

MC/18/3662

Date Received: 24 December 2018

Location: Land Off Curtis Way Rochester

Proposal: Creation of a coach park with a new access from Curtis Way, together with entrance control equipment at the proposed access and associated landscaping, including a bund around the coach park.

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Ward: Rochester South & Horsted Ward

Case Officer: Wendy Simpson

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**Recommendation of Officers to the Planning Committee, to be considered and determined by the Planning Committee at a meeting to be held on 13th February 2019.**

**Recommendation - Approval with Conditions**

- 1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.  
  
Reason: To comply with Section 91 of the Town and Country Planning Act 1990 (as amended).
- 2 The development hereby permitted shall be carried out in accordance with the following approved plans:
  - 9T078/CW/130/01 rev 01 (site location plan);
  - 'Extent of Medway council Freehold Ownership' plan (no plan number but shows red and blue lines);
  - 9T078/CW/120/01 rev 01 (existing site layout);

- 9T078/CW/110/01 rev 01 (proposed site layout);
- D001 rev \* (existing site sections);
- D002 rev \* (proposed site sections);
- CW-001 (proposed planting plan);
- Top junction drawing on drawing no. 9T078/CW/110/02 rev 02;
- ENG-001-01 rev A (Bollard detail sheet)
- 03/0857 rev F (A229 City Way/Marconi Way - proposed modifications);
- Technical sheets for the Traffic light, control cabinet and bollards, received on 8 January 2019;
- photographs of entrance 'traffic light', bollards and control cabinet, all received on 8 January 2019;
- AT Access technical sheet for bollards also both received on 8 January 2019.

Reason: For the avoidance of doubt and in the interests of proper planning.

- 3 Prior to the first operation of the coach park hereby approved the installation of the approved surface water drainage system, final coach park surfacing, marking out of parking spaces, installation (in an operational condition) of the retracting bollards, intercom system, traffic signal at the new access and barriers around the new access shall be completed on site and thereafter retained in good working order.

Reason : To ensure the coach park is of a fully operation standard to comply with saved policy BNE2 of the Medway Local Plan 2003.

- 4 Prior to the first operation of the coach park hereby approved details of highway signage to be erected at the Marconi Way junction with the A229, including a plan showing the location of the proposed signage, shall be submitted to and agreed in writing with the Local Planning Authority. The approved signage shall be erected as agreed also prior to the first operation of the coach park and maintained in situ thereafter.

Reason : To regulate traffic flow from the exiting Marconi Way onto the wider highway network in accordance with saved policy T2 of the Medway Local Plan 2003.

- 5 Prior to first operation of the coach park hereby approved the modification works shown on drawing 03/0857 rev F (A229 City Way/Marconi Way - proposed modifications) shall be completed together with the installation of a detector for traffic stopped within the hatched yellow highway marking box at the Marconi Way/A229 junction, set to extend the red traffic signal for northbound traffic for an additional 8 seconds, shall be completed and retained as such thereafter.

Reason : To regulate traffic flow from the exiting Marconi Way onto the wider highway network in accordance with saved policy T2 of the Medway Local Plan 2003.

- 6 Prior to the first operation of the coach park hereby approved the package of highway works to Curtis Way, including the strengthening of the highway carriageway, as detailed in the 'Transport Statement 02' and the relocation of the existing height restriction barrier and installation of highway waiting restrictions, as shown on drawing 9T0768/CW/110/01 rev 01 shall be completed and retained as such thereafter.

Reason : To ensure the free flow of traffic on Curtis Way and the surrounding road network in the area in accordance with policy BNE2 and T2 of the Medway Local Plan 2003.

- 7 Prior to first operation of the coach park hereby permitted the earth bund shown on landscape drawing CW-001 (proposed planting plan) shall be constructed in accordance with the section drawing shown on that drawing. The soft landscaping of the bund shall take place in accordance with the implementation details shown on drawing CW-001 (proposed planting plan) within the first planting season following the construction of the bund and the ongoing maintenance of the soft landscaping shall take place in accordance with the maintenance details shown on drawing CW-001 (proposed planting plan).

Reason: To soften the visual amenity of the area and provide biodiversity enhancement opportunities, in accordance with saved policies BNE6 and BNE38 and paragraphs 127 and 175 of the National Planning Policy Framework 2018.

