Medway Council Local Plan

Development Strategy: Analysis of Responses
Summary Report
Final

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Medway Council

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TABLE OF CONTENTS

1 INTRODUCTION

1.1 Medway Council published a Regulation 18 Development Strategy document for consultation between 16th March 2018 and 25th June 2018.

1.2 This document built on the previous stages of consultation: Issues and Options February 2016, and Development Options May 2017.

1.3 This document sets out the ambitions for the local plan, provides options for Medway's growth, proposes policies for managing development through the plan period to 2035. It is based upon Medway Council's evidence base and analytical work and informed by the comments received at the previous stages on consultation.

1.4 Medway Council invited consultees to provide comments on four Development Scenarios, as well as the proposed policies to support growth and manage development. To aid in this an online questionnaire was constructed using Snap Surveys software which mirrored the layout of the consultation document. Comments could be submitted using this form, or by contacting the council directly by post or email.

1.5 The purpose of this report is to summarize the work carried out by Johns Associates collating all responses received into the format of the Snap Survey to aid in subsequent analysis and auditing of consultee comments.

2 METHODOLOGY NOTES

2.1   Responses were received in both electronic and paper formats by post, email, and online through the Snap Survey:

Respondent Type	Electronic	Paper	Snap Survey
Charity/Community/Faith Group	13		2
Councillor/MP/Parish Council	17	2	1
Developer/Consultant	57		2
Government Department/Public Bodies	9		1
Local Authority	6		
Member of the Public	180	12	46
Other	5		2
Total	287	14	54

2.2   In order to aid in the analysis of responses it was decided that responses received in electronic and paper formats would be collated and converted as best as possible into the Snap Survey format.

2.3   To achieve this, responses were analysed using keyword mapping software to identify which policy questions and policies were referenced in each response, this was then used to guide the first manual analysis of responses where relevant sections were input into the Snap Survey format. In order to ensure that legibility was maintained in the case of substantial responses the full response was converted into the Snap Survey format in each instance – where this was not possible, for example in the case of maps or tables, it was noted for each response and a reference included to the sections of the original response not included in the Snap Survey format.

2.4   Once every response had been converted to the Snap Survey format a second manual analysis of responses was carried out in order to assess the issues raised and potential significance of the representation. A final third manual analysis of the responses was carried out in order to produce the summaries for each policy in section 3 of this report below.

3 RESPONSE ANALYSIS

Development Strategy (Q1, DS1)

Respondent Type	Q1, DS1-2
Charity/Community/Faith Group	14
Councillor/MP/Parish Council	19
Developer/Consultant	52
Government Department/Public Bodies	9
Local Authority	6
Member of the Public	220
Other	2
Grand Total	322

Table 3.1: Development Strategy responses by Respondent Type

Q1: Thinking about our approach, the scenarios and the development strategy section, please answer the following question. When developing the Local Plan what things do you think the council should consider about the scale of the development needed to support Medway's growth and provide sustainable development?

DS1a: Does the proposed spatial development strategy represent the most sustainable approach to managing Medway's growth?

DS1b: Please explain why you think proposed spatial development strategy does / doesn't represent the most sustainable approach to managing Medway's growth

DS1c: What do you consider would represent a sound alternative growth strategy for the Medway Local Plan?

3.1   The most frequent issue raised was that of ensuring the infrastructure necessary for development should come forwards either before, or in line with, its corresponding development(s).

3.2   Charities/Community/Faith groups were supportive of the plans visions and objections but raised concern about the level and/or distribution of development specified. Representations were received which advocated for the protection of designated sites – specifically Lodge Hill.

3.3   Developer/Consultants provided the most comprehensive responses and were most forthright in their objection to specific aspects of the plan. The most significant point they raised was in relation to the calculation of housing need using the Government's proposed Standard Methodology. This has potential implications for the rest of the plan. Even developers supportive of the plan, or with sites allocated, raised this issue. There were a significant number of representations received within this respondent group where site(s) were promoted for allocation within the Local Plan.

3.4   Government Department/Public Bodies responded raising the need to ensure that the Duty to Cooperate was taken into consideration through the plan preparation process. Natural England raised a holding objection to any development scenario that would potentially affect Lodge Hill SSSI. Many of these responses included specific policy recommendations that would aid in the production of a plan that these consultees would consider to be sound, and support at examination.

3.5   Local Authorities similarly raised the issue of the Duty to Cooperate, and raised the issue of the Government's proposed Standard Methodology in the context of Medway potentially meeting unmet need of adjacent authorities. There was support for the calculation of housing need proposed within the Local Plan.

3.6   Members of the public most commonly raised the issues of the level and/or distribution of development specified within the Local Plan. There were frequent objections to Scenario 4 as well as significant number of representations advocating for the protection of designated sites, or specifically Lodge Hill SSSI and Nightingales. Members of the public, when submitted their

representations, generally made reference to elements of the plan at a strategic/abstract level rather than responding to a specific policy point or question.

Housing (Q2, H1-H21)

Respondent Type	Q2	Policy H1	Policy H2	Policy H3	Policy H4	Policy H5	Policy H6	Policy H7	Policy H8	Policy H9	Policy H10
Charity / Community / Faith Group	5	2	1	2	1	1	3	2	1	1	1
Councillor / MP / Parish Council	6	2	2	2	2	2	2	2	2	2	3
Developer / Consultant	8	23	17	21	9	3	2		1	8	
Government Department / Public Bodies		1					1	1			1
Local Authority	1	1	2	1	1	1	1	1	1	1	2
Member of the Public	35	5	6	7	4	2	2	2	4	3	4
Other	2			1					1		
Total	57	34	28	34	17	9	11	8	10	15	11

Table 3.2: Housing responses by Respondent Type and Policy

Q2: Thinking about the Housing section of the Development Strategy, please answer the following question. When developing the Local Plan what things do you think the council should consider to meet Medway's housing needs?

3.7 The views offered by respondents regarding the housing section tending to vary by respondent group, with councillors/MP/parish councils and members of the public frequently stating concerns that the level of development was excessive as well as distributed incorrectly across Medway. Respondents frequently objected to the Hoo Peninsula being a focus for development as well as citing the poor state of existing infrastructure. This in turn supported other comments regarding the popular requirement that infrastructure must be delivered before residential development can take place to avoid exceeding the capacity of existing infrastructure.

3.8 Developers/consultants in comparison most frequently raised the issue of calculating housing need and the impacts that this would have on the allocation of residential and employment sites. These respondents challenged the approach adopted by the council and suggested the only sound approach was to adopt the Government's Standard Methodology for calculating housing need – which would result in a need to increase the provision of housing allocations. In an effort to address this developers promoted a number of sites for consideration as allocations.

Policy H1:

H1a: Does the proposed policy for housing delivery represent a sound approach?

H1b: Please explain why you do / don't think the proposed policy for housing delivery represent a sound approach

H1c: Would you suggest an alternative approach?

3.9 The proposed policy for housing delivery was subject to a number of challenges from respondents across a number of distinct issues. The most significant of these was raised by multiple respondent groups and related to the methodology adopted for calculating housing need, specifically that the proposed policy lacks sufficient evidence to warrant a departure from utilising the Government's standard methodology for calculating housing need. This in turn lead on to a further issue relating to the development scenarios in that some respondents felt unable to effectively comment on this, and subsequent housing policies, due to the lack of allocations and uncertainty around the level of development proposed. Homes England suggested that it would be prudent to include a policy specifically for the Hoo Peninsula Rural Town as it is present in all development scenarios.

Policy H2:

H2a: Does the proposed policy for housing mix represent a sound approach?

H2b: Please explain why you do / don't think the proposed policy for housing mix represent a sound approach.

H2c: Would you suggest an alternative approach?

3.10   The proposed policy for housing mix was subject to scrutiny from respondents, most notably developers/consultants. Their concerns related to the efficacy of requiring a specific mix of housing across Medway rather than making use of all available evidence by utilising market research and local need at the application stage. There was additional concern regarding the need for 'sufficient consideration' given to the provision of self/custom build homes as it was not clear enough to provide certainty to developers.

Policy H3:

H3a: Do you agree with the threshold for contributions for affordable housing and the percentage requirements for its provision?

H3b: Please explain why you agree / disagree with threshold for contributions for affordable housing and the percentage requirements for its provision.

H3c: What do you consider would represent an effective alternative approach?

3.11   The thresholds for contributions were subject to scrutiny from a number of respondents but most notably developers/consultants. Concerns related to the need for the thresholds to be in accordance with the draft NPPF and take into account site specific viability assessments when determining an appropriate level of affordable housing provision. The evidence base for the differentiation between rural and urban levels of affordable housing provision was questioned, as well as the definition of rural and urban areas to which the policy applies. Members of the public advocated for higher levels of affordable housing provision and stressed the need for affordable housing to be relevant to affordability in a Medway context.

H4: What do you consider would represent an effective split of tenures between affordable rent and intermediate in delivering affordable housing?

