

# MEDWAY LOCAL DEVELOPMENT FRAMEWORK

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

Submitted to Medway Council's Cabinet 19 October 2010

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
<b>Overall</b>					
			I.H. Smith	Improve schooling, roads, high streets, hospitals before housing.	Development will need to be accompanied by the provision of appropriate infrastructure.
				Restrictions on new house building. The infrastructure in Medway cannot cope with more population. Hospital waiting time, schools, road capacity are all overcrowded.	Housing provision is a requirement of the PPS3 Development will need to be accompanied by the provision of appropriate infrastructure.
		University College for the Creative Arts at Rochester	David Hawkins	Comment to preface: It is disappointing that there is no reference to students who may want to comment - in addition to residents, workers and visitors - particularly given the large number of universities in Medway and the importance of them to the economic/cultural/social life of the local communities.	Provision is made in the housing and education policies to meet the needs of students.
<b>Preface</b>					
	Question 1			<p><b>Q1: Have we identified the right issues?</b></p> <p>Answers for question 1 (from questionnaire &amp; website):</p> <ul style="list-style-type: none"> <li>• 10 Yes/ Agree</li> <li>• 3 No/ Disagree</li> <li>• 5 Don't Know</li> </ul>	
	Question 1	CPRE Kent	Brian Lloyd	<p>We are disappointed that the document fails to recognise the issues that face the rural communities in Medway and that it is almost entirely urban focused. We accept that the vast majority of Medway's population lives in the urban areas, but much of the area is rural. The residents of Medway value the countryside around it, and the rural communities have their own needs. We would refer to the initial comments we presented in our letter of 9th April 2009.</p> <p>In particular CPRE is concerned to ensure that the Core Strategy:</p> <ul style="list-style-type: none"> <li>• maintains and protects the currently defined extent of the Metropolitan Green Belt and defines its role in the Medway context;</li> <li>• recognises and protects the AONB, and explains the importance of the AONB in the Medway context and present how AONB policy will be applied locally;</li> <li>• recognises and protects the areas natural and historical assets;</li> <li>• provides protection for the countryside generally (along the lines of Policy BNE25 of the Local Plan);</li> <li>• seeks to prevent settlement coalescence (as highlighted in Policy KTG1 of the South East Plan);</li> <li>• defines robust and defensible settlement boundaries linked to the definition of a settlement hierarchy;</li> <li>• seeks to ensure viable and vibrant rural communities by recognising the continuing role of agriculture, the need to support appropriate rural employment, the need to maintain and improve rural services and facilities, and the need to meet rural housing needs.</li> </ul> <p>The provision of affordable housing is one issue not discussed in the document. This, we consider, is an important topic that must be addressed by policy in the Core Strategy. Although the South East Plan sets an indicative target of 30% for the Kent Thames Gateway sub-region, the Council's 2006 Housing Needs Study concludes that provision needs to be at a rate of 40%. We agree that the need for affordable housing would seem to justify this higher figure. In addition we consider that the Council needs to consider the site size threshold to which this would apply, and we would suggest that consideration be given to a threshold that is lower than the 15 dwellings indicated in PPS3. We consider that this should be 10 dwellings in the urban areas and 5 dwellings in the rural areas, subject to viability testing.</p> <p>In the rural areas we accept that the 'exception policy' has a role to play in providing affordable housing, though historically only modest amounts of affordable housing have been provided under this policy. Such a policy should be included in the Core Strategy provided it is clear that it is intended to meet the needs of local residents, and that clear locational criteria are presented to ensure that proposals relate to the scale and siting of an existing village and the services and facilities present (including public transport).</p>	<p>The issues of the rural areas are specifically addressed in the chapters on the Hoo Peninsula and the Medway Valley and Downs and more generally in the natural assets, landscape and countryside and open space policies.</p> <p>The concerns of the CPRE are addressed in the Core Strategy in policies on the economy, tourism, the natural environment, landscape, open space, the Hoo Peninsula and the Medway Valley and Kent Downs.</p> <p>In accordance with advice contained in the Medway Strategic Housing Market Assessment, a 25% provision of affordable housing will be sought in the urban area and at Hoo St. Werburgh and 30% will be sought elsewhere. This requirement will apply to developments accommodating 15 or more dwellings or on sites of 0.5ha or more.</p>

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	Question 1		Alastair Blair	The Strategy shows the right headings which need to be advanced for the development to 2026. The rolling out of the strategy and the workshops has not maximised the exposure of the potential horrors that might occur to the Medway area between now and 2026. Where is the newspaper adverts for the workshops, where is the tv exposure, where is the council actively engaging with the residents and business. The workshops are a poorly attended and are not advertised enough. There is too much reliance on the website. Those without web access are being deprived.	Substantial efforts were made to reach all parts of the community using a variety of techniques in accordance with the Statement of Community Involvement
	Question 1	Viridor Waste Ltd	Mandeep Jutley	Having reviewed the current Local Development Scheme (September 2008), we note that a separate DPD document will not be prepared for Climate Change and Natural Resources. As such we agree with these topics to be addressed in the Core Strategy along with Waste and Energy.	The Core Strategy will address waste, minerals, energy, water and climate change.
	Question 1	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	The Cliffe and Cliffe Woods Parish Council would like to see two further issues added to the LDF. 1) Rural Issues - Although the countryside is covered, there are specific issues relating to the rural areas of the Medway Towns. These areas are affected very differently than the urban area and have many different concerns and aspirations. 2) Heritage - The Medway Towns has a rich heritage and we feel the LDF should make special mention of the vast array of heritage assets and how they will be identified and managed. There is still a strong public feeling that further residential development should be resisted.	Both rural issues and heritage are addressed in the core strategy.
	Question 1	Kent Wildlife Trust	Debbie Salmon	The Trust is pleased to see a commitment to a Green Grid, the preservation of the green projections within the urban area and the suggestion that Local Wildlife Sites should be buffered. However the documents produced so far give little detail on the following points. <ul style="list-style-type: none"> <li>• How is Medway Unitary Authority intending to protect SPAs, SACs and Ramsar sites from the impacts of the proposed developments? Is an Appropriate Assessment being prepared?</li> <li>• How the green projections present within the urban environment are to be connected both to each other and out into the countryside.</li> <li>• How the Green Infrastructure is to be extended to cover the whole of Medway Unitary Authority. At Present there are only allusions to urban green infrastructure</li> <li>• How the Green Infrastructure will be delivered</li> </ul> The Trust would recommend that full details are incorporated within the submission document with a comprehensive map and detailed delivery mechanisms. From our work with other Local Authorities delivery appears to be an important issue in examination.	The Core Strategy has not attempted to buffer designated wildlife sites but the council considers that policies on natural assets, landscape and open space will provide adequate protection. An appropriate assessment will be prepared. The Council will work with other stakeholders to implement its countryside policies.
	Question 1	Dickens Country Protection Society	Chris Fribbins	Generally yes, but would also like to see Heritage and Rural Issues considered as separate topics/chapters	The rural issues are addressed in sections on the Hoo Peninsula and Medway Valley and Downs and Heritage Assets are also specifically addressed.
	Question 1	South East Marine Association	Laraine Soliman	No. Medway has long standing problems which have deteriorated as a result of the Council's hostility to small and medium businesses which have been prevented from providing employment and prosperity. Those business are in turn subject to such levels of restraint and damage by local policies that many have failed or been forced out. There is no Medway cathedral, Medway castle, Medway railway station, Medway dockyard, Medway university or Medway football club but it does have a river which is treated as an impediment to the council's pipe dream aspirations rather than an artery for transport, trade and recreation. The dereliction at Rats Bay and Sun Pier is a shameful blot on the landscape. The Strategy must contain a deliverable policy to halt and reverse the siltation which is accelerating following termination of the use of Rochester Riverside and other regeneration sites by commercial craft. As shipping movements reduce so siltation increases. Along with neglect of public piers (and hence public access to the river) prompt action is necessary otherwise there will be public resentment that the river has become an eyesore. The siltation has an impact on the risk of flooding which has so far been ignored.	The opportunities presented by the River Medway are recognised in the River Medway Policy. Flooding is a potential threat along much of the river and has not been ignored. Developments at Strood Waterfront and Rochester Riverside have been accompanied by the construction of new flood defences and the flooding policy will ensure that the issue is addressed in the consideration of all new riverside developments.
	Question 1	BAE Systems	BAE Systems	Representations made by CB Richard Ellis on behalf of BAE Systems. Answer of Q1-3: BAE Systems does not consider the Council's approach to expansion at Hoo St Werburgh to be robust (Option 2 in Spatial Choices). Rather than consider Hoo St Werburgh and surrounding villages as one homogenous land area, the Council should consider appropriate individual land parcels within this option area on their own merit which have potential to meet the housing shortfall. The BAE Sports and Social Club land which covers land to the east and west of Bells Lane at Hoo St Werburgh partially comprises previously developed land and would, if redeveloped, complement recently approved housing schemes immediately to the south of the site, creating a natural form of development along Bells Lane. This would accord with national and regional planning policy which seeks to focus development on brownfield sites. It is important that the Council is sufficiently detailed in its approach if it is to meet its housing target, particularly since housing sites are expected to have been adversely affected by the current economic downturn. PPS3 (2006) highlights the need for local planning authorities to maintain a flexible, responsive supply of land for housing development. PPS3 paragraph 62 states that Local Development Documents (LDDs) should set out a housing implementation strategy. This should include, amongst other things, scenario and contingency planning to identify different delivery options in the event that actual housing delivery does not occur at the rate expected. We disagree with paragraph 5.16 which states that the proposed new settlement at Lodge Hill should be substituted with another option or the quantity of development in the Core Strategy should be radically above that required by the South East Plan. The Council's reasons for the above is: 'due to the quantity of development that is already committed within the main urban area'. However, the Council itself acknowledges that, "some sites have significant constraints which makes them both complex and expensive to bring forward and [that] this has been exacerbated by recent poor economic conditions" (paragraph 4.23). We are not clear why it is certain that Lodge Hill will be delivered, particularly in the current climate, when such sites are reliant upon major infrastructure delivery. This would suggest that additional modest sites, including development at Hoo St Werburgh, should be given greater consideration by the Council if it is to meet its overall housing target. At present we consider that the Council has placed an	The BAE Sports and Social Club has been considered in the Strategic Land Availability Assessment (SLAA) and rejected. Sufficient sites have been identified to meet housing requirements if some sites do not come forward as quickly as assumed. The SLAA has identified a wide range of housing sites of varying sizes to meet requirements. The rate of housing development at 815 per year, far exceeds the average provision of the last 10 years (681per year). This is a challenging target and the Council has not therefore considered a higher figure.