- 8 Prior to first operation of the coach park hereby approved full details of the footpath and bench to be provided in the adjacent open space as shown on drawing 9T0768/CW/110/01 rev 01 and within the blue line on drawing 'Extent of Medway council Freehold Ownership' (no plan number), shall be submitted to and agreed in writing with the Local Planning Authority. The approved path and bench shall be provided with 2 months from the date of the approval of the details and shall be retained in a good state of repair thereafter.

Reason : To provide enhancement of the remaining open space in accordance with policy BNE2 of the Medway Local Plan 2003.

- 9 Prior to first operation of the coach park the two dog waste bins located within the application site shall be reprovided within the area of retained grass open space adjacent to the site.

Reason : So safeguard the good amenity of the open space area in accordance with saved policy BNE2 of the Medway Local Plan 2003.

- 10 No more than 15 coaches shall be parked at the coach park hereby approved at any one time.

Reason : To ensure to good operation of the coach park and the free flow of traffic on Curtis Way and the surrounding road network in the area in accordance with policy BNE2 of the Medway Local Plan 2003.

- 11 At no time shall passengers be dropped off or picked up from the coach park hereby approved.

Reason : To protect the living conditions of adjacent residents in accordance with saved policy BNE2 of the Medway Local Plan 2003.

- 12 Coach access to and from the coach park hereby approved shall only be allowed between the hours of 06:00 hours and 22:30 hours every day of the week.

Reason : To protect the living conditions of adjacent residents in accordance with saved policy BNE2 of the Medway Local Plan 2003.

**For the reasons for this recommendation for approval please see Planning Appraisal Section and Conclusions at the end of this report.**

## **Proposal**

The proposal is for the creation of a coach park for the long-stay parking of 15 coaches. The works involve the subdivision of an existing area of informal open space, with about 55% of the area remaining as grassed, open space. The coach park would cover the other 45% of the existing informal open space area and will measure about 45.5m width, with frontage to Curtis Way, and 82m depth, back to the existing footpath that runs along the rear of the site against the fence with the BAE Systems site. The existing grass surface would be excavated and a strengthened bitumen surface constructed with drainage installed discharging to the mains drainage.

A new vehicle access would be created from Curtis Way onto the site on the western side of the northern boundary. A continuous earth bund, approximately 1m high, would be constructed around the perimeter of the site. On the top of the bund would be planted Hawthorn whips which in time would grow into a continuous hedgerow. The remainder of the bund would be grassed.

Across the access to the site would be installed a row of retractable bollards. Adjacent to the access would be an ancillary control cabinet and traffic light controls. Around the access of the site would be installed intermittent metal barriers to prevent unauthorised access to the site (e.g. by travellers) in addition to the bund and bollards. Access to the coach park would be via an intercom system, with the intercom linked to the Medway Commercial Group. Fob access could also be accommodated, for example for the organisers of the 'host families' schemes that run in Medway.

The proposal would be facilitated by off-site highway works including: relocation of the existing height-restriction barrier to the west of the site; the changing of the timing of the traffic signals; detector and traffic light delay system installed; changing road markings;

relocation of the Marconi Way traffic light; installation of a 'no-left turn sign' at the Marconi Way junction; and directional signage for Rochester either within the coach park or at the Marconi Way junction. (Subject to agreement with the local highway officers.)

The applicant has advised that the final ground level would be kept as close to the existing as possible, only being adjusted to allow for the discharge of the surface water to the central drain and gully's.

Under permitted development powers it is also intended that a surfaced path be constructed around the perimeter of the remaining open space and a bench installed on the southern side of the open space.

Operational details provided for the site include:

- Open every day of the week between the hours of 06:00 and 22:30 hours;
- Coaches can be locked into the coach park when closed;
- Coaches arriving at the coach park will be empty of passengers;
- No drop-off or pick-up will take place from the coach park;
- Coach drivers will be able to use facilities at the Innovation Centre or at Davis Estate.

## **Representations**

The application has been advertised on site and by individual neighbour notification to the owners and occupiers of neighbouring properties.

The following statutory bodies have been consulted: Lead Local Flood Authority, Southern Water, Medway Fire Services, and Rochester Airport.

