received. The responsibility for publicising applications normally falls with the Local Planning Authority (LPA). General guidance on publicising planning applications is set out in Circular 15/92 and more recently the Town and Country General Development Procedure Order 1995 (GPDO). These give practical advice on when to use the three types of publicity currently in use i.e. neighbour notification, site and press notice. In most circumstances representations about planning applications are restricted to a period of 21 days from notification. However, such bodies as

Natural England will be allowed a longer period of time to comment on applications where this is prescribed by legislation.

- 6.14 It is a requirement for all major planning applications to mount a site display on or near the land for at least 21 days before determining the application, publish a local advertisement in The Press and to serve notice on any adjoining owner/occupier.¹
- 6.15 Within the Council area there are a number of key Brownfield development sites. Working with our European partners on a project called REVIT² and covering cities in Germany, Holland, France and Wales a tool kit³ has been developed setting out best practice in community participation and involvement. It uses case studies as a basis for the tool kit. The tool kit is endorsed by this SCI and the methods it describes should be used where appropriate.
- 6.16 The Council recognises that all new development will need access to essential service provision and therefore providers will be consulted on major applications, where appropriate.

7. Other Matters

Role of Planning Performance Agreements

- 7.1 Planning Performance Agreements (PPAs) were formally introduced into the planning system in 2008 and are about improving the quality of planning applications and the decision making process through collaboration. They bring together the Local Planning Authority (LPA), developer and key stakeholders, preferably at an early stage, to work together in partnership throughout the planning process. They are essentially a collaborative project management process tool that provides greater certainty and transparency to the development of scheme proposals, the planning application assessment and decision-making.
- 7.2 ATLAS, the HCA's Advisory Team for Large Applications, provides a free service to Local Planning Authorities, the private sector and other stakeholders who are dealing with large scale and complex development proposals. The team can offer Local Authorities advice on a broad range of issues relating to the delivery of large predominantly residential projects and aims to provide a service that will support partners in tackling obstacles and improve relationships. The services range from helping partners with visioning and masterplanning, to more specific tasks including project management advice, advice on the planning process and addressing technical project issues. Further guidance regarding ATLAS and PPA's can be found on the ATLAS web site:
http://www.atlasplanning.com/page/about_atlas.cfm

Developer Contributions

- 7.3 Medway Council's *Guide to Developer Contributions, a Supplementary Planning Document*⁴ sets out what obligations and contributions will be required for future developments. Developers are expected to take account of, and meet the requirements of this document before submitting planning applications to the Council. It is designed to help them know what the Council is likely to require for

¹ Town and Country (General Development Procedure) Order 1995. Article 8

² www.rev-it-nweurope.org.

³ Available from the Council

⁴ <http://www.medway.gov.uk/environmentandplanning/planning/developercontributions.aspx>

new developments in Medway. This document will continue to be regularly reviewed and updated and the consultation process will be similar to that for all Supplementary Planning Documents as outlined earlier in this document.

- 7.4 Where planning obligations have formed part of the consultation on planning applications any necessary comments will be fed back into the process for reviewing the Developer Contributions Guide.
- 7.5 The last government introduced a Community Infrastructure Levy (CIL) whereby local authorities are now empowered, but not required, to impose a levy on most types of new development in their areas. The new Coalition Government has endorsed the CIL. Medway Council anticipates adopting a Charging Schedule and relevant levy by autumn 2013. There will be rounds of public consultation but these will be detailed separately.

The SCI and the Monitoring and Implementation Framework

- 7.6 The Council has a Monitoring and Implementation Framework (MIF) derived from work undertaken to provide a baseline position for both the Core Strategy and the sustainability appraisal.
- 7.7 The MIF set out in the Core Strategy indicates how policies are to be implemented, by when and by whom. It also sets out indicators to monitor these policies. As indicated above, the Council reports annually on core indicators in the Annual Monitoring Report.
- 7.8 The Sustainability Appraisal also includes a monitoring framework to monitor the performance of the Council's spatial strategy in order to ensure more sustainable development is secured. The MIF therefore builds on these existing processes, rather than establishing an additional framework and this will be reported in the AMR.
- 7.9 In this way the public can be informed of progress with implementing the LDF and whether any review of policies or proposals within it are justified.

Wider community involvement

- 7.10 The Sustainable Community Strategy has been subject to extensive consultation with the community, community groups and stakeholder organisations. The Partnership Plenary, the wider Local Strategic Partnership representing about 450 organisations and individuals has met twice to consider the developing Core Strategy. This was at the strategy development and draft strategy stages. Over 100 organisations and individuals attended on each occasion. Consultation also took place with Medway Voice, an extended Local Strategic Partnership Board, the Youth Parliament, Medway Older People's Partnership, community representatives, Councillors, the Council's Disability Forum, the Ethnic Minorities Forum, three of the most deprived neighbourhoods in Medway and the Local Strategic Partnership Thematic Partnerships.
- 7.11 Some of these consultations have been carried out jointly with the Local Transport Plan in order to ensure that these long-term strategies work together.
- 7.12 We have also drawn on other recent consultations covering local people's priorities, the results of the recent Medway resident's opinion poll and the Ofsted Tellus survey of children and young people. The draft strategy was posted onto

the LSP area of the Council's website which resulted in comments from members of the public.

- 7.13 This first revision of the SCI will be consulted on at the same time as the Publication Draft Core Strategy and using the same consultation methods. In this way, an open invitation will be given to all groups (many of which overlap) who were involved in the SCS and Core Strategy process to comment on the content and delivery of the Statement of Community Involvement.

The Localism Bill

- 7.14 As indicated above a new Localism Bill is currently before Parliament and is expected to receive the Royal Assent early in 2012. The final details of this Bill are still uncertain and changes are inevitable as it proceeds through Parliament. However, what is known is that the Government intention to introduce a new layer of Neighbourhood Planning documents below the Local Plan. This could result in greater involvement for local communities.
- 7.15 Given the current level of uncertainty and anticipated further changes to the Bill, it is felt that an addendum to this SCI should be produced giving the details of community involvement envisaged with neighbourhood plans. This will be produced after the Localism Bill has been enacted.

Glossary

DM	-	Development Management
DPD	-	Development Plan Document
EFL	-	English as a First Language
EIP	-	Examination In Public
LDD	-	Local Development Document
LDF	-	Local Development Framework
LSP	-	Local Strategic Partnership
LDS	-	Local Development Scheme
LPA	-	Local Planning Authority
RSS	-	Regional Spatial Strategy
SCS	-	Sustainable Communities Strategy
SoS	-	Secretary of State
SCI	-	Statement of Community Involvement
SEA	-	Strategic Environmental Assessment
SPD	-	Supplementary Planning Document
SA	-	Sustainability Appraisal

Appendix A

This is a list of bodies, some of which the Council is required to consult, plus other bodies that it may consult should it be thought necessary to do so. This list is not exhaustive and can be added to as a result of this consultation process.

- 02 Airwave
- 118 Twydall Lane
- 20 Slade Close
- ABC Project
- Accent28 Limited
- Action with Communities in Rural Kent
- Adams Homes Associates
- ADE Residents Association
- Aerotation
- Age Concern Medway Ltd
- Ahmadiyya Muslim Association
- Aircraft Owners & Pilots association
- Airport Operators Association
- Airworks Services
- Alan Dawney Coach Hire
- Alec's Express Travel Ltd
- Allhallows Parish Council
- Alliance Environment & Planning Ltd
- Alltask Limited
- Alzheimer's Society (Rainham (Kent) Support Group)
- Amadeus Night Club
- AMEC Group Ltd
- Anchor Trust
- Annington Property Ltd
- Apnar Ghar
- Aramark Plc
- Arethusa Venture Centre
- Arriva Southern Counties
- Arts Council SE England
- ASD Coaches Ltd
- Aylesford Parish Council
- Barton Willmore Planning Partnership
- Batcheller Thacker
- BEBCAR (uk) Ltd
- Bellway Homes
- Berkeley Homes
- Berkeley Leisure Group
- Biffa
- Big Lottery Fund
- Birling Parish Council
- Blackbushe School of Flying
- Bloomfields Ltd
- Bond Pearce
- Boxley Parish Council
- Bredhurst Parish Council
- Brett Aggregates Western
- Bride Hall Developments Ltd
- Bridge Wardens College
- Brimble Lea
- British Archaeological Society
- British Horse Society N& W Kent.
- British Sign and Grapics Association
- British Waterways SE
- British Wind Energy Association
- Brown Group
- Bryant Homes - South East
- BSK
- BT
- Burham Parish Council
- Burnett Planning & Development Ltd
- C T C
- Cabair Flying Schools Ltd
- CABE
- Cable & Wireless
- Calverton Flying Group Ltd
- Capstone Park Volunteers
- Carter Jonas
- Castle Point Borough Council
- CBI
- CBRE
- CEMEX
- Cemex (UK) Limited
- Centre for Kentish Studies
- Chalkwell Garage & Coach Hire
- Chatham & Aylesford Liberal Democrats
- Chatham Historic Dockyard Trust
- Chatham Historic Dockyard

- Volunteer Service
- Chatham Maritime Trust
- Chatham Telephony Centre
- Chattenden Community Project
- Christ Church - Luton
- Church Commissioners for England
- Church in Society
- CI Holdings
- City of Rochester Society
- Civil Aviation Authority
- Cleanaway
- Cliffe and Cliffe Woods Parish Council
- Cluttons
- Cobham Parish Council
- Connexions Chatham Access Point
- Connexions Kent and Medway (HQ)
- Constantine Construction Co (Medway) Ltd
- Construction Engineering School
- Cooling Parish Council
- Costain Limited
- Country Land & Business Association (CLA)
- Countryside Maritime Limited
- Countryside Property
- Court Lodge, Lower Road
- Courtley Consultants Ltd
- CPRE Hoo Peninsula
- CPRE Kent
- CPRE Medway
- Creative Environmental Networks (CEN)
- Croudace Ltd
- Crystal's Coaches
- Culture South East c/o Agenda UK Ltd
- Cuxton Countryside Group
- Cuxton Parish Council
- CVS Medway
- CWS South East Co-op
- Cycling England
- Darland Residents Association
- David Hicken Associates Ltd
- David Jarvis Associates Limited
- David Lock Associates
- David R Stacey
- Davis Brown
- Deanland Airfield
- Defence Estates
- DEFRA (C/O GOSE)
- Delce Manor Housing Co-operative Limited
- Delphi Diesel Systems
- Denham Aerodrome
- Department for Education and Skills
- Department for Transport Rail Sub-Group
- Department of Health
- Derwent Housing Association Limited
- Development & Residential Consulting
- Development Land Services Ltd
- DHA Planning
- Dialogue
- Dickens Country Protection Society
- Diggerland Ltd
- Diocese of Rochester - T&CP Policy
- Disability Information
- Disability Rights Commission
- Dockside Outlet Centre
- Donaldsons
- DPDS Consulting Group
- DTI
- DTZ
- DTZ Pleda Consulting
- Dunedin Property
- EDF Energy
- EDF Energy
- Elliott-Medway Fineline
- English Churches Housing Group
- English Heritage
- English Partnerships - (London)
- English Partnerships HQ
- Entec UK Ltd
- Entergy Power Group
- Environment Agency
- Essex County Council
- Ethnic Minority Forum
- Ethnic Minority Senior Citizen's Association
- Eurobell West Kent Ltd
- Faithdean PLC

- Farleigh Coaches
- Federation of Small Businesses
- Findsbury & Wainscott Community Assn
- First European Airways Ltd
- Firstgroup PLC
- Forestry Commission SE England Consevancy
- Fort Amherst Heritage Trust
- Frances Iles Gallery
- Frankie and Benny's
- Freight Transport Association London and SE Region
- Friends of the Earth (Medway)
- Frindsbury and Wainscott Community Association
- Frindsbury Extra Parish Council
- Frindsbury, Upnor & Chattenden PCC
- Fuel Oils (Holdings) Ltd
- Fuji Copain UK Ltd
- Fuji Seal
- Fusion Ltd
- FWCA Frindsbury and Wainscott Community Association
- Gala Clubs
- Gateway Knowledge Alliance
- General Aviation Awareness Council
- George Webb Finn
- Gerald Eve
- GHG Consultancy Ltd
- Gillingham Business Park
- Gillingham Football Club
- GL Hearn
- GNER Holdings Ltd
- Go-Ahead Group
- Graham Warren Partnership
- Gravesham Borough Council
- Green Issues
- Gregory Gray Associates
- Groundwork Kent & Medway
- GVA Grimley
- Habinteg Housing Association Ltd
- Hallam Land Management Limited
- Halling Parish Council
- Hands Rochester Volunteer

- Bureau
- Hanover Housing Association
 - Hanson Aggregates
 - Hanson-Tower Ltd
 - Harlequin Ltd
 - Harrisons Chartered Surveyors
 - Hartlip Parish Council
 - HE Services
 - Health and Safety Executive - Hazardous Installations Directorate (West Sussex)
 - Heli-charter Ltd
 - Hempstead Residents Association
 - Hempstead Valley Shopping Centre
 - Henry Schein (UK) Holdings
 - High Halstow Parish Council
 - Higham Parish Council
 - Highways Agency
 - Hillreed Homes
 - Hindu Sabha
 - Historic Dockyard & South East Museums Hub
 - HM Prison Cockham Wood
 - HM Prison Services
 - HND Ltd
 - Holiday Inn (Rochester)
 - Home Builders Federation
 - Home Builders Federation
 - Home from Home
 - Home Office
 - Homebase Ltd
 - Hoo St Werburgh Parish Council
 - Hope in the Community
 - Housing 21
 - Homes and Communities Agency
 - Howard Hutton and Associates
 - HSBC
 - Hunting Consortium of Companies
 - Hyde Housing Association Limited
 - Icen Projects Limited
 - ICM Plastic Moulding Ltd
 - ING
 - Inland Revenue
 - IPS International LTD
 - Isle of Grain Parish Council
 - Iwade Parish Council
 - J Sainsbury plc
 - Jaycrest Ltd
 - JobcentrePlus
 - John Divine

- John Sharkey & Co
- Jones Day
- Judith Ashton Associates
- K Ying Chinese Elderly Association
- Kala Kendra
- Keith Hammond
- Kelsey Housing Association Limited
- Kent & Medway Biological Records Centre
- Kent & Medway Economic Board
- Kent & Medway Fire and Rescue Services
- Kent & Medway Learning & Skills Council
- Kent & Medway Rural Transport Partnership
- Kent & Medway Safety Camera Partnership
- Kent Air Ambulance Trust
- Kent Ambulance NHS Trust
- Kent and Thameside Fastrack
- Kent Archaeological Society
- Kent Architecture Centre
- Kent Association For Spina Bifida & Hydrocephalus
- Kent Association of Parish Councils
- Kent Bangladesh Welfare Association
- Kent Community Housing Trust
- Kent Council for Voluntary Youth Service
- Kent County Council - Heritage Conservation Group
- Kent County Council - Planning
- Kent Downs AONB Unit
- Kent Energy Centre
- Kent Ethnic Minorities Disabilities Forum
- Kent Express
- Kent Fire and Rescue Service HQ
- Kent Islamic Centre
- Kent Malayalee Association
- Kent Multicultural Community Association
- Kent Muslim Welfare Association
- Kent Ornithological Society
- Kent Police (Estate Department)
- Kent Probation Service (HQ)
- Kent Ramgarhia Darbar - Gurdwara
- Kent Refugee Action Network (KRAN)
- Kent Reliance Building Society
- Kent RIGS Group M
- Kent Rural Community Council
- Kent Turkish Welfare Association
- Kent Wildlife Trust
- Kent Youth
- Kevin Wise Town Planning & Development Services
- Keystone Centre
- KGB Cleaning Services (Southern) Ltd
- King George V Memorial Houses
- Kings Ferry
- Kingsley House
- Kingsley Smith
- Kingsley Smith & Co
- Kingsnorth Power Station
- KTI Energy Ltd
- KTNC Medway Group
- Kut-O Chinese Association
- L & Q Beaver Ltd
- L C P Automotive Components
- L Robinson & Co (Gillingham) Ltd
- La Leche League Of Rochester
- LA21 Transport Forum
- Lafarge Cement UK
- Lambe & Evans Building Contractors Ltd
- Lambert Smith Hampton
- Lapthorne industries
- LAW Leasing Ltd
- Lee Evans Planning
- Legal Services Commission - SE
- Levvel
- Lilliput Childcare
- Littman Robeson
- Lloyds TSB Bank PLC
- Lloyds TSB Life Assurance Co Ltd
- Locate in Kent
- Lower Halstow Parish Council
- Luddesdown Parish Council
- M Logistics International
- M Y Cartons Ltd
- Mackays of Chatham Plc
- Maidstone Borough Council
- Malcolm Judd and Partners
- Marine and Fisheries Agency
- Marks & Spencer plc
- McCarthy & Stone
- McDonalds Restaurants
- Medway & Swale Estuary Partnership
- Medway Access Group

- Medway Afro Caribbean Association (Gillingham)
- Medway Arthritis Self Help
- Medway Association of Independent Taxi Drivers
- Medway Asthma Self-help
- Medway Bridge Marina Limited
- Medway Chamber of Commerce
- Medway Citizens Advise Bureau (CAB)
- Medway Community College
- Medway Community Living Services Ltd
- Medway Credit Union
- Medway Cycle Forum
- Medway Education Business Partnership
- Medway Ethnic Minority Forum
- Medway Fawcett Society
- Medway Friends of the Earth
- Medway Green Party
- Medway Health Forum
- Medway Hindu Centre
- Medway Homestart
- Medway Inter Faith Action
- Medway Language Achievement Service
- Medway Learning Partnership
- Medway Licensed Taxi Drivers Association
- Medway Maritime Hospital
- Medway Mediation
- Medway Mencap Society
- Medway NHS Trust
- Medway Pensioners Forum
- Medway Ports
- Medway Providers Forum
- Medway Racial Equality Council
- Medway Residents Group
- Medway Scout Association
- Medway Teaching Primary Care Trust (PCT)
- Medway Towns Conservation Volunteers
- Medway Towns Crime Prevention Panel
- Medway Towns Footpath Group
- Medway Towns Gurdwara Sabha
- Medway Urban Parks & Green Spaces Forum
- Medway Valley Countryside Partnership
- Medway Waste Forum
- Medway Youth Parliament
- Mercury Personal Communications Ltd
- MeRGe
- MHS Homes
- Michael Dakers Solicitors
- Michael Parkes Chartered Surveyors
- Michael Parkes Surveyors Ltd
- Micro Medical
- Mid Kent College
- Mineral Products Association
- Ministry of Defence
- Minster on Sea Parish Council
- Mittal Steel Kent Wire Ltd
- MM2K
- Moat Homes Limited
- Moat Housing Society
- Mobile Operators Association
- Mono Consultants
- Mowlem
- Multiple Sclerosis Society (Medway Towns Branch)
- N & D Attwood
- Nathaniel Lichfield & Partners
- National Federation of Bus Users
- Natural England
- Natural Resources Institute
- Natwest Bank PLC
- NCH South East
- Nestledown Beds Ltd
- Network Rail
- New Brompton College
- Newington Parish Council
- NFU
- North Kent Chamber of Commerce
- North Kent Justice Area
- North Kent Magistrates' Court
- North Kent Rail Users Group
- Northfleet Cleaning Services Co Ltd
- Nu Venture Coaches Ltd
- Oasis Unit, HMP Rochester
- Open Spaces Society
- Orange
- Orbit Group Ltd
- Orbit Group Ltd
- Parklake Estates Limited
- Pentagon Shopping Centre

- Persimmon Homes South East
- Planning Perspectives
- Planning Inspectorate
- Planning Potential
- Popular Flying Association
- Powergen Ltd
- PPS Phillips Planning Services Ltd
- Presentation Housing Association
- Presentation Housing Association Limited
- Prime Construction Consortium
- Princess Royal Trust
- Probation Service - Medway Local Office
- Protem (Kent) HGV
- Punjabi International Cultural Society
- R Swain & Sons Ltd
- R W Graphics
- Rail Passengers Council Southern England
- Rainbow Arts
- Rainham & Gillingham Privacy Care Group
- Rainham Gillingham and Chatham Amenity Society
- RAISE
- Ramblers Association (Kent)
- Ramblers Association (London)
- Rapleys
- Rebound ECD Ltd (Medway STC)
- Redhill Air Services
- Redroute Buses
- Redrow Homes (Eastern) Ltd
- Reeves & Neylan Accountants
- RHA
- River Medway Business User Group
- RNID South East and Anglia
- Robert Brett & Sons Ltd
- Rochester Airport Consultative Committee
- Rochester Airport PLC
- Rochester Bridge Trust
- Rochester Cathedral
- Rochester Diocese
- Rochester Diocese Board of Education
- Rochester Independent College
- Roger Tym & Partners
- Rosemound Developments Ltd
- Roueagle Ltd
- Royal Association For Deaf People
- Royal Mail South East
- Royal School of Military Engineering
- RPS Group
- RPS Planning
- RSPB (Medway)
- RSPB South East Regional Office
- S W Attwood & Ptrs
- Safeway Stores Plc
- Salvation Army
- Sanctuary Housing Association
- Savills
- Scout Association
- Secondsite Property Holdings Ltd
- Secondsite Property Holdings Ltd
- SEEBOARD
- SEEDA
- SEERA
- Seneschal
- Shepherd Neame
- Sheppy Industries Ltd
- Shoosmiths
- Shorne Parish Council
- Showman's Guild of Great Britain
- Sikh Sangat Gurdwara Association
- Siri Guru Nanak Gurdwara
- Skanska
- Smith Stuart Reynolds
- Snodland Town Council
- Social Inclusion Project For Medway Young People
- Society Linen Services Ltd
- Somerfield Stores Ltd
- South East Centre for the Built Environment
- South East Coast Strategic Health Authority
- South East England Conservancy
- South East Marine Association
- Southend-on-Sea Borough Council
- Southern Gas Networks
- Southern Housing Group Limited
- Southern Water
- Spiritual Assembly of the Baha'is of Gillingham
- Splashes Leisure Pool
- Sport England - SE Region
- Sri Guru Ravidass Sabha
- St Mary's Island Residents Association

- St. James Isle of Grain Parish Council
- Stahl Engineering
- Staples
- Startrite Designs Ltd
- Stewart Ross Associates
- Stockbury Parish Council
- Stoke Parish Council
- Stonham Housing (Kent)
- Strood Heritage Society
- Strood Sports Centre
- Strood Town Centre Forum
- Strood Youth & Community Centre
- Strutt + Parker LLP, Planning & Development
- Sure Start Chatham
- Sustrans
- Swale Borough Council
- Swale Housing Association Limited
- Synergy
- Sywell Aerodrome
- Taylor Woodrow Developments Ltd
- Telewest Communications SE
- Telspec Plc
- Tesco Stores Ltd
- Tetlow King
- Thames and Medway Canal Association
- Thames Gateway Kent Partnership
- Thames Gateway NHS Trust
- Thames Gateway Strategic Executive (ODPM)
- Thamesport (London Ltd)
- The Abbeyfield Kent Society
- The Barton Willmore Planning Partnership Eastern
- The Bell Cornwell Partnership
- The Benefits Agency
- The Casino Rooms Entertainment Complex
- The Crown Estate
- The Exchange Bar
- The French Hospital
- The Information Shop For Young People
- The Patman Trust
- The Planning Bureau Ltd
- The Post Office Property Holdings
- The Royal Bank of Scotland
- The Theatres Trust
- The Upnor Society
- The word on the street
- Thurrock Council
- Tim's Travel Ltd
- T-Mobile (uk) Ltd
- Tonbridge and Malling Borough Council
- Tourism South East
- Town and Country Housing Group
- Town Planning Team
- Trail Riders Fellowship
- Tram and Light Rail Society
- Transport for London
- Trenport Investment Ltd
- TT Travel
- Turley Associates
- UGC Cinemas
- University College for the Creative Arts
- University College for the Creative Arts at Rochester
- University of Greenwich at Medway
- University of Kent
- University of Kent at Medway
- Unlock
- Upchurch Parish Council
- Veetee Rice Ltd
- Ventmaster Europe Ltd
- Vigo Parish Council
- Vincent & Goring Planning Consultants
- Virgin Active
- Vodafone
- W M Morrisons
- Wainscott Residents Association
- Wakeley Brothers
- Walter & Randall
- Ward Homes Group Ltd
- Watson Day
- Webb Aviation Aerial Photography
- West Kent Badger Group
- West Kent Downs Countryside Forum
- West Kent Health & Social Care Trust
- West Kent Primary Care Dental Service
- Westminster Health Care
- Westminster Pharmaceutical & Paramedics
- White Young Green
- Wilkinsons Hardware
- Women's Aid
- Women's National Commission
- Women's Support Service

- Workers' Educational Association (WEA)
- Wouldham Parish Council
- WYG PLANNING & DESIGN
- Xchanging Ins-Sure Services
- Young Offenders Institute
- Youth Justice Board

Appendix B

Lodge Hill : Master-Planning consultation bodies

Group	Notes
27 th Scout Group	Community
Allhallows Parish Council	Community
Allhallows Primary School	Community
Arethusa Venture Centre	Community / Business
Arriva (Southern Counties) Ltd	Business
Bishop Gundulph Church	Faith
Bridgewoods Fields Archery Club	Community / Business
British Horse Society	Community
Canterbury Christ Church University	Community / Business
Chatham World Heritage	Community / Business
Chattenden Community Forum	Community (commenced in 2011)
Chattenden Primary School	Community
Chattenden Syndicate	Community / Business
Church in Society	Faith
Cliffe & Cliffe Woods Parish Council	Community
Cliffe Village Club	Community
Cliffe Woods Community Centre	Community
Cliffe Woods Primary School	Community
Cooling Parish Council	Community
Council for Voluntary Services	Community
CPRE Kent	Community
CPRE Medway	Community
Cuxton Parish Council	Community
Dickens Country Protection Society	Community
Diocese of Rochester	Faith
Elms Medical Centre	Community
English Heritage	Statutory
Environment Agency	Statutory
Federation of Small Businesses	Business
Friends of Hillyfields	Community
Friends of North Kent Marshes	Community
Friends of the Earth South East	Community
Frindsbury & Wainscott Community Association	Community
Frindsbury Extra Parish Council	Community
Frindsbury Tennis Club	Community
Grain Parish Council	Community
Greening the Gateway Kent and Medway	Business
Groundwork, Kent & Medway	Community
Halling Parish Council	Community
High Halstow Cricket Club	Community
High Halstow Parish Council	Community
High Halstow Primary School	Community
Higham Parish Council	Community
Highcliffe Medical Practice	Community
Hoo Partnership	Community
Hoo Residents Association	Community

Hoo St Werburgh Parish Church	Community
Hoo St Werburgh Parish Council	Community
Hoo Village Institute	Community
Hope in the Community	Community
Hundred of Hoo Leisure Centre	Community / Business
Hundred of Hoo School	Community (n.b the school has a community manager)
Kent & Medway Fire & Rescue Service	Statutory
Kent Council for Voluntary Youth Services	Community
Kent Economic Board	Business
Kent Ornithological Society	Community
Kent Police Authority	Statutory
Kent Wildfowling & Conservation Association	Community / Business
Kent Wildlife Trust	Statutory
Kingsnorth Climate Action Medway	Community
Locate in Kent	Business
London & Quadrant Community Partnership	Community
Medway Countryside Forum	Community
Medway Enterprise Gateway	Business
Medway Historical Ordnance	Community
Medway Local Access Forum	Community
Medway Older Peoples' Partnership	Community
Medway Pensioners Forum	Community
Medway Primary Care Trust	Statutory
Medway Racial Equality Council	Community
Medway Regeneration Ambassadors	Community
Medway Urban Parks and Greenspaces Forum	Community
Medway Youth Parliament	Community
Mid-Kent College	Community / Business
Natural England	Statutory
Nextstep Kent & Medway	Community / Business
North Kent Chamber of Commerce	Business
Open Spaces Society	Community
Parks Medical Practice	Community
Peninsula Rock	Faith
Peninsula Youth for Christ	Faith
Raise	Community
Ramblers Association	Community
Royal Engineers Angling Club	Community
Royal Engineers Museum & Library	Community / Business
Royal School of Mechanical Engineering	Business
RSPB	Statutory
Rural Liaison Committee	Community Forum - Parish Councils on the Hoo Peninsula
Soroptimists International – Medway Towns	Community
St Margaret Church, High Halstow	Faith
St Mary Hoo Parish Council	Community
St Nick's Day Centre Strood	Community
St Werburgh Medical Practice	Community
Stoke Parish Council	Community
Strood Heritage Society	Community

University of Greenwich	Community / Business
University of Kent at Medway	Community / Business
Upnor Residents Association	Community
Visit Kent	Business
Wainscott Primary School	Community

Appendix C

Pre-application 'basic' measures for major applications

1. **Inclusive invitation.** Reasonable attempts should be made to ensure that a representative cross-section of the community, the promoter(s) and the Council should be invited to the same event(s), to ensure that all participants are aware of each other's views. Invitations should go to existing local resident associations, community forums, neighbourhood groups and interest groups where they exist or are formed as a result of the proposal. It may be necessary to hold additional events for those groups not traditionally involved in the planning process. Events should be held in accessible locations. In any event, all participants in the involvement process should be asked to put their contact details on record so as to ensure that they receive feedback on the results of involvement.
2. **Authorisation.** Those representing community groups, the promoter(s), and the Council should be able to show that they are authorised to speak for their organisations. The scale and remit of those organisations should also be made clear.
3. **Continuity.** Involvement should be a continuous process with the timetable for the period of preparing the plan or making the planning application made clear in advance to the participants. Where involvement is intended to include a series of meetings or events then, as far as possible, the same individuals that represent the community, the promoter and the Council should continue to be involved throughout the process to ensure continuity of views. Nevertheless, it may be appropriate for other participants or advisers to be involved intermittently. However the process should not be re-run if or when representatives change.
4. **Independent advice.** Where technical or professional advisers or private consultants are employed as independent facilitators to manage the involvement process, they should have a client duty of care to all parties equally and should be instructed to follow these ground rules, irrespective of the party employing them. Where facilitators or advisers are not independent this should be declared.
5. **Early Involvement.** Arrangements should be made for the meetings process to begin and for all parties to meet at the early "ideas" stage of the plan or the development preparation process. This is before specific proposals are made, when significant options are still open and can be identified and while there is still the potential to make a difference.
6. **Presenting options.** The aim should be to set out options or choices that are possible in the way that specific development is carried out, including those suggested by the community that reflect the community's needs, ambitions and experience. Purely oral or written presentations should be avoided so that, wherever possible, options are illustrated in 3 dimensional terms with models and examples of sustainable development best practice in comparable schemes elsewhere (see for example "Towards Good Practice in Sustainable Urban Land Use" ODPM 2004). In generating options the constraints of already adopted national and local planning policy should be made clear as well as the opportunities still open to choice. It may not be possible to include in options issues that are commercially confidential.
7. **Choosing between options.** The planning criteria for choosing between options should be made clear and transparent, identifying where a distinction has been made between choices based upon technical and legal argument and choices based purely on opinion.