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

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

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

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

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				important tool for understanding the time-depth and historic character of Kent's countryside. Policy C3 of the South East Plan states that in terms of the countryside, policy should "protect and conserve its distinctive qualities" and Policy QL9 of the KMSP plan required the protection of historic landscape features.	
2.7		Viridor Waste Ltd	Mandeep Jutley	Having reviewed the State of Medway Report on Waste (January 2009), we make the following comments: 1) We support recognition that the site between Royal Eagle Close and Clipper Close has significant existing and potential capacity, which is allied to the range of possible treatment/processing options, which could enable it to meet the landfill diversion target for Medway (para 4.18). 2) We support recognition that the site between Royal Eagle Close and Clipper Close could manage both municipal waste and Commercial and Industrial waste (para 4.37). 3) We support recognition that the site between Royal Eagle Close and Clipper Close could potentially be used to recover waste from Construction and Demolition streams (para 4.41). 4) We support recognition that there may be capacity to reuse and recycle hazardous waste at the land between Royal Eagle Close and Clipper Close (para 4.69).	The site between Royal Eagle Close and Clipper Close has significant capacity (0.67 mtpa) across a wide range of waste streams. This capacity will be very significant to deliver increased levels of reuse and recycling and potentially recovery (gasification/pyrolysis). Though composting capacity does not appear to be a methodology that the site is deploying it could potentially be used without the need for a new planning. Total negation of final disposal to land does not appear to be a realistic scenario despite the site's high capacity and breadth of waste management potential.
2.8		tbh developments ltd & helvig ltd	tbh developments/helvig	The work undertaken on the Economic Development Strategy & Employment Land Study to date is not based on any evidence base relating to employment land availability. This evidence base is fundamental to the determination of a Core Strategy and policies for employment land provision (compare for example the evidence base for housing land availability). Any work that the Council does in moving forward this part of the Core Strategy risks being seriously flawed unless and until the employment land evidence base is available.	The core strategy draws upon the Medway Employment Land Survey, 2006, and the Medway Strategic Land Availability Assessment 2010. A further study has been commissioned which will be taken into consideration.
2.8		Kent County Council	Richard Feasey	The following should also be added to this list: - Historic Towns Survey reports for Chatham, Rochester and Gillingham. These were formerly adopted as part of the Kent and Medway Structure Plan (2006) as SPG3 guidance on Archaeology and Historic Towns and are still highly relevant guidance for development affecting the historic environment in these towns. - The Historic Landscape Characterisation Survey (2001) which provides an important tool for understanding the time-depth and historic character of Kent's countryside.	Where these documents have been used to inform the Core Strategy, they will be included in the evidence base.
2.8		University College for the Creative Arts at Rochester	David Hawkins	The University assumes that the Council will make early contact with the University, as part of the Council's Infrastructure Planning, as required by central government.	Agreed.
2.9			Lillian Harrison	An explanation on how the sites proposed to Medway Council in this earlier 'call for sites' are to be assessed and considered for inclusion in the CS/later DPDs should be given, for clarity.	The "call for sites" submissions have been taken into account in the preparation of the Medway Strategic Land Availability Study, 2010, which in turn informs the core strategy.
2.9		tbh developments ltd & helvig ltd	tbh developments/helvig	The "Call for Sites" came too late in the LDF process. The Council should have included its conclusions on the call for sites in the evidence base for the issues and Options report. It is unsatisfactory that the process for consideration of this evidence base is unclear and lagging behind key decisions on Core Strategy being taken by the Council.	Noted.
2.12			Lillian Harrison	This approach may appear to be somewhat biased towards the Conservation lobby. In order to obtain a balanced approach, there should have been wider stakeholder interest meetings involving minerals/waste operators and developers.	The mineral and waste operators are stakeholders in the process; equity and clarity of the procedure is essential. This dictates that no one area of interest should have exclusive involvement in discussions with the authority.
<b>3. Conformity with National and Regional Policies</b>					
		Kent Wildlife Trust	Debbie Salmon	Conformity with National and Regional Policy- Within this section there are a number of important policies for ecological protection which are currently absent. The highest level policy is The Conservation (Natural Habitats &c) Regulations 1994. This legislation transposes EC protection of SPA, SAC and Ramsar sites into UK law. The pertinent sections to the Core Strategy are s20 and s48 which state that if a project or plan is likely to have a significant effect on a European site either alone or in combination with other plans, an Appropriate Assessment must be undertaken, and that if the AA finds that the plans affects the site and these effects cannot be mitigated then permission should be refused. As the proposed level of housing and employment development will increase recreational pressure on the estuaries and associated marshland it is essential that such plans are appraised. The Trust welcomes the inclusion of PPS9 but would also wish to see the inclusion of NRM5 of the South East Plan, which reiterates the need to protect international, national and local sites and create a multifunctional green infrastructure.	The Habitats Regulations are referred to in relation to the natural assets policy.
3.3		Kent County Council	Richard Feasey	The historic environment will be an important planning issue throughout Medway and particularly in the urban cores of Rochester, Chatham and Gillingham. PPG15 and PPG16 (soon to be replaced by new guidance (PPS15)) on the Historic Environment should be added to the list of most significant planning policy documents.	Noted.
3.9		Viridor Waste Ltd	Mandeep Jutley	We would welcome the opportunity to comment on the management of the identified quantities of waste between 2006 and 2025 for Kent and Medway and whether this should be apportioned between Kent and Medway in principle, and if so how.	The disaggregation of London's waste imports, is a matter for the respective waste planning authorities of Kent County Council and Medway Council to address.

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



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

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	Question 4	ScottishPower	Chris Girdham	It is the role of the Core Strategy to facilitate development within Medway that is compatible with, and is therefore supportive of, national and regional energy policy. The Government has advised that there is a need for investment in new generating capacity to be developed in the near term, to replace a number of older power stations which are due to close before the end of 2015. Furthermore, it is acknowledged that the delivery of new generating capacity at a level which maintains security of supply will be a challenge in itself. The South East Plan (SEP) (2009) refers to power generation in the Kent Thames Gateway as one of several essential functions of the region, London and the nation (SEP para 19.6). The Plan also recognises that the provision of land for such activities will contribute to diversifying the local economy and reduce dependency on jobs from outside the area. SEP Policy KTG1 requires that provision is made for the future capacity and the viable operation of these essential functions. It follows that clustering of energy development at the Hoo Peninsula and Isle of Grain, where much of the power generation in the South East is located, represents a function of national and regional importance which has to be supported by the Strategy. This is also consistent with the concept of clustering in SEP Policy RE2.	The Core Strategy does not seek to impose a limit on further energy generation. The economic chapter supports existing economic functions including the energy industry at Kingsnorth and the Isle of Grain. Support is also afforded by the conventional energy generation policy.
	Question 4	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Yes. As net providers of energy for the region we need to aim to reduce the generation of energy by burning fossil fuels, so overtime we should see a reduction in the amount of fossil fuel burning power stations in our area and improvements to the local air quality	The Core Strategy does not seek to impose a limit on further energy generation. The economic chapter supports existing economic functions including the energy industry at Kingsnorth and the Isle of Grain. Support is also afforded by the conventional energy generation policy. Energy efficiency and renewable energy are addressed in a separate chapter.
	Question 4	Kent Wildlife Trust	Debbie Salmon	It is imperative that the Core Strategy seeks to influence how the Government energy policy is applied in Medway for the following reasons:- <ul style="list-style-type: none"> <li>• It is important that all authorities endeavour to lower carbon emissions and so reduce the effects of global warming on the natural world.</li> <li>• Within Medway and surrounding areas there are a number of important European sites that could be impacted by energy production within the area.</li> <li>• The Trust support wood fuelled energy production as this will result in management of ancient woodland becoming more profitable.</li> </ul>	The Core Strategy does not seek to impose a limit on further energy generation. The economic chapter supports existing economic functions including the energy industry at Kingsnorth and the Isle of Grain. Support is also afforded by the conventional energy generation policy. Energy efficiency and renewable energy are addressed in a separate chapter.
	Question 4	Dickens Country Protection Society	Chris Fribbins	With the amount of power generation in the Medway boundaries and close by, we need to influence how energy policy is going to evolve.	The Core Strategy does not seek to impose a limit on further energy generation. The economic chapter supports existing economic functions including the energy industry at Kingsnorth and the Isle of Grain. Support is also afforded by the conventional energy generation policy. Energy efficiency and renewable energy are addressed in a separate chapter.
	Question 4	BAE Systems	BAE Systems	Representations made by CB Richard Ellis on behalf of BAE Systems. Answer of Q4-6: BAE Systems requests that the Council adopts a sufficiently flexible approach in its emerging Core Strategy to recognise and accommodate site-specific circumstances, up-to-date assessments of housing need, supply, and demand, technological advances, policy revisions, and viability considerations. This will ensure development is achievable and deliverable across the Plan period.	Noted.
	Question 4	Kent County Council	Richard Feasey	Questions 4 to 7 Yes Provision for growth at Thamesport and related improvements infrastructure improvements to the A228 and rail access have been a feature of preceding strategic planning policy (Kent and Medway Structure Plan) and the South East Plan recognises the regional significance of Thamesport as deep water, 'gateway' port . The presumption should be in favour of the safeguarding of the aggregate import terminals at Thamesport and Cliffe not least given the strategic role played by Thames Estuary wharves in the handling of marine aggregate and the projected greater role to be played by aggregate imports in future aggregate minerals supply in the South East. Consideration of safeguarding should extend not only to existing capacity /operations but also include investigation of the scope for safeguarding of any potential for their expansion where this would be acceptable given their proximity to sensitive nature conservation areas noted in para 4.11	Safeguarding of important minerals and mineral related development such as the Thames Estuary wharves is addressed by the minerals policy.
	Question 4	RSPB	Fay Martin	No. The RSPB supports the Government's goals set out in The White Paper to cut CO2 emissions by 80% by 2050. To deliver this goal, we consider that a strategic approach to the location of energy facilities will be required. Nevertheless, Medway Council will have an important role in ensuring that energy and CO2 targets are delivered within the Medway region without negatively impacting on the features of conservation or environmental importance, including the European Sites within and adjoining the Council area. The Society also considers that the Core Strategy can assist in meeting these targets by requiring developments to achieve BREEAM or Code for Sustainable Homes targets. We would welcome the inclusion of a policy that requires development to be designed according to the principles of passive solar design as this approach can deliver significant reductions in the energy demand of buildings. We would also welcome the inclusion of targets for on-site energy generation for residential, commercial and public buildings.	The Core Strategy has been prepared in accordance with the current Government policy on energy.
	Question 4	Open Spaces Society	Patricia Wilson	Yes. Essential that the LDF should stipulate that, as things stand with failure to succeed with Carbon Capture process, no new fossil fuel power station(s) will be permitted in Medway (encourage government) Major effective effects should be put into increasing energy from renewable resources.	The Core Strategy does not seek to impose a limit on further energy generation. The economic chapter supports existing economic functions including the energy industry at Kingsnorth and the Isle of Grain. Support is also afforded by the conventional energy generation policy. Energy efficiency and renewable energy are addressed in a

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

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 5	Frindsbury and Wainscott Community Association	A Wade	Yes. Carbon emissions should be monitored and strictly controlled. New Kingsnorth should not operate without new technology.	The point is noted, though the Secretary of State will determine the nature of the new generation capacity and associated carbon capture system at Kingsnorth.
	Question 5	RSPB	Fay Martin	No. The RSPB considers that in order to achieve The White Paper targets to cut CO2 emissions by 80% by 2050, the emphasis of generating capacity will need to be placed on carbon neutral solutions.	The point is noted.
	Question 6			<p><b>Q6: Should the expansion of Thamesport be actively promoted given the impending development of the London Gateway project?</b></p> <p>Answers for question 6 (from questionnaire &amp; website):  12 Yes/ Agree  6 No/ Disagree  2 Don't Know</p>	
	Question 6	CPRE Kent	Brian Lloyd	Any expansion of Thamesport must be based on robust evidence of need, and would need to be accommodated within the employment area defined under Policy S13 of the Local Plan. In particular, regard will need to be given to the impact on the important nature conservation interests that adjoin the site.	The economic strategy includes making provision for the expansion of the existing economic functions of the area. The impact on natural conservation will need to be considered.
	Question 6	London Thamesport (Hutchison Ports UK Ltd)	Nicholas Orbell	<p>London Thamesport is an existing facility, and is recognised within the Deep Sea container sector as a significant port for UK imports. The development of London Gateway will provide additional capacity to complement existing capacity that is nearing capacity limits, to meet the forecast UK import growth recognised in the medium to long term. To not support London Thamesport will detrimentally affect not just Medway but the UK economy. The preferred planning consideration should be to distinctly recognise the supporting logistics and transport needs required to encourage related development activity and secure related business activity and employment in the immediate region (being the strategic view for the development of London Gateway).</p> <p>In October 2007 the Government produced a discussion document 'Towards a Sustainable Transport System' (TaSTS). This set out how the Government is responding to i) the recommendations made in the study by Sir Rod Eddington to improve transport's contribution to economic growth and productivity; and ii) how it is ensuring that transport plays its part in delivering the overall level of reduction in carbon emissions recommended by the Stern Eddington Review of the Economics of Climate Change. In summary TaSTS defines the Government's transport goals as wanting the transport system to:</p> <ul style="list-style-type: none"> <li>- support economic growth</li> <li>- tackle climate change;</li> <li>- contribute to better safety, security and health;</li> <li>- promote equality of opportunity; and</li> <li>- improve quality of life and promote a healthy natural environment.</li> </ul> <p>In November 2008 the Government produced 'Delivering a Sustainable Transport System (DaSTS) which set out how the approach set out in TaSTS is being put into practice.</p> <p>DaSTS explains that analysis undertaken by the Government has led to the identification of a number of components of the nation's transport system which, collectively, are critical to the functioning of the system as a whole and to the economic success of the nation. Government will focus on 14 route corridors that link key centres of population to each other and to the busiest international gateways that have the highest volume of goods and people movement. London to the Thames Gateway Ports, which includes Thamesport, is in an area identified as one of the critical route corridors. Thamesport is identified within DaSTS as one of the key routes for freight.</p> <p>Policy T10 of The South East Plan - Regional Spatial Strategy for the South East (May 2009) states that, "relevant regional strategies, local development documents and local transport plans will include policies and proposals for infrastructure that maintain and enhance the role of gateway ports," this includes Medway (Thamesport) and goes on to say, "encouragement should be given to investment in infrastructure that supports short sea connections linking into the wider European network via these ports."</p> <p>The South East Plan goes on to confirm the importance for the major ports, which includes Thamesport, to produce port Master plans in accordance with the Government guidance issued in December 2008 and as confirmed in the Interim Report of the Ports Policy Review (July 2007). Master plans enable better planning for transport interventions and identified transport requirements should then be taken into account in relevant national strategies, local development documents and LTPs.</p> <p>Significantly, the development of London Gateway is unconfirmed. DPWorld reported its latest financial position in August 2009. DPW has put around half of its planned global capacity expansion on hold, and among the affected projects is the London Gateway terminal. The Core Strategy is fundamentally incorrect in its stated assumption that development is "impending".</p>	The economic strategy includes making provision for the expansion of the existing economic functions of the area.
	Question 6	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	There is concern that further expansion of Thamesport should be resisted unless the percentage of freight that is moved by rail is increased and that by road reduced (guarantees from Network Rail would be required for this and there are real conflicts with other rail movements in the area)	The economic strategy includes making provision for the expansion of the existing economic functions of the area.
	Question 6	Kent Wildlife Trust	Debbie Salmon	The Trust would have concerns regarding the expansion of Thamesport due to the increase in shipping and its impact on the protected bird species. Thamesport is located adjacent to The Medway Estuary and Marshes SPA, Ramsar site and SSSI. The ecological impacts of this development need to be assessed as part of the AA to enable Medway Unitary Authority to assess whether impacts can be mitigated.	Medway Council is currently discussing the scope and extent of the appropriate assessment with Natural England, the Environment Agency and adjoining authorities prior to preparing a screening document and appointing a consultant to carry out the assessment.