**12** letters have been received raising the following objections:

- Loss of green space that is widely used by local residents and is the only green space in the area;
- The little landscaping and bund is no compensation for the loss of the green space;
- Fumes and pollution from the coaches will harm the living conditions of neighbouring properties and residents in the area;
- Noise and disturbance from coaches will harm the living conditions of neighbouring properties;
- The traffic on the roundabout at the top of City Way is already getting heavier with the redevelopment of the old college site. Additional coaches will make this worse;
- If not secured people will cause a nuisance in the car park, unsocial behaviour, noise from motorbikes and cars and travellers will go in;
- There will be the overlooking of properties and loss of privacy to neighbouring dwellings;
- Questioning the adequacy of coaches turning into Marconi Way from the City Way/ A229 roundabout;
- Will be harmful to the visual amenity of the area;

- Concerns about highway safety;
- No drivers' facilities are being provided but it is a good walk from the site to Davis Estate and there are no public toilets nearby;
- Curtis Way is narrow and unadopted and people walk in the road to the main road. Marconi Way is very busy and the junction at the end of Marconi Way (onto City way?) is a very sharp turn and not suitable for coaches;
- the noise of the early and late operation of the coach park in combination with the existing fire station will be too much for neighbours;
- Curtis Way is one lane only so coaches stopping to let others pass will produce both noise and pollution for neighbours;
- The loss of the height restriction barrier will allow travellers to get access to the remaining open space;
- Drop off and pick up of for 'host families' will need to take place which involves a lot of cars;
- It is not practical for drop off and pick up of host families to drop off elsewhere and then move the coaches to the new coach park as the drivers will need to legally stop for a number of hours;
- The site is too remote and contribution to traffic congestion;
- The site is too remote and coaches parked (some for several nights) could be prone to vandalism;
- The coach park is too small for festival times;
- The proposal will destroy the 'host families' business with the loss of business revenue to Medway;
- Drivers should not be redirected to a pub to use facilities;
- The proposed coach park is not sufficiently secure with a bund and bollards;
- The coach park will not be readily acceptable to drivers;
- Coaches will have to be kept running for heating or air conditioning;
- No rubbish facilities are provided nor arrangements for clearing rubbish;
- Coaches having to queue to exit Marconi Way with their engines running will result in more pollution for neighbours;
- The proposed path on the remaining open space will be used as a racetrack for illegal motor bikes;
- The proposal will have a very significant visual impact from adjacent residential properties;
- Coaches waiting to access the coach park will block the hockey club's only access;
- Coaches waiting to exit Marconi Way will block the access for fire engines;
- Activities in the fire station yard are limited so no training can take place after 21.30 hours to protect neighbours' from noise;
- The reduction in the size of the playing field and close proximity of the coach park will impact the enjoyment of the open space;

**Cllrs Clarke, Griffin and Turpin (Ward Councillors)** have jointly made the following comments:

- the open space is lost without investment in the remaining green area or play park;
- inadequate security against traveller occupation and anti-social behaviour;

- lack of drivers facilities and fear poor driver behaviour on site related to this lack of facilities;
- coaches queuing to exit Marconi Way will be polluting for adjacent houses;
- increase traffic congestion exiting Marconi way causing issues for Kent Fire and Rescue and traffic queuing on Marconi Way often blocks exit from Curtis Way;
- there are no pavements or lighting and pedestrians walk in the roadway of Curtis Way;
- coaches blocking A229 as they exit Marconi Way waiting to go round the gyratory;
- the early opening and late closing are inappropriate in a residential area; an overspill of coaches would block surrounding roads;
- the site will be unattractive for coaches to use and affect the local tourist economy.

**Stefan Wolf** (A representative from a German school) comments that their school's language trip programme brings 60 children at a time to Rochester for a fortnight at a time. He explains how popular it is go to Rochester and adjoining towns. He raises concerns about damage to their coaches parking in the proposed coach park – particularly from youngsters. He is minded that the new site is not suitable for drop off and pick up due to the number of cars for drop off and collection and the site would be inconvenient and may be inaccessible for some. It may be that the coaches will have to do a roadside pickup in neighbourhood areas, which would be disturbing to neighbours and not ideal. The children need facilities when waiting for drop off and pick up. The coach drivers need facilities for things such as toilet cleaning, support and help. Without such facilities coach hire companies may be unwilling to go to Rochester – and in that way their language trips will become impossible if they cannot secure coaches.

**BAE Systems** comment that whilst they do not object to the proposal they have a concern regarding traffic movements at the Marconi Way/City Way/A229 junction and the traffic systems in and around this location. They advise that they have a number of HGV's and 40 foot trailers and containerised vehicles transiting on a regular basis during the working week and the potential for congestion that may be caused by the proposal and road safety. They advise that the articulated vehicles can just negotiated the junction entering Marconi Way from the A229. However, chartered coaches find it difficult to negotiate the junction and during busy periods can 'become stuck' across the junction existing Marconi Way onto the A229/A230.