8. Consensus. Best endeavours should be made to reach consensus making it clear and specific how far the involvement has resulted in agreement to adopt or to alter proposals. Where agreement has not been possible, the reasons and the scale of disagreement should be made clear and specific.

9. Transparent records. Community involvement meetings should be summarised in a Community Involvement Statement, which will be submitted to the Council as a supporting document. Community Involvement Statements will be provided by the applicant to support relevant planning applications submitted for determination. A Community Involvement Statement will also be prepared and submitted with Local Development Documents for examination.

An opportunity will be given to participants of community involvement meetings to verify Community Involvement Statements before they are submitted to the Council. Participants may provide a written statement of omissions and corrections which will be reported and considered by the council along with the Community Involvement Statement.

10. Feedback on the outcome of community involvement. Those who have supplied their details will be notified of the availability of a report to show, with reasons, how far the recommendation or determination of planning applications or the approval of Local Development Documents has reflected the opinions given by the community and the weight given to them. For planning applications this will be either the case officers delegated decision report, or the Development Management Area Committee report and minutes. For Local Development Documents this will be the Community Involvement Statement as required by the Town and Country Planning (Local Development) (England) Regulations 2004. Neighbourhood Planning Groups are expected to share the outcome of community involvement with their membership by, for example, their community newsletters.

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Lodge Hill Development Brief

Consultation draft July 2011

Agenda Item 5.

About this document

This document is a consultation draft of a Development Brief for Lodge Hill. It sets out the Council's policies, expectations and ambitions for the new settlement at Lodge Hill. Because it is being produced before the new Core Strategy is adopted, it will not be a formal Supplementary Planning Document (SPD). Instead it will be approved by the Council to inform the Hearings into the Core Strategy. It will also be a material consideration in the determination of any planning application for the site. Once the Core Strategy is adopted, the Council will consider upgrading the document to a full SPD.

The Council is also consulting on the publication draft of its Core Strategy. Policy CS33 of the Core Strategy makes a strategic allocation of land at Lodge Hill for a new settlement and sets out key principles that will have to be followed in its development. This Development Brief expands on Policy CS33. It will provide more detail about how the Council feels the site should be developed. The Development Brief also includes policies related to the potential impact of the new settlement on the wider area.

➔ **Text in this format is a specific policy that has to be complied with by future developers.**

The remaining text provides context and guidance to inform these policies. It is relevant in determining future applications but does not have as much weight as the policies themselves.

How to get involved

When the Council started producing this document in March 2011, we asked local people about some of the issues that would be covered in it. The comments and feedback that we received then has influenced this document. A full summary of previous consultation is at Appendix 1. There has also been a lot of consultation carried out by Land Securities on their proposals for the site. The Council has had access to the feedback from these events, and this has also been taken into account when writing the Development Brief.

This document is in draft. We want to be sure that the policies for the Lodge Hill site take on board the community's aspirations, thoughts and concerns. If you have any comments on the policies in the draft Development Brief, or any suggestions for how it could be improved, please let us know in one of the following ways:

Limehouse: This is an online consultation system. We 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 you can see our responses to all comments we receive. To register, please go to: <http://medway-consult.limehouse.co.uk/>

Email: ldf@medway.gov.uk

Telephone: 01634 331446 (office hours are 9am – 5pm Monday to Thursday and 9am – 4:30pm Friday)

Post: Lodge Hill Planning and Project Manager
Planning Policy and Design Team
Regeneration, Community and Culture
Medway Council
Gun Wharf
Dock Road
Chatham
Kent ME4 4TR

Comments must be received by 5:00pm on Monday 10 October 2011. Any comments that arrive after this time cannot be considered for the next draft of the Development Brief.

Other documents

All planning policies have to be assessed to make sure that we understand what the impacts of the proposals are. In this case, as the Development Brief are an expansion of the policies set out in the Core Strategy, many of the assessments required have been carried out to support that document. In particular, a sustainability appraisal has been carried out on the Core Strategy at various stages and is publicly available. A Habitats Regulations Assessment is required as the development may have an impact on the Special Protection Areas and Ramsar sites at the Medway and Thames estuaries. This is also being carried out for the Core Strategy but is currently still in progress.

More detailed assessments of the impact of the Lodge Hill development will take place as part of the planning applications for the site.

Lodge Hill Development Brief

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Neighbouring communities

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Skills and education
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Materials
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Chapter 1 – Introduction

1.1

The vision for Lodge Hill, below, is set in the draft Core Strategy. It shows what the new settlement should be like when it is complete. It underpins Policy CS33, the Lodge Hill policy in the Core Strategy, and will underpin the eventual proposals for the site. The rest of this Development Brief, and the policies it includes, are intended to help make this vision a reality. The Concept Plan, overleaf, is also from the Core Strategy and shows, at a broad level, how the principles set out in the policy influence the form of the development to come.

A Vision for Lodge Hill

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.

1.2

The Core Strategy also sets seven development principles for Lodge Hill. These inform all the policies in the Development Brief. The thread that links them is the need for Lodge Hill to be an exemplar of sustainable development. This is not just about how it reduces its impact on the environment and responds to climate change. Just as crucial is how the new community is grown and the quality of life that Lodge Hill provides for its own residents and the wider community.

1.3

The development principles for Lodge Hill are:

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

provide a range of training, employment and business opportunities

- **Well served** – allowing the community within Lodge Hill and beyond to benefit from public, private and voluntary services that are accessible to all and meet people's needs and aspirations
- **Well run** – effective engagement and participation by local people, groups and businesses in the planning, design and delivery of Lodge Hill, with a sustainable management model and effective leadership, governance and participation of the community in the long-term stewardship of Lodge Hill.

The site and surroundings

1.4 Figure 1.2 shows the boundary of the strategic allocation, as set out in the Core Strategy. This Development Brief cannot allocate land outside of this area. However, it does apply to a wider area, as it has to consider the influence that the development will have on its surroundings, and vice versa.

1.5 The character of the Lodge Hill site is dictated by its topography. Chattenden Ridge runs through the north of the site, Deangate Ridge is immediately to the south and a large proportion of the developable area of the site is hidden in the valley between. There is a broad, fairly flat area at the base of the valley, but in places the northern slope becomes quite steep. Deangate Ridge meets the high ground at Round Top Wood at the western edge of the site, and this divides the main "Lodge Hill" area of the site from the area at Chattenden Barracks and the existing village.

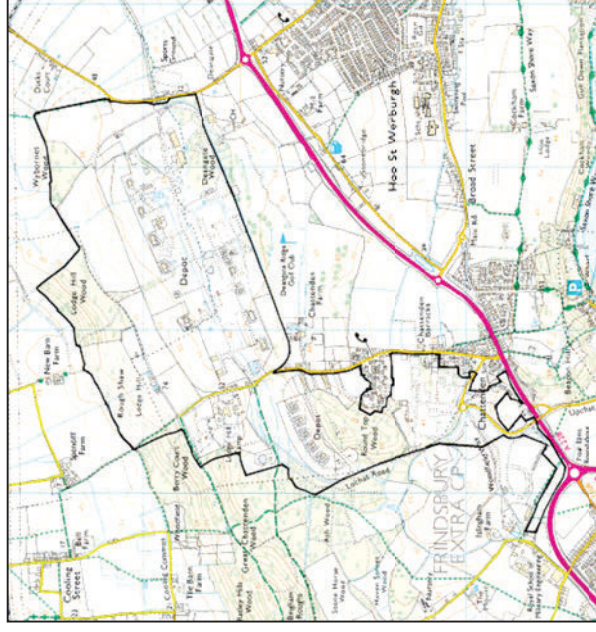


Figure 1.2: Strategic allocation boundary

1.6

Historically, the ridges running across the Peninsula would have been heavily wooded. The areas in and adjoining the site still retain large areas of woodland. Parts of Great Chattenden Woods, Lodge Hill Wood, Wybournes Wood, Deangate Wood and Round Top Wood are ancient woodland. There are also some other wooded areas including shelterbelts along historic field margins. The Chattenden Woods Site of Special Scientific Interest (SSSI) is designated partly for the importance of its woodland habitat, and partly for its populations of woodland birds. This includes Chattenden Wood, Lodge Hill Wood and the area of grassland at Rough Shaw.

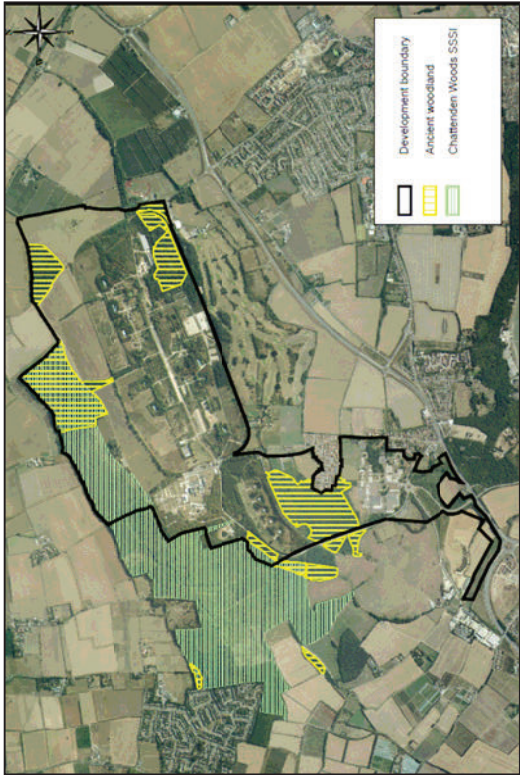


Figure 1.3: Existing woodland on site

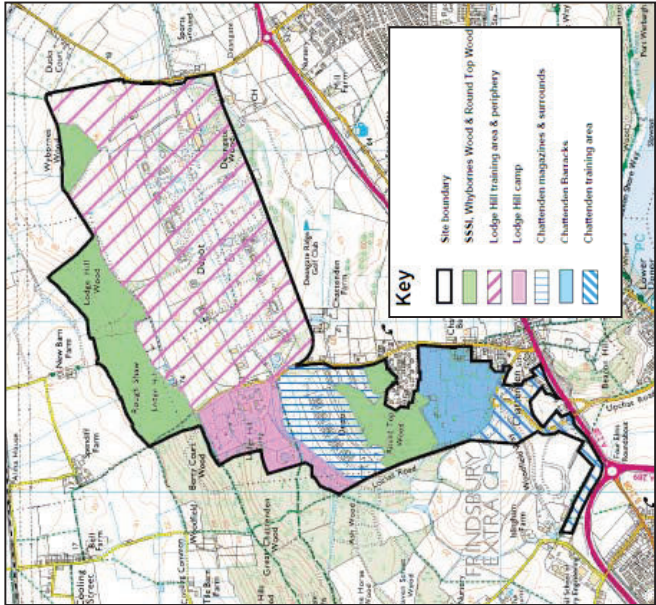


Figure 1.4: Historic divisions of site

- 1.7 The woodlands provide a green backdrop to the Medway towns. Together with the area of farmland to their south (part of the Islingham Farm holding) they help to separate the rural Hoo Peninsula from the main built up area, which ends at the A289. This farmland is very prominent in views from the A289 both approaching and leaving Medway. Its importance as a buffer and a gateway will only be increased with the development of Lodge Hill so close to the main urban area.
- 1.8 The relationship of Lodge Hill to this area will make a strong statement about its character and intent.
- 1.9 The MOD has occupied land around Lodge Hill for well over 100 years. The site has always been part of a network of military installations around the River Medway, and was historically linked to the depot at Lower Upnor by a rail system. While “Lodge Hill” refers to the whole of the current development site, in fact this includes a number of distinct areas, which were developed in stages. Figure 1.4 shows the division of the site between these areas. Most recently, the whole site has been used for various forms of military training. This has also taken place on some of the adjacent farmland.
- 1.10 The historical use of this site has left a wealth of military heritage. Many of the buildings and structures on site are highly significant as part of Medway’s military history. English Heritage has recently listed four WWII sentry posts; all are Grade II.
- 1.11 Magazine sheds for the manufacture and storage of munitions, are spread fairly evenly throughout the spine of

the site, each with embankments to contain any explosion. The first of these was built between in the late 19th century. The Chattenden Magazines (a group of five of these sheds) are secluded within a walled area to the north of Round Top Wood. Sadly, all of the magazine sheds have been much altered and damaged since their original construction.

- 1.12 There is a large group of buildings and structures from the period of the First and Second World Wars. This includes a large number of pillboxes (sentry posts), some associated with the defence of the site and its facilities, and others associated with the stop line across the Hoo Peninsula. The stop line was one of a series of anti-tank measures created in case of invasion. Although the stop line itself (essentially a fortified ditch) is no longer visible, the remaining pill boxes are a reminder of its existence. There is also an Ack-Ack station on Chattenden Ridge, which was built in 1913-14 in conjunction with one at Beacon Hill near Upnor. This may be the first anti-aircraft battery in Europe, and is certainly the first in the UK. Currently, it is in very poor condition.

INSERT FIGURE 1.5 (photos - heritage)

- 1.13 Figure 1.6 shows a zone around the site boundary where the impact of development at Lodge Hill is likely to be greatest. This area includes the existing village of Chattenden, adjacent areas of farmland, existing leisure uses and Chattenden Woods SSSI. Changes and proposals within this zone will also have an impact on the new settlement. This zone represents the boundary of the Development Brief.

- 1.14 The Development Brief will also need to address the impact of Lodge Hill across the wider area, including on other existing communities on the Peninsula. Figure 1.7 shows Lodge Hill in the context of the wider area.

Evidence base and current proposals

- 1.15 To support the Core Strategy allocation, a large evidence base has been assembled. This is in accordance with the requirements of government policy in PPS12. It is based on a current masterplan and is available on the Council's website.
- 1.16 The masterplan that supports the Core Strategy may not be the one that is eventually granted planning permission and built out. However, the base information that has informed it is applicable to any proposal on the site. It has been referred to throughout this Development Brief and has helped to inform the policies in it.

Chapter 2 – Community

- 2.1 The strength of the new community at Lodge Hill will be crucial to its success. Neither the Council nor the developer can dictate how a community will grow or develop. However, the onus is on the developer to provide the right conditions for the community to develop naturally. This chapter sets out what can or should be done to provide those conditions.
- 2.2 It is also important that the existing community is not forgotten. Development on the scale of Lodge Hill will be a major change to an area that is currently rural and with no settlements of this size. Provision at Lodge Hill can serve this existing community as well as its own, and every effort should be made to integrate the two.

Housing

- 2.3 Lodge Hill will be a mixed-use settlement. However, housing will be by far the largest portion of development, by both land take and value.
- 2.4 The Core Strategy policy says that the site can accommodate around 5,000 residential units. The indicative masterplan produced in support of the Core Strategy shows around 4,500. However, minor changes to the masterplan could easily increase this figure. A capacity of 5,000 is therefore still appropriate for the policy. An outline application for the site will need to fully assess the maximum level of development that could come forward. The final capacity of each development parcel will be determined at the detailed application stage.

- 2.5 A successful new community should include a wide range of housing types, from town centre flats to larger family houses. This will provide the conditions for a mixed and inclusive community, and will meet a full spectrum of housing need.
- 2.6 Lodge Hill is Medway's only large development site outside of the waterfront and town centre regeneration areas. It should take the opportunity to concentrate on family housing. This will help to balance the higher proportions of flats and smaller units likely to be provided elsewhere. The rural setting also means that Lodge Hill has potential to accommodate "executive" housing: large, high quality houses in more spacious plots. These should not dominate the housing mix but could add to the variety proposed.
- ➔ **Development at Lodge Hill should include a wide range of housing types but family housing should form the majority of provision. It should also take the opportunity to provide some lower density executive style housing.**
- 2.7 The quality of housing provided is very important. Policy CS15 of the Core Strategy requires all housing to meet the Council's space standards, and will apply to Lodge Hill. In addition, Lifetime Homes is a well-established standard designed to promote inclusive housing and enable people to remain in their home when their circumstances change. Its design standards are intended to provide benefits for a wide range of possible users. As Lodge Hill is intended to be an exemplar of sustainability and housing is a key social issue to be addressed, housing on Lodge Hill should meet this standard.

- 2.8 It is accepted that some of the external requirements may be difficult to achieve on Lodge Hill due to site gradients in some areas. The Code for Sustainable Homes gives points for achieving Lifetime Homes standards and has an exception for steep plots. A similar exception will be provided for Lodge Hill.
- ➔ **Affordable housing on Lodge Hill should aim to meet Lifetime Homes standards. Where the gradient of a plot is more than 1:15, there will be an exception to the need to meet criteria 2 and/or 3 for that plot.**
- 2.9 Affordable housing will need to be provided in line with the Core Strategy. This requires 30% of the overall housing provision to be affordable, subject to viability.
- 2.10 Affordable housing should be provided in all phases of the development. The exact location and spread will be determined through negotiation with the Council's Housing team.
- 2.11 There may be some cases where varying the 30% provision for an individual development parcel would benefit the overall development. The Council will consider requests for this but only where a robust justification can be provided. The overall level of provision will have to be balanced elsewhere, preferably within the site. The Council will need to be assured that a suitable method for ensuring this is in place before agreeing to a variation, particularly where it requires the agreement of a different developer.
- 2.12 Delivery of the affordable units should be phased broadly in line with delivery of the private dwellings.
- ➔ **Affordable housing at Lodge Hill should be provided in line with Policies CS14 and CS33 of the Core Strategy.**
- 2.13 Medway Council has established standards for the size and tenure mix of affordable housing provision. These relate to the existing distribution of need in the main urban area. Lodge Hill is a completely different context. It would not be appropriate to apply the same standards and a different way of assessing the likely housing need at Lodge Hill is needed.
- 2.14 Some work on this has been carried out in support of the Core Strategy. When the likely cost of new housing at Lodge Hill is compared with the income profile of potential residents, there is a "gap" where potential residents would be unable to afford market housing on the site. This gives a suggested distribution of housing need for the site. In terms of size of unit, the housing need is wide-ranging. The affordable housing should be representative of the total mix within each phase.
- 2.15 Social rented housing has been the main form of affordable housing provision for some time, but is now being phased out in favour of affordable rented. The legislation that enables this new form of tenure should be in place by the time housing starts being delivered on Lodge Hill. It is also possible to incorporate key principles of the affordable rent tenure under current legislation. Affordable rent will therefore be sought on the Lodge Hill development from the outset.

2.16 Intermediate tenures include shared ownership, shared equity and intermediate rent. It should be a key part of the housing provision at Lodge Hill. This will ensure that a mixed and inclusive community can be created. Shared ownership is the Council's preferred form of intermediate housing. There is evidence of strong demand for it within Medway. However, the intermediate market is evolving rapidly, and the Council does not wish to prevent any future products being considered.

➔ **The affordable housing provided at Lodge Hill should provide a good range of sizes of units to reflect the overall housing mix for the site. It should be based on a tenure mix of 50% affordable rented and 50% intermediate housing, though some variation on a phase-by-phase basis may be acceptable. Shared ownership will be preferred for the intermediate provision.**

2.17 The existing community at Chattenden has a high proportion of affordable housing. This is mainly concentrated in an area to the north of the main village, owned and managed by London and Quadrant (L&Q). The layout of this estate is dated, and there have been some anti-social behaviour issues. Its isolation from the main village is unhelpful.

2.18 A high proportion of a single type of housing in one area can undermine the benefits of a having a mixed and inclusive community. However, this is not a reason to reduce the level of affordable housing provision in neighbouring phases. The Council will work with developers to agree an affordable housing plan for each phase, which will take into account adjoining development. This applies whether it adjoins the existing village or other phases of Lodge Hill.

2.19 As the MOD vacates the site, it is also releasing its family housing in Chattenden to Annington Homes. Many of these properties are also in need of investment.

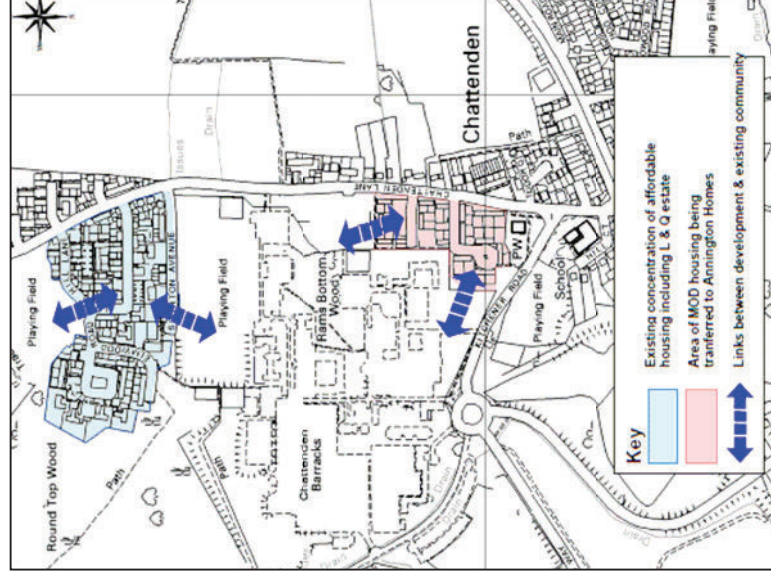


Figure 2.1: Interface with existing housing at Chattenden

2.20 Lodge Hill may act as a catalyst to nearby landowners and prompt investment in these (or other) areas. This would be welcomed, as it could help to improve the integration between the new and existing communities. The Lodge Hill developer and surrounding landowners are encouraged to explore a joint approach to any proposals that come forward. However, this does not mean that any proposals for replacement of existing affordable housing can be offset against the 30% requirement. This should be a net increase in provision.

2.21 To be a fully inclusive community Lodge Hill will also need to make provision for specialist housing. This includes:

- Sheltered housing for older people (sometimes also referred to as retirement villages);
- Assisted living or extra care, for older people with healthcare or personal support needs;
- Nursing homes, for older people with the greatest level of healthcare and personal support needs.
- Supported housing for people with physical and/or learning difficulties
- Wheelchair accessible housing

2.22 The Council is currently undertaking an analysis of the need for these types of specialist provision. The exact level of provision will be determined through the outline planning application. Older peoples' housing schemes should be mixed tenure.

2.23 Any large amounts of older people's housing could benefit from being phased later in the development. This will make it more likely that there is demand from people with a

connection to Lodge Hill, either living there themselves or moving to be closer to family on site.

➔ **The masterplan should make provision for specialist housing of the types set out above. The exact level of this provision and the proportion that should be affordable will be determined with regard to identified needs.**

Community Facilities

2.24 The development at Lodge Hill could lead to as many as 12,500 new people living in the area. There will also be a workforce of around 5,000 people, some of who will travel in from outside the new settlement. This amount of population growth will clearly increase demand for supporting facilities. However, it will also be able to support services and facilities that can serve the Peninsula as a whole.

2.25 The developer must be responsible for meeting the needs arising from Lodge Hill for a number of reasons:

- To ensure that further strain is not placed on existing communities and facilities. Many existing facilities are already under pressure and could not cope with the increased demand.
- To ensure that Lodge Hill becomes a well-functioning and liveable new community, with a sense of place and a good quality of life for future residents.
- To reduce the need for people to travel to meet their day-to-day needs. Personal travel has one of the highest environmental impacts of all human activity.

➔ **Demand for community facilities and services arising from the increase in population at Lodge Hill will be met within the development site wherever possible. Demand can be met off-site but nearby where this is a more efficient use of resources or has additional benefits for existing communities. In this case, excellent links from the development must be provided. Off-site provision further afield will be acceptable where the scale or nature of the demand cannot be met on or near the site.**

2.26 Table 2.1 sets out the broad scale of community facility provision that the development is likely to require. The final demand will depend on the exact housing numbers and mix that come forward. The phasing and triggers for provision will be agreed at outline application stage.

2.27 Off-site provision may be beneficial for leisure and indoor sports. There are existing facilities close to the site, which are well used and valued. Investment in these facilities to cater for some of the increased demand is likely to be a more efficient use of resources than providing brand new facilities within the development. It will also promote integration of the new and existing communities.

2.28 The Deangate Ridge sports centre, adjacent to the eastern site boundary, is an obvious opportunity for off-site provision. There are also facilities within and on the edge of the village of Hoo, including the BAE sports and social club. This is privately owned and run but is also used by various community groups. The club has recently been seeking to improve its facilities, so it may be another option to meet some demand from Lodge Hill. Public access and use of the facility would have to be

assured. Its location at the northern edge of Hoo could act as a bridge between the two settlements, especially if good links are provided.

2.29 There is also an existing community centre at Chattenden, located at the edge of the L&Q estate. Again, this is well used by local groups. Some of these groups also cater for other communities on the Peninsula. It is well positioned to serve the Chattenden end of Lodge Hill. Provision could still be made in the main valley to serve this part of the community.

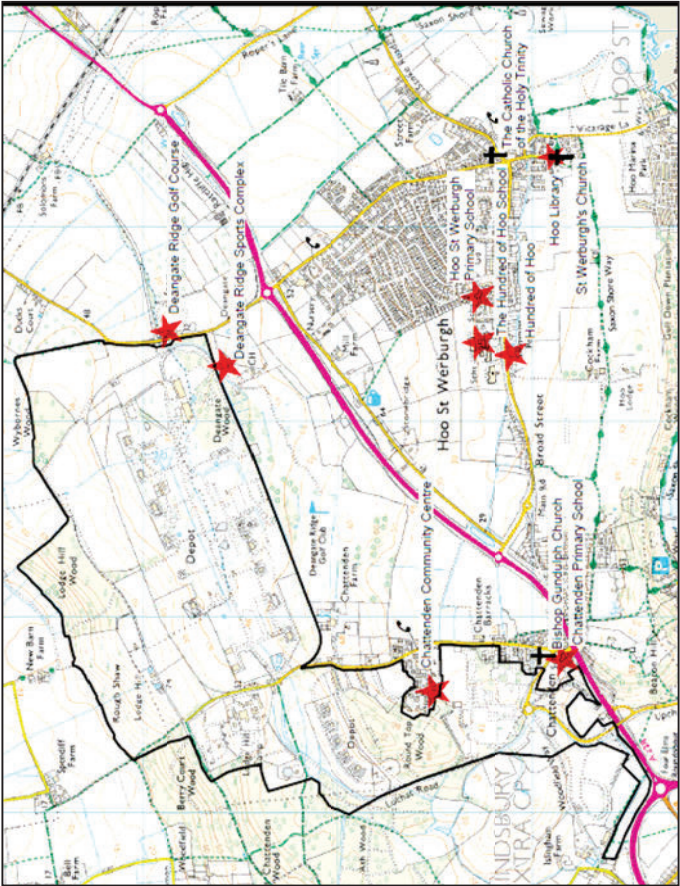


Figure 2.2: Existing community facilities near to the site

Facility	Amount
Secondary school & sixth form	1 school – 5 to 8 forms of entry (150 – 240 places per school year) Financial contribution to grammar school education if demand is found to exceed nearby capacity (based on 25% of secondary school pupils requiring grammar places)
Primary schools	2 new schools and 1 expansion/rebuild – 5 to 8 forms of entry in total (150 – 240 places per school year)
Nursery education (ages 2-4)	80 – 100 places to be provided, preferably co-located with primary schools
Other childcare/education provision	At least 1 families and children's services centre (Sure Start or equivalent)
Healthcare	Special Educational Needs provision to be incorporated into school provision
Public toilets	Health centre on site with accommodation for 6-9 GPs To be provided in Lodge Hill town centre and at the Chattenden local hub. Town centre facility to include "Changing Places" facility in addition to standard disabled toilet.
Play areas	NEAPs – as per adopted standards LEAPs – as per adopted standards LAPs/Doorstep play – as per adopted standards
Informal amenity space	As per adopted standards
Formal outdoor sports	As per adopted standards
Allotments	Minimum 75 standard plots (5 rods or 125m ²)
Youth centre(s)	Likely one standalone facility plus sharing of main community hub
Community centre(s)	Likely one centre in multi-use building in main valley, plus expansion/improvement of existing facility in Chattenden
Place of worship	Capacity to share community facility in main valley
Library	Library to be combined with other community facilities.
Recycling bring sites	At least 2 (one in town centre and one at Chattenden hub)
Cemetery provision	TBC – likely to be contribution to off-site provision
Emergency services	Capacity for police contact point in shared community facility Possible ambulance base

Table 2.1: Suggested scope of community facilities required by Lodge Hill

- 2.30 Community facilities are essential to quality of life but can cost much more to upkeep than their limited potential for income generation can support. However, most community uses do not require specialist space. Somewhere warm, of good size, and with toilets and a place to get refreshments, is often all that is needed.
- 2.31 Multi-functional buildings are a practical solution. To maximise their potential, room layouts should be as flexible as possible. This gives value for money as costs like maintenance, utilities, insurance and so on are shared. It also limits the natural resources required to meet provision and avoids buildings sitting empty when their main user does not need them. Even uses that do require some specialist accommodation, like a library, can benefit from locating in a shared building.
- 2.32 Clustering of community facilities has other benefits. A community café in the lobby of a shared building can become a meeting place for residents. If different groups use the building at the same time, it can help to bridge generation gaps and bring added value. Clustering facilities also makes them easier to get to, for residents who may want to use more than one service, for example. If located in a town centre, the potential for linked trips increases and they can help build the critical mass that creates a vibrant and liveable place.
- 2.33 The town centre at Lodge Hill is the obvious place for the main cluster of these uses. Most uses with a settlement-wide (or Peninsula) catchment should be located here. Examples might be the health centre and library, or a place of worship.
- 2.34 Smaller hubs should be created in the main valley so that as many residents as possible are within ten minutes walk of local facilities. Two local hubs are likely to be needed to achieve this. Community uses with a more local catchment should be located in these smaller hubs. This will also help support local retail provision by attracting footfall. The uses to be provided at these hubs should include “green” uses such as play space or allotments.
- 2.35 The ten-minute walking catchment is also appropriate for primary schools, so these would be best located at the local hubs. Consultation carried out by Land Securities showed strong support for the idea of schools being at the heart of the new community. This is likely to be the best way of achieving the benefits of multi-functional provision at the smaller scale of the local hubs.
- 2.36 Chattenden is physically separated from the main development site by Round Top Wood, and by the distance and topography of the intervening land. Some of the existing built-up areas also act to split the development. Although it is still walkable, people here are more likely to consider using their cars to access the main town centre. There are also a number of existing community facilities in the village.
- 2.37 Chattenden will need a local hub to meet the requirement for ten-minute walking catchments. However, for the reasons above, this hub should be larger than the local hubs in the valley. This would serve the existing population of Chattenden as well as the new development. The location of the hub should take advantage of the existing community uses to help

build critical mass. The developer is encouraged to consider opportunities to relocate existing uses (such as the school, church or community centre) within the development to achieve this. This would be dependent on terms being reached with the relevant landowners and/or users.