3.12   Respondents considered the 60% affordable rent and 40% intermediate an effective split but queried whether this split should be applied across Medway, comments received suggested that respondents considered that it would be appropriate for this to be a useful starting point but the policy should include flexibility to take account of local need/circumstances.

Policy H4:

H5a: Do you agree with this policy approach for Supported Housing, Nursing Homes and Older Persons Accommodation?

H5b: Please explain why you agree or disagree with this policy approach for Supported Housing, Nursing Homes and Older Persons Accommodation.

H6a: Do you consider that the council should promote the development of retirement villages, or other such clusters of specialist housing to meet needs?

H6b: Please explain why you do / don't consider that the council should promote the development of retirement villages, or other such clusters of specialist housing to meet needs

3.13   Respondents supported the proposed policy and agreed that the council should promote the development of retirement villages/other clusters of specialist housing. Comments in support of this indicated feeling that such developments should be well integrated with local communities, as well as the policy going further and setting a target/allocating schemes over the plan period.

H7a: Do you consider that the council should require large residential developments of over 400 homes to include provision for specialist and supported housing within its proposed scheme?

H7b: Please explain why you do / don't consider that the council should require large residential developments of over 400 homes to include provision for specialist and supported housing within its proposed scheme

3.14 Respondents considered that large residential developments should include provision for specialist and supported housing however comments in support of this emphasised that such a policy should be flexible and ensure that it does not adversely affect the delivery of housing.

Policy H5:

H8a: Do you agree with the proposed policy for student accommodation?

H8b: Please explain why you agree or disagree with the proposed policy for student accommodation.

H8c: Would you propose an alternative approach?

3.15 Respondents agreed with the proposed policy, comments from UCA stressed the need for student housing sites to be situated sensibly in relation to the higher education facilities.

Policy H6:

H9a: Do you agree with the proposed policy for mobile home parks?

H9b: Please explain why you agree or disagree with the proposed policy for mobile home parks.

H9c: Would you propose an alternative approach?

3.16

3.17 Respondents predominantly agreed with the proposed policy, the only objection received suggested that park homes should be considered less favourably than other forms of residential development. It was suggested that the policy should include a reference to the role of park homes for rural and agricultural workers and ensure such development can continue to support the rural economy.

Policy H7:

H10a: Do you agree with the proposed policy for houseboats?

H10b: Please explain why you agree or disagree with the proposed policy for houseboats

H10c: Would you propose an alternative approach?

3.18 Respondents agreed with the proposed policy with suggestions that it be amended to include a reference to avoid impacts on designated sites, habitats, and species from new moorings.

Policy H8:

H11a: Do you agree with the policy approach for HMOs?

H11b: Please explain why you agree or disagree with the policy approach for HMOs.

3.19 The majority of respondents supported the policy approach for HMOs, however concern was raised about the difficulty enforcing standards in HMOs, as well as the need to ensure the health and wellbeing of new and existing residents was not adversely affected.

H12a: Do you consider that the council should set locational criteria for HMOs, such as consideration neighbouring uses and proximity to other HMOs?

H12b: Please explain why you agree or disagree that the council should set locational criteria for HMOs.

H13a: Should the council make use of Article 4 Directions to restrict the ability to convert properties to HMOs?

H13b: Please explain why you agree or disagree that the council should make use of Article 4 Directions to restrict the ability to convert properties to HMOs

3.20   The majority of respondents thought the council should make use of both locational criteria and Article 4 directions to restrict the HMOs, one objection was received suggesting such approaches would be misguided as HMOs form a vital part of housing supply and instead focus should be on enforcement action against poorly managed HMOs.

Policy H9:

H14a: Do you agree with the self build and custom housebuilding approaches taken above?

H14b: Please explain why you agree or disagree with the self build and custom housebuilding approaches taken above

3.21   The majority of respondents supported the proposed policy, at least in principle, however the subsequent questions illustrate that the implementation of the policy is contentious. Developers suggested that the implementation of any policy must be flexible and site specific, with any level of self/custom build informed by viability assessments for that site.

H15a: Do you think that the council should allocate specific sites for self/custom housebuilding development?

H15b: Please explain why you agree or disagree that the council should allocate specific sites for self/custom housebuilding development

H15c: Do you have any sites suitable for this use that you wish to promote for us to consider?

3.22   The majority of respondents considered that the council should not allocate sites for development, however a minority supported such a policy. Concerns were that allocation of sites for self/custom build would establish the principle of residential use for a site. Developers were against sub-allocation of a site for self/custom build as it could impede housing delivery. No sites were suggested for promotion.

H16a: Do you agree with the approach set above?

H16b: Please explain why you agree or disagree with the approach set above

H16c: What proportion of the allocated site do you agree is an acceptable percentage to be sold and built out before the remaining plots could be offered to the council/housing association or other non self/custom builders?

H16d: After what further period of time of unsuccessful marketing do you feel it would be acceptable to offer the remaining plots on to the council/housing association or other non self/custom builders?

3.23   Respondents agreed with the proposed approach. Members of the public suggested proportions of 50%. Homes England suggested any proportion must be determined on a site by site basis informed by interest in self/custom build plots. In terms of the period of time of unsuccessful marketing respondents provided suggestions ranging from 3 months only, to 6 months, through to a 1 year time period. The most frequent suggestion was 6 months.

H17b: Please explain why you agree or disagree that sites over a certain size should offer a percentage of the plots to self/custom builders

H17c: Do you agree with the proposed 5% share of plots for self/custom build and the threshold of sites at 400 dwellings and over?

H17d: Please explain why you agree or disagree with the proposed 5% share of plots for self/custom build and the threshold of sites at 400 dwellings and over

3.24   Among non-developer respondents there was support for requiring a proportion of sites above a certain size being allocated for self/custom builders, however some developers raised objections regarding the imposition of thresholds as inflexible – instead preferring that should a proportion be required the exact amount be determined through a site specific viability assessment. An alternate approach suggested was that the Council seek to identify sites specifically for self/custom build rather than attempt to incorporate them into strategic sites.

H18a: Do you agree with this approach outlined above?

H18b: Please explain why you agree or disagree with this approach

H19a: Do you agree with this approach outlined above?

H19b: Please explain why you agree or disagree with this approach

3.25   There was considerable support for these approaches among the majority of respondents however developers suggested that in terms of marketing it would be appropriate to have a 3-6 month set period for the Council / Housing Associations to acquire the plot, at the end of which it would revert to the developer. In terms of completion most considered 3 years to be an excessive length of time with the most frequent suggestion being 2 years. Concern was raised by developers that time periods greater than these place a significant burden on them which may impede housing delivery.

Policy H10:

H20a: Does this represent a sound approach to planning for gypsy, traveller and travelling showpeople's accommodation needs?

H20b: Please explain why you agree or disagree that this is a sound approach to planning for gypsy, traveller and travelling showpeople's accommodation needs

3.26   While the proposed policy was supported by the majority of respondents concerns were raised by parish councils that the draft policy was not sufficiently strongly worded and that the policy should direct development away from rural areas.

H21a: Do you consider that the council should identify site allocations for new gypsy and traveller, and travelling showpeople in the Local Plan?

H21b: Please explain why you agree or disagree that the council should identify site allocations for new gypsy and traveller, and travelling showpeople in the Local Plan

3.27   The majority of respondents considered that the council should identify sites, the reasoning behind this was that a proactive and positive approach would result in less sites in inappropriate locations.

Employment (Q5, E1-E8)

Respondent Type	Q3	Policy E1	Policy E2	Policy E3	Policy E4
Charity/Community/Faith Group	3	1	2	2	1
Councillor/MP/Parish Council	4	2	2	2	2
Developer/Consultant	7	11	5	4	3
Government Department/Public Bodies	1	1	2	1	1
Local Authority	3	1	1	1	1
Member of the Public	27	4	5	3	4
Other	1				
Total	46	20	17	13	12

Table 3.3: Employment responses by Respondent Type and Policy

Q5: Thinking about the employment section of the Development Strategy, please answer the following question. When developing the Local Plan what things do you think the council should consider to meet Medway's economic needs?

3.28 One of the most prevalent considerations respondents raised was the need for infrastructure to be delivered to support economic growth as well as residential development. Respondents also felt that the local plan should promote and encourage the development of the low-carbon and green economy, sustainable agriculture and food production, as well as sustainable tourism within Medway. Respondents emphasised the need for certainty around the level of employment land through an allocation process appropriate for the level of housing provision, where broad locations are identified it is important sufficient information is available.

3.29 Members of the public reiterated the concern around the delivery of infrastructure to support economic allocations as well as the need to safeguard designated environmental sites wherever possible.

Policy E1:

E1a: Do you consider that this is an effective approach to securing and strengthening Medway's economy?

E1b: Please explain why you think that this is / is not an effective approach to securing and strengthening Medway's economy

3.30 The proposed policy was supported by the majority of respondents, however concerns were raised regarding the need to review the level of provision accordingly if the level of housing provision increases following the adoption of the Government's standard methodology for calculating housing need. Concerns were also raised by developers that the policy did not provide the necessary flexibility to address sites allocated for employment use but without a reasonable prospect of being developed.