**Holcombe Sports Club** comment that the Hockey Club and Holcombe Health clinic are used by over 1000 people each week. Curtis Way is not wide enough for two cars to pass at all on some of its length and only just squeezing past on the widest part of Curtis Way. The proposed coaches to the coach park would mean that congestion may occur at times on Curtis Way and upon departure, the coach would pull onto Curtis Way prior to being able to see whether it is clear and safe. At that point, with the proposed retractable bollards, it may be too late to reverse and allow cars to clear Curtis Way. Curtis Way is also used by pedestrians as there is no footpath and the safety of pedestrians will be at

risk with large vehicles using Curtis Way. The coach park will increase congestion at the Marconi Way/A229 junction, which is already busy and traffic lights only lets a very limited number of cars out of Marconi Way at any one time. On bigger school tournament days it can currently take more than 60 minutes to get from the car park to the Marconi Way/A229 junction. Drivers leaving Holcombe Park have a limited view down Holcombe Way due to tree positions. The proposed bund will not adequately secure the coach park. There are no facilities for the drivers and drivers will not be allowed to use the Clubhouse.

**Medway Fire and Rescue Service** advise that the means of access for the Fire and Rescue Service is satisfactory.

The **Lead Local Flood Authority** have made the following comments : should sustainable urban drainage systems [SUDS] need to be used for surface water drainage, then a management procedure and details of the maintenance contractor to carry out the maintenance should be agreed.

## **Development Plan**

The Development Plan for the area comprises the Medway Local Plan 2003 (the Local Plan). The policies referred to within this document and used in the processing of this application have been assessed against the National Planning Policy Framework 2018 and are considered to conform.

## **Planning Appraisal**

### *Background*

This application is submitted following the loss of the long-stay coach park at Anchor Wharf in Rochester, which falls within the Rochester Riverside development area. The Anchor Wharf Coach Park provided 32 long stay coach parking spaces and within the Section 106 agreement for the Rochester Riverside development an amount of money was secured for the provision of alternative long-stay coach parking facilities.

The coach data summary provided in the Transport Statement says that the 2016 and 2017 data figures shows that, outside of festival days, only 3 days in 2016 and 1 day in 2017 saw over 20 coaches using the existing Rochester Coach park in a day. The supplied graphs in the Transport Statement for total coach parking numbers per day at the former Rochester coach park shows parking demand to have been mostly under ten coaches per day through the year, and then more often than not under fifteen coaches per day. (This is the total number of coaches per day and does not include the tracked times that the coaches arrived and left, which may reduce the number of coaches in the coach park at any one time further still.)

On the site adjacent to the application site, prior to the construction of the fire-station operated a park-and-ride service until about 2012. The park-and-ride ran a regular bus service exiting Marconi Way, across the A229 and down the Chatham Maidstone Road,



then looping round from Chatham to Rochester and back up City Way to the park-and-ride site again.

### *Principle*

The coach parking data provided for the former Rochester coach park shows that there is a critical need for the provision of a new dedicated coach park in the Medway area to support the tourism and entertainment industries and local business interests.

The new site needs to be well located to the main road network through Medway so as to be both easily accessible for coaches arriving in Medway but only a short and easy distance from the main tourism and entertainment centres in Medway – particularly Rochester and Chatham. The applicants have considered over 40 separate sites and the proposed site is the one which meets to the greatest degree the selected criteria of being available, having easy access, not being a regeneration site and not causing unacceptable harm to interests of acknowledged importance.

The application site is located between an existing employment area and the southern edge of the main residential area on the western side of City Way, within the Medway Council boundary. The site currently forms part of a larger area of land designated as 'protected open space' within the Local Plan.

As the application site is located on protected open space and as such the principle of development would normally be against the loss of such open space unless other material planning considerations outweigh the need to protect all the open space.

### *Loss Open Space*

Saved policy L3 of the Local Plan relates to the protection of open space and states that the loss of existing open space will not be permitted unless a re-provision of the open space is provided within the same catchment area of an acceptable amenity value. The policy would also allow for the loss of a small part of the open space to provide required sports and recreational facilities. Paragraph 92 of the NPPF says that planning policies and decisions should provide social, recreational and cultural facilities the community needs including community facilities such as *'local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship'* and to *'guard against the unnecessary loss of valued facilities and services'* and *'ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community'*.

In this case the proposal would result in the loss of about 45% of the existing 'informal use' grassed open space, which is part of a larger open space allocation that includes formal sports pitches used by the Holcombe Hockey Club. This loss would not be re-provided within the same catchment area. The loss of the open space clearly does not accord with the provisions of policy L3 but the benefits of the proposal must also be taken into account in the consideration of the whole proposal.