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

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

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

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



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

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

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

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

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 13	Kent County Council	Richard Feasey	All the key points regarding Medway's demographic structure seem to be included but it is interesting to note that reference is made to Medway's own population projections alongside KCC strategy based forecasts of change in household size. Consistency between sources used is clearly important.	Noted.
	Question 13		Carl Kroon	The national figures have exceeded government figures.	Noted.
	Question 13	Medway Countryside Forum	David Murr	There appears to be a marked discrepancy between the forecasts for population growth in the period to 2026 as set out above (Q13) and those formerly projected and agreed in Council, which accepted 300,000. We would welcome the acceptance of this lower figure/forecast of 264,300, but consider that even at this level of increase the implications for both the urban and rural environment could be very serious.	Forecasts invariably change over time and are reviewed annually.
	Question 13	FWCA Frindsbury and Wainscott Community Association	J R Masey	Get infrastructure right for present inhabitants before more growth. Cannot cope now re: services. Area is getting too large and impersonal.	The housing target reflects the population growth that is expected until 2026. The council is preparing an infrastructure plan to ensure that the necessary physical and social infrastructure is there to aid the delivery of these targets as sustainably and equitably as practicable.
	Question 13	Frindsbury and Wainscott Community Association	A Wade	We seem to have returned to 'Predict and Provide' Policies considered flawed and unacceptable. More dwellings mean more London commuters	Noted.
	Question 13		W Mann	No. Seem rather low if we do build 16,000+ dwellings	Noted.
	Question 13	Land Securities Group Plc	Land Securities Group Plc	Population projections are sensitive to minor changes in methodology and unpredicted changes in trends, e.g. migration or birth rate. The sharp downturn in house-building has had an impact on the ability to forecast the timing of new housing, particularly in areas such as Medway with high housing capacity. We therefore consider that it would probably be sensible for the Council to refer both to its own internal projections and the official Government ONS projections which would give a range against which to plan. This can be monitored over the Plan period.	Noted.
	Question 14			<b>Q14: In addition to natural population growth, people living longer and reduced household sizes, are there any other demographic factors that should be taken into account when planning for an adequate supply and type of accommodation?</b>  Answers for question 14 (from questionnaire & website): 9 Yes/ Agree 0 No/ Disagree 3 Don't Know	
	Question 14	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Risk of excessive small housing units that are not fit for purpose and become less so if there is any future demographic change. Quality standards are required for the smaller housing units and sub-divided/split properties/flats etc. Poor quality new build and conversions should be resisted.	Noted and new standards are being promoted alongside the core strategy.
	Question 14	Kent Wildlife Trust	Debbie Salmon	Increases in population due to growth via the Thames Gateway will need to be factored into the Appropriate Assessment to analyse impacts on European protected sites.	Noted
	Question 14		Mari-Anne Harstad	Where is the information concerning migrants, we need to establish facilities to ensure good social cohesion, language schools, community projects	See detailed area profiles and proposed vision and objectives in the core strategy.
	Question 14	Dickens Country Protection Society	Chris Fribbins	As the quality of the local environment is improved and people get to understand the rich heritage of the area, high speed train travel etc. there may be increased pressure on inward migration.	Noted
	Question 14	Kent County Council	Richard Feasey	As well as an ageing population, more people are developing conditions in later life, such as dementia and physical disabilities, which mean that the type of accommodation such as that meeting Lifetime Homes Standard/Wheelchair Accessible Homes Standard is of growing importance especially given current levels of provision. Also looking at the overall net migration figures some of the cultural changes which Medway is experiencing is masked. The net outward internal migration cancels out the net inward international migration and so although there is no impact on the total population the demographic profile of the area has changed in recent years.	Noted.
	Question 14			Response from Bloomfields Ltd on behalf of Mr and Mrs P Mercer; and Medway Rewind Services. Additional inward migration from increased attractiveness of area due to improvements in the public realm and transport links (rail) with London. As a consequence there is likely to be a greater demand for dwellings, in particular at the middle to higher end of the market.	Noted and reflected in Thames Gateway growth status.
	Question 14		Mike Walters	EU policy will result in unwanted mass immigration putting a strain on council resources.	Noted.
	Question 14	City of Rochester Society	John Liddiard	Excessive immigration	Noted.
	Question 14			Do not rely on developers to upgrade existing infrastructure. The local government should do this.	Noted.
	Question 14		Alastair Blair	Population for housing expansion should not rely on developer input for infrastructure reinforcement. The structure should come from local and national government.	Arrangements for appropriate and necessary developer contributions are well established.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 14		Carl Kroon	Student (uni) accommodation. If livestock have to have accommodation of certain size and type why doesn't the citizen? Larger population bring with more children, the LDF has no mention of facilities. Chatham in particular is anti-child. A situation that is perpetuated throughout Medway by Council and HSG obligations.	Opinions noted.
	Question 14	FWCA Frindsbury and Wainscott Community Association	J R Masey	Some built that can be easily adapted having the disabled in mind. Support warden controlled homes for some elderly. I do query whether the housing market should be so influenced by split households.	Noted and reflected in proposed housing policies.
	Question 14		W Mann	Need good mix of social and private housing, 1 bed flats to 4 bed houses plus further provision of student accommodation.	Noted and reflected in proposed housing policies.
	Question 14		Dr D Brighton	Yes. Accommodate intake from London, with Hitachi trains. Mix-flats (1/2 bed) near stations and parking, buses. Support local industry development. Hostels for single important workers- not MHS homes	Noted.
	Question 14	Open Spaces Society	Patricia Wilson	Impossible to tell. For instance immigration may vary with reduction in job opportunity e.g. current increases in return of areas nationals. Charges under universities & future/ higher colleges may determine vacancies inflow or exodus of students. If you hold low wages in Medway mean difficulty in affording homes, rented or owned, then more proportion of 'affordable housing' but NB not in green belt. (ref. Para. 4.31 and 4.34.) What should be encouraged is increased use of "under-used upper floor within town centres (para.4.34) possibly by fiscal means?"	Points noted and reflected as appropriate in the proposed housing policies.
	Question 14	Land Securities Group Plc	Land Securities Group Plc	We consider that the size of the labour force in Medway is an important issue both in planning for the local economy and transport and commuting. Those population forecasts, which have been produced, which break down population by age bands (e.g. ONS) show only minor growth in the labour force despite higher overall rises in population than Medway Council is projecting. The evidence base for the final Core Strategy needs to contain a thorough assessment of potential labour force growth and change.	The Council's own population/job forecasts include an assessment of the contribution of older workers to future work force demographics to ensure an accurate, understanding of the labour force up to 2026.
<b>Housing</b>					
			Alastair Blair	Gypsies should be integrated into normal housing. Provision of sites without rules and maintenance of rules should activity be discouraged. Hiding under human rights is just a copout. Special needs is a difficult subject and requires government planning to provide a national norm. Medway should not go it alone.	Noted. The authority will assess the need for Gypsy and Traveller site provision in the area to ensure an equitable and fair response to the needs of a legally defined ethnic group.
		Medway Renaissance	John Finlayson	Provision needs to be made for all types of accommodation to meet the needs of all communities within Medway. The analysis seems to suggest there is an urgent need for units offering extra care for the elderly and to meet single household needs. The LDF will be the spatial planning strategy until 2026. In this context uncertain what bringing sites forward in a timely manner means. Irrespective of the current economic downturn the LDF needs to support the longstanding objectives for the Thames Gateway and the urban regeneration proposed for Medway. It needs to facilitate development with partners and now is the moment of opportunity for growth based on existing Medway. High quality design will be essential to successful place making in Medway. This needs to be embedded in the LDF. Design led place making in certain areas will be transformational and all stakeholders, members the public and partners need to be fully engaged.	Design is addressed in the quality and sustainable design, housing, heritage assets and energy efficiency policies in the Core Strategy.
		Natural England	Josh Nelson	Natural England would expect any housing or regeneration to be of the highest standards in environmental sustainability terms, appropriately located to avoid impacts on the natural environment (in particular, statutory nature conservation sites and the Kent Downs AONB), and contribute to the provision within Medway of multi-functional green infrastructure in accordance with the South East Green Infrastructure Framework.	Design is addressed in the quality and sustainable design, housing, heritage assets and energy efficiency policies in the Core Strategy. The natural assets, landscape and open space policies seek to protect and enhance the natural environment.
	4.21		Steve Banfield	This makes no reference to the plans being proposed for Horsted (a proposed 450 dwellings {APPLICATION NUMBER: MC2009/0630})	Point noted. This site has been included in the Medway Strategic Land Availability Assessment.
	Table 2	CPRE Kent	Brian Lloyd	We note that the identified housing supply to 2026 does not include any allowance for windfall developments. Whilst PPS3 discourages councils from making windfall allowances in their development plans for the first ten years of the plan period, they can do so after the first ten years - i.e. for the period 2016 to 2026. We would encourage the Council to include such a windfall allowance in the Core Strategy in meeting its housing requirements, which will give added flexibility/contingency. With an annual average of 238 windfall completions over the last five years, this is potentially a significant source for future housing.	The Medway Strategic Land Availability Assessment does not include windfall estimates but as they come forward, windfall planning permissions will be included in the overall supply figure in future reviews of the SLAA. They will provide an additional source of supply if some identified sites fail to come forward as soon as expected.
	Table 2	Chatham Historic Dockyard Trust	Bill Ferris	The table indicates that the Interface Land has a capacity for 500 homes. Arguments have been made that this volume is potentially low. Elsewhere in supporting documents the area is described as predominantly mixed use. The Council is about to enter into a Memorandum of Understanding with the landowners, SEEDA and CHDT, which relates to the production of SPD for this critical area following the demise of an earlier development project for the land. There is no evidence of where the suggested volume of housing has been derived from and it might be more appropriate to reference the current, very positive, partnership approach to the production of SPD for this land which is required to deliver multiple outputs including: - The creation of an appropriate arrival to the Historic Dockyard - Development likely to enhance the historic environment and setting of Scheduled Ancient Monuments - Connectivity between the former areas of the once "joined up" Dockyard - A commercial mixed use development likely to complement the emerging Historic Dockyard/Chatham Maritime destination Further weight is added to this approach when in Section 4.121 it is suggested that the site would make an ideal location for a new campus for UCA. The paper does not reference how this might be compatible with the housing proposal.	The Medway Strategic Land Availability Assessment identifies both a mixed-use development and a location for the University of the Creative Arts as suitable alternatives for the Interface Land.
	Table 2	Lafarge Cement UK	David Simms	Proposals for Temple Waterfront are subject to a resolution to grant outline planning permission, subject to signing of a S106 agreement. The outline planning application makes provision for the delivery of up to 620 homes as part of a mixed-use scheme, a figure which should be reflected in Table 2.	Noted