E2: Which locations do you consider are the most appropriate for employment growth?

3.31 Respondents provided a number of locations they considered most appropriate: the TIL site at Grain, the Hoo Rural Town and Lodge Hill site, expanding or intensifying existing areas on the Isle of Grain, and existing town centres.

E3a: Do you agree with the proposed approach to assessing GVA with planning applications for employment uses?

E3b: Please explain why you agree or disagree with the proposed approach to assessing GVA with planning applications for employment uses

3.32 The proposed approach to assessing GVA was supported by the majority of respondents however some concerns were raised around an agreed methodology for its assessment, its weight in considering planning permissions, as well as its flexibility in implementation and an appropriate threshold for such an assessment.

E4a: Do you support the proposed approach for higher value jobs in Medway?

E4b: Please explain why you support / do not support the proposed approach for higher value jobs in Medway

3.33   Respondents supported the proposed approach for higher value jobs.

E5a: Do you consider that there is demand for further serviced office accommodation in Medway?

E5b: Please explain why you consider / do not consider that there is demand for further serviced office accommodation in Medway

3.34   Respondents provided mixed views on the level of demand for serviced offices in Medway, responses submitted in support of serviced offices presented the benefits that they brought to small and micro businesses and village workers; whereas others considered that the presence of empty office complexes in Medway was indicative of a lack of demand for serviced offices that would be met by the private sector.

Policy E2:

E6a: Do you agree with the proposed policy approach for the rural economy?

E6b: Please explain why you agree / disagree with the proposed policy approach for the rural economy

E6c: What alternative approaches would you propose?

3.35   The proposed policy was predominantly supported by respondents; however, concerns were raised regarding the notion of positive benefits with clarification requested on this terminology, the need for a flexible approach in implementing the proposed policy, as well as a suggestion to include reference in the policy to the need to conserve the best and most versatile agricultural land wherever possible.

Policy E3:

E7a: Do you agree with the proposed policy approach towards tourism?

E7b: Please explain why you agree or disagree with the proposed policy approach towards tourism

E7c: Would you suggest an alternative policy approach?

3.36   The proposed policy was supported by the majority of respondents with the only objection relating to the policy being overly inflexible in requiring development to avoid negative impacts. Suggestions included amending the policy to consider negative impacts against benefits; as well as noting marinas on Policy mapping.

Policy E4:

E8a: Do you agree with the proposed policy approach towards visitor accommodation?

E8b: Please explain why you agree or disagree with the proposed policy approach for visitor accommodation

E8c: Would you suggest an alternative policy approach?

3.37   The proposed policy was supported by the majority of respondents however concerns were raised over the requirement that development must avoid negative impacts, and accordingly it was suggested the policy be amended to reflect support for proposals where negative impacts were mitigated or outweighed. This point was explicitly supported by Natural England who recommended that the policy require environmental net gain.

Retail and Town Centre (Q8, RTC1-RTC29)

Respondent Type	Q8	Policy RTC1	Policy RTC2	Policy RTC3	Policy RTC4-5	Policy RTC6	Policy RTC7	Policy RTC8	Policy RTC9	Policy RTC10	Policy RTC11	Policy RTC12
Charity / Community / Faith Group	4	2	1	1	1	1	1	1	1	1	1	1
Councillor / MP / Parish Council	5	2	2	2	2	2	2	2	2	2	2	2
Developer / Consultant	3	7	7	7	4	1	1	2	1	2	1	3
Government Department / Public Bodies												
Local Authority	1	1	1	1	1	1	1	1	1	1	1	1
Member of the Public	28	2	1	1	1	1	1	2	2	4	4	3
Other	1						1					
Total	42	14	12	12	9	6	7	8	7	10	9	10

Table 3.4: Retail and Town Centre responses by Respondent Type and Policy

Q8: Thinking about the retail and town centres section of the Development Strategy, please answer the following question. When developing the Local Plan what things do you think the council should consider to meet Medway's retail and town centre needs?

3.38   The most significant concern for members of the public was to ensure that out-of-town development was restricted in order to promote a focus on regeneration of existing town centres. This should in turn be supported by improving connectivity and accessibility by public transport as well as increasing the vitality of town centres through alternative uses. A concern of many respondents was to ensure that supporting infrastructure to either deliver new retail development or support existing centres was delivered in line with residential development outlined in the development strategy; as well as ensuring that the cross-boundary impacts of these increases were monitored and managed accordingly. It was also suggested that policies in this section should retain a degree of flexibility to enable them to respond to the evolving market in terms of town centre usage and retail behaviour.

Policy RTC1:

RTC1a: Do you consider that the proposed policy represents an effective approach for managing a retail hierarchy in Medway?

RTC1b: Please explain why you consider / don't consider that the proposed policy represents an effective approach for managing a retail hierarchy in Medway

RTC2a: Do you agree with the definition of Chatham as the primary centre at the top of the hierarchy?

RTC2b: Please explain why you agree or disagree with the definition of Chatham as the primary centre at the top of the hierarchy

RTC3a: Do you agree with the identified district centres?

RTC3b: Please explain why you agree or disagree with the identified district centres

3.39   The proposed policy was predominantly supported by the majority of respondents with one objection regarding the position of Chatham within the proposed hierarchy and its justification within the evidence base. It is important to note however that there were multiple comments in support of Chatham as the primary centre and that considered the evidence to be sound.

RTC4: How do you consider that Dockside should be recognised in Medway's retail hierarchy?

3.40   There were mixed views on whether Dockside should be considered part of Medway's retail hierarchy, where it was supported it was for the benefits this would bring in terms of its vitality, and where it was opposed it was due to the lack of features normally associated with a traditional town/district centre.

RTC5: Would you propose any alternative approaches to Medway's retail hierarchy?

3.41   It was suggested that the policy should include reference to retail provision to support the development strategy; as well as a need to ensure the policy was flexible enough to accommodate the changing nature of retail use.

Policy RTC2:

RTC6a: Do you consider that the proposed policy represents an effective approach for securing and strengthening the role of Medway's traditional town centres?

RTC6b: Please explain why you consider / don't consider that the proposed policy represents an effective approach for securing and strengthening the role of Medway's traditional town centres

RTC6c: Do you agree with the proposed sequential approach?

RTC6d: Please explain why you agree or disagree with the proposed sequential approach

RTC6e: Would you propose alternative approaches?

3.42   The approach contained within the proposed policy was supported by most respondents however there were several queries and objections from developers regarding its application of the sequential test, the evidence base used to inform the approach, and that the promotion of Chatham town centre was not sound. It was also suggested that the policy should make specific reference to the creation of new local centres to support new development outlined in the development strategy scenarios.

Policy RTC3:

RTC7a: Do you consider that the proposed policy represents an effective approach for securing and strengthening the role of Medway's traditional town centres?

RTC7b: Please explain why you consider / don't consider that the proposed policy represents an effective approach for securing and strengthening the role of Medway's traditional town centres

RTC8a: Do you agree with the proposed approach to impact assessments?

RTC8b: Please explain why you agree or disagree with the proposed approach to impact assessments

RTC9a: What do you consider would represent an appropriate size threshold for developments to undertake an impact assessment?

RTC9b: Would you propose alternative approaches?

3.43   Respondents predominantly supported the proposed policy and approach to impact assessments with comments in support stating that it was in accordance with the default position described within the NPPF and draft NPPF (now revised July 2018). In contrast objections received stated that the approach was not considered to be consistent with the NPPF in that it did not adequately justify its approach. There were two main approaches proposed in response to RTC9, some respondents advocated that the threshold should be 2500m2 while others considered that a lower threshold would be appropriate for Medway and believed it could be well evidenced.

14

Policy RTC4 and 5:

RTC10a: Do you agree that this proposed approach represents an effective approach to planning for the city and district centres in Medway?

RTC10b: Please explain why you agree or disagree that this proposed approach represents an effective approach to planning for the city and district centres in Medway

3.44   The majority of respondents agreed with the proposed approach, however concerns were raised relating to the effects of the proposed policies on the Hempstead Valley District Centre. In order to address these concerns the developer suggested that policy RTC4 should be rewording to improve its flexibility, and that policy RTC5 should have the restriction against non-A1 town centre uses removed.

RTC11a: Do you consider that changes are required to the town centre boundaries as defined in the figures 5a to 5f on pages 83 to 85 of the Development Strategy Document ?

RTC11b: Please explain why you consider / don't consider that changes are required to the town centre boundaries as defined in the figures 5a to 5f in the Development Strategy Document

3.45   Respondents on the whole considered that changes were not required to town centre boundaries. One response was received suggesting that Strood Retail Park should be included within the district centre boundary for Strood.

RTC12a: Do you agree with the classification of primary and secondary shopping frontages as shown in figures 5a to 5f on pages 83 to 85 of the Development Strategy Document ?

RTC12b: Do you agree with the classification of primary and secondary shopping frontages as shown in figures 5a to 5f in the Development Strategy Document?

RTC13: Do you consider that there are alternative approaches to manage this aspect of Medway's main centres?