2.38 There is therefore a clear hierarchy of local centres within the development:

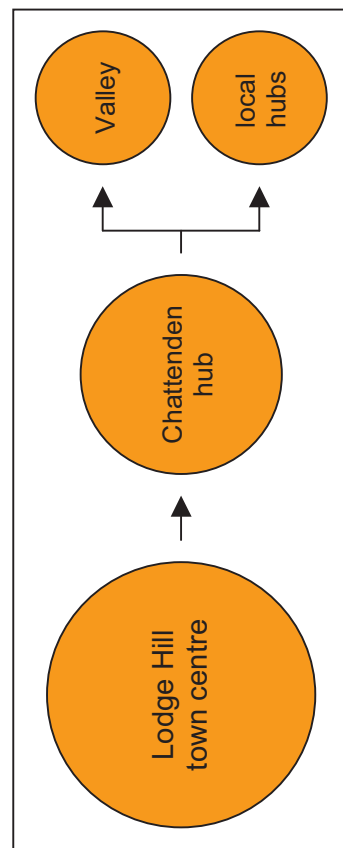


Figure 2.3: Hierarchy of local centres

→ **Community facilities within the site should be provided in multi-functional shared buildings wherever possible. The facilities should be clustered at the town centre and local hubs together with local green space. The amount of provision at each hub should be guided by its place in the hierarchy and whether the facilities proposed have a neighbourhood or settlement (or wider) catchment.**

2.39 Some community provision, such as play space, has a very local catchment. These should be spread throughout the development. The Council has set access standards for open

space in new developments, specifying the maximum distance that someone should have to walk to use the facility.

2.40 In some parts of the site, ecology or heritage features may influence the available space for open space provision. This may mean the access standards have to be relaxed for some properties. However, this will only apply in exceptional circumstances and proposals should come as close to meeting the standards as possible.

2.41 Open space provision can also be multifunctional. Co-location of facilities such as play areas and allotments can help with security, community cohesion and management.

→ **Open space provision (including play space, formal outdoor sports provision, informal amenity space and allotments) should be distributed throughout the development in accordance with the Council's adopted standards. Any shortfall should be made up by contributions to off-site provision. Open space provision should be multi-functional wherever possible.**

Governance and management

2.42 Community facilities and services, open spaces and infrastructure all require ongoing maintenance, management and investment. Service charges are often imposed on residents of new estates to pay for things like landscape maintenance. Usually, a private management company is employed or set up to undertake the maintenance. However, this does not encourage a community to get involved in its

local area or to take responsibility for itself. It also does not allow the community to set priorities for future investment.

2.43 Community development is a worthwhile goal in its own right. The principle is to enable local people to decide what their own issues, needs and solutions are. The vision for Lodge Hill requires it to be an exemplar of sustainability. This is as much about how the community works as how much carbon it is responsible for. The development principles for the site reflect this.

2.44 The standard approach will not be sufficient for this vision to be realised. Whatever model is put forward must meet the following key principles:

- Enable ongoing investment in facilities and services, not just management and maintenance.
- Be accountable to the local community, including representation from other local groups and bodies where appropriate.
- Be able to respond to the local community's priorities and needs.
- Encourage integration of the new community and the existing community of Chattenden.
- Be able to have a holistic view of the needs of all facilities and services, including being able to work with other providers.
- Be self-sustaining in terms of both funding and functioning. This may not apply from the outset, but should be possible once the development becomes established.

2.45 One option could be to establish a Community Trust or similar organisation. This would be fully accountable to the local residents.

2.46 This type of organisation can take on a wide range of responsibilities. It would enable residents to be directly involved in their neighbourhood. It also has a key advantage over more traditional delivery methods, such as a management company or new parish council. This is that a Trust can be entrepreneurial. It can take risks to achieve greater community gains. It can direct its spending and investment according to the community's priorities.

→ A mechanism for ongoing community management and governance should be established. A Community Trust is the Council's preferred option, but other models will be considered if they meet the principles in para. 2.44.

2.47 Whatever model is chosen (for the rest of this document referred to as a Trust) it must be able to fund its responsibilities. As noted above, much community provision is more of a liability than an asset. Service charges should be seriously considered as a reliable option. However, they are unlikely to be set much above the level required for ongoing maintenance. This will not provide capability for ongoing investment or allow the Trust to respond to needs and priorities that arise as the community establishes.

2.48 Some of the facilities and services that might be passed to a Trust do have potential to generate income. It is also common for Trusts to be given an endowment when set up. This can be a financial endowment or in the form of land or buildings.

Table 2.2 suggests various responsibilities that a Trust could take on, and which might provide an income stream.

Possible responsibility	Potential Income
Management & maintenance of open spaces	N
Fishing lakes	Y
Management & maintenance of ecology areas	N
Management & maintenance of unadopted roads	N
Managed workspace provision	Y
Parking provision (communal/charged)	Y
Car club	Y
Community centres	N
Sustainability advice	N
Partner/shareholder in any ESCo or MUSCo*	Y
Youth centre/provision	N
Waste management facilities/recycling & reuse centres	Y
Ongoing community engagement	N
Café and/or crèche associated with other community facilities	Y
“Landmark” projects (e.g. equestrian centre, garden centre/farm shop)	Y
Town centre management	Y

Table 2.2: Possible responsibilities for a Community Trust or similar

*An ESCo (Energy Services Company) may be needed to manage and distribute on-site energy generation. If it has responsibility for other utilities (such as sewerage or broadband) it is a MUSCo (Multi-Utility Services Company).

2.49 The Council is not setting requirements for how the Trust should be funded. The developer will be expected to have thoroughly costed the proposal that comes forward. It will need to demonstrate how funding will be made available to meet the Trust's objectives.

2.50 Ideally the Trust would determine its own remit. This would make it truly representative of its community. However, some of the responsibilities listed above will have to be carried out, whether by the Trust or not. They are part of the developer's requirement to provide facilities to support the new development. While some of these can be usefully allocated to the Trust, it should still be given scope to expand or detail its role as the community establishes.

2.51 It may be most practical to establish the Trust in phases. This is acceptable, but its funding (in whatever form this is provided) must keep pace with its responsibilities. Early provision is preferable.

Neighbouring Communities

2.52 Lodge Hill may, over time, replace Hoo St Werburgh as the rural service centre for the Peninsula. Its population will support services that are currently lacking or struggling on the Peninsula. When combined with the catchment from nearby villages this potential increases. Examples could be a foodstore, a high frequency bus service, and significantly improved leisure facilities.

2.53 It is therefore important that nearby communities are able to access facilities provided on site. High Halstow, Cliffe Woods

and Hoo St Werburgh are all within very easy walking and cycling distance. Residents of other villages on the Peninsula currently have to drive (or catch an infrequent bus) to Hoo or the main urban area to access most services. They pass Lodge Hill en route, so are also likely to divert into the site. Chapter 5 (Transport) discusses in more detail the form these links might take.

2.54 Although an increase in the facilities available to the Peninsula residents is generally welcome, there is a risk that new facilities at Lodge Hill could draw trade from existing facilities. This might even lead to the loss of some facilities where they are already struggling.

2.55 In most villages, day-to-day needs are catered for by a corner shop or small parade. Lodge Hill is unlikely to draw significant trade from these. The possible exceptions are High Halstow and Cliffe Woods because they are very close to Lodge Hill. However, it is likely that only a small proportion of these villages would find it more convenient to use Lodge Hill.

2.56 The greater threat is to facilities that already require some travel. This is likely to most affect Hoo St Werburgh, which may have to adjust from serving the Peninsula to serving a more local population. Feedback from local residents on this issue shows that the facilities which raised most concerns were (listed with highest concern first):

- Village shops (including Hoo)
- Schools in neighbouring villages
- Village halls and community centres
- Village pubs
- Leisure facilities

2.57 Facilities that have a catchment wider than Lodge Hill should be considered carefully. The opportunity to improve service provision for the Peninsula should be taken. However, where possible, these facilities should complement the existing offer rather than directly competing. For example, the improvements to leisure provision may not need to provide a swimming pool immediately adjacent the site, particularly if links to the existing pool in Hoo can be improved.

2.58 In other cases, the solution may be working arrangements that include the existing communities and businesses. Any town centre management or business forum for Lodge Hill could invite businesses in Hoo to join. A close relationship between the new secondary school and the Hundred of Hoo School would help to balance demand between them. A different specialism for the new school and joint working on intake arrangements could also help to reduce conflicts.

2.59 Finally, the potential for direct contributions to help support existing facilities should be considered. It is not the role of a developer to support unviable businesses elsewhere or at the expense of the new provision. However, where Lodge Hill has a direct impact on an existing service and its failure would have a harmful impact on neighbouring communities, there is a case for targeted investment to help mitigate the impact.

2.60 This is only possible if the contribution required meets strict legal tests regarding its relevance to planning and to the particular development. It is likely to be most relevant to retail provision, where a retail impact assessment will be required.

→ **Proposals for facilities and service on Lodge Hill should seek to minimise negative impacts on existing communities and facilities in nearby villages. Measures to reduce impacts should be incorporated into proposals, including as part of future governance arrangements.**

2.61 Many developers of large-scale projects also have corporate social responsibility initiatives. This might include a fund that encouraged bids for community projects in nearby villages. This is beyond the scope of the planning process but may be a role that the Trust could take on.

Chapter 3 – Economy

Economic strategy

3.1 The Core Strategy says that Lodge Hill should make a strong contribution to the wider Medway economy. It will need to have a strong and sustainable economic base in its own right. Lodge Hill has some major advantages as a location for modern, high-quality employment uses (see Box 3.1). Establishing a successful business location will take commitment and investment from developers. However, with a 15-20 year timescale for the development, it is entirely achievable.

- Excellent transport links to London and Europe via the High Speed 1 rail link
- Good road links (M2 and M25 via the A289)
- Potential for direct energy supply from on-site generation, and nearby power stations (needed for some energy-hungry IT uses such as data centres)
- Located within North Kent's corridor of innovation centres and networks
- Exceptional rural setting including golf course adjoining the site
- Bridging location between emerging industries at Grain and Kingsnorth and the main urban area, including the universities at Chatham Maritime

Box 3.1 – Lodge Hill's advantages as a potential business location

3.2 The Council is committed to working with the developers to ensure that Lodge Hill reaches its potential. This includes work outside of the planning process, for example with the Council's Economic Development and Education teams.

3.3 The Council's Economic Development Strategy identifies some of the issues facing the local economy. It sets strategic priorities for Medway's future growth. Developers must have regard to this strategy when drawing up proposals for the site. Issues of particular relevance to Lodge Hill include:

- Increase the gross value added (GVA) of employment within Medway;
- Reduce out-commuting;
- Maximise the potential of the "M2 accessible" areas where demand for premises is highest;
- Retain more graduates;
- Raise skills levels within Medway's workforce.

3.4 Developers should capitalise on Lodge Hill's advantages to make the most of opportunities in higher-value growth sectors. The sectors which may have most potential for Lodge Hill include:

- High-value manufacturing (including food)
- Environmental technologies
- Research and development
- Creative industries
- Health

3.5 Infrastructure is key to achieving economic growth. Lodge Hill can take advantage of its good transport links.

Telecommunications (such as high speed broadband) is also becoming an absolute priority for businesses. The developer should make every effort to secure the best possible broadband infrastructure into the site.

- 3.6 It is central to the vision for Lodge Hill that it should be more than just a commuter village taking advantage of the fast links to London. The developer must have a holistic strategy for realising its economic potential.

➔ **An economic strategy for the site should be submitted with the outline application.**

Jobs and business space

- 3.7 The Core Strategy gives two targets for employment creation:
 - Around 5,000 jobs (in balance with housing numbers); and
 - At least 43,000m² business floorspace (with an aspiration for a higher figure)
- 3.8 It is not realistic to expect everyone who lives on site to also work on site. However, it is important that the opportunity is provided. This will also allow for changes in working patterns in the future, where more people may choose to live and work in the same area. The rising cost of travel is one factor that could contribute to this.
- 3.9 Some jobs will be provided in the on-site retail, leisure and community facilities. Figure 3.1 shows the likely split of employment from on-site services. Jobs in these sectors

are an important part of overall provision. However, they will not address many of the local economy's identified weaknesses. The target for business floorspace will ensure that the development also provides the higher-value employment that the local economy needs.

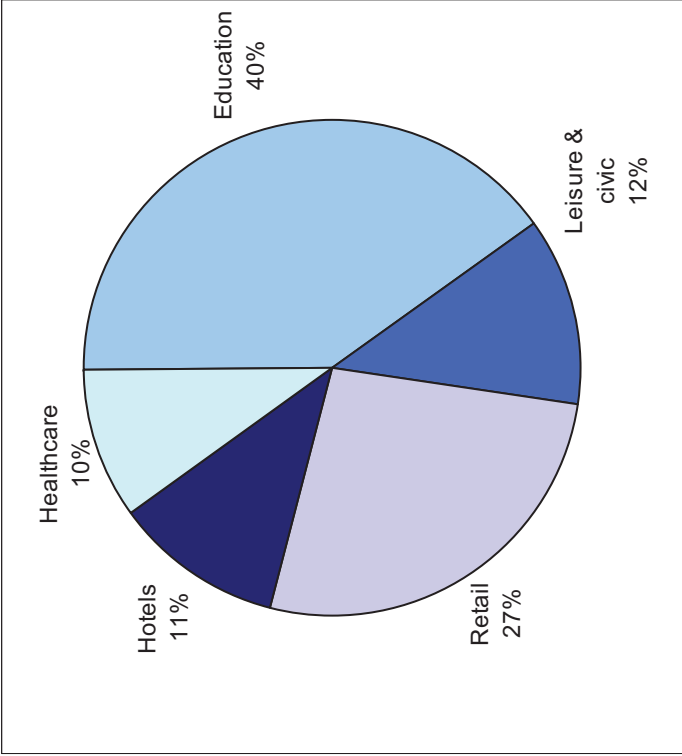


Figure 3.1: Indicative services employment distribution

- 3.10 The total employment in on-site services will be around 900 jobs, leaving 4,100 to be provided by the business

space. If the minimum floorspace is provided, this means around 1 job per 10m².

3.11 This is clearly ambitious. Guidance prepared in 2010 for the Homes and Communities Agency suggests very few sectors reach this average employment density. Office-type uses are the main sector that does achieve it. Light industry and general industry have averages of 1 job per 47m² and per 36m² respectively. However, this can vary greatly. Some light industrial uses (such as some research and development) have employment densities close to the target figure.

3.12 This highlights the importance of aiming to exceed the Core Strategy's floorspace target. It would give some flexibility regarding which uses and sectors can be accommodated within the site, while still allowing the overall jobs target to be met.

➔ **Although 43,000m² is the minimum acceptable employment floorspace, the masterplan should retain the ability to accommodate a significantly higher level, should demand come forward. The developer's economic strategy will be expected to demonstrate how the level of floorspace proposed will meet the 5,000 jobs target.**

3.13 High-value employment tends to fall within use class B1, and some within B2. These classes cover offices, research and development, and light industrial (B1) and general industrial (B2). Business floorspace at Lodge Hill should concentrate on these uses. Not all B2 uses will be suitable

for the site, but modern technology means that many industrial uses can be accommodated in mixed-use areas.

3.14 Sui generis uses (uses not falling within a defined class) may also be appropriate. This will depend on the nature of individual proposals. Environmental technologies, one of the key growth sectors, often involve sui generis uses.

3.15 Uses within Class B8 (storage and distribution) often require large footprint buildings with excellent road access. They tend to generate large amounts of HGV traffic. Employment in these uses is often at a very low density, and can be low-skill and pay. These uses will not generally be appropriate at Lodge Hill. However, some small-scale B8 uses may be accepted as part of the overall mix. In this case, they would have to demonstrate that they do not undermine the overall vision and character of Lodge Hill.

3.16 There should also be some provision of uses that are intended to improve the functioning of the settlement, as well as those concentrating on raising the area's economic profile. Uses such as a car mechanic, for example, will make Lodge Hill more liveable for residents. These can be termed "non-core" or functional uses.

3.17 The main considerations on whether any particular use is acceptable for the site will be:

- How well the proposal fits with the overall vision and character for the development
- The amount of jobs created

- The contribution of the proposed use towards the wider local economy, in terms of value added, skills development and/or graduate retention
- Its value to the proper functioning of Lodge Hill as a place to live, or to the wider Peninsula.

➔ **The majority of business floorspace at Lodge Hill should be within use classes B1. The acceptability of use class B2 and sui generis uses will be assessed on a case-by-case basis. B8 uses will not generally be acceptable. Between 5% and 10% of overall floorspace should be reserved for non-core or functional uses (see para. 3.16).**

3.18 The government is reviewing the use classes order. This could significantly change the grouping of business uses. In this case, the discussion and policies above should be taken to refer to the equivalent replacement use classes.

3.19 Employment space at Lodge Hill should be provided as an integral part of the settlement's built form. Large single-use areas should be avoided. Town and local centres should be mixed-use hubs including employment provision. Some employment uses can also be located within or alongside residential areas. The specific uses proposed would have to avoid impact on the amenity of neighbouring residents.

3.20 Some business park provision could accommodate larger floorplate uses and those that cause amenity problems if located too close to residential properties. It would also allow clustering of uses, which may be crucial to successfully establishing higher value employment.

➔ **Employment space should be distributed and integrated throughout the site. Any business parks must reflect the overall character of the development. Business uses should be provided in the town and local centres. Small clusters of business premises in predominantly residential areas will be acceptable where the uses proposed will not harm amenity.**

INSERT FIGURE 3.2 – EXAMPLE KNOWLEDGE PARK LAYOUT/DESIGN RESPONDING TO HERITAGE/URBAN DESIGN

3.21 A range of types and sizes of business premises should be provided. Smaller units are generally easier to integrate and have higher employment density. They are suitable for start-up and grow-on businesses, so a healthy supply can help raise graduate retention. Medway currently has much higher demand for small units than large units.

3.22 Large, single-user buildings are still acceptable. In the case of business parks or clusters at least one large user may be needed as an "anchor tenant" in a similar way to a department store anchoring a shopping centre. However, large single-use buildings should not form the sole strategy for employment provision.

3.23 Managed workspace has a crucial role to play in increasing the supply of value-added jobs and nurturing local entrepreneurs. It has often been particularly successful for high-tech industries. It can include workshop/industrial space as well as offices, and can

range from a single desk in a shared office to a suite suitable for a medium-sized business, as well as other services for homeworkers.

➔ **Employment provision should include a substantial proportion of small and medium sized business units as part of a wide range of types and sizes. Managed workspace (both office and industrial) should be also provided.**

3.24 Business premises can become outdated very quickly. The physical constraints of a building built for a specific user can be an issue. Other common concerns relate to ICT requirements (especially broadband speeds) and the energy costs of running an older building. The developers of Lodge Hill will need to consider how their employment provision can be future-proofed so that it continues to thrive in the longer term.

➔ **Proposals should ensure the provision of high-quality ICT infrastructure and flexible formats and layouts that will enable future adaptation and conversion.**

3.25 Another current trend is an increase in working from home. Homeworking is not included in calculations of employment need and provision because it can be very difficult to measure. In many cases the homeworker is employed by a company elsewhere but only travels to the office when necessary. However, with the right infrastructure, homeworking can include a very wide range of business models, and can provide high value-added

employment. High-speed broadband will make Lodge Hill attractive to this type of worker.

➔ **Provision and support for homeworking should be made as part of the proposals for Lodge Hill, including dedicated workspace in all dwelling units (except specialist units such as older persons housing).**

3.26 Live-work units are one form of homeworking. They fill a specific niche in the market. There is no evidence of any particularly high demand for them in Medway, but they should be considered as part of the overall housing and employment mix at Lodge Hill.

3.27 Links to other employment provision within Medway are also crucial to help reduce out-commuting. Key destinations for those not working at Lodge Hill are Chatham town centre, Medway City Estate, Kingsnorth and Grain. The developer should consider improvements to these links as part of their wider transport and access strategy (see chapter 5 - Transport). However, this should not be considered an alternative to on-site provision.

3.28 The phasing of employment provision will need to be considered. It may take time to establish a market for large-scale employment provision at Lodge Hill. There will also be a need to respond to market changes. Ideally, employment provision should keep pace with residential development. This should be adopted as a broad principle, but it is accepted that there will be some variation across the course of the development.

➔ **Employment provision should broadly keep pace with residential development. Variations from this phasing should be justified.**

Skills and education

3.29 The need to improve the skills profile of the local workforce is a key priority for Medway as a whole. The Council has a range of initiatives aimed at improving the skills and employability of the local workforce. Many of these are promoted through links with local colleges and universities. The developers of Lodge Hill can both support and benefit from these existing initiatives.

➔ **The economic strategy for Lodge Hill should consider opportunities for training and skill building, including through the construction process.**

3.30 The biggest potential is at the construction stage. Support could include:

- Financial support to existing programmes
- Provision of placements for apprentices and people on other training programmes
- Commitment to work with local contractors and a local supply chain
- Involvement of local firms and trainees in innovative construction methods and provision of small-scale renewables
- Work with colleges and universities to use the site as a case study

3.31 At the operational stage, individual businesses that occupy new premises will be responsible for their own approaches to training. However, a wide range of business can benefit from initiatives linking employers with universities, business networks, potential employees or other support. The emerging economy at Lodge Hill could benefit from this kind of initiative. Developer support could take the form of:

- Financial support to existing initiatives and networks
- Facilitation of events for businesses moving into Lodge Hill (or considering doing so)
- Provision of premises on-site that can be used by such initiatives
- Use of community premises such as schools to support lifetime learning and links between students and businesses

3.32 Further discussion will be required on the exact approach that is most appropriate for Lodge Hill.

➔ **Appropriate support for programmes designed to promote skill building in the local workforce, including businesses that locate on-site, shall be agreed between the developer and the Council.**

3.33 Most initiatives tend to be time-limited and in response to a specific need. However, the principle of working with the private sector and developers is unlikely to change. Any commitments for support will need to be able to respond to changing needs and to work through programmes that emerge over the development timescale.

- 3.34 The best way to promote links between on-site businesses and higher education would be for a university to locate on site. A satellite campus is the most realistic option given the amount of land available. The universities already in Medway have not identified any specific demand for a location at Lodge Hill. However, this may change over the 15-20 year development timescale. Other universities with a requirement in the area may also come forward. It is not appropriate to reserve an area in the masterplan for a higher education use. However, if a proposal comes forward at a later date, it will be looked on favourably.
- 3.35 Any higher education provision on site should be in addition to the employment floorspace identified above.

Retail

- 3.36 Figure 2.3 (Chapter 2 - Community) set out a hierarchy of centres within Lodge Hill. The same hierarchy should apply to retail provision, with large-scale uses and the main cluster being located at the town centre.
- 3.37 Hoo St Werburgh is the current rural service centre for the Peninsula. Although it has a wider range of facilities than the other villages, there is still limited retail provision. The two small foodstores in Hoo do not serve much more than a day-to-day convenience need. The range of other retail provision is also fairly limited.
- 3.38 This means there is a wider market for retail facilities at Lodge Hill. The location of the main town centre should reflect this and enable access for the rest of the Peninsula.

This wider market should allow retail facilities to be brought forward earlier than if they were relying solely on demand from the development. The access strategy for the site (see Chapter 5 - Transport) should acknowledge the likely draw of the town centre and provide good access to the town centre for sustainable modes of transport. The closest existing villages are within easy walking and cycling distance; this should be encouraged.

➔ **Retail provision at Lodge Hill should follow the hierarchy of town centres and local hubs set out in Figure 2.4. The exact distribution between these hubs should ensure that the main town centre has sufficient critical mass to be a vibrant and attractive place for residents, workers and visitors.**

- 3.39 The Core Strategy states that retail provision at Lodge Hill should be at least 5,000m² Gross External Area (GEA), including a foodstore. This figure is relatively flexible. There will need to be good a range of smaller shops, food and drink uses and other ancillary uses (such as a bank and a hairdresser) to balance the draw of the foodstore. Links between the foodstore and the rest of the town centre are also crucial.

➔ **A foodstore should be provided within or on the edge of the town centre. Excellent links between the two (physical and functional) should be provided. The scale of foodstore proposed (including its parking provision and the range of comparison goods sold) should avoid over-dominating the retail offer of the town centre as a whole.**

3.40 As identified in Chapter 2, Lodge Hill may, over time, replace Hoo St Werburgh as the rural service centre for the Peninsula. The scale of retail provision proposed should take account of the possible impact on Hoo. A balance is needed between serving the needs of the new and existing communities and ensuring that some form of retail heart is able to survive in Hoo. The scale of foodstore proposed is likely to be crucial to this.

➔ **The impact of retail proposal on nearby centres, particularly Hoo St Werburgh, should be considered and minimised as far as possible. The retail impact assessment to be submitted with the application will need to include an assessment of the impact on Hoo St Werburgh.**

Leisure

3.41 Leisure provision is both a community facility and a contributor to the economy. Chapter 2 (Community) dealt with leisure requirements for the development arising from their role as a community facility. This section now looks at the economic role. There is potential for additional provision that will support the wider business economy as well as providing more service sector employment. In particular, there is a market for hotel provision.

3.42 The Lodge Hill evidence base suggests that up to two hotels could be provided on site. A business hotel would serve both the on-site employment and the wider local economy. There is also a potential market for a leisure-

based hotel. This could provide conferencing facilities and event space, high-end leisure facilities such as a spa, and a good quality restaurant.

3.43 There is an existing golf course adjacent to the site at Deangate Ridge. This has obvious synergies with a leisure hotel. Links between the two may also increase the hotel's ability to function as a support to the business offer on site. The Council would be willing to explore opportunities for partnership working with the developer to maximise the potential support the golf course can offer.

3.44 Potential links to the golf course suggest that the best location for a leisure hotel is along the southern boundary of the current Lodge Hill Training Area. There are existing wooded areas, which would make a very attractive setting for a high-value hotel. This location is also close to the town centre and on the flatter part of the site that could accommodate larger floorspace business uses.

3.45 A business hotel is likely to need to be visible from the highway to capture trade related to the other employment areas on the Peninsula. There is very little of the site where this applies, which suggests that this hotel would be better located in the Chattenden Barracks part of the site. Again, there are areas here that would be suitable for business use.

3.46 Smaller scale tourism use would also be acceptable. Less work has been carried out to determine the market for this. However, there are again potential links with off-site uses. For example, the RSPB have a number of sites nearby

where they are considering expanding visitor facilities, and this could provide opportunities for eco-tourism.

➔ **Proposals for tourism uses at Lodge Hill are likely to be acceptable, and should maximise potential synergies with off-site facilities. Small-scale facilities can be integrated with the overall development. The preferred location for larger hotel facilities is as shown on the land-use masterplan, but other locations will be considered where they complement the overall vision and masterplan for the site.**

Chapter 4 – Environment

- 4.1 Sustainability in its widest terms involves ensuring well-being and quality of life for everyone. This not only applies to the current population but also means ensuring that future generations have the same chances. Environmental issues, while not the only factor, are often central to this aspect.
- 4.2 All new development must be designed and built to minimise greenhouse gas emissions and resource use during the construction and use of the buildings. It will need to allow people to adapt to the consequences of climate change. The vision for Lodge Hill requires it to go beyond this general requirement and be an exemplar of sustainability. The Core Strategy makes particular reference to:
- Enhancing the natural environment;
 - Conserving natural resources;
 - Minimising the carbon footprint of the development as a whole;
 - The potential for a comprehensive heating grid;
 - The need for a water strategy; and
 - Allowing people to lead sustainable lifestyles.
- 4.3 The scale of the site, and the fact that development is starting almost from scratch, means that Lodge Hill is a unique opportunity. It can set a standard not only for Medway, but also for the rest of the Kent Thames Gateway.
- 4.4 The policies in this Chapter of the Development Brief set out what the Council believes is necessary for Lodge Hill to be an exemplar of sustainability (in addition to the economic and social issues discussed in previous chapters). There is scope to relax individual standards if they cannot be met on a specific phase. However, a strong justification will be needed, in relation to the overall sustainability of the relevant phase.
- 4.5 To ensure that Lodge Hill as a whole is as sustainable as possible, it is essential that the site has a cohesive sustainability strategy. To ensure this, proposals should be assessed using BREEAM Communities.
- 4.6 BREEAM Communities targets the concept and planning stage of developments. It assesses eight categories that are linked to planning policy and best practice standards and are already familiar to many developers. These are: climate change and energy, community, place shaping, buildings, transport and movement, ecology, resources and business.
- 4.7 At the outline application stage, only an Interim BREEAM for Communities Certificate is available. This does not give a ranking, it only confirms whether the development will pass or fail. It is not necessary for an Interim Certificate to be submitted for Lodge Hill.
- ➔ Outline planning applications must be supported by a sustainability statement showing how the requirements of this Development Brief will be met. This should demonstrate how the site will achieve BREEAM Communities “Excellent”. Detailed planning applications must be accompanied by:**
- **A sustainability statement showing how the requirements of this Development Brief have been addressed, including the CSH and BREEAM requirements for each building.**

- **A Final BREEAM Communities Assessment, demonstrating that BREEAM Communities “Excellent” has been achieved.**

4.8

The Code for Sustainable Homes (CSH) and BREEAM are well recognised national rating systems for the sustainability of individual buildings. The Government has adopted CSH for new homes, while BREEAM applies to all other types of developments. Both systems provide frameworks to reduce the environmental impact of new buildings through the integration of energy and water efficiency measures, climate change adaptation measures and by using less polluting materials.