The remaining grass open space area will be improved by the provision of a surfaced footpath around its perimeter and a bench, which makes the use of the site more accessible for example in inclement weather, if pushing a buggy or using a mobility aid. It is acknowledged that this is a limited enhancement against the significant loss. The existing two dog waste bins can be relocated from their current location in the proposed coach park area to the area of remaining open space.

The key phrase within the wording of the NPPF is that of '*guard against unnecessary loss*'. There are also the references to '*the community needs*', which relates to the local community that uses the open space and not the 'Medway community' whose businesses and other interests or 'needs' would be supported by the provision of the coach park.

These wider 'Medway' needs are however very real and, given that the Rochester Riverside coach park has now been closed there is a very real need for a new, permanent coach park to serve the tourism, educational, arts, business and exchange program interests within Medway.

It could be considered that the loss of the open space is a 'necessary loss' although accepted that the proposal is contrary to policy L3 of the Medway Local Plan 2003 and the relevant sections of paragraph 92 of the NPPF.

#### *Economic and Tourism matters*

The National Planning Policy Framework explains that one of the three overarching objectives of sustainable development is build a strong, responsive and competitive economy (paragraph 8). Paragraph 80 says that in planning decisions '*significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development*'. Paragraph 82 advises that planning decisions should recognise and address the specific locational requirements for different sectors.

In this case the proposed coach park is required to support the local business needs, the evening leisure economy and tourism in Medway. The provision of a long-stay coach park is critically needed within the Medway area, following the recent closure of the Acorn Wharf coach park, to support the existing business and tourism uses in Medway, including the various festivals that take place during the year. This factor should carry significant weight in any planning consideration.

As the coach park is to be for long-stay parking of empty coaches following drop-off/awaiting pick-up its location away from the town centre area is acceptable.

The proposal is consider to comply with the relevant parts of paragraphs 8, 80 and 82 of the National Planning Policy Framework.

## *Design*

The Government attaches great importance to the design of the built environment. Good design is considered a key aspect of sustainable development and is indivisible from good planning. Paragraph 127 is key to the achieving well designed places which includes the functioning of a place as well as its appearance. In accordance with the NPPF, Local Plan Policy BNE1 'General Principles for Built Development' requires the design of development to be appropriate in relation to the character, appearance and functioning of the built and natural environment. Policy BNE6 of the Local Plan requires landscaping schemes to enhance the character of the locality.

The location of the coach park is within an area of non-residential uses between an existing employment area and a residential area.

Curtis Way spurs off Marconi Way, which leads to the existing employment area occupied by BAE systems, behind which is the Rochester Airport Industrial Estate. To the east of the application site on Curtis Way is a fire station and to the west on Curtis Way, on the far side of the informal open space area, are sports pitches and facilities for the Holcombe Hockey Club and the Holcombe Health Clinic. The sports pitches are shown in the local plan to be part of the protected open space designation.

By its nature the coach park would be an open hardsurfaced (tarmac) area. The proposal includes the enclosure of the hardsurfaced area by a 1m high grassed bund, on the top of which will be planted a row of Hawthorn whips, which will over time grow into a Hawthorn hedgerow. The perimeter bund and hedgerow will soften the appearance of the coach park from the public highway and the public footpath that runs along the southern boundary of the site. On the northern boundary of the coach park will be created a new access point with a row of intermittent barriers around its edges, to prevent unauthorised large vehicle access, and ancillary plant such as rising bollard control cabinet, traffic lights, and entrance telecom.

In terms of the layout of the space this is dictated by the operational needs of the use and the number of coach parking spaces being provided. Whilst it is accepted that the planting of a continuous hedge, on top of a perimeter bund, is not a feature of the existing landscape of this area, nor a usual landscape feature for a parking area, its provision is for amenity reasons. Over time the proposed hedge would filter views of the parked coaches from outside of the site and is acceptable.

The remaining informal open space is owned by the Council and under permitted development powers there is to be provided a surfaced path around the perimeter of the open space and a bench on the southern side of the open space. An appropriate condition is proposed to secure its provision.

Subject to conditions to ensure the timely provision of the soft landscaped elements, and their ongoing management and maintenance, no objection is raised to the design and

appearance of the coach park under saved policy BNE1 of the Medway Local Plan 2003 or the relevant parts of paragraph 127 of the NPPF 2018.