3.46   Respondents were supportive of the classifications of primary and secondary frontages.

Policy RTC6:

RTC14a: Do you agree that this proposed approach represents an effective approach to planning for temporary uses in centres in Medway?

RTC14b: Please explain why you agree or disagree that this proposed approach represents an effective approach to planning for temporary uses in centres in Medway

RTC14c: Would you propose alternative approaches?

3.47   The proposed policy was supported by respondents, some comments in support of the policy suggested that a similar approach could be adopted in local centres, as well as a suggestion that policy RTC5 and RTC6 should do more to support retail / leisure / hospitality due to the challenges these sectors face.

Policy RTC7:

RTC15a: Do you agree that development of specific uses should be restricted where it could result in an unhealthy and unsustainable overconcentration of premises in one area?

RTC15b: Please explain why you agree or disagree that development of specific uses should be restricted where it could result in an unhealthy and unsustainable overconcentration of premises in one area

3.48   The approach proposed through this policy was supported by the majority of respondents however concerns were raised by developers that it was overly generic and would not allow an appropriate level of flexibility and would result in an over-burdening of businesses.

RTC16b: Please explain why you agree or disagree with the definition

RTC16c: Do you think that the list should be amended?

3.49   While this definition was similarly supported by the majority of respondents concerns were raised by developers that no consideration had been given to other A class uses and their impacts on health and wellbeing which can be equal to, or greater than, those of the specific uses defined here.

RTC17a: Do you think that the council should introduce a maximum percentage for units in an area that are allowed for use by the specific businesses noted above?

RTC17b: Please explain why you think / don't think that the council should introduce a maximum percentage for units in an area that are allowed for use by the specific businesses noted above

3.50   Respondents offered mixed view on this proposal with most objecting on the ground that it may inadvertently lead to vacant units due to its inflexibility.

RTC18a: Do you think that such uses should be restricted near schools and youth facilities?

RTC18b: Please explain why you think / don't think that such uses should be restricted near schools and youth facilities

3.51   The majority of respondents did not think that such uses should be restricted near schools and youth facilities. Explanations offered by developers presented evidence disputing links between fast food, school proximity, and obesity. Other concerns were the policy creating vacant units through an inflexible approach.

RTC19a: Do you think that the council should not set policy in this area, but rather consider proposals for such uses on a case by case basis?

RTC19b: Please explain why you think / don't think that the council should not set policy in this area, but rather consider proposals for such uses on a case by case basis

3.52   Most respondents considered that proposals should be considered on a case by case basis for various reasons: developers who had objected to the other elements of the proposed policy considered there was no appropriate reason to restrict uses by location, concentration, or distances from schools.

Policy RTC8:

RTC20a: Do you consider this is the appropriate approach to planning for Hempstead Valley shopping centre?

RTC20b: Please explain why you consider / don't consider that this is an appropriate approach to planning for Hempstead Valley shopping centre

RTC21a: Do you think that further developments at Hempstead Valley should be restricted, so that greater priority is given to retail and leisure in the main town centres in Medway?

RTC21b: Please explain why you think / don't think that further developments at Hempstead Valley should be restricted, so that greater priority is given to retail and leisure in the main town centres in Medway

3.53   The proposed policy was predominantly supported by respondents however objections were raised by developers challenging the assertion within the text of the policy that the success of the Hempstead Valley District Centre had come at the expense of traditional centres and consequently that further development at the HVDC should not be limited through policy. These objections also contended that there was no basis within the NPPF to restrict district centres over traditional centres.

RTC22a: Do you support a policy approach that seeks to achieve a balance of uses across all centres in Medway?

RTC22b: Please explain why you support / don't support a policy approach that seeks to achieve a balance of uses across all centres in Medway

3.54   This approach was supported by the majority of respondents, however explanation was not provided for these responses.

Dockside:

RTC23a: Do you support a policy approach that recognises the family leisure role of Dockside?

RTC23b: Please explain why you support / don't support a policy approach that recognises the family leisure role of Dockside

RTC24: What do you think is the appropriate approach to further growth? Should policy only allow a small amount of new 'convenience' retail, or support a wider range of services and shops to develop its role as a local centre?

3.55   There was general support for a policy approach for Chatham Dockside from most respondents, however there was an objection raised against a policy led approach on the grounds that Chatham Dockside does not have the features of a traditional centre.

Policy RTC9:

RTC25a: Do you consider that this is an appropriate approach to planning for Medway Valley Leisure Park?

RTC25b: Please explain why you consider / don't consider that this is an appropriate approach to planning for Medway Valley Leisure Park

3.56   The proposed policy was supported by the majority of respondents, however explanation was not provided for any of these responses.

RTC26a: Do you think that there should be a specific policy to manage the development of Medway Valley Leisure Park, or if proposals should only be determined by use of wider retail policies?

RTC26b: Please explain your answer

3.57   The majority of respondents thought that a specific policy was appropriate to manage the development of Medway Valley Leisure Park given the special nature of the area.

Policy RTC10:

RTC27a: Do you agree with this proposed approach to sustainable communities?

RTC27b: Please explain why you agree or disagree with this proposed approach to sustainable communities

RTC27c: What alternative approaches would you suggest?

3.58   The proposed policy was supported by respondents, comments were received seeking clarification on the use of 'health' within the policy as to whether it related to human health; and suggesting that the policy include an element of flexibility to allow the use of defined centres can appropriately respond to evolving market requirements.

Policy RTC11:

RTC28a: Do you consider that this is the appropriate approach to planning for small retail areas?

RTC28b: Please explain why you consider / don't consider that this is the appropriate approach to planning for small retail areas

3.59   The proposed policy was supported by the majority of respondents, the only concern raised related to development on the Hoo Peninsula and the vulnerability of existing small businesses to an influx of larger retail areas. Comments in support of the policy noted that where growth occurs it is important to balance meeting the needs of residents while maintaining the hierarchy of defined centres.

RTC28c: Do you think that it would be better if there were no specific policy for local centres and shopping parades, and development proposals were considered on a case by case basis?

RTC28d: Please explain why you think / don't think that it would be better if there were no specific policy for local centres and shopping parades, and development proposals were considered on a case by case basis

3.60   The responses to this question were mixed, those who favoured a case-by-case approach advocated its flexibility and ability to appropriately respond to the local circumstances around each development; while those who favoured a policy based approach stated that the value of village centres was too great to be simply left considered on a case-by-case basis.

Policy RTC12:

RTC29a: Do you consider that this is an effective approach to planning for retail parks?

RTC29b: Please explain why you consider / don't consider that this is an effective approach to planning for retail parks

RTC29c: Would you suggest alternative policies for planning of development in retail parks?

3.61   The proposed policy received mixed support, with objections from developers/consultants stating that there was no provision within the NPPF to plan for retail development in out-of-centre retail parks and as such the proposed policy should not be considered sound. The suggested solution to this was a rewrite of the policy with regard to the NPPF and relevant guidance.

Natural Environment and Green Belt (Q11, NE1-NE8)

Respondent Type	Q11	Policy NE1	Policy NE2	Policy NE3	Policy NE4	Policy NE5	Policy NE6	Policy NE7	Policy NE8
Charity/Community/Faith Group	7	1	1	1	1	2	2	2	3
Councillor/MP/Parish Council	5	2	2	2	3	2	2	2	2
Developer/Consultant	6	2	2	5	7	2	5	3	3
Government Department/Public Bodies	1	2	2	2	1	3	1	2	1
Local Authority	2	1	1	1	1	2	2	2	2
Member of the Public	37	8	6	8	3	4	4	3	7
Other	2	1		1	1	1		1	
Total	60	17	14	20	17	16	16	15	18

Table 3.5: Natural Environment and Green Belt responses by Respondent Type and Policy

Q11: Thinking about the natural environment and greenbelt section of the Development Strategy, please answer the following question. When developing the Local Plan what things do you think the council should consider to support conservation and enhancement of the environment in Medway?

3.62   The most significant concern for respondents related to the principle of protecting the natural environment from inappropriate development. The means by which this should be achieved were varied and included such suggestions as: including specific reference to species and habitats beyond designated areas or potentially applying local designations to specific areas; promoting an approach that would proactively plan for the impacts of climate change and mitigate them wherever possible; and promoting the use of woodland planting as a means of effective mitigation.

3.63   There were also suggestions that a policy relating to noise impacts should be included within the local plan, the Environment Agency referenced appropriate strategic documents which should be included in the supporting text for the relevant policies. Developers were concerned that without a fully updated Landscape Character Assessment or Green Infrastructure Framework it would not be possible to effectively comment on these aspects of the local plan.

Policy NE1:

NE1a: Do you consider that this is an effective approach to managing the internationally important habitats in the designated SPA and SAC habitats?

NE1b: Please explain why you consider / don't consider that this is an effective approach to managing the internationally important habitats in the designated SPA and SAC habitats

NE1c: What alternative approaches would you recommend to secure the favourable condition of these areas?