➔ **All new buildings at Lodge Hill should achieve successively higher sustainability standards in accordance with the following timeline:**

- **Until 2016: CSH Level 5 and BREEAM “Excellent”**
- **From 2016 onwards: CSH Level 6 and BREEAM “Outstanding”.**

Energy

4.9

Around half of the UK’s carbon emissions come from energy used in people’s homes and workplaces. It is therefore essential that the energy demand of the new buildings at Lodge Hill are minimised and that renewable energy resources are installed. Energy issues must be considered right at the start of the design process. Development at Lodge Hill should be designed in accordance with the energy hierarchy (see Figure 3.1).

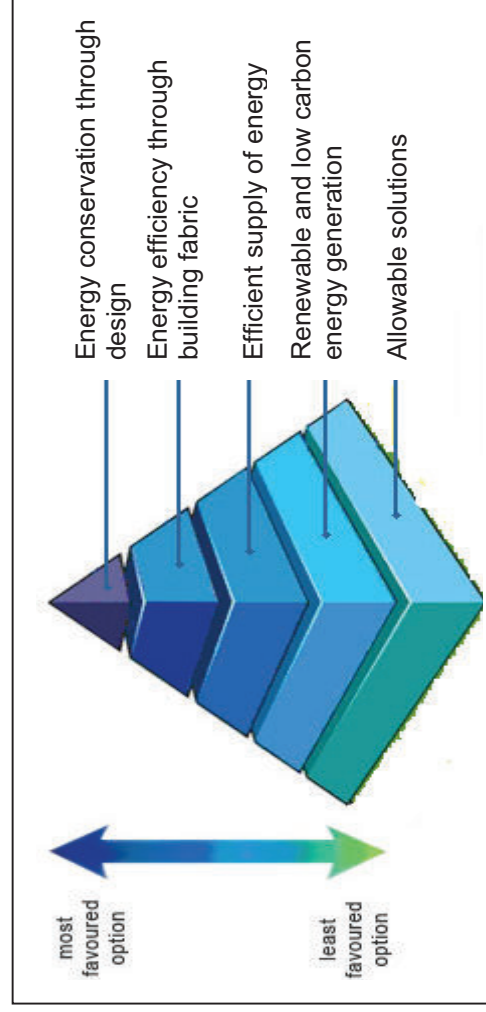


Figure 3.1: The energy hierarchy

4.10

CSH and BREEAM require a certain level of carbon reduction, but do not specify a particular level of energy efficiency. To ensure Lodge Hill is constructed in line with the energy hierarchy, specific energy efficiency standards should also be set. The requirements of BREEAM “Excellent” are not as high as CSH Level 5. Energy costs are an increasing concern for businesses, so maximising energy efficiency in commercial buildings will help to increase the economic viability of Lodge Hill. Residential developments will need to meet the energy standards of the Code for Sustainable Homes Level required at the time.

➔ **Residential developments should meet the energy standards of the relevant CSH level. Non-residential developments should meet the energy standards required for BREEAM “Outstanding”.**

4.11 CSH Level 6 requires dwellings to be zero carbon, and this currently includes emissions from cooking and appliances. However, the current Government has amended the definition of zero carbon to exclude appliances and cooking. In 2016 should the CSH Level 6 definition still include emissions from appliances and cooking, it will be acceptable to use allowable solutions to meet this part of the standard. Emissions from appliances and cooking do not need to be included in the energy strategy for on-site solutions.

4.12 Energy statements will be required at both outline and detailed planning application stages. These should include:

- The expected energy demand and carbon emission from the development;
- The expected energy and carbon dioxide emissions savings from proposed energy efficiency and renewable energy measures

4.13 Guidelines as to the format and required content of energy statements are included in Appendix 2.

➔ **All planning applications for new built development must be accompanied by an energy statement in accordance with the guidelines in Appendix 2.**

4.14 Energy demand can be vastly reduced by passive design. Simply put, this means designing buildings to take maximum advantage of free heat from the sun and free ventilation and cooling from the wind. Box 4.1 suggests some principles that can be applied to achieve this.

4.15 The Lodge Hill site has a number of topographical features that should be considered as part of a passive design strategy. These include the use of the south facing ridge slope for solar gain and the need for additional shelter or careful orientation on the exposed ridge.

- Designing the site layout and orientation of buildings to minimise the need for and use of mechanical ventilation, heating and cooling systems
- Orientation habitable rooms (e.g. living rooms) within 30° of south
- Locating windows at heights that allow lower sun angles in the winter
- Providing louvres and balconies to provide shading to south facing windows in the summer months
- Using soft landscaping including deciduous tree planting, to allow natural sunlight to pass through during the winter months whilst providing shade in the summer
- Integrating passive ventilation, for example passive stack ventilation and design dual aspect units to cross ventilation
- Providing north facing windows in offices and other commercial buildings
- Integrating exposed thermal mass into buildings to modulate internal temperature gains
- Painting of flat roofs white or using green roofs to reduce heat absorption

Box 4.1: Passive design measures

➔ **All development at Lodge Hill should incorporate passive design measures that take advantage of natural light and heat from the sun and use natural ventilation, whilst preventing overheating in the summer. Measures should be tailored for each different building type and innovative solutions will be welcomed.**

4.16 The energy efficiency standards proposed are in line with the Government's energy efficiency requirements for zero carbon homes in 2016. A national kWh/m² target for energy demand for non-residential buildings has not yet been published.

➔ **All development at Lodge Hill should maximise energy efficiency as follows:**

- All new residential buildings should achieve 39 kWh/m²/year energy consumption for apartments and mid-terrace houses and 46 kWh/m²/year for end-terrace, semi-detached and detached houses
- For non-residential development, as much as possible of the required 25% reduction in carbon dioxide emissions compared to 2006 Building Regulations levels should be met through energy efficiency measures
- External lighting should be designed to minimise wasted light through spillage or reflections to the night sky.

4.17 Decentralised energy generation is the use of an energy network to supply heat and/or power to a number of buildings from a local energy source. This can be a more efficient supply and lead to carbon dioxide savings,

especially if waste heat from existing power generation or other local heat sources can be used. However, to maximise carbon dioxide savings the source and location of the energy must be selected carefully.

4.18 A certain threshold of heat demand is needed before a decentralised energy supply can become fully operational. There are a number of specific considerations when installing an energy network in a phased development:

- The very first buildings may need their own energy supply before the energy network is commissioned
- In order to obtain the necessary heat demand to operate the energy network, buildings that have a high heat demand (such as schools) should be brought forward as soon as possible.

4.19 If an energy network is planned at Lodge Hill planning conditions/obligations will be used to ensure that all buildings are connected.

4.20 A decentralised energy generation for Lodge Hill would also have potential to provide heat and power to existing buildings in close proximity to the site. The developers should make every effort to engage with the owners of these buildings and to connect them to the energy network. The existing buildings most likely to be suitable for connection include:

- Chattenden Community Centre
- Chattenden Primary School
- Deangate Ridge Leisure Centre
- Deangate Ridge Golf Club

- The London and Quadrant Housing Estate in Chattenden.
- 4.21 There are two potential sources of waste heat in the vicinity of Lodge Hill. These are the Damhead Creek and Kingsnorth power stations. Both have recently sought planning permission to extend or replace their capacity. Damhead Creek has planning permission, while Kingsnorth's planning application is still with the Secretary of State. Both include a requirement for pipes to be built to transport waste heat to the edge of their site boundary. If an energy network is proposed for Lodge Hill, all avenues for using the waste heat from one of these power stations should be explored.
- **Any proposals for a decentralised energy system for Lodge Hill should:**
- **Be supplied by a renewable form of energy wherever possible**
 - **Include provision of an efficient gas or renewable fuel boiler system for temporary use in any buildings completed before the site-wide energy network is completed, and design these buildings so they can easily switch to the central energy network system once it is available**
 - **Ensure that, within each phase, buildings with high heat loads are brought forward as early as possible**
 - **Engage with existing local heat users (especially those listed above) to try and facilitate their connection to the energy network**
- **Explore the feasibility of connection to existing heat sources and take this forward wherever possible**
 - **All buildings should be designed and built with a communal heating system**
 - **All buildings containing more than one unit should have a communal plant room with space for: the boiler to supply the interim heat (if needed), the heat exchanger that delivers heat from the network, the heat meter and the controls, and which should be situated where there is easy access for the heat main to enter the building.**
- 4.22 As much as possible of the energy demand remaining after passive design and energy efficiency are applied should be supplied from renewable sources produced on-site. This reduces the development's reliance on remote sources of energy, including imported oil and gas.
- 4.23 Different detailed proposals will be suited to different renewable and low carbon energy technologies. Site characteristics will also impact on their feasibility. The following renewable energy technologies are considered to be suitable for Lodge Hill:
- Small to medium scale stand-alone wind turbines (subject to there being no undue negative effect on the sensitive landscape around the site and no significant noise implications for nearby residents);
 - Solar photovoltaics;
 - Woodfuel heating;
 - Solar water heating; and

- Ground-sourced and water-sourced heating systems (The electrical energy used to operate proposed heat pumps, and the carbon dioxide produced doing this, must be subtracted from calculations of energy provided and carbon dioxide saved by renewable sources of energy).

4.24 More innovative technologies that may come forward in the future will also be considered on a case-by-case basis.

4.25 Woodfuel heating can provide a low carbon, renewable form of energy. However, any wood fuelled installation should use fuel from a sustainable source, as local as possible, and should have long-term management arrangements in place. In addition, any installation would need to consider the potential air quality impacts from the combustion of woodfuel. This is particularly true at Lodge Hill as some of the ecological areas nearby may be sensitive to the effects of poor air quality. Liquid biofuels are not considered an appropriate energy source for Lodge Hill, as they should be prioritised for powering transportation.

4.26 No specific renewable energy target is set for Lodge Hill. This is because the energy requirements for CSH and BREEAM already set a reduction in carbon emissions which cannot be met without renewable or low carbon energy provision.

➔ **The choice of renewable or low carbon energy supply should take into account the guidance in paras. 4.23 to 4.26.**

4.27 In order to meet CSH Level 5 and beyond, the majority of the required carbon reduction can be met on-site through good design, energy efficiency and renewable energy technologies. However, it is likely that some remaining carbon dioxide emissions will need to be addressed through allowable solutions. These are off-site means of reducing carbon dioxide emissions. They have not yet been fully defined by the Government but are likely to be measures such as installing renewable energy generating capacity off-site or retrofitting energy efficiency measures to existing local buildings.

4.28 The Council's order of preference for the form of allowable solutions at Lodge Hill is listed below. However, this will be subject to compliance with the Governments' requirements for allowable solutions when these are published.

- ➔ **Medway Council has the following order of preference for allowable solutions:**
1. **Connection of buildings near to Lodge Hill to any planned heat network**
 2. **Installation of energy efficiency measures in local public buildings and homes**
 3. **Off-site renewable energy installations**

Water

4.29 The water supply for Kent is already very stressed. More locally, many communities on the Hoo Peninsula are known to have water pressure problems. Water sources in the local area are likely to diminish further with the changing climate.

Lodge Hill must not place additional stress on the water sources in the area.

- 4.30 Improvements to the water supply network are needed to take place to create sufficient capacity for the scale of development across the Kent Thames Gateway. Most of these will take place outside of the Medway area. The developers at Lodge Hill should work with the local water utility company to ensure that the development at Lodge Hill does not place additional stress on water resources.

➔ **Any outline planning application should be accompanied by a water-cycle strategy developed in conjunction with the Council, the Environment Agency and Southern Water. This strategy should:**

- **Assess the impact that the proposed development at Lodge Hill will have on water demand within the framework of the water companies water resource management plans;**
- **Set out the proposed measures to limit additional water demand from new housing and non-domestic buildings. This should consider any energy used by water reduction methods.**

- 4.31 Due to the existing local water supply issues, more stringent targets have been set for non-residential buildings than are required by BREEAM. The mandatory water requirement for Code for Sustainable Homes Level 5 is the same as for Code Level 6, so no additional water efficiency requirements have been set for residential buildings.

➔ **All non-residential development at Lodge Hill should aim to achieve maximum credits from BREEAM credit area WAT 1. Landscaping should be designed to avoid the need for irrigation wherever possible.**

- 4.32 Lodge Hill has a low risk of flooding from fluvial and tidal flooding, as classified by the Environment Agency. However, poorly designed or maintained drainage and too many hard surfaces in a new development can lead to localised surface water flooding in heavy rainfall. This can also increase the risk of flooding elsewhere.

- 4.33 BREEAM Communities sets a mandatory standard for surface water. The peak run-off rate into a watercourse or other receiving body must be no greater for the developed site than it was for the pre-developed site for at least the 1 in 100 year return period events. Run-off must be attenuated using sustainable urban drainage systems (SUDs) and not discharged into the sewer. Many of the important ecological areas on the Hoo Peninsula are water-based habitats. Changes to the drainage from Lodge Hill must avoid reducing the water supply for these sites.

- 4.34 The flood risk assessment process will identify whether any key flood flow paths exist on the site. If any key flood flow paths are identified, the design of the development should not position buildings within them.

➔ **The development should be designed and laid out to route water away from vulnerable uses if a flood were to occur. Should any key flood flow paths be identified on**

the site, buildings should be situated so as not to block these paths, unless this can be suitably mitigated.

- 4.35 SUDs are the most appropriate way of dealing with surface water run-off. They have a number of advantages over traditional drainage, including increasing biodiversity, removing pollutants from the water and improving the quality of green infrastructure. When designing SUDs:
- Where possible, water should be collected and stored on site for later use;
 - The next preference is for collecting water for slow release into a waterway (the preference is to store water in ponds or open water features, otherwise rainwater tanks or sealed water features should be used);
 - The next preference is to drain water directly into a watercourse. Where this is not possible, water should be directed into surface drains; and
 - Water should not be directed straight into sewers.

- 4.36 Much of the ground at Lodge Hill is clay. This means that infiltration systems are unlikely to be appropriate.

➔ **Surface water should be managed on-site or as close to the site as possible, using SUDs and taking into account the advice in para. 4.36. This should aim to provide water quality and biodiversity benefits as well as reducing the amount and rate of run-off leaving a site. The impact on nearby protected ecological sites must be considered. A long-term plan for the maintenance and management of the SUDs will be required.**

Materials

- 4.37 The energy used to create materials and in the construction process adds to a development's ecological and carbon footprints. The energy embodied in new construction and renovation each year accounts for about 10% of UK energy consumption. Roughly half of this is used in the extraction and manufacture of materials. The other half is largely from transport (getting the materials to the processing plant or to site). Building materials also have other potential impacts such as the emission of potent greenhouse gases (e.g. HCFCs) from manufacture, and environmental degradation during extraction and processing. There is a finite amount of resources available on the planet, so use of virgin materials should be minimised as far as possible.
- 4.38 Not all of the existing buildings on site are suitable for re-use in their existing form. However, as many as possible of the existing buildings on site should be re-used where this does not prevent other objectives from being met. See also the Heritage section of Chapter 6.

➔ **A pre-demolition audit should be carried out for the whole site in line with the Institute of Civil Engineers' Demolition Protocol. Where this demonstrates that re-use of a building is not possible, an appraisal of the potential to re-use and recycle the materials on-site should be made using the same protocol. Consideration should also be given to temporary use of buildings that cannot be retained permanently.**

4.39

The impact on the environment from materials used in the construction of Lodge Hill should be reduced as much as possible. Key considerations are:

- The embodied energy of the materials: re-used and recycled materials mostly have a lower embodied energy than virgin materials;
- The energy used to transport materials: materials should be sourced as locally as possible to the site;
- The long term sustainability of the material: whether it is from a replenishable source;
- Whether good environmental practices have been employed during extraction and processing;
- Whether the materials are free from substances which contribute to climate change through ozone depletion; and
- The durability of the materials, reducing the amount of materials needed to maintain the building over its lifetime.

4.40

The use of materials with a low environmental impact is not given significant weight in the scoring of the Code for Sustainable Homes or BREEAM. To meet the exemplar vision, additional requirements have therefore been set out in this Development Brief.

➔ **To reduce the environmental impact of materials and construction, Lodge Hill should aim to meet the targets and standards set out in Box 4.2.**

4.41

The environmental impact of construction can also be reduced by making sure that additional building work in the future is minimised. Flexible and adaptable floor layouts and

structures means that buildings can adapt to future needs without significant additional works.

- 50% (by value) of construction materials should be sourced within 50 miles of the site
- 20% (by value) of construction materials should be recycled or reused
- All materials should be responsibly sourced. New timber should be PEFC certified or FSC, CSA or SFI certified with a Chain of Custody Certificate. Other materials should be certified using the BRE's BES 6001 Responsible Sourcing of Construction Products scheme.
- Building materials should be long lasting, taking into account their use and the conditions they will be exposed to
- Residential developments should achieve an A+ to B rating from the BRE Green Guide to Material Specification (or equivalent replacement guide) on at least 3 of the following: roof, external walls, internal walls (including separating walls), upper and ground floors (including separating floors, and windows.
- Non-residential developments should achieve an A+ to B rating from the above guide on at least 3 of the following: roof, external walls, internal walls, upper floor slabs, floor finishes/coverings, and windows.

Box 4.2: Standards for materials at Lodge Hill

Food

4.42 Around a quarter of an individuals' environmental footprint comes from food. This can be reduced by eating more local, seasonal and organic food. Lodge Hill should maximise the potential to assist residents to grow their own food, and to source more from local and seasonal sources. The Hoo Peninsula has a significant number of agricultural businesses, making local sourcing particularly appropriate.

4.43 When residents understand the benefits of local food, they are more likely to source more fresh food locally. This has many benefits, making residents healthier, reducing food miles and stimulating the local economy. Local food production does not feature in the CSH or BREEAM. However, as it has a large environmental impact, some measures to increase local food production have been included in this Development Brief.

➔ **0.25 hectares of land per 1,000 population at Lodge Hill should be allocated for food growing. Provision should be made for the long term management of these areas. Specific provision of 1m² per household should be made for blocks of flats, where possible within 200m from the entrance to the building.**

4.44 The quality of allotment provision (or similar) is crucial. Higher quality not only maximises the food growing potential but encourages a wider range of people to make use of them. The Council has set general quality standards for allotment provision across Medway. These reflect the need to improve existing provision as well as relating to new

allotments. As an exemplar of sustainability, Lodge Hill should be ensuring that the highest possible quality is provided.

➔ **All new allotment provision should be of high quality. Traditional allotment sites should have a water supply, provide sheds on all plots and have well-drained and accessible paths. Other provision, such as community gardens, will be judged on the basis of individual proposals. All sites should be securely fenced and capable of being locked and should be located where they can benefit from natural surveillance.**

Waste

4.45 The construction sector uses over 420 million tonnes of material resources a year. It generates around 90 million tonnes of construction and demolition waste, which is 3 times the waste produced by all UK households combined. 13 million tonnes of construction materials are delivered to building sites but never used. It is essential that the design of the development and the management of the build programme consider how to minimise construction waste at every stage.

4.46 All phases of Lodge Hill will be expected to:

- Minimise the creation of waste in the first place
- Re-use waste from the construction process
- Allow as much waste as possible to be recycled on other nearby development sites (including but not limited to other phases of Lodge Hill)

➔ **A site waste management plan should be submitted to and agreed by the council before construction starts. During demolition and construction, waste should be reused according to the guidance in the Institute of Civil Engineer's Demolition Protocol. Where it cannot be reused, it should be recycled according to the guidance in the same Protocol.**

4.47 The site-wide waste management plan should include targets for waste recovery and measures to promote re-use, segregation, recycling and composting of waste. WRAP's "Designing Out Waste" and "Net Waste tools or BRE's SMARTwaste tool (or an agreed alternative) should be used.

4.48 High levels of recycling from residents and businesses moving into Lodge Hill should be encouraged. Recycling and composting facilities should be as easy to access as waste facilities. This means provision of space within buildings to store recyclables alongside general rubbish as well as provision of easily accessible and secure outside space for storing rubbish and recycling. For residential units, the space inside the building should be integral to the kitchen design, and not a stand-alone unit. The Council produces guidance for developers on the specific requirements for storage space. This is regularly updated and developers should refer to the most recent version.

➔ **Space should be provided inside all buildings for occupants to separate out waste into separate containers for the types of recyclables that the Council collects. Space for composting organic waste should be**

provided in houses with private gardens. Enough space should be provided on-site to securely and safely store waste recycling and composting bins.

4.49 The Council runs a household food waste collection service. However, there is currently no similar service for non-residential buildings. Specific requirements for composting facilities in non-residential buildings are therefore desirable.

➔ **A communal composting facility for businesses at Lodge Hill should be considered, along with provision for the long-term management of the facility.**

Fostering sustainable lifestyles

4.50 In order to deliver a truly sustainable development it is necessary to work with residents to help them live a sustainable lifestyle. Sustainability advisors or "green caretakers" are one option to fulfil this function. They would be able to provide advice to residents about how to live more sustainably and how to make the best use of features within their properties and the development as a whole.

4.51 The Community Trust (see Chapter 2) would be an ideal delivery method for the green caretakers. However, if this option is not taken, there should be an alternative provision.

➔ **A green caretaking service or alternative sustainability advice should be provided for incoming occupiers of properties at Lodge Hill.**

Climate change adaptation

- 4.52 Climate change is likely to mean hotter drier summers and wetter milder winters with more intense rainfall. New development will need to be designed so that it remains comfortable for users over its lifetime. It should also avoid making local climatic conditions worse. Key issues to be considered include:
- Flood risk
 - High temperatures (and resultant need for cooling)
 - Water supply and quality
 - Managing ground conditions

4.53 Mitigating climate change can be difficult because it is impossible to know exactly what its effects may be. However, a lot of research has been done into the subject, and there are best practice guidelines (as set out in Box 4.3) on how to accommodate it in new development.

➔ **Applicants should demonstrate through their sustainability statement that the development has been designed to mitigate against the future impacts of climate change. This should include the measures in Box 4.3 where appropriate.**

- Orientate buildings and streets to minimise summer and maximise winter solar gain;
- Maximise natural ventilation;
- Incorporate green roofs and walls into buildings;
- Provide amenity spaces that can be used for the enhancement of biodiversity, sustainable drainage systems and for ameliorating the urban heat island effect;
- Be adaptable to allow for additional shading or cooling requirements as the climate changes;
- Avoid large expanses of hard surfacing, such as car parks. Where large expanses of surfacing are proposed, this should be constructed from permeable paving in order to lessen the risk of flooding.
- Use roof spaces where practicable to create new outdoor spaces and enhance biodiversity alongside the integration of renewable energy.

Box 4.3: Best practice guidelines for mitigating against climate change

Pollution and nuisance issues

- 4.54 There is known to be some land contamination on the site. Given the long history of military use, including past manufacture of munitions, this is to be expected. It is not yet known exactly what this constitutes or where the highest concentrations are.
- 4.55 The developer will need to propose a remediation method following full survey results. Burying and capping of contaminated soils is not likely to be sufficient. Treatment of soil on-site and re-use within the development would be

more sustainable than transporting large amounts off-site for treatment or disposal. This would be the Council's preference, where the level and type of contamination allows. Final details will be dealt with through the outline permission and its conditions.

4.56

A phased approach to remediation may be acceptable. In this case the developer would need to demonstrate that there would be no risk to development or end users on the treated parts of the site from any contamination remaining. It is likely to be more efficient to carry out remediation in broad phases than to treat each small development parcel separately.

4.57

The remediation strategy will also need to consider the risk to water quality, particularly in relation to any SUDs and the existing watercourse. There is unlikely to be major areas of groundwater on site due to its geology. However, where small amounts of water have collected in made ground, there is a risk that these may also be contaminated.

➔ **A full contamination survey and initial site-wide remediation strategy should be submitted with the outline application. Detailed remediation proposals may be dealt with on a phased basis.**

4.58

The development of Lodge Hill may cause some issues with noise and air quality. The main causes are likely to be:

- Construction stage impacts;
- Increased traffic;
- Industrial/employment uses (although it is unlikely that proposals will involve heavy industry);

- Deliveries for retail and other town centre uses, particularly a supermarket or other larger retail;
- Energy generation plant(s);
- Wastewater treatment plant(s);
- Cooking smells and noise associated with food and drink uses.

4.59

Traffic-related impacts will need to be considered at the outline application stage. Some preliminary work was done for the Core Strategy evidence base. This suggests that the main area affected is likely to be Four Elms Hill, approaching Four Elms roundabout. There are a few isolated dwellings on this stretch of road. There may also be some impact around the main site accesses. The effect of this on existing residents and those moving into the new development must be considered.

4.60

Construction stage impacts will also need to be considered at outline application stage. These will need to be resolved before any form of development starts on site, including any remediation, infrastructure or earthworks. A construction management plan should be provided, either with the outline application or through conditions attached to it. In relation to noise and air quality, it is expected to include the following:

- Details of phasing and construction traffic routing;
- Dust suppression measures;
- Hours of working;
- Policies for control of noise from the site.

4.61

Other impacts, which relate to individual uses, will not be known until detailed proposals come forward. Air quality and noise assessments must be submitted with any detailed

application for uses that would cause emissions or noise. These will be expected to comply with any site-wide strategy.

➔ **An air quality assessment and noise assessment should be submitted with the outline application. As well as assessing traffic and construction impacts in detail, this should highlight areas where further assessments will be needed at the detailed application stage(s). A construction management plan or code of practice should also be submitted before development starts to demonstrate how construction-stage impacts will be minimised.**

4.62 Because traffic is expected to cause the most impacts, electric vehicles are one option to reduce this. Their main benefit relates to air quality, as they cause no emissions at the point of use. They can also reduce noise impact, as they tend to be much quieter than standard vehicles. Hybrid vehicles are not completely emission-free but can still be a significant improvement on petrol or diesel engines.

4.63 Use of these (or other new technologies with similar benefits) should be considered for the Lodge Hill bus service and car club in particular (see Chapter 5). Charging points and other measures to encourage take-up of these vehicles by households and businesses should also be provided.

➔ **The use of electric, hybrid and other low-emission vehicles should be promoted as part of any air quality strategy for Lodge Hill. Measures to be provided should**

include readily available charging points throughout the development.

Ecology

4.64 The Lodge Hill site is of considerable significance for ecology. Although in military use, there are areas within the security fence where this is fairly low intensity. A wide range of natural or semi-natural habitats therefore remain. In much of the area outside the security fence, the training activity takes place alongside agriculture. There are shelterbelts, hedgerows and blocks of woodland within this area.

4.65 The Chattenden Woods SSSI crosses the allocation boundary. Great Chattenden Wood lies mainly outside the boundary, at the northwestern corner. Lodge Hill Wood and Rough Shaw, an area of grassland, are within the boundary, at the north edge of Chattenden Ridge. As an SSSI, this site is of national importance for ecology. It was designated for its woodland habitat and the range of woodland birds that it supports.

4.66 Initial surveys of the site were carried out as part of the evidence base for the Core Strategy. The site supports a large number of species that are protected by UK or European legislation, or are priority species in the UK Biodiversity Action Plan:

- Reptiles (adder, grass snake, slow worm and common lizard)
- Several species of bats (complete list not yet confirmed)
- Badgers

- Great crested newts and common toad
- Birds* (barn owl, bullfinch, cuckoo, dunnoek, linnnet, hobby, nightjar, skylark, song thrush, starling, lapwing, fieldfare, brambling, redwing, turtle dove
- Invertebrates (cinnabar moth, wall brown, wasp spider, several bee species)
- Plants (true fox sedge)

**This list refers only to species that are specifically protected. There is a general legal protection for all wild breeding birds and their nests.*

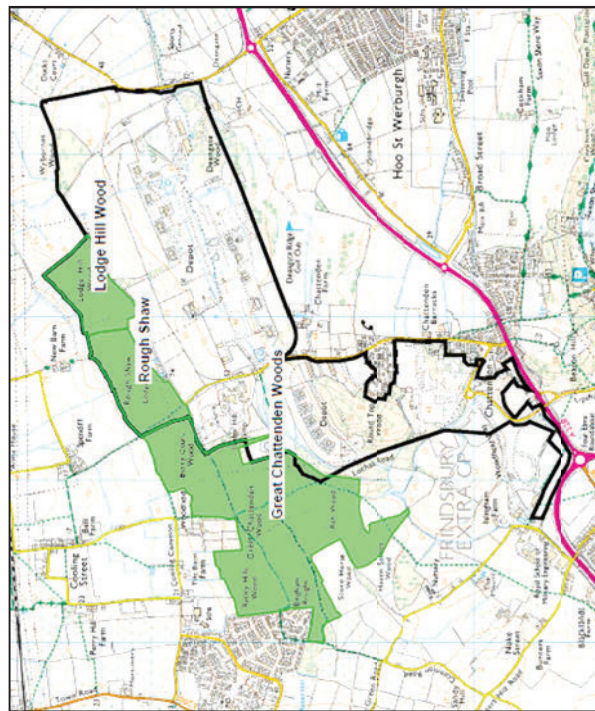


Figure 4.2: Chattenden Woods SSSI

4.67 There are areas of habitat on site that are suitable for other protected species, but it has not yet been confirmed whether they are present. Further surveys will be needed prior to any outline application to ensure that the ecological value of the site is fully understood.

4.68 Some species on and around the site are not legally protected, but are still of conservation interest. Among these are a large number of nightingales, which are breeding around the site. This may represent as much as 1% of the total UK population, which increases the significance of any impact the development may have on this species. The nightingale population has a high profile locally, and has been raised as a concern in many of the consultation events to date.