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	4.30	Environment Agency	Jennifer Wilson	We note the comments at 4.30 and 4.39 on Travelling Showpeople and welcome the Council's recognition of the Guild's desire to relocate our existing yard at Strood to a better location should this become available. We further welcome the Council's commitment to preserve this existing yard pending such relocation should it occur. We also note that the Council recognizes the GTAA figures and also that the RSS Partial Review may adjust these figures, which the Council are prepared to accept as valid. Therefore we wish the final document to reflect these points and also to recognize the importance of achievable criteria for "Windfall" applications from Travelling Showpeople in the future.	Noted
	4.31	Abbey Developments Ltd	Abbey Developments Ltd	We consider that any decisions regarding a change to the existing affordable housing provision percentage or threshold should be set out within the Core Strategy document where it can be subject to robust examination and debate. Any change to the percentage or threshold should also be supported by relevant and up to date housing market assessments, which are included within the evidence base for the Core Strategy. We note that policy KTG4 in the Regional spatial Strategy sets out an indicative target of 30% affordable housing in the Kent Thames Valley and paragraph 19.13 which states that "30% affordable housing is the maximum judged practical in the sub-region". Taking this policy and comments into account we consider that, as the policy states, that 30% should be the maximum indicative target. Therefore we consider that there is no justification for discussing affordable housing figures of 40% or higher.	The Core Strategy proposes a policy derived from the Medway Strategic Housing Market Assessment that recommends 25% affordable housing on all sites within the existing defined boundary to the main urban area and Hoo St. Werburgh and 30% affordable housing on all sites elsewhere.
	4.33	University College for the Creative Arts at Rochester	David Hawkins	a. The final sentence is incorrect as it relates to student residential accommodation, as it implies that there is an adequate supply of such accommodation. That is not the case, at least so far as the University for the Creative Arts is concerned. In any event, if the University were to locate its new Kent campus in Medway, there is a concern that the existing supply of student accommodation would not be able to support the needs of the University. b. The University looks forward to working with the Council, and others, to ensure that the residential needs of its students are met.	The issue of student accommodation and the willingness of the Council to work with the Universities and Mid Kent College to help deliver such accommodation in suitable locations are addressed in the housing chapter.
	4.34	Land Securities Group Plc	Land Securities Group Plc	Reference is made at Paragraph 4.20 to the needs of increasing numbers of smaller households, and the need for higher quality solutions. Paragraph 4.34 refers to, inter alia, the shortage of larger house types. We consider that Medway Council may wish to consider expanding upon these statements to avoid any perception of inconsistency with one another.	Noted.
	4.35	Groundwork Kent & Medway	Simon Green	This may need to be reinforced since otherwise some developers may argue to be granted consent on green field sites rather than tackling the more challenging sites first. Apart from the housing need, many regeneration sites are currently blots on the urban landscape near the river and need to be addressed for this reason too.	Noted.
	4.35	tbh developments ltd & helvig ltd	tbh developments/helvig	The Core Strategy should assess the adequacy of the mechanisms for bringing forward existing regeneration opportunities in a timely manner. The role of Medway Renaissance in this respect should be explicitly stated.	Noted.
	4.36		Alastair Blair	None of the existing Lungs for Medway should be breached - Rainham, Capstone should be left as a legacy to the Medway Towns people to enjoy and use. Housing in these areas will kill the benefits of natural habit as local areas for all to enjoy	Noted.
	4.40		Alastair Blair	Leave it where it is	Noted.
	4.40	University College for the Creative Arts at Rochester	David Hawkins	The University looks forward to working with the Council, and others, to ensure that the needs of its students are met.	Noted.
	Question 15			<b>Q15: Should the emphasis on urban regeneration be retained in housing provision, given the difficulties of bringing sites forward in an economic downturn?</b>  Answers for question 15 (from questionnaire & website): 20 Yes/ Agree 6 No/ Disagree 1 Don't Know	
	Question 15	CPRE Kent	Brian Lloyd	Yes, urban regeneration should remain the focus of the strategy in accordance with the established approach towards development in this part of Thames Gateway. The LDF looks forward to 2026, so it needs to take a long-term view on delivery rather than a knee jerk reaction to the short-term economic downturn. In terms of housing delivery, Medway is also fortunate in being a Growth Area and having a dedicated delivery body in the form of Medway Renaissance.	Noted The Core Strategy is continuing to give priority to the regeneration of the urban area over the release of greenfield sites.
	Question 15		Alastair Blair	Yes but keep away from Rainham and Capstone Valley	Noted The Core Strategy is continuing to give priority to the regeneration of the urban area over the release of greenfield sites.
	Question 15	Groundwork Kent & Medway	Simon Green	Yes. Developers will naturally argue for developing green field sites first when they are cheaper and if the LDF does not have a strong emphasis on urban regeneration it may be difficult to resist greenfield planning applications.	Noted The Core Strategy is continuing to give priority to the regeneration of the urban area over the release of greenfield sites.
	Question 15		Paul Watson	1. In principle, placing an emphasis on urban regeneration accords with the guidance set out in Planning Policy Statements 1 and 3 and the overall strategy promoted in the South East Plan. 2. It is good planning practice to seek to regenerate areas in need of investment and environmental improvement and there are	The Core Strategy is continuing to give priority to the regeneration of the urban area over the release of greenfield sites.

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				<p>many sustainability advantages of seeking to utilise previously developed land within areas already served by good public transport options.</p> <p>3. An urban regeneration focus would assist in minimising the green field land take and therefore in slowing the general outward creep of the main settlements within Medway.</p> <p>4. However, the advantages of an urban regeneration focus must be balanced against the clear need to deliver new housing and employment generating development within the relevant timescales. The economic realities of delivering housing on sites where there may be substantial abnormal costs related to contamination or due to existing land values must be carefully considered.</p> <p>5. In this context, PPS12 makes clear that Core Strategies and Allocations documents should not bring forward strategies or allocate land for development where there is a real prospect that the strategy or site is unlikely to be deliverable in the timescale required.</p> <p>6. It is therefore necessary for the Council to satisfy itself through engagement with landowners, developers and statutory undertakers that land is both available and deliverable.</p> <p>7. This process has begun and the 'call for sites' consultation which was completed at the end of 2008 will be an important part of this evidence base.</p> <p>8. Overall, it is our submission that the urban regeneration focus should be retained provided that the Council can be satisfied in respect of delivery.</p> <p>9. Where there is uncertainty over delivery, it will be necessary for the Council to demonstrate that the strategy is flexible and in essence that it has a 'Plan B'.</p> <p>10. An approach adopted by some other authorities has been to identify reserve Greenfield sites which will only be released if monitoring shows that the favoured urban site delivery is falling behind the delivery schedule.</p> <p>11. In this way inspectors can be confident that strategies are robust and deliverable.</p> <p>12. In terms of viability it is our experience based on the approach taken by Inspectors at various Core Strategy EIP's, that calculations of viability should build in some assumptions in terms of economic recovery and it is not the case that sites which may appear unviable on the basis of current values must be excluded from consideration. Rather, where sites are unlikely to come forward until later in the plan period it may be appropriate to base calculations of viability on prices that were achieved in 2006 / 2007 prior to the severe economic down turn.</p>	<p>The Medway strategic Land Availability Assessment demonstrates that sufficient housing can be delivered during the plan period to meet housing requirements and individual site phasing has been prepared in association with the site owners.</p> <p>The SLAA has identified a substantial surplus of housing sites, which would be available if there emerges uncertainty over delivery on specific sites.</p>
	Question 15	Barratt Strategic		<p>Whilst Barratt Strategic feel there should continue to be an emphasis on urban regeneration within Medway, there should also be a recognition that urban regeneration alone will not provide for the areas housing needs. As recognised in para 4.23, the development of many urban regeneration sites is often complex, these sites are often severely constrained, and in an economic down turn can be the first to suffer and the last to come back. A more balanced approach needs to be taken to the housing land supply, with a recognition of the merits of less constrained brown field sites, and green field urban extensions. As per our response to question 96, Barratt Strategic feel that the scale of development expected from the urban regeneration sites over the plan period should be scaled back, as should the scale of development that can practically be delivered at Chattenden. As a result Barratt Strategic feels that a further strategic allocation needs to be identified, and have suggested that this should be a scaled down Extended Hoo (including Hoo, St Werburgh, High Halstow and Cliffe Woods). This approach would not in our opinion prejudice the council's urban renaissance program, or conflict with the longstanding objectives of regeneration proposed within the Thames Gateway. Chattenden and extended Hoo will in our opinion provide for a very different but complementary housing offer that is associated with the urban regeneration sites. In effect the policy approach we are suggesting will facilitate a more healthy housing land supply, catering for all sectors of the community, thus actively assisting in the economic regeneration of the area, and provide a more socially inclusive approach to housing land supply. In our opinion the housing market in Medway has for some time been seen as being heavily weighted towards flatted development, at the expense of family accommodation, which has not necessarily assisted in the urban regeneration of the area.</p>	<p>The extended Hoo option was rejected in the Issues and Options report for the reasons set out in that report.</p>
	Question 15		Gary Brook	<p>Support</p> <p>It is contended that the emphasis on urban regeneration should be retained in housing provision even in sight of the difficulties of bringing housing sites forward in a recessionary market.</p> <p>Our client supports the allocation of strategic sites in sustainable locations as a means of providing for the Council's housing targets. We consider that in meeting these targets the Council should emphasise that housing targets are minimum targets as expressed by the South East Plan, Regional Spatial Strategy (2009).</p> <p>In addition, we consider that the Council should consider suitable unallocated brownfield sites in sustainable locations which would in turn help Rochester obtain inward investment.</p> <p>The Corporation Street Development Framework Supplementary Planning Document (SPD) adopted in November 2008 identifies our client's land as part of a 'main development opportunity site' which encompasses the whole of Corporation Street and encourages both retail and residential development. We consider that our client's site, as part of a comprehensive redevelopment scheme, could provide housing of at least 50 units per hectare and would contribute to the Council's housing targets.</p> <p>In summary it is considered that the Core Strategy should ensure that housing targets are set as minimum targets with flexibility to provide additional housing on suitable and sustainable locations. This will enable the Core Strategy to be flexible; in turn this will heighten the chances of the borough meeting its housing requirements, something which it has failed to meet on a consistent basis since 2001.</p>	<p>The South East Plan was revoked on 6<sup>th</sup> July 2010 and its provisions no longer apply.</p> <p>Sites in Corporation Street have been assessed in the Strategic Land Availability Assessment.</p>
	Question 15	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	<p>Yes, but need to show real improvements in quality. Parking issues need to be addressed - although need for private transport can be reduced, there will still be a requirement in the evening and at weekends,</p>	<p>Noted. The Core Strategy is continuing to give priority to the regeneration of the urban area over the release of greenfield sites. Design and parking are addressed in the quality and sustainable design, housing and transport policies of the core strategy.</p>



Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 15	Lafarge Cement UK	David Simms	The emphasis on urban regeneration must remain part of the Medway spatial strategy, recognising that such sites are an important opportunity for supporting existing communities and making effective use of otherwise despoiled land. Urban regeneration sites provide an opportunity to support and extend existing local facilities, or to establish new facilities where none currently exist. Such sites, when well related to public transport and local facilities, can support sustainable patterns of travel and can act to support existing, or help establish new, communities.	Agreed, The Core Strategy is continuing to give priority to the regeneration of the urban area over the release of greenfield sites.
	Question 15	Trenport Investments Limited	C Hall	Urban regeneration sites are by their very nature often more complex and costly to develop. During times of economic difficulty greenfield sites are likely to prove to be more likely to be viable and to be able to be developed. In order to help meet the housing needs of Medway, as well as meeting the growth aspirations of the Thames Gateway, there will need to be less emphasis on regeneration until the economy is more economically buoyant and land values mean that more expensive regeneration sites become more viable and can be developed.	The Core Strategy is continuing to give priority to the regeneration of the urban area over the release of greenfield sites.
	Question 15	tbh developments ltd & helvig ltd	tbh developments/helvig	There is a real danger that the Lodge Hill, Chattenden new settlement will detract from the completion of the urban regeneration sites in Medway. Similarly, housing development at Lodge Hill would not appear to be required until well into the the Plan period given the existing permissions/allocations/commitments that exist in Medway. The Core Strategy should therefore seek to defer bringing forward Lodge Hill until the latter part of the Plan period (say not before 2020) and should provide that any start on the new settlement should not adversely affect the commitment to and completion of regeneration opportunities within the urban area.	Whilst the Strategic Land Availability Assessment includes phasing, the core strategy does not preclude sites coming forward earlier than expected for development.
	Question 15	Kent Wildlife Trust	Debbie Salmon	Development, positioned at the urban waterfront, provides opportunities to re-establish natural vegetation along the banks of the Medway and other watercourses by development pulling back from the banks. Research shows that if 15 meters is conserved from the top of each bank 90% of the flora species are conserved which in turn maintains the ecological quality of the river itself. Many of the Local Authorities within Kent aim to enhance the river Medway the continuation of this process in Medway would increase the ecological resilience of this important river. The Trust would wish to make the following comments to highlight our specific concerns regarding the following developments. Temple Waterfront The Trust has previously had concerns regarding the loss of Brownfield habitat and disturbance to birds caused by recreational pressure. The proposed mitigation is in our opinion adequate however it is important this mitigation is included in ensuing conditions. The Upnors This area contains Cockham Woods SSSI. This site should be managed, buffered and connected into the wider Green Infrastructure as part of development plans.	The impact of development on Brownfield habitats is recognised and addressed in the natural assets policy.
	Question 15	Dickens Country Protection Society	Chris Fribbins	This would be supported as making best use of previously developed land, but care is required to maintain quality, design and space standards.	Design is addressed in the quality and sustainable design, housing, heritage assets and energy efficiency policies in the core strategy.
	Question 15	Abbey Developments Ltd	Abbey Developments Ltd	Whilst we note that the long term aim for Medway has been towards urban regeneration and that this aim has been developed and refined over a period of years we consider that in the current economic climate that serious consideration has to be given to bringing forward sites which are less complex in terms of their planning, infrastructure and remediation. The complex nature of several of the urban regenerations sites and the costs associated with these, which are exceptional as noted in paragraph 4.35, is likely to lead to viability issues in the current economic climate which may delay or prevent these sites from coming forward and delivering the housing numbers. Smaller and less complex sites, within and adjacent to the urban area, which have considerably lower costs are more likely to be able to come forward in the current economic climate. These sites would be sustainable due to their location to adjacent to and within existing development and their size would mean that the level of additional infrastructure required would be minimal. Locating development in sustainable locations would accord with Policy H2 of the Regional Spatial Strategy which states that new housing whether on Brownfield or Greenfield land should be in sustainable locations. We note the comments in paragraph 5.16 regarding the possibility that releasing Greenfield land could undermine the delivery of urban regeneration sites. However, we consider that releasing small sites would not have a detrimental impact on the viability of the larger Brownfield sites, as any viability issues associated with these sites are more likely related to remediation costs and extensive infrastructure requirements rather than a lack of demand for reasonably priced homes. Smaller Greenfield sites could provide family housing in sustainable locations adjacent to existing family units in a shorter time period. Our client has a small Greenfield site which is available for development. The site is located close to existing transport links, services and facilities. Due to its size, location and previous uses it would only require minimal infrastructure improvements and would be able to deliver housing within a short timeframe.	<p>The Core Strategy is continuing to give priority to the regeneration of the urban area over the release of greenfield sites.</p> <p>The Medway Strategic Land Availability Assessment demonstrates that sufficient housing can be delivered during the plan period to meet housing requirements and individual site phasing has been prepared in association with the site owners.</p> <p>The SLAA has identified a substantial surplus of housing sites, which would be available if there emerges uncertainty over delivery on specific sites.</p> <p>The SLAA identifies many small sites within the urban area, which are less complex and could come forward in the current economic climate.</p>
	Question 15	BAE Systems	BAE Systems	<p>Representations made by CB Richard Ellis on behalf of BAE Systems.</p> <p>Answer of Q15-21:</p> <p>PPS3 (2006) highlights the need for local planning authorities to maintain a flexible, responsive supply of land for housing development. This is particularly important given that the Council recognises that "some sites have significant constraints which makes them both complex and expensive to bring forward and [that] this has been exacerbated by recent poor economic conditions" (paragraph 4.23). As stated in paragraph 4.35, additional sites do not need to be identified provided those that are already identified are brought forward in a timely manner. However, BAe Systems considers this to be a high risk approach given that the Council also notes that development costs for sites along the urban waterfront are exceptional and will require further public funding. This would suggest that additional provision should be made if the Council is to meet its housing targets. This would accord with national guidance, as PPS3 paragraph 62 states that Local Development Documents (LDDs) should set out a housing implementation strategy. This should include, amongst other things, scenario and contingency planning to identify different delivery options in the event that actual housing delivery does not occur at the rate expected.</p> <p>Our client would also wish to highlight that the housing targets specified in the Regional Spatial Strategy for the East of England (RSS, 2008) are minimum targets only. This is particularly significant given that the Medway Towns are a designated regional hub, 'Centre for Significant Change' and 'Diamond for Growth'. The Borough also falls within the Thames Gateway, the UK's largest regeneration area and a major Growth Area. As such Medway has been set a number of significant challenges. While we recognise</p>	<p>See response to Paul Watson on question 15.</p> <p>The South East Plan was revoked on 6<sup>th</sup> July 2010, and its provisions no longer apply. The BAE systems site at Hoo St. Werburgh has been rejected in the SLAA.</p>

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				that a fundamental priority for the Thames Gateway is regeneration of previously developed sites (RSS, paragraph 19.1), the RSS also specifies that, in planning the housing provision delivery, local planning authorities (LPAs) should also take into account the ability to accelerate the rate of housing delivery in Growth Areas (RSS Policy H2). Furthermore, LPAs must also plan and manage the provision of housing to enhance the viability of rural settlements, promote a 'rural renaissance', and therefore meet the long-term needs of rural communities (RSS Policy H2). If the Council is to meet its development requirements across the Plan period, it must therefore adopt a more open approach to housing provision, including at Hoo St Werburgh. Should the Council fail to do so, we would query the Core Strategy's deliverability and thus its effectiveness, as per the requirements of PPS12 (2008).	
	Question 15	GVA Grimley Ltd	Sheery Sassoon	According to the preface, the Core Strategy will last up to 2026. Given its lifetime and the probability that there may be further periods of economic instability, policies should be worded flexibly and build in strategies that encourage urban regeneration and housing provision in potential economic downturns. It is considered that policies should continue to support urban regeneration, including residential developments, throughout the duration of the Core Strategy, including periods of economic instability. (Suggestion: Policies should encourage development and urban regeneration throughout the duration of the Core Strategy, including periods of economic uncertainty. Strategies which encourage housing to be brought forward at all stages of the economic cycle should be developed and built into planning policies.)	Comments noted and considerable flexibility is built into the core strategy.
	Question 15		Ian Mawer	While we recognise the very real challenges faced by local authorities and developers in delivering regeneration in the current economic environment, we consider that the Core Strategy, being the long-term strategic document for Medway should take a long-term and flexible approach and maintain the objective to realise regeneration aspirations for the area. SEEDA continues to support an average annual increase in GVA per capita of at least 3%.	Noted.
	Question 15	Kent County Council	Richard Feasey	Yes. The Core Strategy need to plan for the medium/long term rather than alter the fundamentals of strategy in response to current circumstances. A sustained emphasis on urban regeneration would be consistent with the thrust of the RSS (Policy KTG1(i): Core Strategy)	Noted.
	Question 15	The Peel Group	The Peel Group	It is noted that the report identifies that units with planning permission, including existing allocations not yet started and identified regeneration sites, provide housing capacity beyond that required by the RSS (16,300 unit minimum requirement between 2006 and 2026 against a theoretical capacity for 19,300 units). It is also noted that at this stage of the Core Strategy, the Chatham Docks site is not identified as regeneration site or housing allocation, despite the substantial opportunity for regeneration that the site provides. The emphasis on urban regeneration in housing provision should be retained through the Core Strategy. However, given existing difficulties of bringing forward such sites in an economic downturn the Council should identify additional regeneration sites, including Chatham Docks, to provide alternatives and increase the likelihood of achieving the minimum RSS requirement as it unlikely that all of the regeneration sites currently identified will come forward within the Core Strategy period. Whilst the priority should remain delivering development on regeneration sites and previously developed land within the urban boundary, such as Chatham Docks, the Core Strategy should also recognise that a range of sites need to be provided, including small sites outside the urban boundary which should also have a role to play in delivering housing where they are appropriate in scale and well related to the existing urban area. Urban regeneration through housing provision also provides further opportunities. For example housing development at Chatham Docks will help to facilitate other forms of development, including a mix of uses and the rationalisation of the port. Therefore housing is a key element delivering employment and leisure uses on a number of regeneration sites.	The Core Strategy seeks to protect existing employment sites from development for other uses in order to avoid the necessity of releasing greenfield sites for employment use. Chatham Docks is safeguarded as a dock in the River Medway and Transport policies. Sufficient sites have been identified in the SLAA to avoid the need for the release of greenfield sites outside the urban boundary for development.
	Question 15		Mercer	A greater balance is needed in the provision of residential sites to ensure that there is an available and deliverable supply of housing land in Medway. In the current economic climate it is unlikely that many of the larger regeneration sites identified for housing will come forward due to high costs associated with their development (de-contamination, infrastructure provision). Having regard to this, a greater variety of sites including greenfield land within and adjoining the urban area, should be identified for residential development to ensure the supply of dwellings is maintained within the Medway area. Such a strategy will also assist in maintaining investor confidence in the area through the provision of new houses on smaller sites.	The Core Strategy is continuing to give priority to the regeneration of the urban area over the release of greenfield sites.  The Medway strategic Land Availability Assessment demonstrates that sufficient housing can be delivered during the plan period to meet housing requirements and individual site phasing has been prepared in association with the site owners.  The SLAA has identified a substantial surplus of housing sites that would be available if there emerges uncertainty over delivery on specific sites. Furthermore, the SLAA has identified a wide variety of sites of various sizes throughout Medway to meet its requirements.
	Question 15		Peel Investments (Intermediate) Ltd	The Core Strategy should recognise that a range of sites need to be provided and that whilst urban regeneration should remain a priority there is also opportunity for other sites to deliver housing, particularly given the complexities involved in many of the urban regeneration sites and the current economic climate. Alternatives could include sites outside the urban boundary which should also have a role to play in delivering housing where they are appropriate in scale and well related to the existing urban area. Wooley's Orchard would make a significant contribution to meeting future housing targets in Medway within a sustainable location. The site is close to local shops and the scale of opportunity provides the ability and resources to improve local community facilities and to improve bus services to this part of the urban area. Development would help to extend the existing community and help to support local facilities. The site is large enough to be developed in a way that can be sensitively designed not to impact on adjoining residential areas. Rainham should be considered as an option for sustainable expansion. It is well linked to neighbouring towns of Chatham and Gillingham and has strong local transport facilities and local services, including schools. These facilities include a regular train service that serves London, with High Speed services from December 2009, as well as Ramsgate,	Wooley's orchards has been assessed and rejected in the SLAA and options for development to the east and north of Rainham have been considered and rejected in the Issues and Options report.