3.64   The proposed policy was supported by the majority of respondents, members of the public who objected to this policy did so due to their opposition to any development at Lodge Hill. Natural England's comments on this policy related to the need to ensure that development in close proximity to SPAs or Ramsar sites contributed to the North Kent Strategic Access Management and Monitoring Strategy as well as assessing their direct and indirect impacts on these sites. Additional suggestions included referencing the health benefits of the natural environment, and that the policy should reinforce the prioritisation of brownfield land over greenfield.

Policy NE2:

NE2a: Do you consider that this is an effective approach to conserving and enhancing Medway's natural environment?

NE2b: Please explain why you consider / don't consider that this is an effective approach to conserving and enhancing Medway's natural environment

NE2c: What alternative approaches would you recommend to secure the favourable condition of these areas?*

3.65   The proposed policy was supported by the majority of respondents but received significant and contrasting suggestions. Developers including Homes England sought for flexibility to be added to the policy to allow development to proceed where the benefits outweigh the harm to designated sites, whereas Natural England and local authorities suggested that development that could damage designated sites be refused. This sentiment was echoed by members of the public who sought the strongest possible protections for designated sites such as Lodge Hill.

Policy NE3:

*NE3a: Do you consider that this is an effective approach to conserving and enhancing the special features of the Kent Downs AONB?

NE3b: Please explain why you consider / don't consider that this is an effective approach to conserving and enhancing the special features of the Kent Downs AONB

NE3c: What alternative approaches would you recommend to secure the components of natural beauty?*

3.66   The proposed policy was near wholly supported by respondents, the Kent Downs AONB Unit provided a comprehensive list of components it felt should be included within the policy which would improve its effectiveness. Additional suggestions were provided by Natural England seeking the policy to closely reflect the protection afforded to AONBs in the NPPF. Some objections were received from members of the public seeking a halt to development within the AONB, as well as raising the issue of the development of Rochester Airport and its effects on the tranquillity of the AONB.

Policy NE4:

*NE4a: Do you consider that this is an effective approach to landscape policy in Medway?

NE4b: Please explain why you consider / don't consider that this is an effective approach to landscape policy in Medway

NE4c: What alternative approaches would you recommend?*

3.67   The proposed policy was near wholly supported by respondents, parish councils had concerns that the policy would not be able to effectively prevent developments which could detrimentally affect the landscape character of rural areas. Developers suggested that it was not possible to fully comment on the policy due to the absence of a fully updated Landscape Character Assessment and Green Infrastructure Framework.

Policy NE5:

*NE5a: Do you consider that this is an effective approach to securing effective and healthy green infrastructure in Medway?

NE5b: Please explain why you consider / don't consider that this is an effective approach to securing effective and healthy green infrastructure in Medway

NE5c: What alternative approaches would you recommend to secure effective and healthy green infrastructure in Medway?*

3.68   The proposed policy was predominantly supported by respondents, Natural England recommended that the policy be supported with a detailed green infrastructure strategy to ensure its effective delivery. Suggestions were made to the text of the policy by the Environment Agency and developers sought clarification on the terminology used in the Green Infrastructure Framework which would in turn lead to increased certainty at the masterplanning stage by allowing developers to determine their obligations under the policy. Concerns raised by members of the public related to the efficacy of the policy for Lodge Hill given the development detailed in the development strategy.

20

Policy NE6:

NE6a: Do you agree with the proposed policy for Green Belt?

NE6b: Please explain why you agree or disagree with the proposed policy for Green Belt

3.69   The proposed policy was predominantly supported by respondents with some caveats in that any release of Green Belt land would need to be done in only exceptional circumstances. It was suggested that clarification may be needed to ensure that Green Belt was not misinterpreted as an environmental constraint but as a planning constraint, as well as ensuring the continued engagement with neighbouring authorities.

NE6c: Do you consider that the exceptional circumstances exist to justify the review of the Green Belt boundary?

NE6d: Please explain why you consider / don't consider that the exceptional circumstances exist to justify the review of the Green Belt boundary

NE6e: Do you have suggestions for alternative approaches to Green Belt policy?

3.70   There were a number of respondents who considered that exceptional circumstances existed that justified a review of the Green Belt boundary. In the case of developers this was facilitating housing need through sensitive release, for members of the public there was a mix of opposition to any release of Green Belt land and others who would accept the release of lower value sections. It was also suggested that the need to preserve existing green spaces warranted expanding the Green Belt boundaries.

Policy NE7:

NE7a: Do you agree with the proposed policy for flood and water management?

NE7b: Please explain why you agree or disagree with the proposed policy for flood and water management?

NE7c: Do you have suggestions for alternative approaches for this policy area?

3.71   The proposed policy was supported with comments from the Environment Agency requesting that the Water Framework Direction (WFD) was explicitly referenced alongside an explanation of the benefits of good water quality in all water bodies. Natural England suggested that it may also be relevant to include measures that could be taken to help with climate change adaptation and resilience. Other comments included the need to ensure that any direct or indirect impacts of Sustainable Drainage Schemes (SuDS) on the historic environment was considered and mitigated where possible.

Policy NE8:

NE8a: Do you agree with the proposed policy for air quality?

NE8b: Please explain why you agree or disagree with the proposed policy for air quality?

NE8c: Do you have suggestions for alternative approaches for this policy area?

3.72   The proposed policy was predominantly supported by respondents however Natural England suggested that the policy should be amended to reference the harmful ecological impacts of air pollution as well as the human impacts. Public Health also queried the absence of a specific policy on noise pollution within the document. Suggestions were made by developers with regard to mechanisms for mitigating air quality impacts, and when these should be acceptable.

Built Environment (Q14, BE1-BE5)

Respondent Type	Q14	Policy BE1	Policy BE2	Policy BE3	Policy BE4	Policy BE5-6
Charity/Community/Faith Group	1	1	1	1	1	1
Councillor/MP/Parish Council	4	2	2	2	2	2
Developer/Consultant	1	9	4	7	5	1
Government Department/Public Bodies		1				1
Local Authority	1	1	1	1	1	2
Member of the Public	26	2	4	2	2	2
Other	1					
Total	34	16	12	13	11	9

Table 3.5: Built Environment responses by Respondent Type and Policy

Q14: Thinking about the built environment section of the Development Strategy, please answer the following question. When developing the Local Plan what things do you think the council should consider to support sustainable development and high quality design in Medway?

3.73 The most important issue for respondents was the need to promote sustainable development through energy efficient and environmentally sensitive design. Another common suggestion from members of the public was to ensure that there was adequate car parking provision for new development to reduce the impact of car parking on existing residents. Kent County Council suggested that it would be appropriate to incorporate the requirement for the production of an Energy Statement for major development to identify how they would meet the challenges of climate change.

Policy BE1:

BE1a: Does the proposed policy for high quality design represent the most appropriate approach for the Medway Local Plan?

BE1b: Please explain why you think that the proposed policy for high quality design do / don't represent the most appropriate approach for the Medway Local Plan

BE1c: What do you consider would represent a sound alternative approach towards planning for high quality design in the Medway Local Plan?

3.74 The proposed policy was broadly supported with criticism from some developers centred on the inclusion of local standards, Building for Life and Lifetime Homes standards – mainly that these standards should not be referenced within the policy and should be replaced by references to appropriate national standards and Building Regulations. Additional suggestions related to non-residential development, notably that there should be a floorspace threshold / feasibility test for the requirement for development to meet BREEAM "Very Good" standards.

Policy BE2:

BE2a: Does the proposed policy for sustainable design represent the most appropriate approach for the Medway Local Plan?

BE2b: Please explain why you think the proposed policy for sustainable design does / doesn't represent the most appropriate approach for the Medway Local Plan

BE2c: What do you consider would represent a sound alternative approach towards sustainable design in the Medway Local Plan?

3.75 The proposed policy was broadly supported, however it received criticism from members of the public, parish councils, and community groups as it did not include standards for energy and water use – the rationale being that such standards would assist in delivering sustainable development. Developers were broadly supportive of the policy but raised concerns around

the policy interaction with non-residential development as well as the need for flexibility in implementing the policy to avoid impeding the delivery of housing to meet assessed need.

Policy BE3:

BE3a: Does the proposed policy for housing design represent the most appropriate approach for the Medway Local Plan?

BE3b: Please explain why you think the proposed policy for housing design does / doesn't represent the most appropriate approach for the Medway Local Plan

BE3c: What do you consider would represent a sound alternative approach for housing design in the Medway Local Plan?

3.76   The responses to the proposed policy were broadly supportive with concern being raised by developers against the use of the Medway Housing Design Standard, with the solution to only reference the Nationally Described Space Standards unless an appropriate evidence base to support this difference could be presented. Additionally it was suggested that the policy should include references to dementia friendly developments as well as the benefits of incorporating natural features into housing design.

Policy BE4:

BE4a: Does the proposed policy for housing density represent the most appropriate approach for the Medway Local Plan?

BE4b: Please explain why you think the proposed policy for housing density does / doesn't represent the most appropriate approach for the Medway Local Plan

BE4c: Is there an alternative way to express optimum net residential density, e.g. habitable rooms per hectare?