INSERT FIGURE 4.3: NIGHTINGALES (PHOTOS)

4.69 The development of Lodge Hill has potential for both direct and indirect impacts on ecology. Direct impacts mainly relate to loss of habitat. Indirect impacts can include:

- Increased disturbance from new population, traffic etc;
- Impact of localised air quality issues;
- Fragmentation or isolation of habitats; and
- Predation or competition from pets and other animals associated with urban areas.

4.70 SSSI land and ancient woodlands are protected by other policies and will not be developed, although there is still potential for indirect impacts here. The remainder of the site is a patchwork of habitats, each of which has potential to support biodiversity. It is therefore inevitable that there will

be some loss of habitat as a result of the development.

However, the impact of this should be mitigated as far as possible, by prioritising the protection and retention of the most valuable habitats. This should be determined with reference to the following criteria (not in order of priority):

- The intrinsic importance of the habitat, at a national, regional and sub-regional level, including whether it is a priority habitat in the UK or Kent Biodiversity Action Plans;
- The range of species supported, including the range and number of protected, priority or conservation concern species*;
- The population size of the species present; and
- The extent to which the habitat is isolated or forms part of a wider ecological network.

**Habitats supporting some species are also protected by law.*

4.71 Where habitat supporting protected or priority species is lost, it must be re-provided. The first preference is for this to take place within the on-site green infrastructure, but where this is not possible, off-site mitigation must be provided. Off-site mitigation should be provided as close to the site as possible, and should remain within the Hoo Peninsula at worst case.

4.72 The replacement habitat must be of equal or greater value to the habitat lost, in terms of the number of species (and individuals) supported. New habitat often does not support the range of biodiversity that well-established habitat can do. This means that a larger area than lost may be required.

4.73 There are a number of existing habitats on the Hoo Peninsula that are isolated and scattered. Larger blocks of habitat are more resilient to the impact of climate change. Developers of Lodge Hill should therefore take every opportunity to locate replacement habitat adjacent to existing and to help restore links between existing sites.

INSERT FIGURE 4.4: HABITAT MAP OF THE HOO PENINSULA

4.74 The timing of provision is also crucial. Good quality habitat takes time to establish. New habitat must be ecologically functioning before the area it is replacing is developed. Some habitats (such as woodland) can take a long time to establish successfully. The ease of replacement may therefore need to be taken into account when determining which areas are to be retained.

➔ **Habitat loss within the site should be avoided wherever possible, with highest priority given to high value habitats*. Where this is not possible, replacement habitat should be provided. For high value habitats, this re-provision should be greater than like-for-like in terms of area. The location of replacement habitat should maximise its contribution towards a wider ecological network.**

**High value habitats, for the purpose of this document, are those with the highest intrinsic value, or those that support populations of protected species or species of conservation importance.*

4.75 Woodland birds, including nightingales, are particularly vulnerable to indirect impacts. Trampling and vandalism can also damage the woodland habitat of the SSSI. The risk to the SSSI increases the closer development is sited to its edge. Residential development is likely to have the greatest impact. A buffer zone around the northern edge of the site is therefore needed. A distance of 200m should be taken as a guideline. The Chattenden magazine compound is an exception to this. As it is behind a secure wall, this would prevent much of the possible impact.

4.76 It may be possible to reduce this 200m in some areas. Any proposals for a reduced buffer would have to demonstrate that there would be no harm to the SSSI as a result.

4.77 The buffer zone does not have to be a sterile area. As much of it as possible should be left undeveloped, but the uses in Table 4.1 could be acceptable within this area. Uses that would attract activity should be located as far as possible from the SSSI boundary, and the impact of any increased activity would require mitigation.

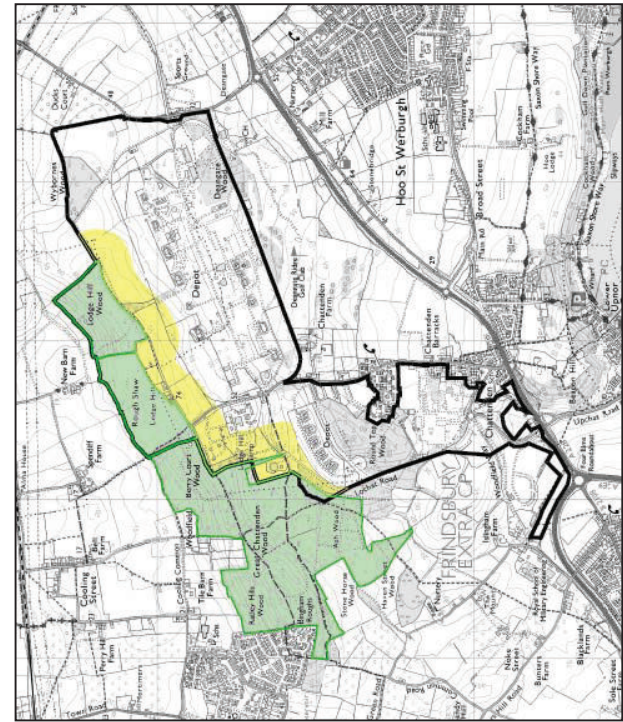


Figure 4.5: SSSI buffer zone

Land use	Comments
Balancing ponds	
Sports pitches/pavilion	
Community building	Would need to be conscious of food waste e.g. attracting rats
Informal open space e.g. countryside park	
Nature trails	
Education or visitor centre	
Schools	Would need to be conscious of food waste e.g. attracting rats
Play areas	
Car parks	When provided in association with other acceptable uses
Allotments	
Golf course	
CHP (combined heat and power) plant	Noise and air quality assessments needed
Sewage treatment plant	Water and air quality assessments needed
Commercial development	Would depend on the exact

	nature of the use. Would need to be conscious of food waste e.g. attracting rats
Elderly/other specialist housing	Subject to suitable management regime. Would need to be aware of food waste issues and prevent keeping of pets.

Table 4.1: Possible uses within SSSI buffer zone

4.78

There are two existing public rights of way through Great Chattenden Woods, and an informal footpath through Lodge Hill Wood. There should be no additional access to the SSSI itself. Landscaping proposals for the buffer should support this by discouraging access and activity in the more sensitive areas. The existing footpaths are important for connecting Lodge Hill to surrounding communities, but will need to be carefully managed to ensure that their use does not damage the SSSI. Fencing and defensive planting may be needed along the edges of the footpaths to prevent people straying into the rest of the woods.

➔ **A buffer zone should be provided to the SSSI to limit the indirect impacts of development. Justification will be needed where this is proposed to be less than 200m. Access management, education and information strategies should support this buffer zone.**

4.79

The ancient woodland on the site does not have the same statutory protection as the SSSI. However, it can still be damaged by inappropriate use. Buffers to these areas will not need to be on the same scale as that for the SSSI.

Between 20m and 50m should be sufficient. There may be an argument for allowing or encouraging increased access to one or more specific areas of woodland. This could reduce the desire for people to use the more sensitive areas where access is limited. Deangate Wood, for example, could probably withstand a greater degree of activity than some of the other areas. The areas of ancient woodland would benefit from being included in the access management strategy for the SSSI.

4.80

Biodiversity in Britain has been declining for some time and the planning system has a general aim to protect and enhance biodiversity. As an exemplar of sustainability, Lodge Hill should follow best practice in including biodiversity within the development. Landscaping proposals should maximise the ecological benefits of all areas of open space within the site, from large-scale parks to roadside verges. Opportunities for buildings to contribute to biodiversity should also be taken, including through provision of green and brown roofs and green walls.

INSERT FIG 4.6: LIVING ROOFS AND WALLS (PHOTOS)

4.81

Best practice development should increase the biodiversity of a site after it has been developed. As an exemplar of development, this should be Lodge Hill's aim. The range of wildlife already supported by the site means that there may not be significant opportunities within the site boundaries. However, off-site enhancement (for example, provision of new wildlife corridors) should be considered.

➔ **Biodiversity should be integrated into Lodge Hill through the landscaping strategy for open spaces and through provision of green and brown roofs and green walls on a high proportion of new buildings. There should be no net loss of biodiversity from the site (including any off-site replacement habitat) and opportunities to enhance the ecological value of the area should be taken.**

4.83

Bird numbers have been declining in these important sites and there is not currently any clear information to explain why. Recreational disturbance may be one cause. This is where increased use of the shoreline and rural areas disturbs birds. It can lead to reduced breeding success or simply make the site less attractive to birds, which therefore locate elsewhere. In other areas, such as the Thames Basin Heaths, dog walking has been a particular concern.

4.82

The network of habitats across the Hoo Peninsula includes large areas of mud flat and grazing marsh, which support vast numbers of wading birds, particularly during winter. Much of these are designated as Special Protection Areas (SPAs) and Ramsar Sites. SPAs and Ramsar sites are international designations, which shows how important these sites are.

4.84

Medway Council, together with a number of partner organisations, has commissioned detailed research into this. Preliminary results suggest that while recreational disturbance may not be the whole cause, it does have an impact. The full results should be available later this year.

4.85

If recreational disturbance is one of the causes of the bird decline, Lodge Hill could have further harmful impacts on the SPAs and Ramsar Sites. An additional human population of around 12,500 in close proximity to the Thames and Medway SPAs could lead to significantly more people accessing these areas. This will have to be closely monitored. If monitoring shows unacceptable impacts, additional measures must be agreed and put in place.

➔ **Proposals for Lodge Hill, and in particular the EIA for any outline application, must have regard to the latest available information on bird disturbance in the Thames and Medway SPAs and Ramsar Sites. If recreational disturbance is found to be a potential cause of bird decline, the developers must provide mitigation measures and ongoing monitoring of the impacts.**

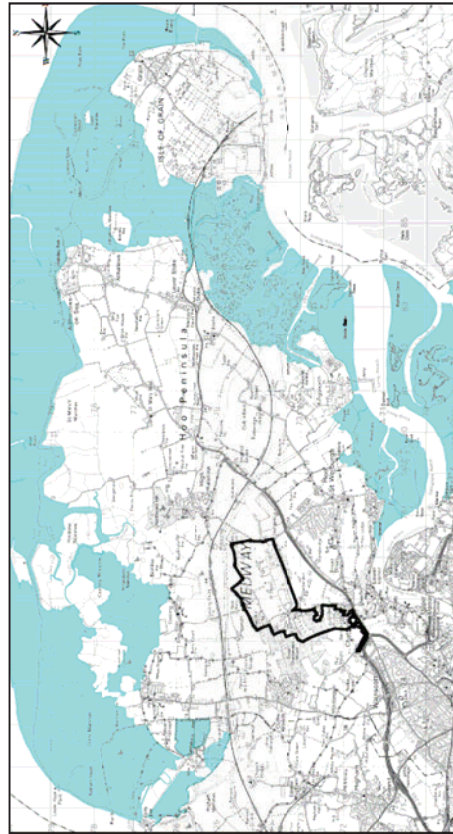


Figure 4.7: SPAs and Ramsar Sites on the Hoo Peninsula

- 4.86 Mitigation measures can include:
- Education and information provision for residents moving into the area;
 - Management plans for affected areas, e.g. “dogs on leads” areas, or restricted access at certain times;
 - Warden patrols of affected areas to ensure responsible behaviour by visitors;
 - Provision of alternative destinations to reduce the number of people visiting the sensitive areas (the success of this depends on why they are visiting and whether the relevant features of the sensitive sites can be replicated elsewhere).

4.87 The area affected by bird decline is much wider than the immediate vicinity of Lodge Hill. It is therefore likely that any mitigation for the impact of the development on the SPAs and Ramsar sites would be through a financial contribution to wider schemes.

4.88 Increased recreational pressure may also be an issue at some of the SSSIs on the Peninsula. Northward Hill and Tower Hill to Cockham Wood are both within walking or cycling distance of Lodge Hill. It is the responsibility of the developers to ensure that any potential for impact on these sites has been properly assessed. They must also propose and provide suitable mitigation for any impacts. Potential mitigation measures and monitoring requirements are likely to be similar to those for the SPAs and Ramsar Sites.

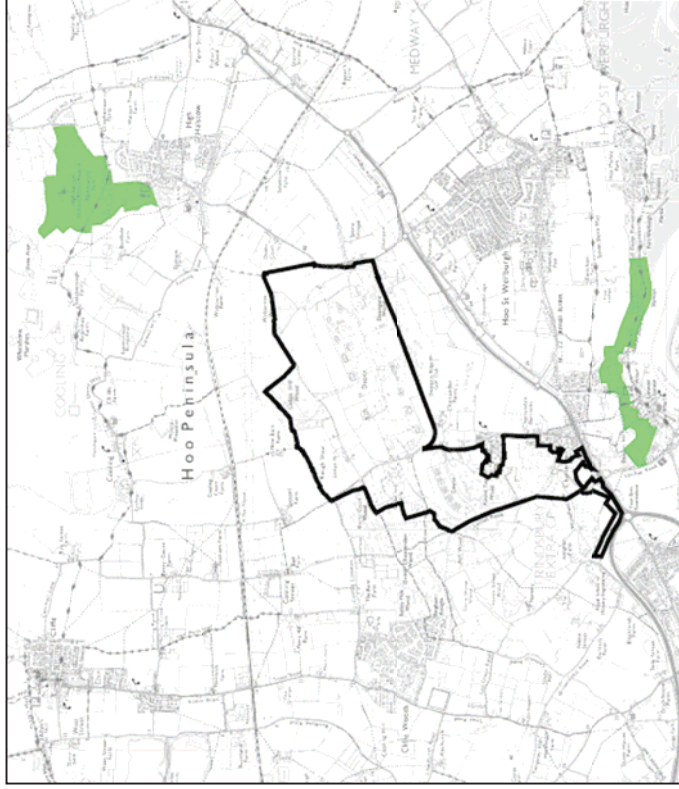


Figure 4.8: Northward Hill and Tower Hill to Cockham Wood SSSIs

→ **An assessment of likely impacts on nearby SSSIs should be carried out as part of the EIA for Lodge Hill. The developer will then be responsible for mitigation of any impacts on these areas.**

Chapter 5 – Transport

Transport Strategy

5.1 The vision for Lodge Hill will not be realised without a strong transport strategy. The development will cause an increase in traffic. It is important that the existing road network is improved where needed to cope with this. However, it is not possible to simply cater for unconstrained traffic growth. As well as sustainability issues, increased cost and greater land-take, this would impact on quality of life for local communities. It is therefore essential that measures are put in place to reduce private car use in favour of lower-impact modes of transport.

5.2 Mixed-use development can reduce the need to travel at all. Applying this principle at the scale of a new settlement means that most day-to-day needs of future residents can be provided for on site. The previous chapters have outlined the scale of provision necessary for this.

5.3 For the remaining travel, the sustainable transport hierarchy is well established, as set out in the government policy document *Manual for Streets*. This gives priority to the most sustainable modes of transport.

5.4 Movement networks within the site, and transport proposals linking the site to Medway and beyond, will be expected to follow this transport hierarchy. Within the site this should be achieved by filtered permeability. It should be easier for a resident to walk or cycle to their destination than to drive.

➔ **A Transport Assessment, including a Travel Plan, must be submitted in support of an outline application**

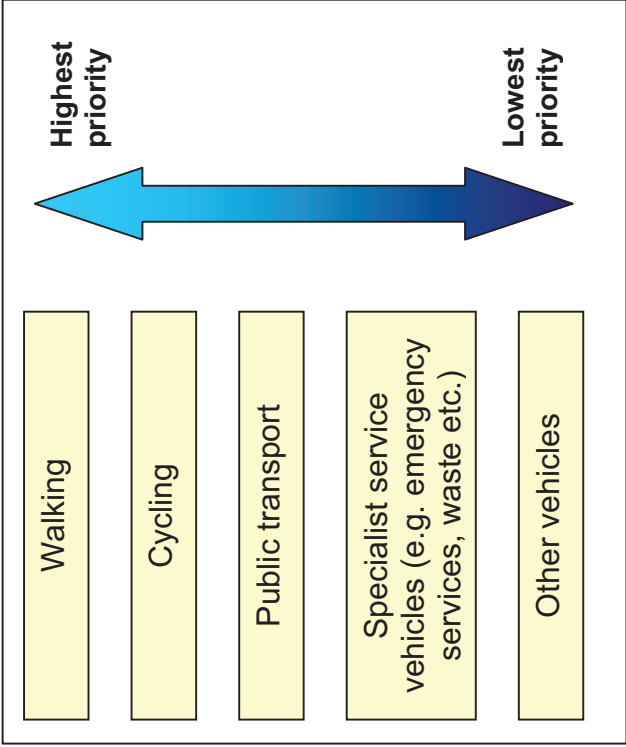


Figure 5.1: Transport hierarchy

for Lodge Hill. All applications should demonstrate that the required transport infrastructure will be in place as needed, and that the proposals enable and encourage sustainable transport choices by residents and businesses.

Walking and cycling

5.5 Walking and cycling are viable modes of transport for almost all journeys within the site. A permeable, attractive and safe network of cycle and pedestrian routes should be provided

strategy. Hard and soft landscaping in shared surface areas should be designed to provide psychological as well as physical traffic calming. “Home zones” or similar treatment should be considered for some of the residential areas.

➔ **Shared surfaces and home zones (or similar) should be used where possible.**

- 5.6 Pedestrian and cycle networks should be given greater priority than vehicle routes where there is a potential conflict. There may be some circumstances where this is not possible, particularly on the main site access roads. Where this is the case, proposals must provide a convenient and safe alternative route for pedestrians and cyclists. This should not undermine the general principle of directness.
- 5.7 Ideally, the green grid should be used for the foot- and cyclepath networks. This will have to be carefully handled in the more ecologically sensitive areas. For example, the lighting strategy for footpaths within the green grid will have to take account of any foraging routes used by bats.
- ➔ **A network of pedestrian and cycle routes shall be provided linking homes and businesses to destinations on site. This network should be attractive, safe and direct, making use of the green grid where possible.**
- 5.8 Shared surfaces should be considered for mixed-use areas as well as residential streets. A high proportion of shared surface areas on site would send a clear message that pedestrians and cyclists are welcomed and encouraged. They must be designed as part of a holistic movement
- 5.9 Shared surfaces do, however, have implications for inclusive design. Blind and visually impaired people often find them difficult to use. There are design features that can mitigate this without undermining their purpose. Use of these should be considered at the detailed design stage.
- 5.10 Off-site pedestrian and cycle routes fall into two categories: functional links and leisure provision.
- 5.11 Functional links would not only cater for residents and businesses on the site, but would enable existing nearby communities to access jobs and services at Lodge Hill. There are five key links that should be considered:
- Cliffe Woods
 - High Halstow
 - Hoo St Werburgh
 - Wainscott
 - Medway City Estate
- 5.12 Many of these links will run alongside or cross busy roads. The A228 and A289 separate the site from Hoo St Werburgh and Wainscott. Dux Court Lane connects high Halstow to the site, and is likely to become one of the new site accesses. These routes will need to ensure that

- pedestrian and cyclist priority is provided at junctions. In some cases bridges above the carriageways are likely to be the only feasible solution. These should be designed so that the necessary height can be achieved without significant route diversions. This avoids tempting pedestrians and cyclists to take the more direct route at grade, which has obvious safety issues.
- 5.13 There are existing public rights of way which connect the site to Cliffe Woods. These are much more direct than the road network, but run through the Chattenden Woods SSSI. The draw of the services at Lodge Hill and the need for access must be balanced with the need to protect the sensitive ecology in this area.
- 5.14 Medway City Estate is beyond easy walking distance from the site. However, it would be within cycling distance. It provides a large concentration of jobs which could serve the population of Lodge Hill. The roads linking Lodge Hill to Medway City Estate are heavily trafficked and high speed, and unlikely to be attractive for cyclists. The potential for a fully off-road cycle link from the site should be explored. If this is not feasible, any improvements to the road links should include provision for cyclists.
- ➔ **Pedestrian and cycle links to neighbouring settlements and Medway City Estate should be provided as part of any related road improvements. Off-road links should also be provided where possible, if these would facilitate a more direct, safer or more useable route.**
- 5.15 The Hoo Peninsula has a dense network of public rights of way. Because of its long military usage, the Lodge Hill site and its immediate surroundings are not well connected to this network (see Figure 5.2). Linking the site back into this network would benefit residents of the new settlement and surrounding communities. The Council also has a wider ambition to improve the accessibility of its rural areas.
- 5.16 Where links can be made within the site or land in the same ownership, proposals should be brought forward as part of the planning applications for the site. Where links cross third-party land, an alternative approach will be needed. This may include financial contributions towards improved accessibility. The Council has some powers to create new rights of way and other footpaths, and a record of working with local landowners. It may therefore be more able to deliver off-site accessibility improvements than the developer. This would also help to offset pressure on nearby farmland from the new community.
- 5.17 Although there are existing bridleways on the Peninsula, they are not currently well linked. Proposals to improve connectivity from Lodge Hill should consider whether improvements can be made to this particular aspect of the network.
- ➔ **Improvements to connectivity of footpaths, cycle routes and bridleways in the vicinity of the site should be undertaken. These should promote the wider aim of improved accessibility across the Peninsula, and be coordinated with the Council's wider strategy.**

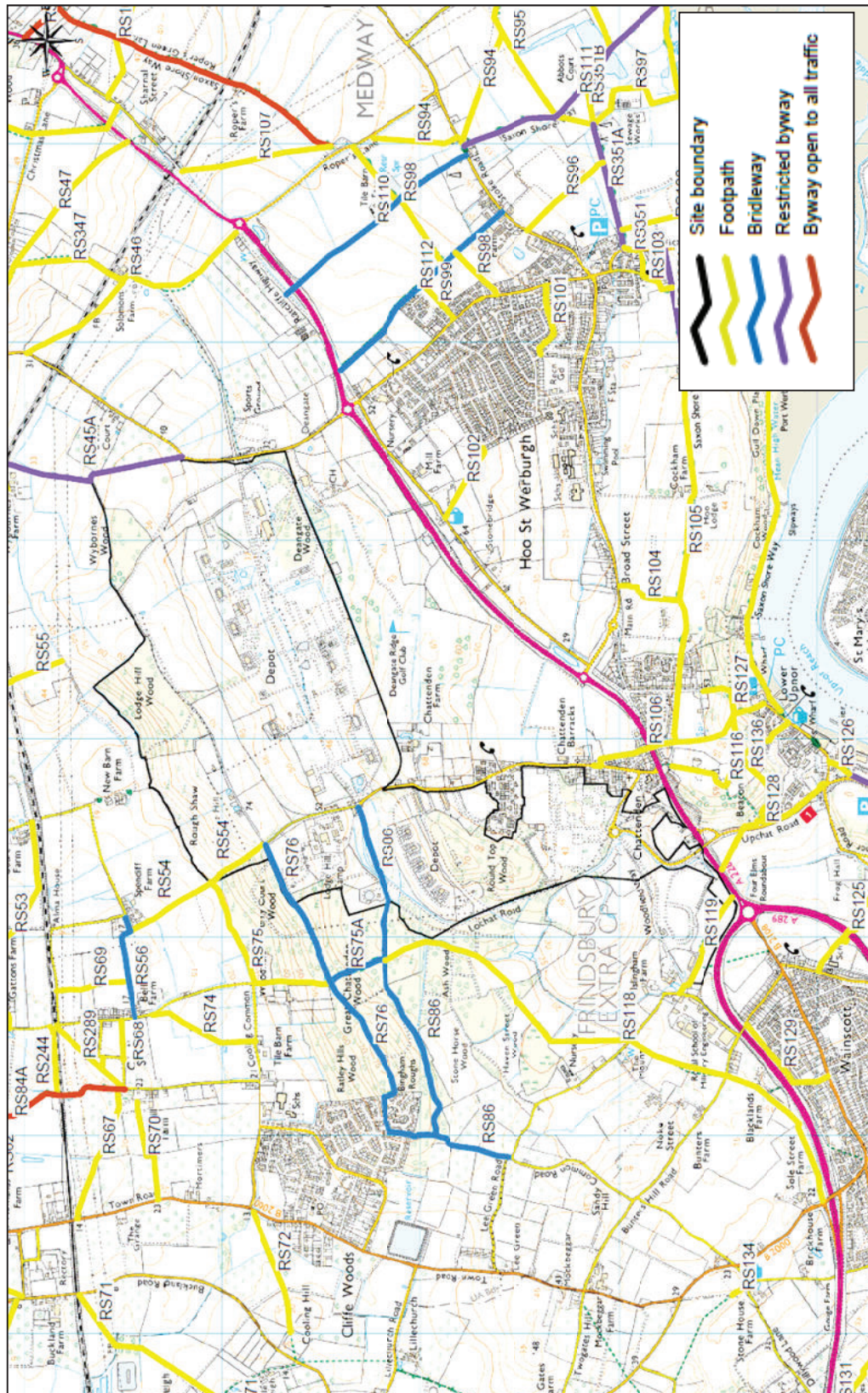


Figure 5.2: Public rights of way network

Public Transport

- 5.18

For longer trips, public transport is the main alternative to private car use. Existing public transport on the Peninsula is limited. The main bus route is currently route 191, which serves Hoo St Werburgh up to 4 times an hour. It takes a very lengthy route through the Medway Towns and only extends to the rest of the Peninsula once an hour. The vision for Lodge Hill requires a step change in public transport provision. Significant modal shift from the private car is needed to meet sustainability objectives and limit the impact of traffic growth.
- 5.19

Although a single-track freight railway runs around 600m to the north of the site, it is unlikely to be possible to upgrade this to passenger service. Even if it were possible, the level of future usage would be unlikely to sustain a useful service, and would not justify the huge expense.
- 5.20

Improvements to the bus service are therefore the only viable option. A dedicated bus service to key destinations will raise the profile of public transport. Reliability, frequency of service and speed of route are key to increasing bus use. The Fastrack service in Dartford and Gravesham has followed these principles, and has been very successful. Reliability and speed of route can be best achieved by bus priority measures on the main road network. Ideally, these should make taking the bus quicker than driving.

➔ **The road network between Lodge Hill and the main urban area shall be upgraded to provide bus priority on all relevant links and junctions.**

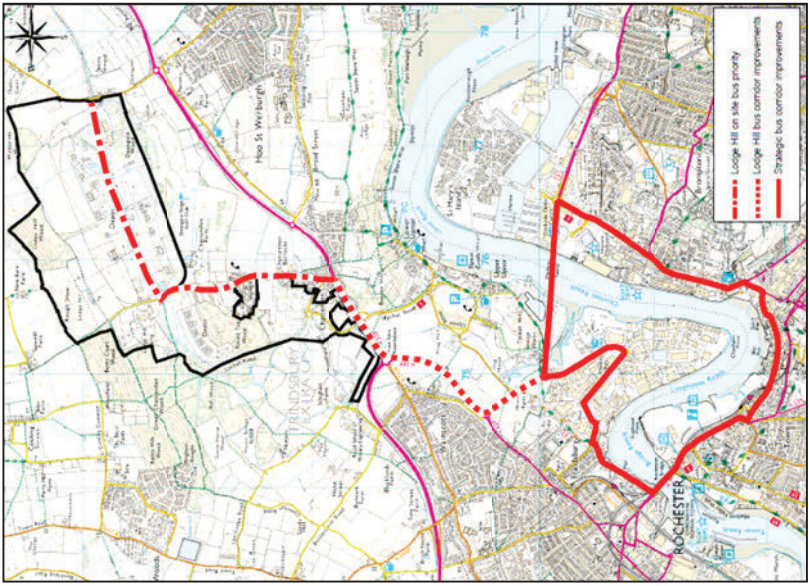


Figure 5.3: Strategic bus corridor improvements

- 5.22 The road network within the site may not require specific bus priority measures. However, road design and any traffic control measures must ensure that the service remains quick and reliable within the site.
- 5.23 The final bus route has to be carefully considered. It must serve a large enough catchment to make the service viable, and must serve a range of destinations that people will want to travel to. However, it must also avoid slowing journey times excessively with tortuous routes through residential areas to collect passengers.
- 5.24 The road network within Lodge Hill should enable a quick and straightforward route through the development. Key destinations within the site that should be directly served by bus stops are:
- Town centre
 - Foodstore
 - Secondary school
 - Local hubs and primary schools
 - Main employment area(s)
- 5.25 Clustering of facilities and uses should enable this to be accomplished in the most efficient way. In addition, as many residential properties as possible should be within 5 minutes walk of a bus stop. This may require one or two extra stops.
- 5.26 Key destinations that should be served outside of the site are:
- Proposed park and ride at Whitewall Creek (with interchange to urban routes)
- Strood rail station
 - Chatham Town centre (including bus station)
 - Chatham rail station
 - Chatham Maritime
 - Hoo St Werburgh
- 5.27 It may be more practical to provide two separate routes. A shuttle to and from Strood station in peak periods would be a fast and direct service, taking advantage of existing bus priority measures at Canal Road. This would be a very effective way of reducing commuter traffic, which will reduce impacts on the strategic road network. This could then be supplemented by a service to the other key destinations.
- ➔ **The bus route(s) proposed should serve the key destinations set out above.**
- 5.28 The exact service standards will be determined at a later stage. A bus company will be appointed to run the service and will need to ensure that it is practical and achievable. However, the Council will expect a very high quality service to be provided. Passengers need to be confident that they can rely on it, and it should be perceived as a different class of provision to the service the area has had previously. The standards that the Council will seek are set out in box 5.1.
- 5.29 Initial discussions with a local bus company suggest that these standards should be possible. They have reviewed the suggested route and confirm that it will allow suitable journey times. The service will require developer support to become established, but should be self-sustaining by the time the development is complete. This is reliant on

sufficient passenger numbers using the service. These will only be achieved if **all** of the components that make the bus service recognisably high quality are in place.

- At least 85% of dwellings in Lodge Hill should be within 5 minutes walk of a bus stop.
- Real time information should be provided at all bus stops within the site, in key publicly accessible buildings and (where possible) within individual residential and business properties.
- Where real time information is not already available at key destinations outside the site, a financial contribution will enable this to be provided.
- Weekday peak time services should run at least 6 times an hour (every 10 minutes). Peak times are 07:00 to 09:00.
- Remaining weekday services and Saturday daytime services should run at least 4 times an hour (every 15 minutes).
- Sunday and evening services should run at least twice an hour (every 30 minutes). Evening services should begin no earlier than 20:00. The last bus from Chatham should depart no earlier than midnight.
- Smart ticketing, through ticketing and pre-pay services should be provided where possible.
- Fares should be set at a level that does not discourage bus usage.