### *Amenity*

Paragraph 127 of the National Planning Policy Framework requires that development functions well over its lifetime and provides a high standard of amenity for existing users (neighbours), which is reflected in the requirements of policy BNE2 to protect the amenities of neighbours in terms of privacy, daylight, sunlight, noise, vibration, heat, smell, and airborne emissions.

In respect to neighbours' amenities the fire station, health clinic, hockey club and employment uses are not sensitive to the proposed use of the application site.

The creation of a coach park in Curtis Way will introduce new coach movements into the area, and onto a site that is currently used as green open space. There are however currently traffic movements along Curtis Way related to the fire station, Holcombe Hockey Club and Holcombe Health Clinic. Holcombe Hockey Club attest to there being over 1000 people each week using the hockey club and health clinic and at tournament times very high volumes of traffic on Curtis Way.

The adjacent fire station has heavy vehicle movements intermittently throughout the 24 hour period and prior to the fire station being in situ the adjacent site was used as a park-and-ride facility, with regular buses and movements to and from the site during daytime hours.

As such, although the site is an open green area and is adjacent to the edge of a residential area, Curtis Way is not a road without an existing regular amount of traffic movements. Holcombe Hockey club also will create a certain level of outdoor noise in the vicinity at times when training, matches and tournaments are taking place.

It is also taken into account that only empty coaches will be allowed to park at the coach park and there will be no drop off or pick up occurring at the site and no loading or unloading of luggage. Therefore there will be no associated traffic related to collection and drop off or coaches' engines left running while bags are loaded and unloaded. Modern coaches do not need to leave their engines running for heating or air conditioning as they have air recirculation systems.

In terms of the hours of operation of the coach park the coach park would be accessible to coaches every day of the week between 06:00 hours and 22:30 hours. (Some coaches may be 'locked in' overnight.) For daily visits to Medway it is unlikely that there will be any arrivals as early as 6am and the earliest exchange coach movement, of the regular operators, is advised as being for pick-up (off site) at 7.45am. As such there are unlikely to be any coach movements to or from the site before 7am.

The evening coaches using the site are expected to be for the Chatham theatres. The evening time noise related operation of the coach park would not be a constant noise but

just when coaches are parking or moving. For the most part the coaches will be static with engines off. Neighbours refer to a planning condition for the fire station that no training is allowed within the outside yard after 9.30pm – but the type of noise from that form of activity would be of a more continuous/ongoing nature than for coaches that park and switch off.

Overall, given the relatively low number of coach movements expected for this long-stay coach park, spread throughout the operational hours, the proposal cannot be considered to cause such a level of noise, disturbance or fumes so as to harm the living condition of neighbours in the vicinity and warrant the refusal of the planning application.

In terms of a loss of privacy for the closest houses to the coach park, in Haredale Close, it is relevant that only empty coaches will be using the site, so only the driver on board, if they have not opted to visit the local amenities in the area. The rear wall of the closest houses are approx. 28m from the closest edge of a coach parking bay.

On the highway verge of Curtis Way adjacent to the rear fences of the residential properties, is a significant amount of mature planting which is bare in the winter, when the use of the coach park would generally be low, but will create some additional visual filtering between the closest parked coach in the proposed coach park and residential properties through much of the year.

Overall, subject to the use of planning conditions, the proposal is considered to be acceptable in terms of the level of new impacts that would result in this area and would not be harmful to the living conditions of neighbours. The proposal would comply with the saved policy BNE2 of the local plan and the relevant parts of paragraph 127 of the NPPF 2018.

### *Highways*

Saved policy T2 of the Local Plan requires that, where new accesses are being formed to the highway, that the access is not detrimental to the safety of vehicle occupants, cyclists and pedestrians; or the access can be improved to a standard acceptable to the Council as Highway Authority. Paragraph 109 of the NPPF states that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe.

The planning history for the area details that the adjacent fire station site operated for a number of years as a park-and-ride facility, which has been taken into account in the consideration of the current proposal. The park-and-ride facility ran a regular bus service exiting Marconi Way across the A229 to Chatham Maidstone Road and then looping round from Chatham to Rochester and back up City Way to the site again. It is noted that the buses used for the park-and-ride service were shorter than coaches, with the buses used having been about 11m in length whilst coaches range from about 12m to 14.5m or possibly 15m.