BE4d: What do you consider would represent a sound alternative approach for housing density in the Medway Local Plan?

3.77   The responses to the proposed policy was supportive with some policy suggestions: the policy could specify density ranges for different areas / local circumstances, and that the policy could potentially be expanded to all sites or masterplans. No alternative suggestions were put forwards for BE4c.

Policy BE5 and BE6:

BE5a: Do the proposed policies for the historic environment represent the most appropriate approach for the Medway Local Plan?

BE5b: Please explain why you think the proposed policies for the historic environment do / don't represent the most appropriate approach for the Medway Local Plan

BE5c: What do you consider would represent a sound alternative approach towards planning for the historic environment in the Medway Local Plan?

3.78   While the policy was broadly supported by most respondents Heritage England did not consider that policy BE5 set out a positive and clear strategy for the historic environment required by the National Planning Policy Framework, and provided suggestions on how this could be addressed to their satisfaction. Kent County Council provided suggestions to strengthen policy BE6 with a focus on heritage rather than historic environment, promoting a focus on archaeological assets, and supporting the production of a Medway Landscape Character Assessment.

Health and Communities (Q17, HC1-HC5)

Respondent Type	Q17	Policy H1	Policy H2
Charity/Community/Faith Group	4	2	3
Councillor/MP/Parish Council	6	2	2
Developer/Consultant	3	4	3
Government Department/Public Bodies		1	
Local Authority	2	1	1
Member of the Public	34	3	6
Other	1	1	
Total	50	14	15

Table 3.7: Health and Communities responses by Respondent Type and Policy

Q17: Thinking about the health and communities section of the Development Strategy, please answer the following question. When developing the Local Plan what things do you think the council should consider to help improve the quality of life for Medway's residents?

3.79   The primary concern raised by respondents was the provision of healthcare facilities: GP surgeries and hospitals. Existing facilities would need to be enhanced, or new facilities created, to meet the identified increases in population as well as meeting the needs of an aging population. Respondents considered it vital that the appropriate level of provision was identified and secured through discussions with the relevant healthcare authorities and provided in a timely fashion as development was brought forward.

3.80   Additional comments received touched on: the need to ensure that faith groups had facilities available for worship with supporting infrastructure, recommendations that the proposed policies in this section make specific reference to the range of specialist accommodation required, and suggestions that the policy promote sustainable food production.

Policy HC1:

HC1a: Does the proposed policy for Health and Wellbeing represent the most appropriate approach to planning for health improvements in Medway?

HC1b: Please explain why you think the proposed policy for Health and Wellbeing does / doesn't represent the most appropriate approach to planning for health improvements in Medway

HC2a: Do you agree with the proposed threshold for HIAs?

HC2b: Please explain why you agree or disagree with the proposed threshold for HIAs

3.81   The proposed policy was supported by the majority of respondents, however objections were raised to the proposed threshold for Health Impact Assessments (HIA) by developers for a number of reasons. These included: the requirement to carry out a HIA alongside an Environmental Impact Assessment (EIA) was unnecessary as the EIA would adequately address such concerns, the local plan should have considered the health impacts of development and as such only proposals which departed from the local plan should require a HIA, and finally that the requirement to carry out an HIA at the proposed threshold would be an unnecessary burden on development that could impede housing delivery.

HC3a: Do you agree with the council's proposed approach to managing Hot Food Takeaways?

HC3b: Please explain why you agree or disagree with the council's proposed approach to managing Hot Food Takeaways

HC4: What do you consider would represent a sound alternative approach towards planning for health in the Medway Local Plan?

3.82   There was agreement among respondents for the council's approach to managing Hot Food Takeaways.

Policy HC2:

HC5a: Does the proposed policy for Community Facilities represent the most appropriate approach to planning for this aspect of social needs in Medway?

HC5b: Please explain why you think the proposed policy for Community Facilities does / doesn't represent the most appropriate approach to planning for this aspect of social needs in Medway

HC5c: Do you agree with the proposed approach to addressing the presumption against loss of community facilities?

HC5d: Please explain why you agree or disagree with the proposed approach to addressing the presumption against loss of community facilities

HC5e: What do you consider would represent a sound alternative approach towards planning for community facilities in the Medway Local Plan?

3.83   The proposed policy is predominantly supported by the majority of respondents and there was agreement that current community facilities would benefit from protection through policy. However concerns were raised by members of the public relating to the loss of existing community facilities beyond the control of planning policy, citing the closure of Deangate Golf Course as an example. Developers noted that to ensure the provision of new facilities must be indicated in the infrastructure delivery plan in order to provide certainty and inform viability assessments.

Infrastructure (Q20, I1-I8)

Respondent Type	Q20	Policy I1	Policy I2	Policy I3	Policy I4	Policy I5	Policy I6-8	Policy I9
Charity/Community/Faith Group	5	2	1	1	1	1	1	2
Councillor/MP/Parish Council	7	2	2	2	2	2	2	2
Developer/Consultant	4	3	6	4	1	1	2	2
Government Department/Public Bodies	1		3	1	1			
Local Authority	1	1		1	2	1	1	1
Member of the Public	27	6	5	3	3	4	4	4
Other	2							
Total	47	14	17	12	10	9	10	11

Table 3.8: Infrastructure responses by Respondent Type and Policy

Q20: Thinking about the infrastructure section of the Development Strategy, please answer the following question. When developing the Local Plan what things do you think the council should consider to help improve Medway's infrastructure?

3.84 The most important issue for members of the public in this section was the delivery of infrastructure (utilities and transport) prior to the delivery of new development as the sentiment was that additional pressure on, and congestion in, the system would be unacceptable. This concern was shared by other respondent groups as the identification of infrastructure requirements would provide certainty for developers in assessing viability.

3.85 The current state of infrastructure on the Hoo Peninsula was a focal point of responses from councillors and parish councils who reiterated that infrastructure should be delivered prior to development through a mechanism such as masterplanning for the peninsula.

3.86 Other issues raised were the provision of health facilities within Medway, the need to promote sustainable modes of transport and support the development of foot and cycle networks, there was also support for Gillingham Football Club must include a benefit to the wider community. The Education and Skills Funding Agency supported proposed policies I1 and I3 and was supportive of an approach that would ensure a good supply of school sites to respond to future needs for school places.

Policy I1:

I1a: Does the proposed policy for Infrastructure planning and delivery represent the most appropriate approach to planning for infrastructure improvements in Medway?

I1b: Please explain why you think the proposed policy for Infrastructure planning and delivery does / doesn't represent the most appropriate approach to planning for infrastructure improvements in Medway

I1c: What do you consider would represent a sound alternative approach towards planning for infrastructure in the Medway Local Plan?

3.87 The proposed policy received a mix of responses relating to the issue of ensuring that the infrastructure delivery plan is delivered promptly, for some respondents its absence at this point was grounds for objecting to this policy until it is in place. Homes England highlighted the need for land required for infrastructure to support the delivery of the local plan to be assessed through the sustainability appraisal methodology once it is identified to ensure the plan is sound.

Policy I2:

I2a: Does the proposed policy for developer contributions represent the most appropriate approach?

I2b: Please explain why you think the proposed policy for developer contributions does / doesn't represent the most appropriate approach

I2c: What do you consider would represent a sound alternative approach for developer contributions in the Medway Local Plan?

3.88   The proposed policies were predominantly supported however criticism was received from Homes England and developers regarding the requirement for infrastructure is delivered ahead of the development being occupied as this may not be appropriate for every development and may hinder the delivery of housing. This was contrasted with the views of members of the public who felt that this was a worthwhile requirement. It was also suggested that contributions could be sought towards green infrastructure in addition to grey infrastructure.

Policy I3:

I3a: Does the proposed policy for Education represent the most appropriate approach for planning for education facilities?

I3b: Please explain why you think the proposed policy for Education does / doesn't represent the most appropriate approach for planning for education facilities

I3c: What do you consider would represent a sound alternative approach for planning for education facilities in the Medway Local Plan?

3.89   Respondents were almost wholly supportive of the proposed policy, the only concern was raised by developers/consultants in the need for clarifying terminology and ensuring that the need for providing educational facilities be informed by site specific assessments.

Policy I4:

I4a: Does the proposed policy for Communications represent the most appropriate approach for the Local Plan?

I4b: Please explain why you think that the proposed policy for Communications does / doesn't represent the most appropriate approach for the Local Plan

I4c: What do you consider would represent a sound alternative approach for planning for communications infrastructure in the Medway Local Plan?

3.90   Respondents were supportive of the proposed policy. Highways England stressed the need for such developments to also consider impacts of traffic flow and highway safety.

Policy I5:

I5a: Does the proposed policy for Utilities represent the most appropriate approach for the Local Plan?

I5b: Please explain why you think that the proposed policy for Utilities does / doesn't represent the most appropriate approach for the Local Plan

I5c: What do you consider would represent a sound alternative approach for planning for utilities infrastructure in the Medway Local Plan?