Box 5.1: Proposed bus service standards

➔ **The proposal for bus service provision should aim to meet the standards set out in box 5.1. Variation of these standards will be considered where there is a sound justification, but should not significantly reduce the quality of the service. Where agreed standards cannot be met commercially from the outset, developer subsidy will be required.**

- 5.30

The Council aims to introduce a smart ticket system across Medway, but the funding for this is not yet certain. It is not known whether this will be in place by the time the Lodge Hill bus service is required. However, the bus service should be capable of using the system once provided.
- 5.31

A high quality bus service should be provided from the beginning of the development. It should be in place at the point the first parcel of residential properties are occupied. While it may not be feasible to provide the final service at that point, the full route and frequency of service should be phased in as soon as possible.
- 5.32

It is unlikely that full bus priority measures will be available from the outset, as they will have to be integrated with road upgrades to cater for increased traffic. Four Elms roundabout is a known traffic problem at present and every effort should be made to provide bus priority here from the outset.
- 5.33

It is crucial that people moving to early phases of Lodge Hill are able to form sustainable travel habits. If bus priority measures are to be phased in, there may be no clear benefit to bus travel for occupiers of early phases. In this case, the

developer will be required to make the service attractive in other ways. This is likely to include the provision of free or subsidised bus season tickets for residents and businesses.

➔ **The bus service can be provided in phases provided there is still a high quality service from the outset. If phasing of priority measures reduces the attractiveness of bus travel for early residents, alternative measures to promote the bus service will be sought.**

- 5.34 Provision of free or subsidised season tickets should be considered regardless of the bus priority phasing. This would help to form sustainable travel habits among new residents and therefore to meet the target for modal split. The Transport Assessment should provide a clear analysis of modal split to inform whether these additional measures will be needed. There should also be a system in place to monitor modal split once the development has commenced. If targets are being missed, additional measures such as subsidised tickets can be brought in as needed.

➔ **Consideration should be given to provision of subsidised bus tickets to improve modal shift.**

Site access

- 5.35 Figure 5.4 shows the main road network in the vicinity of the site. There is only one main road on and off the Hoo Peninsula; the A228. The Wainscott Bypass (the A289) passes fairly close to the edge of the site. However, the land between the A289 and the site is very visually sensitive. It will not be possible to take a busy road through this area

without destroying its landscape character. This means that the only option for site access is via the A228.

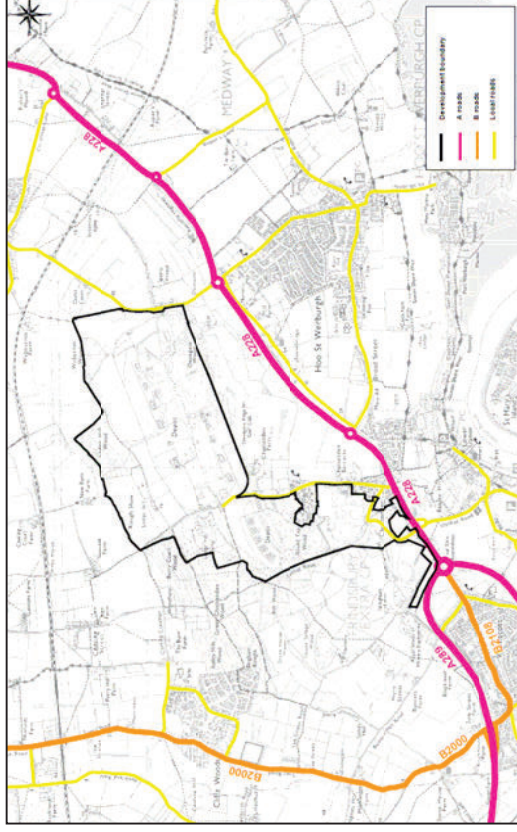


Figure 5.4: Local transport network

- 5.36 A settlement of this size will need more than one access point. There are already two roads into the site: Chattenden Lane and Lochat Road.
- 5.37 Chattenden Lane serves the existing village of Chattenden as well as the military site. It is adopted for most of its length although the final section remains in MOD ownership. It has existing properties on both sides, which limits the potential to upgrade its capacity. Although it would be capable of serving a higher level of traffic than existing with relatively minor upgrades, it is unlikely to be suitable as the main site

access. Upgrades will need to include removal or redesign of the existing traffic calming, especially if this road becomes part of the bus route.

- 5.38 Lochat Road is an MOD road and links Lodge Hill with the Upnors. Although it is an MOD road it is used by civilian traffic. It is not directly accessible from Four Elms Hill eastbound. However, the intervening land is within MOD ownership so a link to this road could be made. A strip of land between Lochat Road and Four Elms Hill has been included in the strategic allocation for this purpose.

INSERT FIGURE 5.5: SUGGESTED ACCESS ARRANGEMENTS (CHATTENDEN)

- 5.39 Both existing roads are at the western end of the site. At least one access point at the eastern end of the site will also be needed. Dux Court Lane runs along the eastern edge of the site. It meets the A228 at an existing roundabout which also serves Hoo St Werburgh via Bells Lane. Historically there was an eastern access to the military facility onto Dux Court Lane. This would be an obvious location for a second access but would require widening and upgrading of Dux Court Lane. However, alternatives may be acceptable. The principles for a eastern access are that it should:
- Enable a reasonable distribution of traffic to reduce pressure on the western accesses;
 - Ensure that there is an emergency route from all parts of the site if one access is blocked for any reason; and
 - Facilitate an internal road network that allows for good design, sense of place and ease of movement.

INSERT FIGURE 5.6: SUGGESTED ACCESS ARRANGEMENTS (DUX COURT ROAD & ALTERNATIVES)

➔ **The site must have accesses at both the eastern and western ends. The western accesses should use the existing roads where possible. The eastern access should consider using Dux Court Lane but alternatives will be considered if this is not possible.**

- 5.40 Consultation carried out by the developer shows that transport is one of the local community's main concerns. In particular, there is a lot of concern that Four Elms Hill will struggle to cope with increased traffic.
- 5.41 These concerns are entirely understandable. Four Elms roundabout suffers from congestion at peak times, with long queues on approach roads. Because the A228 is the only main road on and off the Peninsula, accidents or roadworks have a major impact. They can cause rat-running through small villages and rural roads across a wide area, as this is the only alternative. Obvious consequences include traffic congestion and reduced accessibility for rural communities to services in the main urban area.
- 5.42 There are two main rat-running routes from the Peninsula (see Figure 5.7). Neither of these is suitable for high volumes of traffic. It can also cause amenity problems for residents along the routes.

lanes will need to be provided. It would be advisable to allow right turns out of Chattenden Lane, at least for buses.

5.44

There is an existing bridge across Four Elms Hill, which carries Upchat Road between Chattenden and the Upnors. It has raking piers that limit the potential for road widening. This is a major constraint if bus lanes are to be provided without reducing capacity for general traffic. It is therefore likely that this bridge will have to be replaced in order for the improvements to Four Elms Hill to be carried out.

INSERT FIGURE 5.8: UPCHAT ROAD BRIDGE

5.45

Some structural surveys were carried out in 2010 and show that the bridge is likely to need replacing anyway in the medium term. This would be much more complicated once it has become one of the main accesses for Lodge Hill. It is therefore sensible for the work to be phased in line with the improvements to Four Elms Hill. Land levels, ecological designations and landscape character issues mean that the bridge is likely to have to be replaced in its existing location.

➔ **Improvements to Four Elms Hill and Four Elms roundabout to cater for increased traffic from Lodge Hill will be required. Proposed improvement schemes should consider the need for, and timing of, replacement of the existing Upchat Road bridge.**

5.46

The transport assessment will determine when the road improvements are required. This will also be affected by the phasing of the development. An early start at Chattenden,

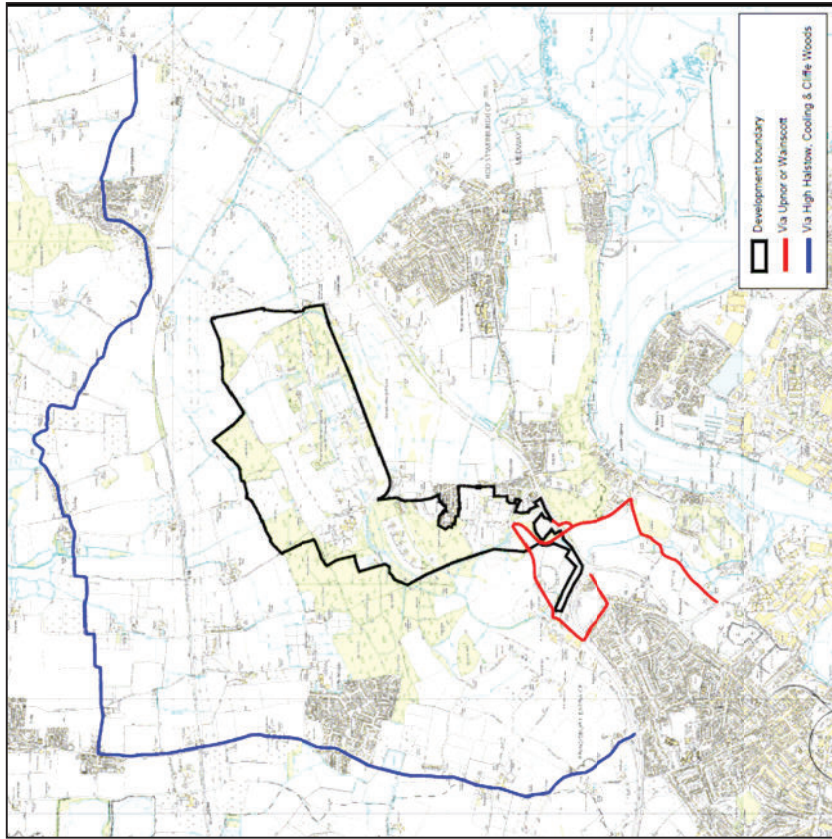


Figure 5.7: Rat-running routes

5.43

An initial transport assessment was carried out as part of the Core Strategy evidence base. This showed that the main capacity issue is with Four Elms roundabout rather than Four Elms Hill itself. Improvements here will be required to cater for traffic from the development. However, there will still need to be some improvements to Four Elms Hill. Bus

for example, would bring forward the requirement for works to Four Elms Hill and the Upchat Road bridge.

- 5.47 Wherever development begins, Four Elms roundabout will be affected and there is likely to be an early requirement for improvements here. The final solution for this junction is likely to be a fairly major redesign. However, the increase in traffic from the first few years of development could be accommodated by relatively minor changes. Again, the information from the transport assessment will determine how the full works should be phased.

➔ **The improvements to Four Elms Hill and Four Elms roundabout will be phased in line with the traffic impact of the development.**

Wider road network

- 5.48 Traffic modelling to inform the draft Core Strategy shows where congestion hotspots would occur in the future. Traffic from Lodge Hill will contribute directly to expected congestion at Junction 1 (J1) of the M2 and on the roads between Four Elms roundabout and the Medway Tunnel. There is also a potential indirect effect on J3 of the M2. If no improvements are provided to reduce congestion nearer to the site, traffic through J3 could increase as people avoid the A289.

- 5.49 Any solution for the A289/A228 corridor must cater for traffic from other future growth including Kingsnorth and Grain. Because of this, it cannot be the responsibility of the Lodge Hill developers alone. It may also require land outside of MOD ownership. Lodge Hill developers will be expected to

make a financial contribution towards the improvements needed, in proportion to Lodge Hill's impact on the network.

- 5.50 The Medway Tunnel is a natural limit to capacity on this part of the road network. Its capacity cannot be increased. Any improvements to the A289/A228 corridor must recognise this. It is important to prevent traffic queuing in the tunnel if at all possible, for safety reasons.

- 5.51 A detailed scheme for this link has not yet been drawn up. The most likely solution is that the two existing roundabouts at Anthonys Way and Sans Pareil would be the main focus of improvements.

- 5.52 The M2 junctions are the responsibility of the Highways Agency. Impacts here will also need to be addressed through a financial contribution. It may be possible to deal with the impact on this junction through ramp metering (controlling the flow of traffic onto the motorway, usually through traffic signals on slip roads) rather than any major physical works to increase capacity.

➔ **Any impact on the road network beyond Four Elms roundabout (including at Junction 1 of the M2) will need to be dealt with through financial contributions to wider schemes.**

Internal roads

- 5.53 Roads within the site should follow a hierarchy based on the amount of traffic they will carry. Table 5.1 compares the purposes and characters of the different hierarchy levels.

distributed more evenly. This will ensure the roads fit better with the character of Lodge Hill as a whole.

➔ **The road network within Lodge Hill should be designed in a permeable layout that distributes traffic evenly and contributes to the character of the settlement.**

5.55 The design of individual roads and development parcels should be driven by character rather than by standards. The target maximum road speeds can be achieved in a variety of ways. Roads within the site can alter their character to respond to the setting and design of future development. Figure 5.9 shows how the primary road network could respond to different characters. Where there are special circumstances (such as where roads adjoin ecologically sensitive areas, or through the town centre) some variation from the standards may be acceptable.

➔ **The hierarchy standards set out in Table 5.1 should be applied sensitively, taking into account the setting and design of each individual area of development. Proposals for variation of these standards will be considered where there are benefits to the character of the development or other special circumstances.**

INSERT FIGURE 5.9: EXAMPLE ROAD LAYOUTS FOR PRIMARY ROADS

5.56 The need to control traffic speeds often requires traffic calming. In existing residential areas the retro-fitting of speed bumps, chicanes, mini roundabouts and similar

	Primary	Secondary	Tertiary
Description	Local distributor roads bringing traffic into and through the site from the main site accesses. Serving over 300 properties.	Major access roads providing main access to residential and business areas. Serving up to around 300 properties.	Local roads within business and residential areas. Include home zones or similar within residential areas.
Design speed	30mph	25mph	20mph or lower
Bus route	Yes	Yes	No
Pedestrian and cycle provision	Cycles share footways unless off-road routes nearby.	Cycles use roadway (or off-road routes). Footways.	Mix of footways and shared surfaces. Cycles use roadway.
On-street parking	Allowed	Allowed	Encouraged
Private accesses	Limited, but acceptable where safety not compromised	Yes	Yes
Traffic calming	Mainly where green grid and cycle/pedestrian routes meet road network.	As primary roads	Physical and psychological - equal priority to pedestrians, cycles and cars.

Table 5.1: Road hierarchies within Lodge Hill

5.54 Primary and secondary roads should create a networked and permeable layout. A single main distributor road for all the potential traffic from the development would have a heavily urban character. It is preferable that traffic is

measures can be very harmful to the character of an area. They can also cause amenity issues, such as noise from cars negotiating speed bumps.

5.57 In a new development like Lodge Hill, traffic calming can be designed in from the outset. This enables less intrusive measures to be used.

5.58 This should include passive (or psychological) traffic calming, for example where pedestrian activity or parked cars encourage drivers to slow down. Active measures like raised tables and chicanes can also be used, if they are considered at an early stage. They should be an integral part of the urban fabric or landscape design. Vertical deflection (mainly through speed bumps) should be avoided where possible. If done well, integrated traffic calming can reduce the need for street clutter like railings and signage.

➔ **Traffic calming should be integrated into road design from the outset and make use of urban design and landscape features.**

5.59 An outline application will set broad principles for the layout of the primary and secondary road network, and for road design across the whole site. Detailed design, including traffic calming will be at a later stage. It will have to work within the parameters set at outline stage. The information submitted with an outline application should include a “menu” of traffic calming options. Developers of individual parcels can then apply those which are most appropriate.

Parking strategy

5.60 Car parking is a crucial part of designing any new place. It influences sustainability (and health) by making it more or less easy to use the car instead of other modes of transport. It has to be provided in a safe and secure way to reduce the potential for car crime, and it has to be incorporated into the design of a place so that the car does not dominate the public realm. The amount of parking, where it is provided and how it is managed are all relevant.

5.61 The Council's adopted parking standards give minimum levels of parking for residential development. There is a caveat for highly sustainable locations, where the level of parking can be reduced. This will apply to Lodge Hill. The site will have services and facilities, will be highly walkable, and will have excellent public transport connections.

5.62 The way that parking spaces are allocated has a major impact on the overall level of parking demand. It is more efficient to not allocate parking spaces to an individual property. Figure 5.10 demonstrates this. However, homebuyers tend to prefer at least one guaranteed parking space, so this is what housebuilders prefer to provide.

INSERT FIGURE 5.10 PARKING ALLOCATION EXAMPLE

➔ **A parking strategy for Lodge Hill should be submitted with an outline application and updated regularly thereafter. It must balance sustainability and design considerations with the need to meet demand. Developers should not seek to over-provide parking.**

- The criteria set out in para. 5.63 should be considered when determining the level of parking for each application. As many spaces as possible should be provided on an unallocated or shared basis in order to reduce overall parking demand.**
- 5.63 The exact amount and distribution of parking for each development parcel will be determined at detailed application stage. Consideration should be given to the following criteria:
- The implications for design and character
 - The size and tenure mix of housing proposed
 - The location of the parcel within the development
 - The need to promote sustainable transport and healthy lifestyles
 - Evidence from previous phases regarding public transport patronage, walking rates and car use
- 5.64 The English Partnerships document *Car parking – what works where* is a useful reference for how to integrate parking provision into urban design. Developers should make full use of this resource. Vehicles should not be allowed to dominate the character of an area.
- 5.65 How parking is provided can have a major influence on how easy and attractive car travel. This includes location and type of parking spaces. It can also include parking charges. Developments both in the UK and abroad have adopted this approach and some have found it very successful in reducing car ownership and therefore car use. However, it is only successful where suitable alternatives are in place.
- 5.66 It would not be fair or realistic to charge for all parking at Lodge Hill. Given its rural location, even with the public transport links being proposed there will still be a requirement for some car transport. However, if a functional level of allocated parking were provided, charging for additional parking could be feasible. This could take the form of residents' parking permits. It would not penalise households for needing to use a car, but could discourage second (and subsequent) car ownership. It would also be possible to discount parking permits for electric or low polluting vehicles, to further emphasise the sustainability rationale for the scheme. Any proposals for parking charges would need to have a clear strategy for managing the impact on existing communities adjacent to the site.
- 5.67 The Trust for Lodge Hill (see Chapter 2) could manage any parking regime. This would enable the proceeds to be re-invested in initiatives to encourage sustainable transport or other community priorities. Giving the community direct control of the scheme and its proceeds would also improve perception of the scheme amongst the community.
- ➔ **Consideration should be given to the location and management of parking provision. This should include consideration of charging for a proportion of on-site parking provision.**
- 5.68 Another advantage of communal unallocated parking is the flexibility to re-use the land if parking demand decreases in the future. If the scheme is run by the Trust, this gives potential for provision of alternative community facilities or income generation through redevelopment. This may be

most relevant for early phases of Lodge Hill, where properties are occupied before all the on-site facilities are provided and there may be greater requirements for off-site car travel than once Lodge Hill is established.

5.69 The Council's adopted parking standards for other uses are maximums. These remain relevant for Lodge Hill. However, provision up to the full maximum is unlikely to be necessary or acceptable. In particular, where the main catchment for a use is within Lodge Hill itself, there should be less need for parking. Every opportunity should be taken to share parking provision between uses with different times of peak demand.

5.70 Town centre parking should not be free for general users. Prices should be set to discourage long stay car parking. This will prevent abuse of the facility, for example by commuters wanting to catch the fast bus link to the station. The foodstore will have a specific parking requirement, but this should be shared with the town centre generally. There are many examples of foodstores refunding parking charges for customers spending over a certain amount, which could be implemented here, if required, by the store operator.

➔ **Parking for non-residential uses should accord with the Council's adopted maximum standards. The exact level of provision should reflect the need to discourage private car use, while supporting the wider economic functions of the development. Sharing of parking between uses should be promoted wherever possible.**

5.71 A car club should be strongly promoted as part of the Green Travel Plan for Lodge Hill. It is one of the most viable ways

of reducing car ownership and is therefore an integral part of any strategy proposing limited parking provision. Car club members have access to a car when they need one but are not so likely to use one for trips where there is an alternative. It can be particularly useful in reducing second (or subsequent) car ownership.

➔ **A car club should be provided to encourage reduced car ownership, and incentives provided to encourage new residents and businesses to make use of it.**

Chapter 6 – Character

- 6.1 Large-scale developments, like a new settlement, can risk appearing sterile and artificial. Everything is new and the place as a whole is much more “planned” than in a traditional town or neighbourhood that has grown up over a much longer period of time. However, a sense of place is one of the key factors that influences quality of life for residents. The character of a place can facilitate or stifle the creation of an active, inclusive, well-functioning community.
- 6.2 The challenge for Lodge Hill is to create a sense of place so that it will function not only in 15-20 years’ time when the development is first completed, but also well into the future. It can achieve this by:
- Capitalising on and responding to its rural setting;
 - Retaining key heritage assets and reflecting the military history in future development;
 - Making use of existing buildings and landscape features;
 - Integrating with the existing built development and community at Chattenden;
 - Requiring a high quality of design throughout; and
 - Enabling a variety of built forms and layouts to be incorporated into an integrated whole place.

Countryside issues

- 6.3 Lodge Hill cannot and should not be separated from its context. It is surrounded on most sides by undeveloped, rural areas. There is a mixture of agricultural, leisure use and woodland, which all adds to an exceptional setting for the site. This is a major asset for the development. It gives a strong foundation on which to establish a sense of place. It

can also be a marketing tool for future developers; it is in their interests to develop and enhance this character.

- 6.4 While the rural setting is an asset for the development, it can also be sensitive to change. Lodge Hill is a large-scale development, much larger than anything that currently exists on the Peninsula. Some existing residents have expressed concern that it will change the character of the surrounding area so that it no longer has a rural feel. However, if the development is sensitively handled, this can be avoided. In other parts of Kent and further afield, it is common to find small market towns serving a surrounding rural hinterland. This does not make the whole of the surrounding area feel urban. This is the model that Lodge Hill should follow.

➔ **Lodge Hill should be integrated into its context. Its built form, layout and scale should support and strengthen the rural character of the surrounding area and smaller settlements.**

- 6.5 The strategic allocation for Lodge Hill includes some of the surrounding areas including part of the Chattenden Woods SSSI. The developable area is smaller (see Fig 1.1). Much of the developable area is in the valley between Chattenden and Deangate Ridges. This has limited visibility from outside the site. The Chattenden Barracks area is much more visible. There is also a small corner of the site to the northeast that slopes down towards High Halstow and is visible from the village, Dux Court Lane and nearby footpaths. Figure 6.1 shows the most visible areas of the site and where the main views of these arise.

INSERT FIGURE 6.1: VIEWS AND VISIBILITY

- 6.6 The line of Chattenden Ridge is an extremely important feature. From the ridge, there are dramatic views over the Peninsula, the Thames estuary and the whole of Medway. From outside of the side, the ridge at the heart of the Peninsula is one of its defining landscape features and is very prominent from nearby settlements, major transport corridors and the footpath network. Historically, the ridge would have been heavily wooded and the woodland portions of the SSSI are remnants of this.



Figure 6.2: View from Chattenden Ridge

- 6.7 The main built up area of the development should not intrude on views of the ridge from surrounding areas. The broad developable area shown in the Concept Plan must be refined through detailed analysis of topography and viewpoints to accomplish this. It may be acceptable to have some small-scale development on or close to the ridge, where it is an appropriate use for the area. A visitor centre by the Ack-Ack station is one possible example. If this is proposed, its position, scale and design must be very carefully considered.

➔ The main built area of the settlement should be set back from Chattenden Ridge so that it does not disrupt this strong landscape feature. Any small-scale development proposed on the ridge or within this generally undeveloped zone will only be acceptable if there are clear benefits to its location here. In this circumstance the siting, scale and design of any such development must not detract from the contribution of Chattenden Ridge to the wider landscape.

- 6.8 Views from the ridge should also be retained. They would be a great attraction for any proposed countryside park. However, there are benefits to reconnecting the existing parcels of woodland along the ridge. It would help to reinforce it as a strong feature within the wider Peninsula as well having ecology benefits. Where this is proposed, planting should be located to retain views where possible.
- 6.9 Another very sensitive area is the edge of the site to the south and west of Chattenden. The land here slopes down towards Wainscott and the rest of the main urban area. The separation between urban Medway and Lodge Hill is narrow, less than 550m at its smallest. This area will also have to include the main western access roads. The distance from the urban edge to the likely location of an entrance slip from Four Elms Hill is just over 400m.
- 6.10 The Local Plan designated this area as an Area of Local Landscape Importance (ALLI). It is not proposed to retain these designations in the Core Strategy. Instead, a criteria-based assessment is proposed. The Council has therefore carried out a Landscape Character Assessment (LCA) for

the whole of Medway. The gap between Lodge Hill and urban Medway includes Bald Top Hill (character area 19) and part of Hogmarsh Valley (character area 18). Box 6.1 summarises the conclusions of the LCA for these areas.

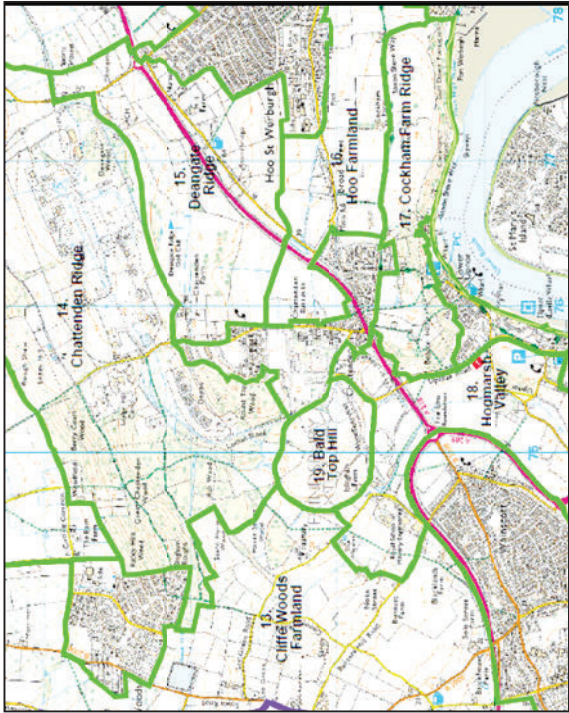


Figure 6.3: Extract from LCA map

6.11 The continued integrity of this gap is crucial. It is the difference between Lodge Hill being part of the rural Peninsula rather than an extension of urban Medway. Where new development borders this area, a robust landscape buffer must be created. This should aim to ensure that the character of the area remains green, rural and distinct. This is likely to involve significant woodland style planting and strengthening of some existing plant lines.

Hogmarsh Valley:

- A green buffer and backdrop and distinctive gateway to the Medway towns
- Contains a number of detracting features including transport corridors, MOD facilities and sewage works. Together with influence of urban fringe this disrupts the overall integrity of the area.
- Recommend strengthening of landscape character through additional planting, softening of urban fringes, provision of more sympathetic boundary treatment and repairing historic field patterns.
- Protect openness and views of wooded backdrop

Bald Top Hill:

- Distinctive and prominent landscape feature in views from Wainscott and the A289.
- Retains tranquil and unspoilt rural character but under threat from expansion requirements of retained MOD estates.
- Character and views must be protected from intrusion as part of surrounding development proposals.
- Improve screening to adjoining military areas, strengthen woodland edges on upper slopes and investigate potential for accessible footpath to take advantage of views from hilltop.

Box 6.1: Summary of relevant Landscape Character Assessment conclusions

6.12 The exact location of the built development edge and landscape buffer should be determined by a thorough visual impact assessment. This should have reference to the key viewpoints shown in Figure 6.1. Detailed proposals should be guided by the information within the LCA.

➔ **A robust buffer should be created at the western edge of the site to screen the new development from urban Medway and in views from the A289. Its objective is to maintain and enhance the integrity of the existing green separation between the site and the urban area.**

6.13 Views from the A228 at Four Elms Hill are less sensitive. Chattenden Woods SSSI and other un-developable areas will continue to provide a green backdrop to Lodge Hill. It is inevitable, and acceptable, that some development will be seen from Four Elms Hill, as indeed the existing Chattenden village is. The beginning of the existing development in this area is a good marker for where visibility becomes less of an issue. A gentle transition should be provided between the countryside and the start of Lodge Hill.

6.14 Consultation for the Core Strategy included a workshop on the Peninsula. This identified Hogmarsh Valley (including Bald Top Hill) as a key concern, due to existing pressures on the area and impact from future developments. It was also agreed that the area has great potential. Its gateway function was recognised; participants felt it could act as a link between the rural and urban areas. They suggested that better awareness and stewardship of this area was needed.

INSERT FIGURE 6.4: HOGMARSH VALLEY (PHOTOS)

6.15 A countryside management plan for this area would help to identify priorities and ways to achieve them. A similar project was undertaken in the Medway Valley and has proved successful. The landowner (the MOD) and the tenant farmer would need to be involved. It would be important to ensure

that agricultural use of the land remains viable. The Council will provide support to local stakeholders should they wish to progress this. The developer(s) of Lodge Hill will be expected to participate, and to link any landscape or ecological mitigation in this area to the plan.

6.16 Any Trust set up for Lodge Hill should also participate. This would be an ideal opportunity for them to build relationships with surrounding communities.

6.17 Funding is likely to be an issue in the current economic climate. Working with the MOD should help to identify small, low-cost measures that bring large gains. S.106 contributions from Lodge Hill may also be an option. These can only be required where they are directly related to the development and its impact. However, it is likely that some contributions towards off-site works will be required for access improvements, ecological mitigation, etc. These are all relevant to the Hogmarsh Valley area so it may be appropriate to direct some of the funding here.

➔ **The Council will encourage and support the production of a countryside management plan for the Hogmarsh Valley area, to respond to pressures from existing and future development. This will need to involve a wide range of local stakeholders. The developer(s) and community organisation at Lodge Hill will be expected to participate.**

6.18 The gap between Lodge Hill and urban Medway includes a small group of houses close to Chattenden village. They are sited between the two arms of the proposed main access.