Also key to the assessment of the proposal is the understanding that the proposed coach park is for long-stay parking and as such is not anticipated to have a high or regular turn-over of coaches coming and going from the coach park, as there would have been for the park-and-ride service, but the hours of the movements will be longer overall. A number of coaches that would use the site are for the various 'Host Family' schemes run in Medway and would likely be locked into the coach park overnight for a number of nights at a time. There is also the likelihood that daytime coaches would park to service Rochester visits and evening coaches would park to service the Chatham theatres trips.

Whilst there is no requirement for coaches to book to use the proposed coach park, a number would book ahead – such as host family coaches and coach companies that are minded/organised to pre-book, but not all would. The pre-booking system is also not possible outside of office hours. However on the whole it is expected that with drop-offs taking place in Rochester or Chatham, with drop-offs having to be pre-booked, there would be an understanding of the availability of space in the coach park at any time. For the 'host family' coaches it is to be encouraged that the drop off and collection take place at the Gillingham M2 service station, where there are facilities for the host families and their charges and their cars can park, if not at the Rochester drop-off bays.. Drop off and pick up would not be allowed at the Curtis Way coach park.

The access to the proposed coach park would be via Marconi Way, therefore any coaches travelling from Rochester to the site would need to follow the Horsted Gyratory and make a left turn into Marconi Way. Whilst this is acknowledged to be a tight turn for coaches, as attested to by the BAE Systems representation, the relocation of the existing stop-line further back into Marconi Way will provide a betterment for coaches entering Marconi Way over the current situation. A swept path analysis drawing has been provided within the submitted Transport Statement tracking a 14.5m long coach successfully around this corner. This change is considered to be acceptable and its timely installation be controlled by planning condition.

Tracking drawings have also been provided for coaches into and around the coach park and at all the affected junctions which show that coaches can successfully manoeuvre through the route. Curtis Way itself is narrow and reviewing the vehicle tracking drawings supplied for Curtis Way it would appear that no other vehicle would be able to pass a coach travelling along Curtis Way to or from the car park entrance to the junction with Marconi Way. There is however a widened road section on Curtis Way, close to the junction with Marconi Way, and this widened road section can be utilised by waiting traffic stopping opposite it while a coach travels along Curtis Way from the coach park, or for a coach to wait opposite to allow a vehicle along Curtis Way. This is an acceptable situation.

Furthermore the proposed works to strengthen the road surface in Curtis Way and the installation of double yellow lines along the length of Curtis Way would ensure a free flow of traffic along Curtis Way and the timely provision of these matters can be controlled by planning condition.

When Coaches are exiting the site and wish to travel to Chatham, they would need to cross straight over the A229 junction, join the Horsted Gyratory and turn left down Chatham Maidstone Road. For coaches travelling to Rochester they also would need to cross straight over the A229 junction and join the Horsted Gyratory, turning right and then right again and then going back on the A229, passed the junction they have just exited, and follow City Way to Rochester. Due to the tight left turn from Marconi Way onto City Way it is proposed that a sign be erected that advises 'No left turn for coaches' and also a directional sign be erected at this junction that would show the route around the Horsted Gyratory and down City Way back to Rochester. Both the 'no left turn' sign and 'directions to Rochester' sign can be the subject of a planning condition. (These signs are advisory but could not be the subject of action if not adhered to on occasion.)

For all coaches exiting Marconi Way they would need to cross over the A229 and potentially stop at the give-way line, after which the traffic splits into a left turn lane and a right turn lane, which again has a give way line, and then onto the Horsted Gyratory. A coach stopped at the first give-way line would significantly overhang into the hatched 'no-stopping' yellow box of the junction it has just crossed. It is proposed that a detector be installed on one of the adjacent traffic poles that will detect when there is a coach overhanging into the yellow box on the A229 and would extend the red signal time for southbound traffic (coming up City Way) for an additional 8 seconds, allowing the coach additional time to clear the junction. In addition, due to the relocated stop-line in Marconi Way the inter-green time is also to be extended by 2 seconds. The extended red signal operation was the management system used for buses when the park-and-ride service operated from the fire station site. This management system can be controlled by planning condition.

Overall it is considered that the mitigation package: the changing of the timing of the traffic signals; detector and traffic light delay function; changing road markings; relocation of the Marconi Way traffic light; installation of a 'no-left turn sign' at the Marconi Way junction; and directional signage for Rochester, would minimise potential impacts to the running of the highway network. In terms of highway safety, it is noted that whilst there is the potential for Coaches to block vehicle movements for those travelling through the junction along City Way, given that the coach park is for 15 coaches and likely trip generation, which will be through the operational hours, it is not considered that coaches overhanging into the yellow box would result in a significant and severe impact to highway safety and would not warrant refusal of the application.