3.91   Respondents were supportive of the proposed policy providing it could be delivered in line with new developments.

Policy I6, I7, and I8:

I6a: Do the proposed policies for open spaces, sports facilities and playing pitches represent the most appropriate approach for the Local Plan?

I6b: Please explain why you think that the proposed policies for open spaces, sports facilities and playing pitches do / don't represent the most appropriate approach for the Local Plan

I6c: What do you consider would represent a sound alternative approach for planning for open spaces, sports facilities and playing pitches in the Medway Local Plan?

3.92 The proposed policies were supported by the majority of respondents, there was concern that existing facilities must be safeguarded and Homes England made specific comments on the provision of open space as part of the Lodge Hill masterplan outlining the need for flexibility in delivering open space given the existing configuration of the site as a disused barracks.

Policy I9:

I7a: Do you agree with the proposed policy for Gillingham Football Club?

I7b: Please explain why you agree or disagree with the proposed policy for Gillingham Football Club

I7c: Do you support the relocation of Gillingham Football Club to a new stadium in Medway?

I7d: Please explain why you do / don't support the relocation of Gillingham Football Club to a new stadium in Medway

I7e: Where do you consider would be a suitable location for a relocated stadium?

I8: What uses would you expect to see come forward as part of any new stadium proposals?

3.93 Respondents were predominantly supportive of the proposed policy for Gillingham Football Club as long as the stated policy was delivered. In terms of location only one specific site was proposed: Mill Hill. The majority of responses preferred a suitable location well served by public transport to enable its use by the community. Respondents would most like to see additional community facilities come forwards as part of any new stadium proposals.

Transport (Q23, T1-T15)

Respondent Type	Q23	Policy T1	Policy T2	Policy T3	Policy T4	Policy T5	Policy T6	Policy T7	Policy T8	Policy T9-12
Charity/Community/Faith Group	5	2	2	2	2	3	2	2	2	2
Councillor/MP/Parish Council	4	2	2	2	2	2	2	2	2	2
Developer/Consultant	7	6	6	4		1	1	1	1	1
Government Department/Public Bodies	1	1			3	3	2			
Local Authority	4	1	1	1	2	1	1	1	1	1
Member of the Public	32	6	5	7	17	4	3	2	3	4
Other	2	1	1	1	1	1				1
Total	55	19	17	17	27	15	11	8	9	11

Table 3.9: Transport responses by Respondent Type and Policy

Q23: Thinking about the transport section of the Development Strategy, please answer the following question. When developing the Local Plan what things do you think the council should consider to support a sustainable and effective transport network in Medway?

3.94 Responses stressed the need for affordable and sustainable alternative modes of transport across Medway that would avoid contributing to congestion on the road network and the associated environmental and health impacts this creates. There was

some concern that it was not possible to effectively comment on infrastructure required to support the level of housing and employment need until further information was available, as well as emphasizing the need to continue to cooperate with other local authorities and government bodies as further modelling work is carried out and the plan continues to be prepared. Responses from members of the public were most frequently concerned about the importance of ensuring the infrastructure was delivered before housing or employment development was allowed to proceed to avoid increasing pressure on existing transport networks.

Policy T1:

T1a: Do you agree that this approach offers an appropriate strategic approach to transport planning in Medway?

T1b: Please explain why you agree or disagree that this approach offers an appropriate strategic approach to transport planning in Medway

T1c: What do you consider would represent a sound alternative approach towards sustainable transport in the Medway Local Plan?

3.95   The responses to the proposed policy were almost wholly supportive however there were concerns raised around the delivery of infrastructure prior to housing or employment, as well as the modelling approach adopted in the evidence base. Respondents were supportive of the measures within the policy to promote sustainable modes of transport as well as the opportunities to support enhancements to sustainable transport networks.

Policy T2:

T2a: Do you agree/disagree that this approach offers an appropriate strategic approach towards a pattern of development which facilitates sustainable transport in Medway?

T2b: Please explain why you agree or disagree that this approach offers an appropriate strategic approach towards a pattern of development which facilitates sustainable transport in Medway

3.96   The responses to the proposed policy were predominantly supportive, one criticism raised was that the policy could consider public transport and cycle network connectivity when determining travel distances, and accordingly support the cycle network to bring this about.

T3a: Research has demonstrated the non-linear relationship between housing density and public transport use. However, in principle, do you agree/disagree that densification is more likely to increase the viability of additional and/or improved public transport services?

T3b: Please explain why you agree or disagree that densification is more likely to increase the viability of additional and/or improved public transport services

3.97   The majority of respondents agreed that densification would be likely to increase the viability of public transport services, however concern was also raised that before these benefits can be realised public services will be under increased pressure and suffer in the short term.

T4a: The optimum densities set out at Table 11.1 are likely to be achieved in the absence of this policy due to their central locations. Is it appropriate to increase these thresholds, subject to good design, and complemented by other initiatives, such as car clubs?

T4b: Please explain why you think it is appropriate / inappropriate to increase these thresholds, subject to good design, and complemented by other initiatives, such as car clubs

3.98   Where respondents considered that it would be appropriate to increase these thresholds the reasoning given was that it was important to meet housing needs and that by increasing densities in areas well served by public transport this could be done sustainably. Where it was considered inappropriate the concerns were that the perceived benefits may not be realised as well as an increase in car parking capacity required around stations.

T4c: Continuing to think about the optimum densities set out in Table 11.1. For peripheral areas, is it appropriate to require a minimum of 35 dwellings per hectare?

T4d: Please explain why, for peripheral areas, you think it is appropriate / inappropriate to require a minimum of 35 dwellings per hectare?

3.99   Respondents both supported and opposed the minimum density for peripheral areas for similar reasons: for peripheral areas it was suggested that while increased density could be supported there should be flexibility within the policy to assess it on a case by case basis as appropriate for the specific areas.

T4e: Would it be appropriate to include Cuxton and Halling stations in Table 11.1?

T4f: Please explain why you think it would be appropriate / inappropriate to include Cuxton and Halling stations in Table 11.1

3.100   Respondents both supported and opposed the inclusion of Cuxton and Halling stations within Table 11.1; the reason for their inclusion is that it would plan positively for the expansion of Medway, while the reasons given in opposition to their inclusion were that rural stations are not sufficiently well served to accommodate increased densities.

T5: What do you consider would represent a sound alternative approach towards the integration of land use and transport planning in Medway?

3.101   Suggestions for an alternative approach included the need to consider transport requirements beyond density around stations and to include a focus on travel for leisure within Medway, as well as exploring the potential for the proposed approach to be adopted around bus stations / routes as well as rail stations.

Policy T3:

T6a: Do you support the principle of a rail upgrade to the Grain freight line to enable passenger services and increased rail freight?

T6b: Please explain why you support / do not support the principle of a rail upgrade to the Grain freight line to enable passenger services and increased rail freight

3.102   Respondents to the proposed policy were predominantly supportive with the only objections received from respondents who felt that further information would be required on particular routes before commenting. Otherwise the responses received welcomed additional support for alternative methods of transport to the private car, however concern was raised that while the policy was supported it should not delay the delivery of housing or employment allocations.

T6c: The council welcomes responses indicating areas of land to be safeguarded. This information could be considered in a business case, subject to funding. Do you have any areas you would like to suggest:-

T6d: What alternative approaches would you suggest?

3.103   Areas that were proposed to be safeguarded were: the B2000 between Cliffe and Cliffe Woods for a future halt/station, Land around Kingsnorth for a passenger terminal station and transport interchange for the Hoo Peninsula. There was also a strong sentiment that designated environmental sites should be safeguarded from this type of development.

3.104   Alternative approaches put forwards were to shift the focus instead to buses and improving their supporting infrastructure.

Policy T4:

T7b: Please explain why you agree or disagree with the proposed policy for aviation in Medway

T7c: What alternative approach would you propose for planning policy for aviation in Medway?

3.105 Responses to the proposed policy were generally supportive from all groups, provided that the associated impacts could be mitigated, aside from members of the public who were almost wholly against the proposed developments at Rochester Airport. The objections that were raised related to matters of: the high level of pollution caused by air travel meant it should not be encouraged, the proposed changes in operations would result in an unacceptable impact on safety and noise for nearby residents, the land at the airport could be better utilised for another use such as healthcare provision, and that the funding for the project could be better spent elsewhere. There were also a number of responses from members of the public opposing the closing of the cross runway specifically.

Policy T5:

T8a: Do you agree with the proposed policy for riverside infrastructure in Medway?

T8b: Please explain why you agree or disagree with the proposed policy for riverside infrastructure in Medway

3.106 The proposed policy was predominantly support by almost all respondents, however modifications were suggested by Natural England to ensure protection of priority habitat and species. Where there was disagreement it was that the proposed policy was overly prescriptive in requiring a full assessment, as well as the ability of road infrastructure to meet any increased level of activity.

T9a: Do you consider the flexible approach to Chatham Docks to be appropriate?

T9b: Please explain why you consider / don't consider the flexible approach to Chatham Docks to be appropriate

T10: What alternative approach would you propose for planning policy for riverside infrastructure in Medway?