The easternmost house is Bridge Lodge and there is a small field to the rear in the same ownership. The total area is approximately 2.8 hectares. The owners of this land made comments in response to the draft Core Strategy, suggesting that it should be included in the strategic allocation. This would not be appropriate because the land is not necessary to meet the objectives of the Core Strategy or to deliver Lodge Hill.

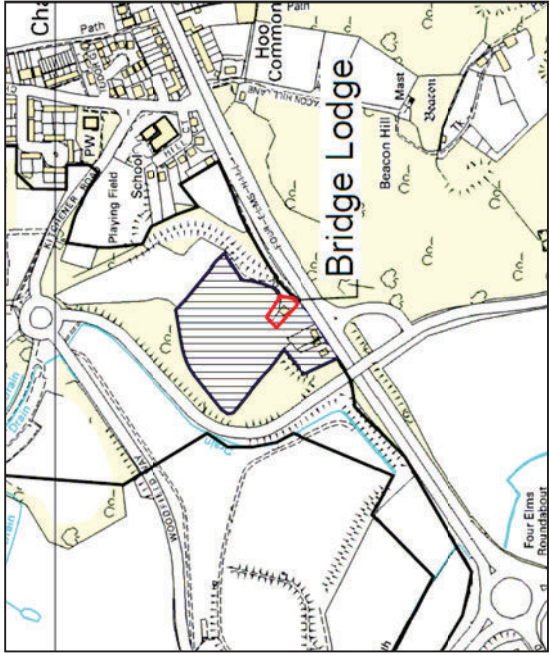


Figure 6.5: Bridge Lodge and environs

6.19 However, the comments do show that the landowner is considering development of this area, so there is a chance that proposals may come forward separately in the future. The sensitivity of the gap between Lodge Hill and urban Medway means that any development potential here is very

limited. The site is within the boundary of the Development Brief, so policies set out above would apply to this site just as they do to Lodge Hill itself.

6.20 The gap between Lodge Hill and High Halstow is also narrow; 800m at its lowest. The topography here is very different to the Hogmarsh Valley and this area is less prominent. However, there is a visible corner at this edge of the site. It is currently open grassland, with Wybornes Wood in the background. This falls within Character Area 14 of the LCA: Chattenden Ridge.

INSERT FIGURE 6.6: NORTHEAST CORNER OF SITE (PHOTOS)

6.21 While this gap may be less prominent than the Hogmarsh Valley, it is of great significance to the residents of High Halstow. There is a need to preserve the separate identity of the village and prevent the risk of future coalescence with Lodge Hill. Maintaining separation between Lodge Hill and nearby settlements is one of the guidelines set by the LCA.

6.22 The easiest way to accomplish this is to strictly limit the visibility of this area from Dux Court Lane. Development should be set back from the site edge at this point and should be low height and low density. Woodland style planting to the edges of this area may again be appropriate, as it will help to recreate the wooded ridge. Woodland blocks are a key feature of the landscape surrounding High Halstow and this would reinforce the rural feel of the area.

➔ The visibility of Lodge Hill from Dux Court Lane and High Halstow should be limited as far as possible.

Woodland style planting and other measures should be introduced to soften development in this area.

- 6.24 This does not detract from the importance of protecting landscape character. There is no presumption that the whole allocated area can or should be built on.
- 6.25 The allocation of Lodge Hill for development will inevitably result in change to the character of the area. Detailed analysis of the areas affected will make it easier to manage this change. The LCA has started this process. The landscape and visual impact assessment to be carried out for the outline application and detailed design work should continue and refine it. The focus should be on identifying and protecting the most important characteristics of each part of the site. There are very few areas where this will require a complete ban on development.
- 6.26 The most visually sensitive areas of the ALLIs and the approach needed in them have been identified above. Other areas are less visible, or have been subject to military use and no longer retain their natural character. These areas make less contribution to the character of the wider area, so are less sensitive. It is therefore appropriate to have fewer restrictions on what can be developed here. However, proposals for these areas must still retain and protect the most important landscape features. Detailed design should respond to the character of the wider area.

Landscape strategy

- 6.27 The landscape strategy for Lodge Hill should acknowledge the contribution that its rural setting makes to its character. It should be designed to facilitate strong visual, conceptual

- 6.23 A large part of the site itself is covered by an ALLI designation in the Local Plan. The allocation of Lodge Hill as part of the Core Strategy will supersede this. Even within the Local Plan, much of the ALLI designation overlaps with the strategic policy safeguarding the MOD estate for future development.

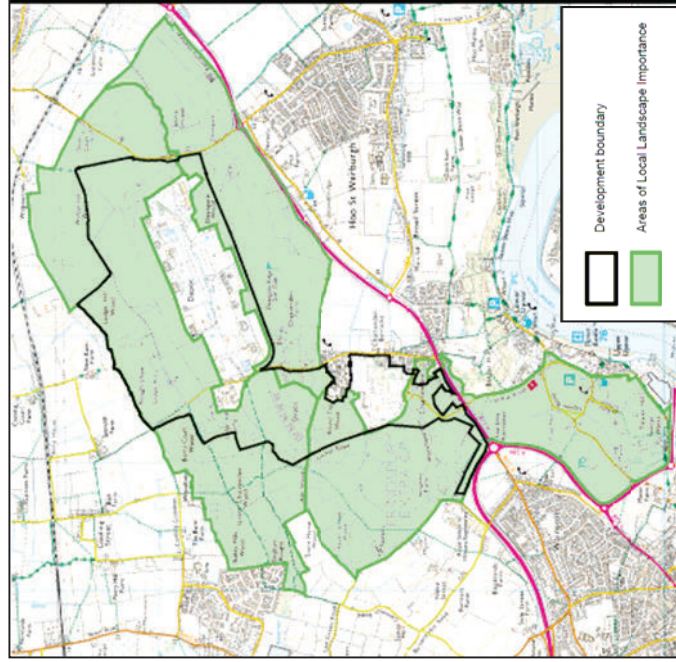


Figure 6.7: ALLI designations at Lodge Hill

and functional links between Lodge Hill and the countryside. Although most of the site is previously developed, there are many existing natural features. The strongest existing features are identified below. The developer should seek to retain these and integrate them into a landscape strategy for the site.

- Ancient woodland within the SSSI and at Deangate Wood, Wybornes Wood and Round Top Wood.
- Groups of Category A trees, including Rams Bottom Wood.
- Shelterbelts running from Chattenden Ridge into the valley.
- The line of trees and vegetation following the security fence.
- The watercourses at the valley bottom, including a number of ponds and small lakes.

6.28 These retained features, combined with the buffer zone for the SSSI, create a strong framework for a green grid across the site (see Figure 6.8). This natural grid also makes a very strong connection to the surrounding countryside. The landscape strategy for Lodge Hill should take this grid as a starting point.

INSERT FIGURE 6.8: FRAMEWORK GREEN GRID

6.29 The grid informed by these features will have a clear influence on the form of the settlement. It will be a major factor in establishing a sense of place for Lodge Hill. As such, proposals for the site-wide landscape framework should form part of the outline application. The major landscape elements will need to be coherent and integrated

even if the detailed design and delivery is carried out in phases. Sufficient detail must be provided at outline stage to ensure that this is achievable.

➔ **A site-wide landscape strategy to guide future public realm and infrastructure proposals should form part of the outline application. This should include a site-wide landscape network building on the grid formed by existing major landscape features, which should be integrated into the settlement as a whole.**

6.30 The large-scale and significant landscape features forming the major green grid are not the only existing features on site. Smaller groups of trees, individual specimen trees and small ponds away from the main watercourse, for example, all add to the character of the place. Considering every one of these will be too much detail for the outline application stage. However, site-wide remediation, earthworks and infrastructure works could all affect whether retention of individual features is possible.

➔ **Schemes for site-wide remediation, earthworks and infrastructure works required in advance of the detailed design stage, should seek to avoid impact on existing trees and other landscape features as far as possible. Where it is not possible, they should demonstrate either that impact has been minimised as much as is practical, or that the features affected are of limited significance to the character and form of the overall development.**

6.31 Detailed design for individual development parcels should consider any existing landscape features on that parcel.

Where possible they should be retained and integrated into the layout of the scheme. The green grid should be linked into all development areas.

6.32 Species selection for landscaping schemes should reflect the local area and should contribute to on-site biodiversity wherever possible.

6.33 The principles set at outline stage will direct the landscape design for individual development parcels. However, there should still be scope for variety to prevent all parts of the site from looking the same. The creation of character areas within the site where different principles should apply will help to strike the balance between variety and incoherence.

➔ **Landscape design for individual development parcels should retain and integrate existing landscape features wherever possible, and should link to the major green grid established at outline stage. All landscaping should contribute to local distinctiveness and should contribute to biodiversity retention and enhancement.**

6.34 The landscape strategy for the site should incorporate a public art strategy. This should look beyond the traditional route of sculptures in public spaces. A more holistic approach could explore how public art can also be incorporated into landscaping and as part of buildings. This will contribute richness and depth to the sense of place for Lodge Hill, giving its new community a cultural identity as well as a visual one. The heritage of Lodge Hill should be seen as a wonderful and varied source of inspiration for a

public art strategy that will cement the new development into the existing local culture and history.

INSERT FIGURE 6.9: EXAMPLES OF INNOVATIVE/INTEGRATED PUBLIC ART

6.35 There will still be a place for sculptural public art as part of the strategy. Developers should consider the potential for a small number of “landmark” features to define and enhance the sense of place in key locations. The locations should be carefully chosen so that the landmark feature does not overwhelm them or seem incongruous. Some options to consider may include:

- Town centre/town square
- Anti-aircraft station on Chattenden Ridge (see heritage section)
- Key entrance points to the development
- Secondary school

6.36 The public art strategy should also encompass community involvement and engagement. The existing community and new residents should have opportunities to be involved. There are many options for doing this. It could involve direct participation in design workshops; a competition with local representatives on the judging panel; or putting shortlisted proposals to a public vote. It may even be possible to give any Trust a commissioning role for some projects.

➔ **A public art strategy for Lodge Hill will be required. This should take a holistic approach to inclusion of public art, outline a mechanism for community involvement, consider the potential for landmark public**

6.38 This has left a significant legacy of military heritage. As well as surviving buildings and structures, traces of other historic features can be found on site. The layout and organisation of the site also reflects its military use. In addition, there are records of buildings, structures and other features that have since been demolished or lost.

INSERT FIGURE 1
(PHOTOS)

- 6.39 This legacy is a fantastic resource for the site. It has significant value in its own right. A number of the existing buildings and structures may be of national importance; some are already listed. This history and local cultural identity can do more for sense of place than any attempt to retrofit an artificial alternative. It is vital that Lodge Hill's heritage is reflected in its masterplan and detailed design.

- 6.40 The most obvious way to integrate heritage into a new development is through the retention and reuse of buildings and other features. For any assets that English Heritage chooses to list, this will clearly be compulsory.

- Buildings that may not have such obvious significance can still be worthy of retention. They add to local distinctiveness and variety, and help to counter the tendency of large developments to seem artificial. There are also sustainability benefits. A supply of older (and usually cheaper) buildings can also be very useful for some business and community. For this reason, consideration should also be given to



temporary use of buildings that are not to be retained long term.

➔ **Subject to structural condition and the need to meet other objectives, existing buildings and structures on site should be retained and incorporated into future proposals where they are significant in terms of the site's heritage or their architectural merit, or where they would contribute positively to the character of the new development.**

6.42 Figure 6.12 summarises the location of buildings and structures on site that may be worthy of retention. Further details are available in Appendix 3. In most cases, little or no information is available about their structural condition. It may be that this is the key driver for which can be retained.

6.43 The pillboxes and other defence structures are highly significant. Four pillboxes have been listed by English Heritage and a number of other structures are still being considered. Every possible effort should be made to retain these structures. This may require significant restoration works in some cases. Proposals for their demolition will only be accepted in exceptional circumstances. For the most important examples, including any that are listed, consideration will also have to be given to their setting.

6.44 The magazine sheds and their embankments are significant at a more local level. They are the main remnant of the original military establishment at Lodge Hill. The group of five "Chattenden Magazines" within a walled enclosure are especially important. The "Expense Magazines" are also an

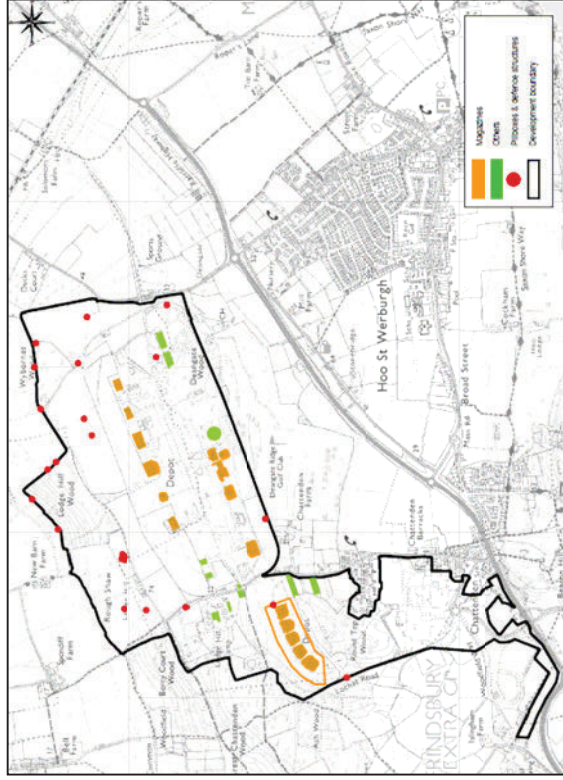


Figure 6.12: Heritage assets at Lodge Hill (see also Appendix 3)

interesting example. However, many of the sheds themselves are in poor condition and have been much altered. Advice from English Heritage is that none of the magazine sheds are likely to be listed. Consideration should still be given to retaining and re-using one or two of the best examples.

6.45 The placement of the magazines has had a major influence on the layout and use of the site over the years. Whether or not the sheds are retained, their siting should be reflected in the proposed layouts. This should include the embankments around each shed, which were to contain any explosions from the munitions stored there.

6.46 The other buildings shown on figure 6.12 have not had such a strong influence on its development and use. They have mainly been selected because of their possible contribution to the character of Lodge Hill as a place. Proposals should retain these buildings where possible. In many cases this will require alterations or extensions. Developers should consider less conventional uses as a way of retaining some of these buildings. There are examples elsewhere of character buildings being saved by innovative thinking about what they can be used for.

INSERT FIGURE 6.13: EXAMPLES OF INNOVATIVE RE-USE

6.47 The history of military use of the site should be reflected through the site's layout as well the retention of existing buildings and structures, where possible. It is common for military sites to be laid out to a regular grid. At Lodge Hill, this is clearly shown by the route of the narrow gauge railway that linked the magazines to Upnor depot. The track itself has long been removed but internal routes still follow the same lines.

INSERT FIGURE 6.14: CHATTENDEN AND UPNOR RAILWAY

6.48 A grid-style layout for the whole development would reflect the military heritage. This will need some flexibility in places, to accommodate difficult topography or retained features. The route of the railway could be reflected specifically. It may be possible to continue reference to the railway in any walking and cycling link between the site and Upnor.

6.49 The allocated site includes land that is used by the MOD but is not within the security fence. A distinction between the secure and non-secure areas should be reflected in the layout of the new development. As the line of the fence corresponds with a strong line of vegetation for much of its length, it may be possible to make a distinct feature of this.

6.50 In some cases, the significance of a feature is not obvious to those without prior knowledge of it. For example, the anti-aircraft station at Chattenden Ridge is believed to be the first in Britain, together with its sister station at Beacon Hill. The purpose of the pillboxes defending the stopline is also unclear, as the line itself no longer exists. The developer will be expected to make provision for interpretation of heritage features. This would benefit from being incorporated into the landscape and public art strategies.

INSERT FIGURE 6.15: CHATTENDEN RIDGE ANTI-AIRCRAFT STATION (PHOTO)

➔ The military heritage of Lodge Hill should be reflected in the layout and landscaping of development proposals. Consideration should also be given to the need for interpretation of key heritage features.

Built development

6.51 The built form of the development is where the need to balance variety and coherence becomes strongest. The emphasis on family housing does not mean that Lodge Hill should be built out in uniform suburban style. It must have a character of its own, as an entire place. There must be a

recognisable core, areas of different character and edges that relate to the surrounding countryside.

6.52 This can be achieved through a hierarchy of streets, public spaces and densities, as is common in traditional settlements. Each area within this hierarchy (centre, suburbs, local hubs etc.) should have a distinct character.

6.53 The town centre is the heart of any place. Its location and design should enable this role. There are a number of factors that suggest that it should be located towards the bottom of the main valley:

- The flatter topography here is better suited for the large buildings that would be found in the town centre, such as a foodstore. Taller buildings (necessary for higher densities and mixed use) can also be accommodated here without intruding on the ridgeline.
- The watercourse running through the valley can enliven and add character to a town square or green.
- Putting the town centre in the valley enables more properties to be within easy walking distance.
- It can be better located in relation to the road access for the rest of the Peninsula.
- The levels of activity that would be generated by the town centre are better located away from the sensitive ecology areas around the SSSI.
- It would place the town centre literally at the “heart” of the development.

INSERT FIGURE 6.16: SUGGESTED LOCATION FOR TOWN CENTRE

6.54 The town centre should be a vibrant, welcoming place. The mix of uses set out in Chapters 2 and 3 will help to accomplish this but design will also play a big role. The town centre will be the main focus point for visitors from the rest of the Peninsula and will play a significant part in the lives of people moving there. It will therefore be important in setting the character for Lodge Hill as a whole. Key principles for the town centre to follow are set out in Box 6.2.

- The town centre should connect with the green spine and watercourse in the valley.
- A town square should be created to enable markets and other public events. It should be of sufficient scale to give it a sense of being a destination.
- A High Street should be created to provide movement (including buses) through the town centre to promote vitality, but should not carry heavy traffic.
- Buildings in the town centre should be of sufficient scale to provide a sense of definition and enclosure to streets and spaces. They will generally be at least three storeys but could be higher subject to suitable design.
- The town centre should be a mixed-use environment including retail, community facilities and business uses. This should also include some provision of residential to ensure that the town centre has activity and natural surveillance throughout the day.
- Food and drink uses should be located where they can make use of outside seating areas and views of key landscape features.
- The supermarket must be well integrated into the built form of and layout of the town enabling easy transition between them.
- A landmark building should be provided for sense of place and navigation, and there is potential for landmark public art to be included.

Box 6.2: Key principles for town centre

INSERT FIGURE 6.17: ARTIST'S IMPRESSION OF TOWN CENTRE

6.55 Traditional town centres have a key navigational point in the form of a parish church, town hall or similar building. These also function as meeting places for the local community and contribute to local cultural identity. Something must take the same function for Lodge Hill. A landmark building should be provided, but the form and use that this should take is flexible. It should be distinctive to Lodge Hill, and a pastiche of traditional building types is unlikely to be acceptable.

➔ **The town centre should be located within the main valley in a position that enables it to act as the heart of the settlement. Proposals for the town centre should follow the principles set out in Box 6.2.**

6.56 In Chapter 2 (Community) an objective was set to ensure that as many properties as possible are within ten minutes walking distance of their nearest hub. This requires two local hubs in the main valley, and one at Chattenden.

INSERT FIGURE 6.18: LOCAL HUBS

6.57 The local hubs will have a smaller mix of uses and level of activity than the town centre but still need to be welcoming and useable. Primary schools will provide community uses, especially with dual use out of hours. Public spaces should be provided at each local hub. This could be a smaller and more informal space than for the town centre, similar to a village green, and should include some form of play area. The creation of “village greens” would also create

opportunities for local food and drink uses like the traditional village pub. A lesser scale of buildings than in the main centre will be required but this should still give them a presence and identity beyond that of the residential areas where they are located.

6.58 The hub at Chattenden should be of slightly larger scale than the other local hubs. This should be reflected in the design of its buildings and spaces.

➔ **Local hubs should provide useable and welcoming environments including areas of public space. While they should complement the surrounding residential areas they should have a distinct character that reinforces their role.**

6.59 The siting of the main and local hubs gives a recognisable core to the main valley. It is good practice to concentrate higher density residential development around mixed-use areas. This has a number of benefits:

- Maximises the number of residents within easy walking distance of facilities.
- Helps maintain activity levels in mixed-use areas during evenings and weekends, providing a sense of safety for users of the area.
- Acts as a ready-made catchment for town centre uses to support viability.
- Helps to support viability of public transport services by providing a concentration of residential and business customers around key routes and stops.

6.60

There are also good reasons for Lodge Hill to follow a traditional density gradient with lower densities at the edges. These include:

- Most edges of Lodge Hill are visually sensitive and lower density development can be easier to integrate and screen in these areas.
- The most sensitive ecological areas are also at the site edges and would benefit from lower activity levels.
- It is important that as many people as possible are within easy walking distance for local hubs and public transport.
- Lodge Hill should help to balance housing mix in Medway by providing a greater proportion of larger units (and plots). This will lead to the area allocated for lower density development being relatively large compared to other similar size schemes.
- The edges of the site consists largely of the previously undeveloped areas and areas outside the security fence. Providing a different character to these areas helps to reflect the site's history.

➔ **Lodge Hill should include a range of densities across the site. An acceptable range is between 15 and 85 dwellings per hectare, excluding some specialist forms of accommodation where higher densities may be reached. These figures are indicative and variations will be acceptable provided all other design objectives are met. The distribution of these densities should be broadly as shown in Figure 6.19.**

6.61

The distribution of hubs and densities also gives a strong steer as to the placement of the primary road network.

Figure 6.19 shows this relationship. The primary road network shown here also follows the principles set out in Chapter 5 (Transport).

INSERT FIGURE 6.19: DENSITIES AND PRIMARY ROADS

- 6.62 Higher densities do not always mean blocks of flats, although these are usually a component. Areas of traditional Victorian terraces, for example, can reach densities of 100 dwellings per hectare (dph). Some modern design has also shown that it is possible to keep the suburban qualities that people value in their housing at higher densities.

INSERT FIGURE 6.20: EXAMPLE DENSITIES

- 6.63 There is a strong link between densities and building height. Even where design solutions achieve higher densities with mainly houses, this tends to result in three storeys (or more) instead of two.
- 6.64 There is a place for taller buildings at key junctions or vistas in lower density areas. Equally, a three-storey dwelling in a large plot would not necessarily damage the character of a low-density countryside edge area. Feature buildings should be treated with caution. They can result in a scheme becoming disjointed if they are poorly placed or too frequent.
- 6.65 Therefore, no maximum building heights are set for Lodge Hill. Instead, Table 6.1 gives broad guidance on the height ranges that could apply. As with density, this guidance is flexible. Variations will be acceptable as long as the overall character of a scheme remains appropriate to the area.

- To provide overlooking and natural surveillance of these areas, especially where properties front public open spaces.
- To limit potential for dumping of rubbish from rear gardens (at countryside edges, especially where properties adjoin woodland or other vegetated areas).

INSERT FIGURE 6.21: COUNTRYSIDE & URBAN GREEN EDGES

6.68 Properties with flanks facing onto open space can also help to resolve these issues where habitable room windows face out. Habitable rooms include living rooms, dining rooms and bedrooms. Kitchens are not habitable rooms but they are still occupied for a lot of the day. They would therefore enable overlooking and are acceptable for this purpose.

6.69 Occasional garden boundaries facing roads or public space will be acceptable provided the overall frontage remains active. The design of the boundary treatment must be appropriate to its setting; close board fencing is unlikely to be acceptable. In lower density areas, a rear garden backing on could occupy a significant proportion of the frontage and therefore have a greater impact on the overall character. It should be used sparingly in these areas, if at all.

6.70 Buildings positioned close to the footpath or road edge will generally be preferable, but variations within the building line can be used where appropriate. It may be useful to step buildings forward at junctions. This defines the space, reduces forward visibility and therefore slows traffic. These

Area	General building height	Feature buildings
Town centre	3-4 storeys*	5 storeys
Other high density	3-4 storeys	4 storeys
Business areas	3-4 storeys	4 storeys
Medium density	2-3 storeys	3-4 storeys
Low density	1-2 storeys	2.5-3 storeys

Table 6.1: Suggested building height ranges

* A storey is taken as approximately 3.5m, measured externally

6.66 In mixed use and higher-density areas, higher floor to ceiling heights should be provided at ground floor. This would provide flexibility for possible future changes of use.

6.67 Positioning lower density areas to the edges of the site has to be handled carefully where they directly abut the countryside edge. There is a general principle of frontage development in all parts of the site, whether facing onto internal roads, open spaces or countryside. This is for a number of reasons:

- To avoid the harsh and unattractive appearance of expanses of fencing from the public realm, especially at the edge of the development. Even well designed boundary treatment can become a problem once it starts to deteriorate or is replaced at different times and in different styles by future residents.
- To avoid pressure for future garden extensions or direct accesses being created into countryside areas or other open spaces.

principles also apply to urban green edges, where the major green grid stretches right into the core of the development.

- 6.71 At the countryside edges, buildings should generally be set back far enough to allow soft landscaping within the plot. There is more scope for variation in the building line here, to avoid the impression of a wall of development. Gaps between buildings can also be variable. They should enable views of the rural setting and major open spaces from within the development.

INSERT FIGURE 6.22: EXAMPLE URBAN AND RURAL FRONTAGES

➔ **Active frontages should be provided to all public spaces and countryside edges. Buildings should be set relatively close to the road within the development, and further back on the green edges, although this can vary. Views of the countryside and major open spaces should be provided from within the built areas.**

- 6.72 None of the above design criteria place any restriction on architectural style. The objective is to ensure that Lodge Hill creates a high quality, liveable and sustainable environment for future residents, workers and visitors. Style is subjective, and the Council does not seek to restrict the design choices that future developers may make. In principle, any architectural style may be acceptable, subject to:
- Taking into account the principles in this document and in the relevant Core Strategy policies. This includes assessment against Building for Life, or any

subsequent scheme that the Council may adopt in its place, and the Council's housing design standards

- Each detailed scheme being high quality in its own right, and complementing the adjacent sections of the development.

- Each scheme contributing to the creation of a place with its own distinct identity.

- 6.73 Having said this, many of the objectives in this document have a direct influence on style. For example, it is difficult to meet higher sustainability targets with traditional building designs. This may change in the future as technologies evolve. Alternatively, modern, sustainable design may become the norm for British housing development.

INSERT FIGURE 6.23: ECO-HOMES

- 6.74 It is therefore likely that a large proportion of the site will be built out in relatively modern designs. The Council is comfortable with this as a consequence of the policies in this document. Innovative and interesting responses to the design challenge will be welcomed, and will be considered against the same criteria set out above.

Masterplan

- 6.75 A masterplan for Lodge Hill is provided at the end of this chapter. This has taken the principles from this document, and combined them to produce a framework for the Lodge Hill site. This masterplan is one way in which the proposals for the site could be advanced. The proposals that finally

come forward may be different. This is acceptable as long as the principles of the Development Brief have been met.

➔ **Development proposals for Lodge Hill should be guided by the indicative masterplan. Proposals that vary from this will need to demonstrate that they continue to meet the principles of the Development Brief.**

Design Codes

6.76 Design codes are a useful tool to guide the development of large-scale sites. They are particularly useful where a scheme is likely to be built out by several developers and over a long period of time. They have been used successfully in many large developments in the UK.

6.77 A design code sets the rules that all future development must follow. The level of detail can vary significantly. At one extreme, Poundbury’s design code prescribed many architectural details. On the other hand, Vauban in Freiburg, Germany had a broad code that specified key urban design principles but left a lot of flexibility for future developers. Both are generally regarded as successful and are often cited as good examples of how coding works.

INSERT FIGURE 6.24: POUNDBURY AND FREIBURG (PHOTOS)

6.78 The level of detail chosen depends on the balance needed between coherence and variety across the site. For Lodge Hill, the code should cover the main urban design principles but not architectural detail. Coding for buildings should be

limited to those elements that define public spaces and create their character. The code could include:

- Building heights
- Setbacks from the road/footpath edge
- Widths of roads and other public spaces
- The proportion of plot or frontage that is occupied by buildings
- Parking treatments
- Requirement for or spacing of feature buildings

6.79 This list is not exhaustive. Other criteria may be found necessary once detailed work on the code begins.

6.80 The Lodge Hill site is not only very large but covers areas with very different characters and settings. A code that set sub-areas and differentiates between them is therefore recommended. Figure 6.25 shows the character areas that might be applied to the indicative masterplan. However, other proposals for sub-areas will be considered depending on the masterplan that comes forward at application stage.

INSERT FIGURE 6.25: CHARACTER AREAS

➔ **A design code for Lodge Hill should be submitted with the outline application. This should focus on key urban design principles and should consider the use of character areas to provide local identity to different parts of the development. The design code should be drawn up collaboratively between the developer and the Council, and should be informed by engagement with the local community.**

- 6.81 Once a design code has been agreed through the outline application process, all subsequent applications will be expected to comply with it. Where full (detailed) applications are submitted that do not directly relate to the outline application, the approved design code will be a material consideration. Such applications will need to demonstrate that the proposed designs reflect the guidance contained in the code.

Chapter 7 – Implementation and Delivery

Process

7.1 Figure 7.1 summarises the route that the Lodge Hill proposals will take from planning policy to delivery on the ground. For Lodge Hill to successfully function as a whole place, there has to be an overall vision for the development from the outset. For this reason, the Council expects proposals to come forward in the form of a site-wide outline application. This will establish permission for the principles of the development, including:

- Maximum limits for floorspace for each use proposed
- Maximum number of dwellings
- Exact limits of the developable area
- Site-wide masterplan and strategic design codes

7.2 Reserved matters applications will then provide further detail for each phase or parcel of development. There may be an occasional parcel where proposals do not meet the parameters set down in the outline application. Full applications for this type of proposal will be considered by the Council on their merits. They will have to conform to the policies set out in this Brief, and should complement the overall vision for Lodge Hill.