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				Dover, Canterbury, Faversham, Sittingbourne, Gillingham, Chatham and Rochester. The site is within 1km of the railway station. As such Rainham presents a number of positive attributes making it suitable for expansion. For the reasons outlined above, the site at Wooley's Orchard is considered to be a good candidate for residential development. It is accepted that as a greenfield site, most available brownfield sites will, in sequential terms, be preferred options and considered before greenfield locations, particularly if the focus through the Core Strategy remains on urban regeneration sites. However, Wooley's Orchard can provide a sustainable alternative to relying solely on urban regeneration sites to deliver the housing requirements over the core strategy period.	
	Question 15	City of Rochester Society	John Liddiard	Q15-21 How about provision for self build housing by individuals or groups Additional growth should be concentrated on or adjacent to the urban areas concentration of effort and resources leads to improved facilities.	Noted. Self build projects can be considered through the development management system as they arise.
	Question 15	Medway Countryside Forum	David Murr	We support the emphasis on urban regeneration within those sites identified as important to the Thames Gateway Strategy (e.g. Chatham, Rochester Riverside), but are concerned that in much of Medway there has been, and continues to be, a regrettable trend towards intensive in-filling of open space, gardens and sites where dwellings are cleared to be redeveloped. This is the inevitable consequence of a distortion of the Gateway strategy away * from outward expansion restraint to promotion of a growth agenda. *Restraint of outward expansion.	The SLAA has not considered open space for development unless already committed and recent government changes to PPS3 are likely to reduce the amount of garden space lost to development.
	Question 15	RSPB	Fay Martin	No. The RSPB considers that the economic downturn provides Medway Council with an opportunity to reconsider the environmental appropriateness of the current urban regeneration emphasis. We are particularly concerned with proposals to focus housing delivery within the Medway urban area at riverside sites. The number and scale of waterfront developments are likely to have a negative impact on the Medway Estuary and Marshes SPA. Of particular concern is the Chatham Docks site, which is located adjacent to Medway Estuary and Marshes SPA. The development has the potential to result in a number of impacts that could potential damage the SPA, including from land and/or water-based recreational activities. We strongly recommend that the riverside sites be thoroughly appraised in the AA of the Core Strategy and we would welcome the opportunity to comment further on this matter prior to the publication of that document.	Medway Council is currently discussing the scope and extent of the appropriate assessment with Natural England, the Environment Agency and adjoining authorities prior to preparing a screening document and appointing a consultant to carry out the assessment.
	Question 16			<b>Q16: Cramped internal living space and poor standards of amenity have been recognised as a national problem, should minimum internal space standards be introduced and an explicit requirement for higher quality design established?</b>  Answers for question 16 (from questionnaire & website): 21 Yes/ Agree 4 No/ Disagree 1 Don't Know	
	Question 16	CPRE Kent	Brian Lloyd	Yes, it should be an objective of the LDF to ensure the highest quality development that also meets the needs of residents.	The Council is currently preparing a supplementary document on internal space standards.
	Question 16	Groundwork Kent & Medway	Simon Green	Yes. There has been a national trend towards very cramped units and in principle all homes should meet the space standards already set for social housing.	The Council is currently preparing a supplementary document on internal space standards.
	Question 16	Mccarthy & Stone Retirement Lifestyles Ltd		Paragraph 4.26 is in danger of coming across as 'ostracizing' flatted developments as acceptable forms of housing. Whilst I would support the notion of producing good quality housing with good quality living environments I question whether the use of specific standards would be the best way to go. The Council will need to consider the implications to housing delivery and affordable housing delivery if it seeks to impose standards that would result in reducing housing densities. There may be a requirement to release more greenfield land to make up for the shortfall in numbers created by using minimum space standards for dwellings. An environment impact assessment should be carried out to ascertain the impact upon housing delivery. If space standards are to be adopted then they should be applied flexibly.	The Council is currently preparing a supplementary document on internal space standards. The impact on delivery and the implications for greenfield land will be taken into account before any space standards are adopted.
	Question 16		Gary Brook	Object With regards to paragraph 4.26, our client agrees that design of flatted developments needs to be carefully considered so as to ensure a higher quality environment. However, it is considered that it is not always appropriate to demand that set standards are met due to various site constraints and individual site characteristics. We are aware that certain development proposals will be in areas where open space amenity is poor and the Council will therefore need to ensure they are designed appropriately so as to incorporate open space and other amenities. We consider that development proposals already have to deal with strict design regulations and that applying further restrictions may result in schemes becoming unviable. Individual scheme design and merits should be justified within design and access statements and measured against good design policies within the relevant plans, rather than placing further arbitrary requirements which may frustrate development. We do not consider that applying further restrictions to design is entirely necessary and we therefore request that the Council adopt a flexible approach and consider development proposals on a case by case basis taking into account individual site characteristics both constraints and merits and existing amenities in the area.	The Council is currently preparing a supplementary document on internal space standards. The question of viability will be taken into account when considering the application of design standards on a site by site basis.