3.107 The approach to Chatham Docks was considered appropriate by almost all respondents, where there was disagreement it was that the Chatham Docks should be safeguarded for their current use only.

Policy T6:

T11a: Do you agree with the proposed policy for a riverside path in Medway?

T11b: Please explain why you agree or disagree with the proposed policy for a riverside path in Medway

T11c: What alternative approach would you propose for planning policy in Medway?

3.108 The proposed policy was predominantly supported by almost all respondents, suggestions included: ensuring that the any path should also include seating and wellness facilities to maximise its appeal to the public, as well as enhancing connectivity along the river for walking and cycling.

Policy T7:

T12a: Do you agree with the proposed policy for marinas and moorings in Medway?

T12b: Please explain why you agree or disagree with the proposed policy for marinas and moorings in Medway

T12c: What alternative approach would you propose?

3.109 The proposed policy was wholly supported by respondents, with comments received relating to the potential inflexibility of support for marinas and moorings in Medway being conditional on no adverse environmental impacts.

Policy T8:

T13a: Do you agree with the proposed policy for planning for logistics in Medway?

T13b: Please explain why you agree or disagree with the proposed policy for planning for logistics in Medway

3.110 The proposed policy was both supported and disagreed with by respondents, where there was disagreement it related to the traffic impacts on road infrastructure and suggested a greater focus on rail.

T13c: This is believed to be the first local planning policy of its kind. It has been prepared in response to recent sector articles calling for planning policy interventions. The council would welcome responses to refine or develop an alternative policy to support the growth of this sector in Medway. Please make any suggestions below:-

T13d: What alternative approach would you propose for planning for the logistics sector and managing associated transport in Medway?

3.111 There were not a great number of suggestions relating to this policy. Those submitted related to the interaction with this policy and the goal of increasing the quantity of high value jobs within Medway – specifically an overabundance of distribution centres.

Policy T9:

T14a: Do you agree with the proposed policy for planning for connectivity in Medway?

T14b: Please explain why you agree or disagree with the proposed policy for planning for connectivity in Medway

T14c: What alternative approach would you propose?

3.112 The proposed policy was supported by respondents, some comments were made relating to the implementation of the policy, specifically: the Council should make full use of its powers to ensure the appropriate expansion of pedestrian and cycle networks, it must also ensure that such networks are positively designed to ensure that they are safe and secure.

Policy T10, T11, T12:

T15a: Do you agree with the proposed policy approaches for managing the transport impacts of development and provision for parking?

T15b: Please explain why you agree or disagree with the proposed policy approaches for managing the transport impacts of development and provision for parking

3.113 The proposed policies were predominantly supported by the majority of respondents; those that disagreed with it sought increased flexibility to increase parking provision, and that any standard used to inform the policy be included within the local plan rather than left to a future document. Highways England provided a comment to assist in the implementation of the proposed policies and outlined available support.

T15c: There may be opportunities to secure a 'dockless' bike sharing scheme in Medway, however this is likely to be initiated by the market. This may be appropriate for specific routes, such as to/from Chatham rail station and the university campuses. Would it be prudent to seek to manage this through planning policy?

T15d: Please explain why you think it would / wouldn't be prudent to seek to manage this through planning policy

T15e: What alternative approaches would you propose for policy in the new Medway Local Plan?

3.114 The majority of respondents believed that it would be prudent to manage this through planning policy as this would ensure that it would be considered early on in the application process. However, members of the public were concerned that the opportunities for this may be limited and could potentially be pursued through the private sector instead.

Minerals, Waste and Energy (Q26, MWE1-MWE3)

Respondent Type	Q26	Policies MWE1-5	Policies MWE6-10	Policies MWE11-15
Charity/Community/Faith Group		1	1	1
Councillor/MP/Parish Council	2	1	1	1
Developer/Consultant		3	3	4
Government Department/Public Bodies		4	3	1
Local Authority	1	2	2	1
Member of the Public	12	2	5	4
Other	3			
Total	18	13	15	12

Table 3.10: Minerals, Waste and Energy responses by Respondent Type and Policy

Q26: Thinking about the minerals, waste and energy section of the Development Strategy, please answer the following question. When developing the Local Plan what things do you think the council should consider to manage minerals, waste and energy within Medway whilst supporting regional and national demand?

3.115 The concerns raised by members of the public in this question relate to ensuring that any minerals or waste works did not harm the environment and were sensitively located to minimise or mitigate health, noise, and infrastructure impacts. Kent County Council provided context for the implementation of these proposed policies in determining planning applications. Hanson provided some general suggestions for the policies as it related to the commercial operation of the waterfront, the impacts of these operations and how it would affect other uses.

Policy MWE1-5:

MWE1a: Do the proposed policies MWE1-MWE5 represent the most sustainable approach to managing the sustainable and steady supply of minerals in Medway?

MWE1b: Please explain why you think that the proposed policies MWE1-MWE5 do / don't represent the most sustainable approach to managing the sustainable and steady supply of minerals in Medway

MWE1c: What do you consider would represent a sound alternative strategy for minerals planning in the Medway Local Plan?

3.116 The proposed policies were predominantly supported by the majority of respondents however modifications were suggested by Kent County Council and the Port of London Authority to strength the policies. Amendments were also suggested by developers to ensure that landbanks could be maintained, minerals prospects remain safeguarded, and to promote the use of masterplans to guide non-mineral development around mineral sites. Members of the public raised concerns regarding the in-combination effects of both mineral and residential development of the Hoo Peninsula on its environmental health.

Policy MWE6-10:

MWE2a: Do the proposed policies MWE6-MWE10 represent the most sustainable approach to managing Medway's waste?

MWE2b: Please explain why you think that proposed policies MWE6-MWE10 do / don't represent the most sustainable approach to managing Medway's waste

MWE2c: What do you consider would represent a sound alternative strategy for waste management in the Medway Local Plan?

3.117 The proposed policies were predominantly supported by the majority of respondents however modifications were suggested by Natural England, the Environment Agency, and the Port of London Authority to strengthen the policies and ensure their sustainability. Areas where it would be necessary to follow the Duty to Cooperate were identified by Kent County Council in

order to establish appropriate assessments of Areas of Search. Concern was raised by developers regarding the extents of disposal to land areas and the effect that this would have on existing or proposed operations. Members of the public were broadly supportive of the policies however concerns were raised around disposal to land areas on the Hoo Peninsula.

Policy MWE11-15:

MWE3a: Do the proposed policies MWE11- MWE12 represent the most sustainable approach to planning for energy in Medway?

MWE3b: Please explain why you think that proposed policies MWE11- MWE12 do / don't represent the most sustainable approach to planning for energy in Medway

MWE3c: What do you consider would represent a sound alternative strategy for energy in the Medway Local Plan?

3.118 The proposed policies were predominantly supported by the majority of respondents with some comments/suggestions for consideration in support of promoting renewable energy installations through flexible policy implementation. There was some concern was raised by developers as to whether it was appropriate for the local plan to provide a specific approach to achieve the requirements of Building Regulations; as well as concern raised by members of the public around ensuring the safety of energy installations around the Isle of Grain.

Sustainability Appraisal and Habitat Regulations Assessment

Respondent Type	SA	HRA
Charity/Community/Faith Group	2	
Councillor/MP/Parish Council		
Developer/Consultant	6	
Government Department/Public Bodies	1	2
Local Authority		1
Member of the Public	1	1
Other		
Total	10	4

Table 3.11: Sustainability Appraisal and Habitat Regulations Assessment responses by Respondent Type and Policy

Sustainability Appraisal

3.119 Respondents challenged the methodology of the Sustainability Appraisal in relation to the assessment of the development scenarios, in the case of scenario 4 they were concerned that due to the promotion of the Lodge Hill site by landowners scenario 4 had been assessed to a greater level of detail than other scenarios. Natural England stated they strongly disagreed with the conclusion of the assessment of scenario 4 and felt that the SA should be reviewed and reformatted to ensure decision making was transparent. Environmental groups reiterated the sentiment expressed by Natural England challenging the findings of the Sustainability Appraisal.

3.120 Developers/consultants provided comments on the Sustainability Appraisal which provided additional information for sites that were being promoted or in the case of some of the larger schemes challenged its findings or methodology.

Habitats Regulations Assessment

3.121 Natural England provided high level comments on the HRA and, as with the SA, had a number of concerns relating to the document. These concerns related to the inclusion of potential mitigation measures at the screening stage for the various development scenarios as well as a lack of consistency in the methodology used to assess the scenarios against each other.

3.122 Natural England also provided comments on the topic of strategic air quality monitoring work relating to the screening of specific sites. Maidstone Borough Council also provided a response relating to air quality stating their commitment to work together with Medway on the issue.

4 CONCLUSION

4.1 This report summarises the responses received as part of the Regulation 18 Development Options consultation between 16th March 2018 and 25th June 2018.

4.2 This report should be read alongside the responses received for reference, these have been collated and converted into the Snap Survey format and are presented as a mailmerged output to improve legibility.

4.3 This report does not contain Medway Council's response to the issues raised in the responses.