➔ **Proposals for Lodge Hill should come forward as a site-wide outline application, including a site-wide masterplan. Proposals which come forward on a piecemeal basis and do not support the overall vision for Lodge Hill will not be supported by the Council.**

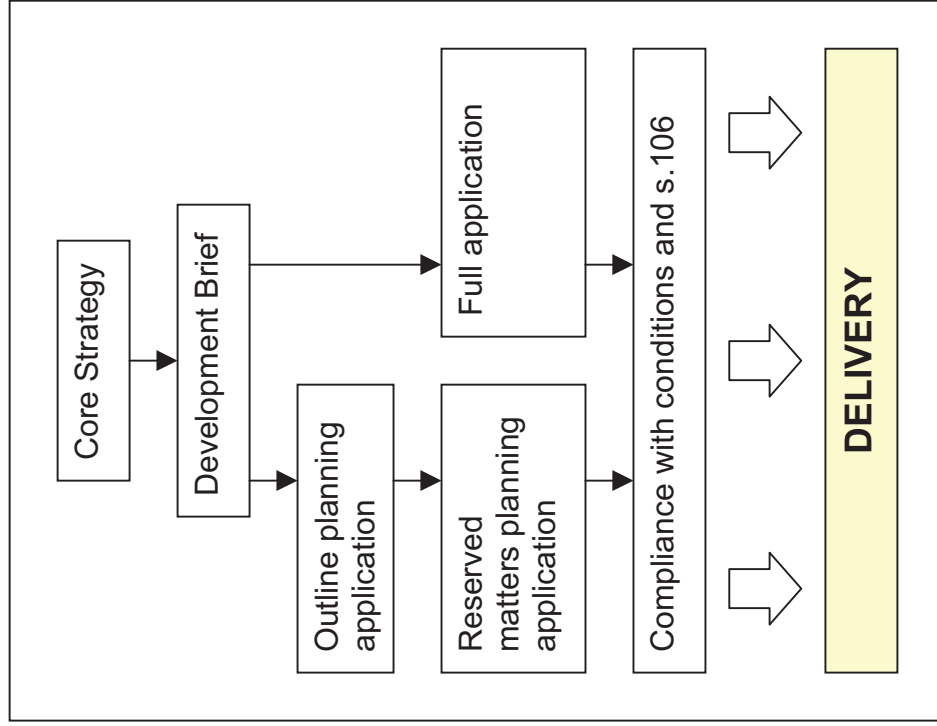


Fig. 7.1: Planning process

- 7.3 The developer checklists overleaf are a summary of the requirements of this Development Brief, setting out what needs to be submitted at the outline and detailed application stages.
- 7.4 It is likely that any outline permission will be subject to a large number of conditions, as well as the obligations within a s.106. A compliance report or summary should be submitted with each reserved matters application to show how it meets the requirements of the conditions and s.106.

Developer obligations

- 7.5 A s.106 agreement is a legal agreement that is entered into by a developer, the Council and (if necessary) other service providers. It is the main mechanism for ensuring that infrastructure is in place when it is needed, especially where it is off-site or requires third party involvement. This includes grey, green and social infrastructure (see Table 7.1).
- 7.6 Legislation has been passed to enable s.106 agreements to be replaced by the Community Infrastructure Levy (CIL). Where a s.106 agreement is required to relate to the specific impacts of an individual scheme, CIL takes a tariff-based approach. Under the CIL system, every development of whatever scale makes a proportionate contribution to the area's overall infrastructure costs. Current legislation requires s.106 agreements to be significantly scaled back by April 2014. The Council currently intends to adopt a charging schedule for its own CIL by mid 2013.

Green infrastructure	Open spaces such as parks, allotments and play areas; green links that might include ecology corridors, footpaths and cycleways; tree planting in urban areas, sustainable urban drainage systems.
Grey infrastructure	“Traditional” infrastructure such as roads, sewers, energy production, phone and broadband
Social infrastructure	Community facilities like schools, health centres, and libraries. Can also include organisations and programmes as well as physical provision.

Box 7.1: Infrastructure types

- 7.7 To meet the delivery timescales set out in the Core Strategy, an outline application for Lodge Hill will need to be submitted and determined well before CIL is up and running in Medway. This being the case, the developers will be expected to commit to a comprehensive s.106 agreement to deliver the required infrastructure. Subsequent reserved matters applications will be tied to the original s.106. In this case, it is likely that Lodge Hill will be exempted from any CIL charge that applies to the rest of Medway.
- 7.8 Regardless of the method of delivery, it is crucial that all infrastructure is in place as it is needed. It is an issue frequently raised by the local community. There are concerns that existing services on the Peninsula, from water supply to healthcare, are stretched and cannot be relied on to support the development.

- 7.9 For some types of infrastructure, the demand (or even the site) for full provision may not exist until later in the development process. It may be suitable to make interim provision for some of these. This will also help to create early wins for the existing community. Services where interim provision may be particularly useful include:
- Health care;
 - Schools (especially secondary);
 - Community facilities;
 - Bus service (subject to the criteria in Chapter 5); and
 - Retail

- 7.10 Not all infrastructure delivery will be within the developer's control. In some cases they can provide the physical infrastructure (such as a health centre or school building) but are reliant on other parties for the final provision of the service. In other cases (such as water supply or broadband) they are entirely reliant on other parties for delivery. The developer will need to liaise closely with these other parties to plan the construction programme and phasing.

Timescales and phasing

- 7.11 The development of Lodge Hill is a 15-20 year project. Over this timescale, it is impossible to predict all the challenges that the development may have to meet. There will be changes in legislation and policies, and economies will continue to cycle between growth, stagnation and decline. The full impact of climate change is as yet unknown. Each of these will have impacts on Lodge Hill.

- 7.12 For Lodge Hill to be successful, the outline application, masterplan and s.106 agreement must remain flexible enough to respond to these future challenges. However, flexibility does have some disadvantages. The existing community and new residents will expect to have certainty about what is to happen on nearby parts of the site. Lack of certainty can also deter developers and investors. The balance may be best struck by giving acceptable ranges of floorspace within the parameters fixed by the outline application.

- 7.13 Any discussion of phasing for the development must remain broad at this stage. Some guidelines and principles can be set down that will help to direct other decisions around implementation.

- 7.14 It is likely that the site will be divided into a few large phases, which would then be broken down into sub-phases or development parcels. This will allow development to proceed in small and manageable amounts that will enable a range of developers and uses to be accommodated on the site, but still allows for infrastructure and other requirements that have to be delivered on a wider scale.

- 7.15 The Core Strategy policy and evidence base suggests that the site may be broken into three broad phases. On the Core Strategy timescale, each of these would take around 5 years to build out. This may change by the time detailed applications begin to come forward, but has been used as the basis for strategic planning to date.

INSERT FIGURE 7.2: CORE STRATEGY PHASING

7.16 Use of small development parcels within the broad phases will help to provide a range of sizes, types and styles of development. The Council encourages this approach. It should include a wide range of parcel types and sizes, including provision for self-build projects. These are encouraged as they are a very effective way of adding character and raising design and sustainability standards, as well as helping to create a fully mixed community. However, it is recognised that market factors will remain a significant influence on land disposal.

7.17 Where a scheme is being built over many phases, it is important that quality stays consistently high. The use of design codes and the standards set down in this document will go some way to ensuring this. Independent design review and design competitions are other possible tools.

➔ **An independent design review should be undertaken of the whole site masterplan prior to the submission of an outline application, and also if any significant alterations are made to the masterplan after the original review. Design reviews may also be required for key parcels at the detailed design stage. Developers will be expected to meet any costs associated with this.**

7.18 Design competitions are not likely to be appropriate for the whole site. However, they could be useful for some of the key sites or areas. There are sometimes concerns that competitions can lead to outlandish or attention-seeking architecture that would not relate well to the overall scheme. There is no reason why this has to be the case if the terms

of the competition are set up with care. They can also be a very positive mechanism for community involvement.

Possible subjects for a design competition could include:

- Exemplar parcel(s) for sustainable design;
- Schools, especially the secondary school;
- Town centre landscaping proposals (town square/town green);
- Landmark public art;
- Cultural or community projects around key heritage features (e.g. anti-aircraft station, expense magazines or renovation of retained buildings);
- Landmark building at southern site entrance (possibly the hotel or a business unit); and/or
- Self-build or small developer parcels.

Ongoing engagement

7.19 The developer for Lodge Hill has already carried out a lot of community engagement. This has informed the evidence base that supports the Core Strategy and this document, including the masterplan. It will continue to inform the proposals that will become an outline application for the site. The Council has also held consultation events for the Core Strategy. This draft Development Brief is subject to further consultation in September 2011, which will inform the final version.

INSERT FIGURE 7.3: PREVIOUS COMMUNITY ENGAGEMENT EVENTS

7.20 The community should continue to be involved through all stages of Lodge Hill's development. The Council's

- Statement of Community Involvement should inform the strategy for this. Lodge Hill will be the largest single development to take place in Medway over the next fifteen years (the timescale of the Core Strategy), and probably beyond. It will be on a larger scale than any of the existing villages. Community engagement strategies must recognise that this results in sensitivity around the proposals.
- 7.21 The future community of Lodge Hill will have the greatest stake in how it should develop. There is no way of consulting with the people who will live at Lodge Hill before development begins. The existing community at Chattenden can give some insight as they will be closely affected by proposals and will be integrated into the overall settlement. As development progresses, people moving into Lodge Hill must be included as well as those living in the surrounding areas. Local businesses (existing and in Lodge Hill) should also be involved.
- 7.22 The Community Trust (or similar) would be an ideal means to facilitate some of this ongoing arrangement. It would already be aware of the community's concerns and priorities. It would also have good access to and relationships with existing groups. It would therefore be able to direct efforts where they are most needed.
- ➔ **Community engagement should take place with the existing, surrounding and new communities throughout all stages of the development. Opportunities to use the Lodge Hill community organisation to help facilitate this should be maximised.**
- 7.23 This potential role is one reason why any Trust should be set up as early as possible.
- 7.24 Community engagement will be particularly important where facilities are proposed to serve a particular section of the community. For example, where youth facilities are being planned, young people in the area should be able to influence what form these take. Again, this is something that the community organisation would be well placed to lead on.

Appendix 1

Previous consultations summary

Council consultations

The Council has not yet carried out any consultations on the Development Brief specifically. However, the Core Strategy, which includes the parent policy, has been through several stages of consultation. A number of the comments received through this process related specifically to the Lodge Hill policy. Where appropriate, they have been taken into account in drafting this Development Brief.

The responses to consultation on the Core Strategy are lengthy documents and have not been reproduced here. They are available on the Council's website as follows:

Issues and Options stage (July 2009):

<http://www.medway.gov.uk/environmentandplanning/developmentplan/localdevelopmentframework/issuesandoptionsreport.aspx>

Pre-publication draft Core Strategy (November 2010): *[link to be provided]*

The Council also published an online questionnaire and launched a Facebook page in April 2011 to seek local opinions on Lodge Hill. Response was fairly limited but provided some useful comments. These have been considered and reflected in the draft Development Brief where appropriate.

A summary of responses to the survey is provided at the end of this Appendix.

Developer consultations

The developer has also carried out a significant amount of community engagement on their proposals at Lodge Hill. The results of these have been made available to the Council and have also helped to inform the draft Development Brief.

In summary, twelve main issues were raised by local residents and groups at the initial consultation events in July 2009. These were:

- Road Infrastructure (congestion)
- Road Safety (on the A228 and Four Elms Hill)
- Site Access
- Provision of Health Facilities
- Provision of Education Facilities
- Concern Regarding Development
- Open Space Amenity
- Protection of Views
- Protection of Woodland
- Protection of Environment
- Provision of Leisure Amenity
- Retail Provision

Topic workshops were then held on Environment, Movement and Community. These provided much more detailed comments from the local community, and many suggestions on how to improve proposals for the site.

Further exhibitions were held in November 2009 and November 2010. These focussed on showing progress with the proposed masterplan, and how previous comments were informing proposals. These later exhibitions had a lower attendance and a lower response rate. However, responses showed that the local community were comfortable with the developers' response to many of the initial issues raised. The main outstanding issues following the November 2010 exhibitions were:

- Road infrastructure and site access
- Environmental protection
- Employment creation

Employment creation had not been identified as a major issue in previous rounds of consultation. It may have been more prominent at this stage because of the wider economic problems facing the UK.

Full reports on the developers' consultation are available from their website at: <http://www.lodgehill.info/core-strategy-consultation/ongoing-consultation/>

April 2011 survey results (summary)

Q1: Which of these options is most important to make Lodge Hill as sustainable or "green" as possible?	
Rank:	
1	Energy efficiency in new buildings on site
2	Providing facilities on site to meet residents' day-to-day needs
3	On-site renewable energy
4	Providing green space within the development
5	Providing alternatives to the private car
Q2: Is there anything else you think we should do to make Lodge Hill sustainable or "green"?	
Less or no development (3 responses)	
People will always use cars (1 response)	
Rainwater harvesting for toilets and washing machines (1 response)	
Plan for the long term, with mixed uses, lots of consultation (especially younger people). Use a mix of technologies, consider skills and training and a good transport strategy. (1 response)	

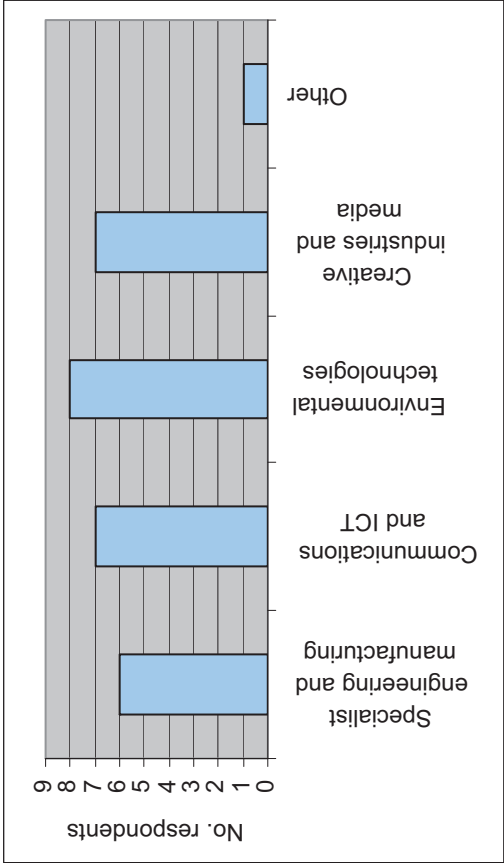
Development Brief (DB) response:
Although this question resulted in the ranking above, it was clear that all five options were considered important by people responding.

All five options are taken forward in the DB. The need for a mixed-use development providing for day-to-day needs within the site is a key plank of the policy for the site.

Q3: Which of these options is most important for reducing private car use?	
Rank:	
1	High quality bus service
2	Walking and cycling links including crossings over busy roads
3	Car club
4	Personalised travel planning
5	Limiting parking provision or charging for parking
Q4: Is there anything else you think we should do to reduce private car use at Lodge Hill?	
No development (2 responses)	
Keep bus fares at a reasonable level (1 response)	
Limited/charged parking would be difficult (1 response)	

DB response:
The transport strategy seeks to balance the need to provide alternatives to the private car and to reduce car use with the need to be realistic about the fact that people at Lodge Hill will continue to own and use cars. The strong support for a high quality bus service is noted and reflects the stance taken in the DB.

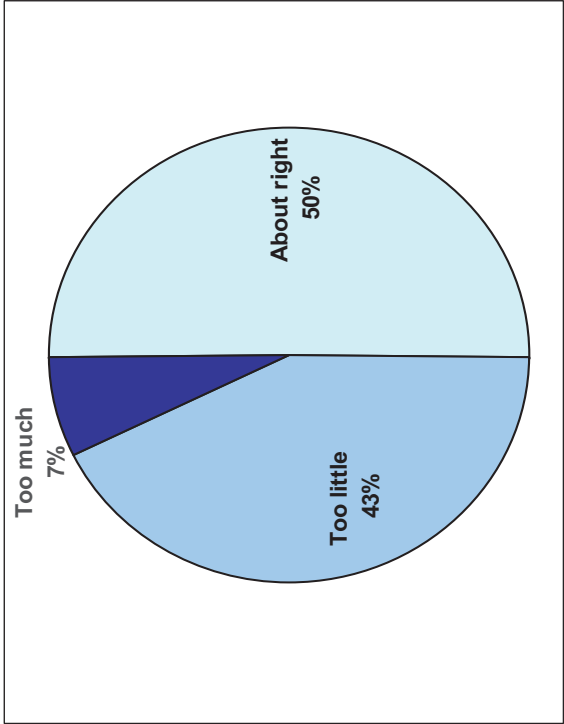
Q6: What sort of employment do you think should be provided at Lodge Hill?



DB response:
The “other” response suggested links to universities and existing businesses to maximise benefits for Medway.

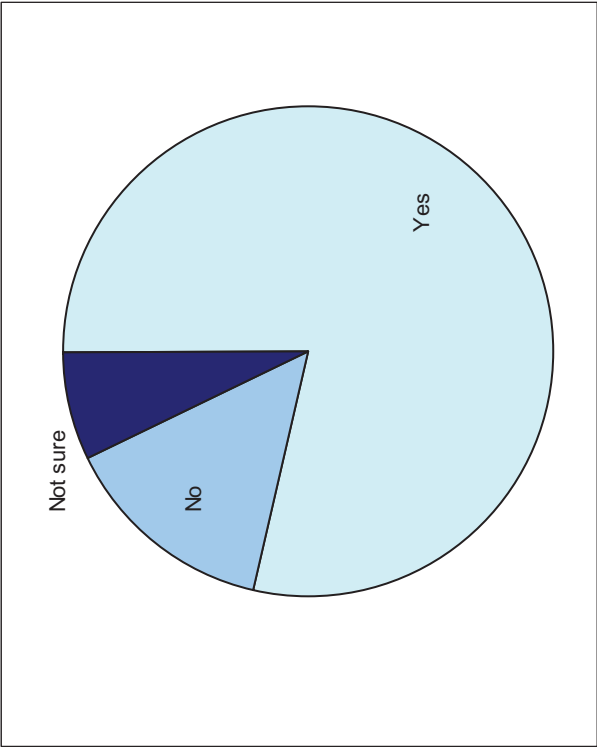
The DB cannot predict what the market requirements will be over the next 15-20 years. However, there was broad support for the range of higher-value employment options, and this is reflected in the DB policies.

Q5: What do you think about the proposed level of employment for Lodge Hill (about one job per household)?



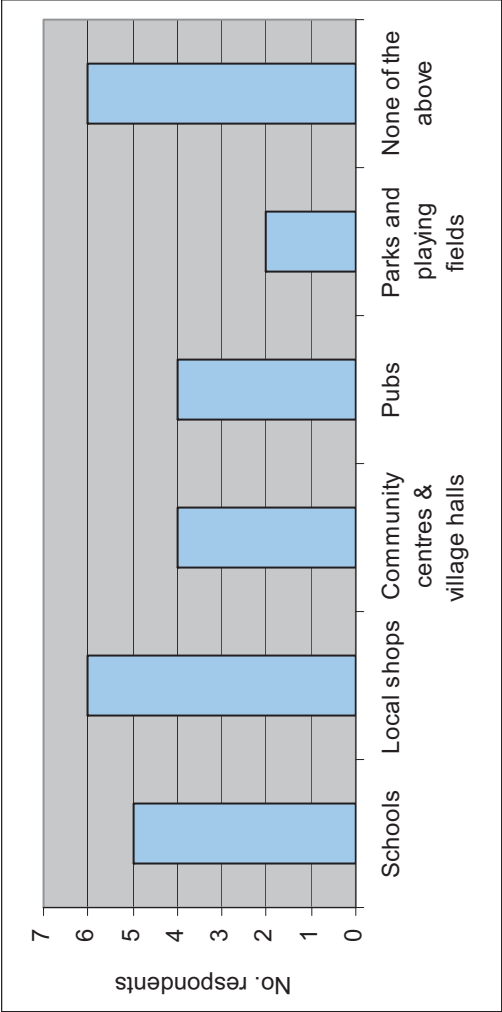
DB response:
The Core Strategy policy requires employment provision to be in balance with the number of households. However, the DB includes measures to try and increase the level of on-site provision if possible.

Q7. Do you think it is a good idea for the community to decide which facilities and services will be provided and to be directly involved in managing them?



DB response:
Developers are encouraged to consider setting up a Community Trust and the principles set out in the DB reflect the responses.

Q9: Which, if any, facilities in existing villages do you think could be threatened by new facilities at Lodge Hill?



DB response:
Opinion was divided amongst respondents as to whether there would be an impact on existing facilities.

The DB encourages consideration of impact, particularly for retail where it can be objectively assessed. Proposals should try to complement rather than compete with existing facilities.

Q8: Is there anything you think we need to bear in mind if a community trust or association is set up for Lodge Hill?
Should be non-political (1 response)
Don't let it be dominated by families with children (1 response)
Will be forgotten about; residents won't want to participate (1 response)
Set up before development starts if possible (2 responses)

Q10: What benefits from Lodge Hill would the local community most value?	
Rank:	
1	Better shopping facilities
=2	Better community facilities
=2	Improved transport links to Medway and beyond
4	A hub for rural bus routes
5	Improved access to the countryside
Q11: Are there any other benefits you think Lodge Hill could bring to the area?	
	None (2 responses)
	Jobs are most important (1 response)
	Must work with existing community (1 response)

DB response:
Although the responses were ranked as above, there was a strong positive response to all of the suggestions. Access to the countryside was markedly lower than the others. This may be because people think existing access is adequate, rather than because it is not valued.

The DB encourages Lodge Hill to consider the potential wider catchment for facilities within the site. Lodge Hill should become part of a wider Peninsula community, not an isolated settlement.

Q12: Any other comments?	
	Roads and transport infrastructure are the main concern (3 responses)
	A white elephant (1 response)
	Want more information about proposals (1 response)
	Respect local heritage (seek local views on this) (1 response)
	Impact on Strood town centre, which is already dying? (1 response)

DB response:
The local community's transport concerns have been noted. The DB includes a significant section on transport and this issue must be addressed by any future planning application(s). Heritage is recognised as being a key contributor to the character of Lodge Hill. Impact on Strood town centre must be considered. However, Strood is actually functioning quite well at present and has proved fairly resilient to the economic downturn.

Appendix 2

Energy statements

Energy Statement format for Outline and Detailed applications

The assessment should include:

- At outline stage, baseline energy demand and carbon dioxide emissions using sample SAP and SBEM calculations;
- At detailed stage, SAP and SBEM assessments would be required for all building types;
- Proposals for the reduction of energy demand and carbon dioxide through energy efficiency measures, showing kWh of energy and kgCO₂ saved as well as the % reduction achieved;
- Carbon dioxide emissions from heating, cooling and electrical power following energy efficiency measures;
- Proposals for meeting residual energy demands through low and zero carbon measures (energy (kWh) savings and carbon dioxide savings should be specified);
- Calculation of the remaining energy demand and carbon dioxide emissions; and
- Calculation of the remaining carbon dioxide emissions (if any) that need to be offset using “allowable solutions”.

The energy demand assessment should be carried out in advance of planning permission in order to ensure compliance with Part L Regulations. This should be carried out as follows:

- a) **For residential developments:** Calculate baseline total energy demand and carbon dioxide emissions

from heating, hot water, pumps and fans, based on the Standard Assessment Procedure (SAP)

- b) **For non-residential developments:** Undertake BREDEM-12, SBEM or other approved total energy assessment at an early stage in the design.

Reductions in energy consumption and carbon dioxide emissions resulting from energy efficiency measures:

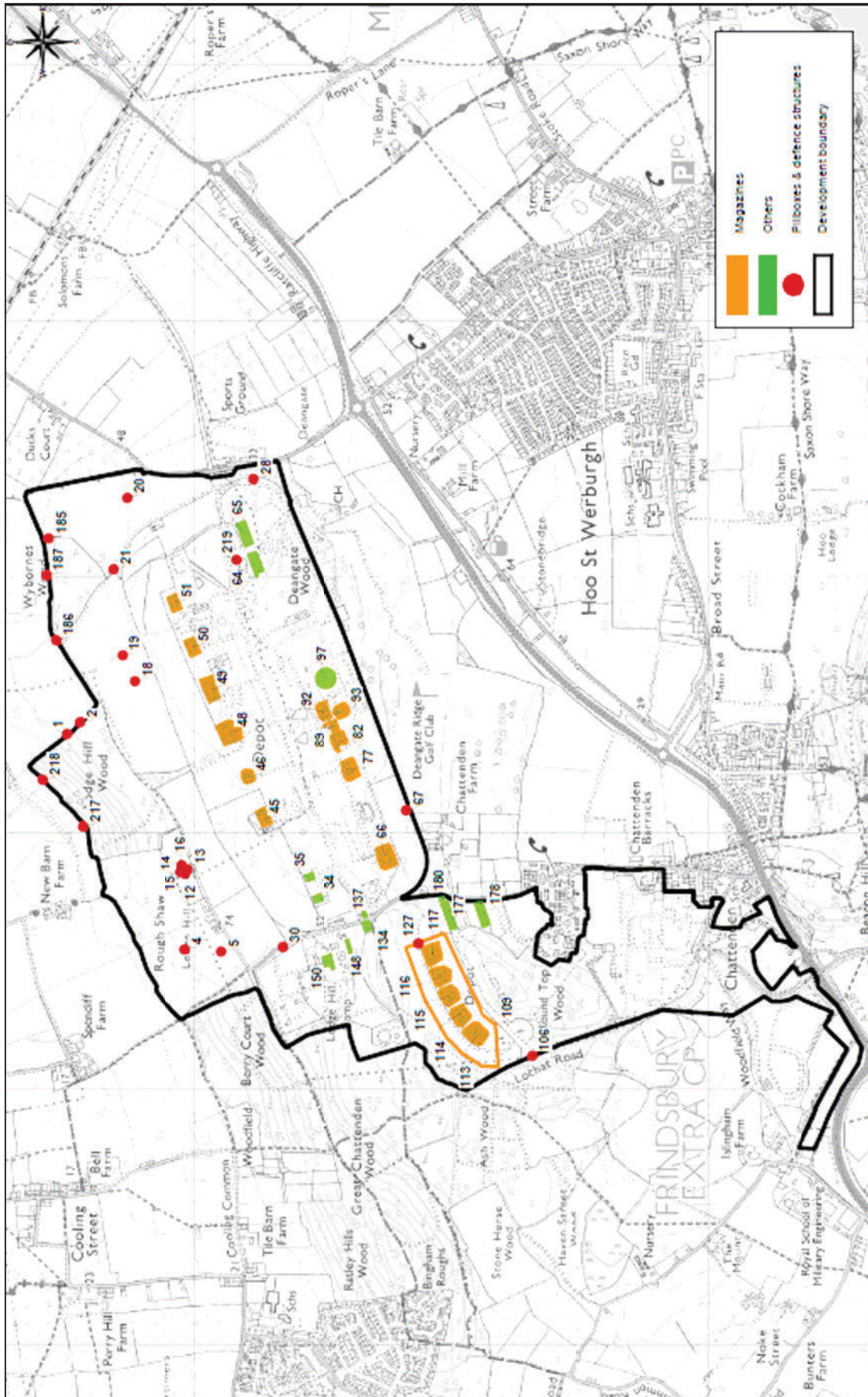
- Provide details of the energy efficiency measures that will be incorporated into the development
- Specific details, such as building material U-values, ratings of electrical appliances, etc should be included

If decentralised energy is proposed load profiles should be calculated for the site on a daily basis and should consider likely fluctuations in demand over a day. This will inform what size of system is appropriate and therefore how much space is required for the energy centre as well as providing an accurate picture of the energy reduction that can be achieved.

A concluding section should be provided outlining the contribution of each set of measures, technology or combination of technologies towards meeting the relevant target and providing recommendations as to which would be more suitable for the site.

Appendix 3

Heritage



Heritage assets at Lodge Hill. The numbers correspond to the building numbers in the built heritage report that supports the Core Strategy. This is available at:

<http://www.medway.gov.uk/environmentandplanning/developmentplan/localdevelopmentframework/ldfevidencebase/lodgehill.aspx>

Pillboxes & defence structures	
Building nos.	Reason for inclusion
1	Significance
2	Significance
4	Significance
5	Significance
12	Significance. Part of Chattanooga Ridge anti-aircraft station
13	Significance. Part of Chattanooga Ridge anti-aircraft station
14	Significance. Part of Chattanooga Ridge anti-aircraft station
15	Significance. Part of Chattanooga Ridge anti-aircraft station
16	Significance. Part of Chattanooga Ridge anti-aircraft station
18	Significance. Part of Chattanooga Ridge anti-aircraft station
19	Significance
20	Significance
21	Significance
28	Significance
30	Significance
67	Significance (Grade II listed)
106	Significance (Grade II listed)
127	Significance (Grade II listed)
185	Significance
186	Significance
187	Significance
217	Significance
218	Significance
219	Significance (Grade II listed)

Magazines	
Building nos.	Reason for inclusion
45	Local significance
46	Local significance
49	Local significance
50	Local significance
51	Local significance
66	Local significance
77	Local significance
81	Local significance
82	Local significance
89	Local significance
92	Local significance
93	Local significance (original magazine shed replaced by structure of no significance, but earthworks remain)
109	Local significance (wall around Chattanooga magazine complex)
113	Local significance
114	Local significance
115	Local significance
116	Local significance
117	Local significance

Others	
Building nos.	Reason for inclusion
34	Character building with flexible re-use potential
35	Character building with flexible re-use potential
64	Character building with flexible re-use potential. Historic railway interchange
65	Character building with flexible re-use potential. Historic railway interchange
97	Laboratory area - demolished but locally significant; potential to reflect in future proposals
134	Character building. Relatively easy to re-use?
137	Character building. Relatively easy to re-use?
148	Local landmark. Little architectural merit but consider re-using/reflecting distinctive glazed roof form
150	Sustainability. Little architectural merit but seems solidly constructed & relatively easy to re-use.
177	Character dwellings & interesting local history. Poor condition but may be more sustainable to refurbish?.
178	Character dwellings & interesting local history. Poor condition but may be more sustainable to refurbish?.
180	Character building. In public part of site so has relevance to existing community