As such, subject to the relevant planning conditions, no objection is raised to the proposal under saved policy T2 of the local plan or paragraph 109 of the NPPF 2018.

### *Ecology*

Policy BNE38 of the Local Plan is concerned with the provision of wildlife habitats in new developments that link into wider wildlife networks. Consistent with statutory duties Policy BNE39 of the Local Plan states that "Development will not be permitted if statutorily protected species and/or their habitats will be harmed". NPPF Paragraph 175 states that

'the planning system should contribute to and enhance the natural and local environment by...minimising impacts on biodiversity and delivering net gains in biodiversity where possible.'

The current proposal includes the removal of a number of semi-mature trees on the site, which should take place outside of bird nesting season. The trees to be removed are not apparently suitable for bat roosting or feeding due to their immaturity and lack of ivy cover or suitable trunk size and texture. The proposal will also remove a significant area of mown grass, which would not be habitat for protected species such as lizards or slow worms due to its management regime and open, flat nature.

The proposals include the planting of a row of Hawthorn whips that over time will grow into a native hedgerow. This will both mitigate against the loss of the small trees on the site and enhance the biodiversity opportunities over time.

No objection is raised on ecology grounds under saved policies BNE38 or 39 of the local plan or paragraph 175 of the NPPF.

#### *Drainage/contamination*

Saved policy BNE23 relates to risks from development to human health and the environment by contamination as do paragraphs 178 and 180 of the National Planning Policy Framework 2018. Paragraphs 155 to 160, 163 and 165 of the NPPF relate to flood risk and that new development should be both directed away from the areas at highest risk of flooding and should not increase flood risk elsewhere.

In this case the application site is not in or near a flood risk zone, as identified by the Environment Agency flood maps. It is noted that the Environment Agency surface water flood map shows that Curtis Way may suffer surface water flooding at times.

The current proposal includes the installation of a surface water drainage system involving a central Arco drain and gulleys, which will discharge to the mains sewerage system.

#### *Local Finance Considerations*

No finance considerations.

### **Conclusions and Reasons for Approval**

The proposed development for a long-stay coach park is a much needed facility to serve the Medway area and its tourism, educational, business and leisure sectors, following the closure of the Anchor Wharf coach park. This need is given significant weight in consideration of the proposal and on balance the proposal is accepted, notwithstanding the loss of part of an area of protected open space and that the proposal is contrary to saved policy L3 (protected open space) of the Medway Local Plan 2003.



The location of the site, close to the edge of the Medway boundary and between the edge of the core residential area and an existing employment area, is considered to be a suitable location. As the use of the site is for long-stay parking for a maximum of 15 coaches there would be a relatively low frequency of vehicle movements associated with the site through its operational hours.

The functional appearance of the proposed development would be softened, in views from outside of the site, by the inclusion of a grassed bund and Hawthorn hedgerow, which would also enhance the biodiversity interests of the site.

The proposed development would not have a detrimental impact on neighbouring amenity in terms of daylight, sunlight, outlook or privacy. Noise and disturbance from the coach park activity would be of a relatively minor level and not harmful to neighbours' living conditions due to the long-stay nature of the coach parking, the low level of vehicle movements anticipated through the operational hours and the restricted hours for access to and from the coach park.

The proposed development would not have a detrimental impact on contamination, flood risk and surface water management, air quality, ecology or highways safety.

Notwithstanding that the proposal is contrary to saved policy L3 of the Medway Local Plan 2003 and paragraph 92 of the NPPF 2018, the proposal is considered to be in accordance with saved policies BNE1, BNE2, T2, BNE38, BNE39, BNE23 of the Medway Local Plan 2003 and paragraphs 8, 80, 82, 109, 127, 155-160, 163, 165, 175, 178, 180 of the National Planning Policy Framework 2018.

On balance, the proposal is considered to be acceptable and is recommended for approval.

The application is being referred for Committee determination as it is a significant Medway Council application and in part is contrary to planning policy. There has also been numerous representations received expressing a view contrary to the recommendation.

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## **Background Papers**

The relevant background papers relating to the individual applications comprise: the applications and all supporting documentation submitted therewith; and items identified in any Relevant History and Representations section within the report.

Any information referred to is available for inspection in the Planning Offices of Medway Council at Gun Wharf, Dock Road, Chatham ME4 4TR and here <http://publicaccess1.medway.gov.uk/online-applications/>