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	Question 16	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Strongly support this suggestion - and the need to ensure it applies to residential conversions into bed sit/flats.	The Council is currently preparing a supplementary document on internal space standards.
	Question 16	Kent Wildlife Trust	Debbie Salmon	The Trust is not qualified to comment on internal space standards however we would recommend that design of development include energy saving technology, enhancements for wildlife such as bat and bird boxes and connected Green Infrastructure throughout the built environment linking open spaces and other ecological hot spots. (For further information on ecological enhancements, corridors and stepping stones see The Kent Design Guide, Biodiversity Appendix at <a href="http://www.kent.gov.uk/NR/rdonlyres/6C743069-88B1-49E2-AFA0-FB60FEEA9695/0/BiodiversityFinal.pdf">http://www.kent.gov.uk/NR/rdonlyres/6C743069-88B1-49E2-AFA0-FB60FEEA9695/0/BiodiversityFinal.pdf</a> )	Noted.
	Question 16	GVA Grimley Ltd	Sheery Sassoon	We support the development of high quality housing in Medway. We consider that every new residential dwelling should have access to suitable quantity of internal space. However we consider that this should be treated flexibly with regard to site specific circumstances and demand for units of different sizes. Policies relating to internal space standards and design may therefore sit more comfortably in an SPD which has the flexibility to be updated regularly and respond to market innovation. (Suggestion- A separate SPD to be published setting out residential space and design standards which can be updated on a regular basis.)	Agreed. The Council is currently preparing a supplementary document on internal space standards.
	Question 16	Kent County Council	Richard Feasey	Minimum space standards also enable people to live in their own homes for longer, for example if they require aids and adaptations or become a wheelchair user.	Noted.
	Question 16	University College for the Creative Arts at Rochester	David Hawkins	The University would welcome the opportunity of liaising with the Council, and others, to ensure that new purpose-built student residential accommodation satisfies certain minimum criteria, including space standards and sustainability.	Noted.
	Question 16		Peel Investments (Intermediate) Ltd	Minimum internal space standards and explicit requirements for high quality design will potentially impact on the viability of schemes. Any standards should not stifle development and a blanket minimum standard would not be appropriate for all types of development opportunity. Therefore, any standards will need to retain flexibility to respond to the characteristics of any individual site or scheme. If the Council is minded to establish minimum housing space and design standards we consider that they should come forward through a Supplementary Planning Document to undergo separate consultation and scrutiny.	The Council is currently preparing a supplementary document on internal space standards.
	Question 16		Dr D Brighton	No. Smaller houses for MHS. To sell- balance supply/ demand. Quality- building regs.	The Council is currently preparing a supplementary document on internal space standards.
	Question 16	Open Spaces Society	Patricia Wilson	Yes, if these improvements are compatible with modestly- priced and affordable housing.	The Council is currently preparing a supplementary document on internal space standards.
	Question 17			<b>Q17: What types and location of sites should be specified to meet the needs of the gypsy and traveller communities – assuming a requirement of at least 14 pitches?</b>  Answers for question 17 (from questionnaire & website): 3 Yes/ Agree 3 No/ Disagree 4 Don't Know	
	Question 17	CPRE Kent	Brian Lloyd	Whilst we support the need to provide sites for gypsies and travellers, we do not consider that the scale of provision identified makes the identification of sites in the Core Strategy a strategic matter. We consider that this is a matter that is best addressed in the supporting DPD.	The housing chapter includes a criteria based policy for the provision of sites for gypsies and travellers but does not address site locations or numbers. This will be included in a subsequent development plan document.
	Question 17	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	The Parish Council would not wish to comment and commit other areas to this allocation. We have already seen areas taken over and given special planning permission in our Parish - these sites should be taken into consideration as part of the local provision (Green belt policies and building outside of agreed village boundaries has been permitted where other forms of development would not have been allowed)..	The housing chapter includes a criteria based policy for the provision of sites for gypsies and travellers but does not address site locations or numbers. This will be included in a subsequent development plan document.
	Question 17	Dickens Country Protection Society	Chris Fribbins	We have seen a number of sites given permission by the Planning Inspectorate in areas outside of allocated residential development where nobody else can develop. These sites should be taken into consideration when assessing requirements.	Noted The housing chapter includes a criteria based policy for the provision of sites for gypsies and travellers but does not address site locations or numbers. This will be included in a subsequent development plan document.
	Question 17		Vivienne Parker	One of the Brownfield sites on the outskirts of Grain village.	The housing chapter includes a criteria based policy for the provision of sites for gypsies and travellers but does not address site locations or numbers. This will be included in a subsequent development plan document.
	Question 17			Gypsy sites should be planned. L.E.A. should provide gypsy sites for itinerate gypsy. Illegal planning on gypsy sites should be controlled and planning consent should be rigorously enforced. Protect green belt/ agricultural land/ green spaces totally.	Noted.
	Question 17		Carl Kroon	Site requires easy access to allow large vehicle in/out; areas to erect equipment for test and maintenance.	The housing chapter includes a criteria based policy for the provision of sites for gypsies and travellers but does not address site locations or numbers. This will be included in a subsequent development plan document.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 17			The RSS may require up to 30 new pitches and 7 stopping pitches for transit purposes. A small land take for this level of provision. This should be recognised and pose no real problem for the CS to make delineated provision. Integrated into the general population in a safe and contained way. Must not be on substandard and unattractive sites that would exacerbate the underlying antagonisms between the traveller and settled population. Chattenden should be seen as a significant opportunity to identify a deliverable solution to a significant level of whatever RSS requirements finally transpire.	The housing chapter includes a criteria based policy for the provision of sites for gypsies and travellers but does not address site locations or numbers. This will be included in a subsequent development plan document.
	Question 17	FWCA Frindsbury and Wainscott Community Association	J R Masey	Sites should have strict regulations regarding litter and safety and security of the environment.	The housing chapter includes a criteria based policy for the provision of sites for gypsies and travellers but does not address site locations or numbers. This will be included in a subsequent development plan document.
	Question 17	Frindsbury and Wainscott Community Association	A Wade	Travellers create many problems within a locality with rubbish and dumping - sites need to be strictly overseen and controlled.	The housing chapter includes a criteria based policy for the provision of sites for gypsies and travellers but does not address site locations or numbers. This will be included in a subsequent development plan document.
	Question 17		W Mann	Provide necessary pitches on brownfield sites, preferably 2-3 sites. Provide all main services and charge appropriately.	The housing chapter includes a criteria based policy for the provision of sites for gypsies and travellers but does not address site locations or numbers. This will be included in a subsequent development plan document.
	Question 17		Dr D Brighton	Yes. Mixed site, fenced, with water, sewage, like mobile home parks, bin collection- worked ok at Farnham, Surrey.	The housing chapter includes a criteria based policy for the provision of sites for gypsies and travellers but does not address site locations or numbers. This will be included in a subsequent development plan document.
	Question 17	Open Spaces Society	Patricia Wilson	ref. para. 4.28 you should tell us if a final report has been completed (footnote 26 at page 26)	The partial review of the SE Plan has been abandoned following the revocation of that plan. The housing chapter includes a criteria based policy for the provision of sites for gypsies and travellers but does not address site locations or numbers. This will be included in a subsequent development plan document.
	Question 18			<p><b>Q18: What quantity and types of accommodation are likely to be needed to meet the needs of non self-contained households, including those with special needs?</b></p> <p>Answers for question 18 (from questionnaire &amp; website):  3 Yes/ Agree  1 No/ Disagree  9 Don't Know</p>	
	Question 18	Mccarthy & Stone Retirement Lifestyles Ltd		<p>PPS3 states that Local Authorities need to plan for a mix of of housing on the basis of the different types of households that are likely to require housing over the plan period. This will include having particular regard to current and future demographic trends and the accommodation requirements of specific groups such as older people.</p> <p>The South East Plan identifies the changing age structure of the Region with an anticipated increase in the proportion of people over the age of 65 by 2028. The draft Plan acknowledges that this will have implications for the type of housing needed. Policy CC11 of the draft plan entitled 'Supporting an Ageing Population' recognises the significant increase in the proportion of older people in the Region in the plan period advising that local planning authorities should pay regard in their Local Development Framework to assessing and planning for the social needs that will arise from an ageing population. This would include the need to make provision of new housing developments to support older people living independent lives. The Policy's supporting text states ".....coupled with the complexity associated with changing lifestyle and housing aspirations, and the Government's desire to provide greater housing choice for older people, this means there will be a need for a variety of housing options to be made available, including support for older people living independent lives in their own homes, sheltered housing and extra care housing..... for a significant number the benefits of sheltered or extra care housing will be essential if they are to maintain an independent lifestyle. The provision of such housing offers choice, frees up under-occupied family sized homes and offers an improved quality of life including improved mental and physical wellbeing of older people".</p> <p>The emerging RSS recognises the implications for planning and the Region that will occur from the projected increase in the proportion of older people, so much so that they have deemed it a sufficient concern to have a specific policy relating to the ageing population. As local authorities in the South East Region will have to have regard to the South East plan in their local development frameworks I would anticipate, and hope to see this issue promoted in the Medway Core Strategy.</p> <p>In terms of local need the Medway Housing Market Assessment identified a need for 1,929 units of sheltered accommodation, of which 727 would be in the private sector in the three years from the date of the report which was 2005. Given Paragraph 4.16's identification that the number of people over retirement age is set to increase by 10,000 in the next years then I would anticipate that the Housing Market Assessment's would need to increase substantial to meet the housing need identified by this increasing population cohort.</p> <p>On behalf of my Client, it would suggest that the Council need to adopt clear policies promoting, and essentially for a Core Strategy ensuring delivery of accommodation for older people. This should include the allocation of specific, suitable sites for older persons</p>	The housing design policy makes provision for a mix and balance of housing of different types and tenures, having regard to the strategic Housing Market Assessment. It also requires housing design to meet the need of the elderly. The question of allocation of sites will be addressed in a subsequent development plan document.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				accommodation so as to ensure deliverability.	
	Question 18	Government Office for the South East	Hazel Long	Affordability is an issue, with local earnings well below the regional average and a shortage of affordable housing. With circa 9,000 households registered on the housing waiting list, is the share of new affordable units sufficient to meet need? What provision has been made for older people's services? Although 85% of the current population of 251,700 live in the five towns, rural areas are home to 12% of Medway's population. What is the Council's policy for the provision of rural affordable housing?	Affordable housing is addressed in the Housing Chapter.
	Question 18	GVA Grimley Ltd	Sheery Sassoon	It is recommended that the Council continue to encourage a mix of housing within developments which reflect market demand and local requirements. These should therefore be reviewed and updated on a regular basis. It is therefore considered that policies relating to housing mix, including those with special needs may therefore sit more comfortably in an SPD which can be updated regularly and respond to local and market requirements. (Suggestion- A separate SPD to be published setting out residential mix which can be updated on a regular basis.)	Noted.
	Question 18		Ian Mawer	Answer to Q18-20, RES Target 9 seeks to 'Ensure sufficient and affordable housing... space of the right quality, size and type to meet the needs of the region and support its competitiveness'. SEEDA therefore considers that these questions ask the right questions, and must be informed by the Council's evidence base, particularly the SHLAA and demographic projections.	Noted.
	Question 18	Kent County Council	Richard Feasey	Community accommodation for people with special needs and requirements can also assist people to live in their own homes from longer, as well as being in line with the Government's Sustainable Communities Agenda. If community facilities are built for all sections of the community, it gives a place for people to meet, learn new skills, train to live independently, learn to live with dementia etc. The key requirement for this type of accommodation is that it is accessible, both physically and geographically.	The housing chapter addresses the issue of housing provision for people with special needs.
	Question 18		Carl Kroon	Low level access with doors that can accommodate wheel chair access, built on flat sites.	The policy on housing design deals with adaptability to meet the needs of the disabled.
	Question 18	FWCA Frindsbury and Wainscott Community Association	J R Masey	Should be included in SE Plan figures.	The housing chapter addresses the issue of housing provision for people with special needs.
	Question 18		Dr D Brighton	Yes. Family houses for Downs Syndrome adults and carer. Better homes for elderly – cared for.	The housing chapter addresses the issue of housing provision for people with special needs.
	Question 19			<b>Q19: Are there any specific housing needs related to the Black and Minority Ethnic communities that should be addressed in the Core Strategy?</b>  Answers for question 19 (from questionnaire & website): 1 Yes/ Agree 7 No/ Disagree 7 Don't Know	
	Question 19	FWCA Frindsbury and Wainscott Community Association	J R Masey	No. Standards should be the same for all.	No particular housing problems for black and minority ethnic communities have been identified in the Medway Strategic Housing Market Assessment.
	Question 19		Dr D Brighton	No. Usual language and education problems	No particular housing problems for black and minority ethnic communities have been identified in the Medway Strategic Housing Market Assessment.
	Question 20			<b>Q20: Should specific provision be made for high quality detached housing?</b>  Answers for question 20 (from questionnaire & website): 6 Yes/ Agree 7 No/ Disagree 2 Don't Know	
	Question 20	CPRE Kent	Brian Lloyd	In accordance with national planning policy, it is appropriate for the LDF to provide a range and choice of housing that meets the need of all. This, we consider, is best done by planning integrated communities that provide a mix of housing. The large redevelopment sites available in Medway will facilitate this approach.	The housing design policy makes provision for a range and choice of housing.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 20	Barratt Strategic		Yes there should be specific provision for high quality detached housing. The existing housing stock in Medway is made up predominately of terraced housing. More recent developments have focused on flatted accommodation. As recognised in the State of Medway Housing Report (Nov 08) there are few detached units in Medway. The lack of supply of family sized accommodation, including high quality detached units has in our opinion been partly to blame for the significant level of out migration Medway has suffered over the years. In addition the lack of high quality detached housing makes it difficult to attract higher paid employees and investment by quality employers, who themselves have the potential to invest in the local area, and thus help foster economic regeneration. In our opinion the Core Strategy needs to provide for a mixture of housing sizes and types, including specifically housing suited to the needs of small households and an element of spacious property capable of underpinning sustainable regeneration, and freeing up movement through the housing stock. As has been recognised elsewhere in Kent where economic regeneration is a key, there is a need to make specific provision for family sized accommodation/high quality detached units. In the context of the above we would draw the councils attention to Thanet DC decision to highlight the need for 34% - 50% of total dwellings in its strategic allocations at Westwood and Minster being a mixture of three and four bedroom homes (policies H6 and H7 of Thanet LP refers)	The housing chapter of the Core Strategy recognises that Medway has a very small proportion of 'executive style' accommodation and makes specific provision for the inclusion of such housing as part of schemes that offer a range of housing types. The recent decision by the Government to abolish the minimum density targets in PPS3 facilitates this policy.
	Question 20	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	We can recognise some of the benefits of this type of allocation, but on balance would want to see more mixed developments	The housing chapter of the Core Strategy recognises that Medway has a very small proportion of 'executive style' accommodation and makes specific provision for the inclusion of such housing as part of schemes that offer a range of housing types. The recent decision by the Government to abolish the minimum density targets in PPS3 facilitates this policy.
	Question 20	Lafarge Cement UK	David Simms	It is important that Medway plans to deliver a range of housing types which meets the full range of housing needs. It is also important to recognise that any site is capable of delivering a range of dwelling types if planned properly and not required to meet overly prescriptive density or other development criteria. Whilst the need to deliver detached homes is supported, this should be done in a way which allows all sites to be brought forward offering a range of dwelling types and sizes, capable of providing a choice of accommodation.	The housing chapter of the Core Strategy recognises that Medway has a very small proportion of 'executive style' accommodation and makes specific provision for the inclusion of such housing as part of schemes that offer a range of housing types. The recent decision by the Government to abolish the minimum density targets in PPS3 facilitates this policy.
	Question 20	Dickens Country Protection Society	Chris Fribbins	A broad mix would be required and attempts should be made to ensure mixed developments rather than sole developments of this kind.	The housing chapter of the Core Strategy recognises that Medway has a very small proportion of 'executive style' accommodation and makes specific provision for the inclusion of such housing as part of schemes that offer a range of housing types. The recent decision by the Government to abolish the minimum density targets in PPS3 facilitates this policy.
	Question 20	Kent County Council	Richard Feasey	The text suggests that a shortfall in detached properties has been identified in Medway and might therefore be addressed in the Core Strategy although the findings of the Strategic Housing Market Assessment are still awaited.	The housing chapter of the Core Strategy recognises that Medway has a very small proportion of 'executive style' accommodation and makes specific provision for the inclusion of such housing as part of schemes that offer a range of housing types. The recent decision by the Government to abolish the minimum density targets in PPS3 facilitates this policy.
	Question 20		Mercer	Attracting higher quality professional and managerial occupations will be dependent on the quality and range of housing available. Specific provision should therefore be made for lower density high quality detached housing.	The housing chapter of the Core Strategy recognises that Medway has a very small proportion of 'executive style' accommodation and makes specific provision for the inclusion of such housing as part of schemes that offer a range of housing types. The recent decision by the Government to abolish the minimum density targets in PPS3 facilitates this policy.
	Question 20	Frindsbury and Wainscott Community Association	A Wade	High quality dwellings should be a standard in all developments -size an important choice possibly a smaller provision.	The housing chapter of the Core Strategy recognises that Medway has a very small proportion of 'executive style' accommodation and makes specific provision for the inclusion of such housing as part of schemes that offer a range of housing types. The recent decision by the Government to abolish the minimum density targets in PPS3 facilitates this policy.
	Question 20	Open Spaces Society	Patricia Wilson	Better to create a mix of housing in the hope that it will lead to more integrated communities.	The housing chapter of the Core Strategy recognises that Medway has a very small proportion of 'executive style' accommodation and makes specific provision for the inclusion of such housing as part of schemes that offer a range of housing types. The recent decision by the Government to abolish the minimum density targets in PPS3 facilitates this policy.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 21			<p><b>Q21: How should the problem of bringing older owner-occupied properties up to modern standards be addressed? Should selective redevelopment be considered as an option?</b></p> <p>Answers for question 21 (from questionnaire &amp; website):  6 Yes/ Agree  6 No/ Disagree  3 Don't Know</p>	
	Question 21	Barratt Strategic		We do not see how the council can advocate the selective redevelopment of older owner occupied properties that do not reach modern standards. This would involve costly CPO. Instead, as part of their approach to combating climate change, the council should look at ways to fund improvements to the existing housing stock. This would be a much more cost effective approach and a lot less disruptive to the local community	The housing policy makes provision for the improvement and renovation of existing housing stock rather than selective redevelopment.
	Question 21	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Natural redevelopment occurs as properties are recycled for the new generations.	Noted
	Question 21	Dickens Country Protection Society	Chris Fribbins	This may be a natural consequence of recycling households from elderly to younger generation	Noted
	Question 21		Vivienne Parker	Too expensive, refurbishment is cheaper & better.	Agreed
	Question 21		I.H. Smith	Not redevelopment in most cases, support, help with the owner/ landlord	Agreed
	Question 21		Carl Kroon	Pre 1919 building cannot be brought up except by demolition and rebuild.	Noted
	Question 21	FWCA Frindsbury and Wainscott Community Association	J R Masey	With loans if needed. Selective redevelopment only with the consent of the occupier. Some of the old properties have character which is lacking in most current buildings (Good example Grange Farm Development)	The housing policy makes provision for the improvement and renovation of existing housing stock rather than selective redevelopment
	Question 21	Frindsbury and Wainscott Community Association	A Wade	No. Many older properties are often significantly superior in construction to new dwellings. Selective redevelopment is not acceptable, it indicates the removal of choice.	The housing policy makes provision for the improvement and renovation of existing housing stock rather than selective redevelopment
	Question 21		W Mann	Yes. Essential update existing old housing stock as well as providing new developments elsewhere.	The housing policy makes provision for the improvement and renovation of existing housing stock rather than selective redevelopment
	Question 21		Dr D Brighton	Yes. Don't make MHS services engineer redundant. Repair more. Redevelopment only if condemned.	The housing policy makes provision for the improvement and renovation of existing housing stock rather than selective redevelopment
				<b>Transport</b>	
		Medway Countryside Forum	David Murr	We understand that the construction of an additional road/mixed modal crossing of the Thames/Medway estuaries has been promoted at high level, notably by some of it's advocates within the County Council. We are strongly opposed to this and consider that it would be a completely inappropriate approach to achieving a sustainable transport system for this area, and would inevitably further raise pressures for excessive and damaging development. The important conservation and landscape areas on the Hoo Peninsula would be particularly vulnerable to spoliation, and the hinterland of the Thames and Medway Special Protection Areas would be seriously affected.	The issues of a Lower Thames crossing will be addressed separately from the Core Strategy.
			Alastair Blair	First- control development to meet local demand. Second- work within national policies but do not spread development on to rural areas at Rainham and Capstone.	There are no proposals in the Core Strategy to develop in the Capstone or in the rural areas of Rainham.
				Control local development of transport to meet demand, work with National policies but do not allow spread of development into rural areas in Rainham and Capstone Valley.	There are no proposals in the Core Strategy to develop in the Capstone Valley or in the rural areas of Rainham.
			Mike Walters	Bus facilities provided by ARRIVA are insufficient on Sundays and at nighttime. I drive a London bus often until 2 am and my earliest start time is 4:30am. People need to get to work and go home at night. The Medway tunnel should be modified with barriers for a combined pedestrian and cycle way.	Bus services are principally the responsibility of the bus companies; The design of the Medway Tunnel precludes its use by pedestrians and cyclists on safety grounds.
		Medway Renaissance	John Finlayson	Regeneration sites are an opportunity to address congestion and are not necessarily the cause. The transport strategy hopefully will major on modal shift. This ties in with current concerns about air quality, which will remain an issue unless there is significant modal shift away from private car use. Parking standards need to be carefully reviewed on the basis of traffic restraint to encourage a modal shift. High parking requirement can adversely affect the viability of regeneration sites particularly in town centres. High Speed 1 will be an important catalyst for the regeneration of Medway. Improvements to the stations as transport hubs need to be actively promoted by the LDF. Access for all and increased connectivity is a major priority for Medway. River crossings and improved transport facilities must feature.	The Transport strategy places a great emphasis on public transport, whilst walking and cycling are also supported. It allows for parking standards to be reduced on sites well served by public transport and promotes improvements to the railway stations. The feasibility of a river crossing is being investigated.



Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
		Natural England	Josh Nelson	In order to best protect species and landscapes against the effects of climate change, Natural England would encourage transport initiatives and policies that reduce reliance on the private car and promote public transport provision where such initiatives and policies lead to a reduction in carbon production. Natural England would also encourage initiatives and policies which have the effect of reducing and/ or minimising air quality impacts on statutory nature conservation sites and on users and inhabitants of the Kent Downs AONB. Any river taxi or wharf protection proposals should avoid adverse impacts on statutory nature conservation sites.	Noted
			Steve Banfield	1. Over many years Medway's Public Transport infrastructure has been extremely poor - It did at least appear again in the evenings after deregulation (- with KCC & later Medway/KCC subsidies). Unfortunately it is still very poor on Sundays. Transport to most of the areas would need to be vastly improved. You could almost do with a Medway towns monorail or underground 24 hour system to get to stations. 2. A transport link in to Strood Rail Station would be of limited use - since it is only on the Charing Cross/ Canon Street line. Rochester or Chatham would be better.	A monorail or underground system would not be viable.
			Barry Knight	Residents' parking is a joke, particularly in Gillingham. Parking is no easier than before (no surprise there then) and the price is rocketing. The so called consultation period in ME7 coincided when things were a bit tight with the redevelopment of the hospital car park. And did residents really request for restricted parking until 10PM? One might expect this in central London but Gillingham?	Noted.
4.43		Network Rail (Town Planning)	Mike Smith	To the point "Mainline and Grain Freight Line capacity limitations â€" resulting in restricted ability to move freight by rail"- Network Rail currently has a scheme in progress to provide improved infrastructure & operation	Noted.
4.44			Barry Knight	The "fast" domestic rail services is probably a misnomer for Medway - given the slow run through to Northfleet and the pinch point at the Rochester Bridge. Also the terminus at St Pancras is not helpful for most commuters - involving a tube journey for many where previously one was not necessary. This and the premium to be paid may mean the commuter will be reluctant to leave the "classic" services - even if South East Trains have slowed these down over the years and will be adding additional stops in December 2009.	Noted.
4.45			Alastair Blair	Towns and traffic will always be congested. Apply traffic management techniques which allow best flow. Convince the public by better public transport that the car should be second option. See Santander in Spain and many other European cities. Little change to road layouts but heavy investment in busses.	The transport strategy places great emphasis on public transport.
4.46		CPRE Kent	Brian Lloyd	We are surprised that these assessments have not already been undertaken as this site is being put forward as the Council's favoured location for development.	Preliminary assessments have been carried out but more detailed assessments will be required as the detailed form of development is clarified
4.51		Network Rail (Town Planning)	Mike Smith	Station environments – Chatham, Gillingham, Rochester and Strood stations all included in National Stations Improvement Programme – options being investigated to re-locate Rochester station with Medway Council	The transport policy includes provision for station improvements.
4.52		London Thamesport (Hutchison Ports UK Ltd)	Nicholas Orbell	This line has potential for freight capacity, thereby by-passing the congested cross London lines. Greater access to the West Coast Mainline should be considered, for the benefit of containerised freight from London Thamesport together with Channel traffic.	The upgrading of the Medway Valley Line as strategic link to Gatwick would need to be investigated at a strategic level. The South East plan does not address the issue nor is it included in the Kent Rail utilisation strategy and consequently it is not included in the Core Strategy.
4.54		Groundwork Kent & Medway	Simon Green	Whilst there are an increasing number of people arguing in favour of a waterbus system, these cannot really be described as "efforts" in the sense of detailed feasibility studies or plans. Given that the problem in Medway is partly about cross river connections as well as the potential up and down river, a better case can be made than in some place with many good cross river connections (eg London). There should be more emphasis on encouraging this the key to which is the condition of the piers themselves and addressing the high tidal range. Piers need to have a high quality environment and to be viable as destinations in themselves and the LDF should include policies to encourage this and to support feasibility studies. Many other coastal estuaries in UK have good cross river ferry systems which would have lower capital costs than cable cars and possibly similar in revenue terms.	The Transport and River Medway policies make provision for use of piers and river taxis.
4.55		Rochester City Airport	Paul Britten	Although we welcome the inclusion of Rochester Airport in the Transport sector no mention is made of its safeguarded status although this issue is raised in regard to Stoke microlight facility. Amateur pilot training is a misnomer as many go on to gain further and professional qualifications. It is a vital licensed drop off and refuelling stop for royal, military, security services, survey, photographic and other business flights. It is the base for the newly commissioned police helicopter run jointly with Essex police.	Noted. The Transport and Movement chapter notes that Rochester is a licensed facility and subject to airspace safeguarding by the Council.
4.55		tbh developments ltd & helvig ltd	tbh developments/helvig	Whether Rochester Airfield will continue in use as a general aviation airfield and what land within the airfield site might be available for development is crucial to the realisation of the strategic employment development at the site provided for in South East Plan Policy KTG3. The Issues and Options Report is completely silent on this fundamental issue and this needs to be remedied when the Core Strategy itself is published. The Council also needs to commit to making any employment development land within the airport perimeter available within a specified timescale.	The development strategy for the airport and the land surrounding it is set out in the draft core strategy.
4.56		Groundwork Kent & Medway	Simon Green	It is hard to see how encouraging microlights can be justified particularly if this unnaturally restrains other developments. Microlights are a minority leisure activity, which can be provided for elsewhere in Kent if there is sufficient need.	The Core Strategy does not encourage microlights and the Issues & Options report sought views on an existing facility at Stoke..
Question 22				<b>Q22: Have the correct transport issues been addressed? If not, which further issues should be considered?</b>  Answers for question 22 (from questionnaire & website): 3 Yes/ Agree	

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				9 No/ Disagree 4 Don't Know	
	Question 22	CPRE Kent	Brian Lloyd	Generally, we consider that the right transport issues have been identified but there are two major omissions. Firstly, no mention is made of the prospect of a Lower Thames Crossing even though one of the options being considered by Government would involve a crossing point from the Hoo Peninsula. The Council should state its strong objection to this in the Core Strategy on the grounds of the severe environmental impact that it will have on internationally important nature conservation interests. Secondly, there is no recognition of Rochester Airfield and its potential contribution to transport and tourism. Whilst any expansion of the airfield would be inappropriate, we consider that it contributes to the transport mix of the area and provides important aviation related employment. It also provides a significant open green area in the urban area that would contribute towards the green grid strategy. The future role of the airfield, therefore, needs to be considered in the Core Strategy.	The issue of the Lower Thames Crossing is dependant on decisions by government and, if necessary, will be dealt with in future review of the Core Strategy. The development strategy for the airport and the land surrounding it is set out in the draft core strategy.
	Question 22	Government Office for the South East	Hazel Long	Has the Council considered the five goals of DaSTS - supporting economic growth, tackle climate change, promote equality of opportunity, contribute to better safety, security and health, and improve quality of life; - Consider improved access to Thamesport.	The five goals of DaSTS are addressed in the transport policy. Improved access to the international gateway at Grain is identified as a key action.
	Question 22	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	There is not much in the way of practical solutions that will provide realistic improvement, but not much we can suggest to improve matters. Only small steps and recognition of 'best practice' when it is carried out.	Noted.
	Question 22	Lafarge Cement UK	David Simms	The issue of parking and its relationship with railway stations is highlighted, but needs to recognise that this is not necessarily only a problem in the immediate vicinity of stations or other areas where restrictions might be established. Where parking regimes are designed to restrict or control parking, recognition must be given to the potential for parking problems to be displaced beyond those controlled areas to surrounding areas. Such parking regimes must therefore be planned holistically as part of an overall transport and accessibility strategy for those areas.	Noted.
	Question 22	Trenport Investments Limited	C Hall	The only comment that we would wish to make is the general comment that we are surprised that there appear to be no transportation issues relating to roads and highways.	The transport policy proposes selective junction improvements and the appendix identifies where they will take place. The main priority is to improve public transport.
	Question 22	Lafarge Cement UK PLC	David Simms	The only comment that we would wish to make is the general comment that we are surprised that there appear to be no transportation issues relating to roads and highways.	The transport policy proposes selective junction improvements and the appendix identifies where they will take place. The main priority is to improve public transport.
	Question 22	Kent Wildlife Trust	Debbie Salmon	The Trust welcomes plans to increase access to public transport and improve pedestrian and cycle ways. These can be included in the Green Infrastructure so long as wildlife enhancements such as wildflower rich roadside verges and indigenous hedgerows are included in design.	Noted.
	Question 22	Dickens Country Protection Society	Chris Fribbins	Transport issues correctly aim to encourage more use of public transport but restrictions on private use through restrictions of access and parking tend to affect the rural communities much more than the urban population.	Noted.
	Question 22	South East Marine Association's	Laraine Soliman	No. In addition to taking steps to reduce the gridlock which is gradually overtaking Medway (which public transport will not solve because it has to be accompanied by high parking costs as well as subsidy) there should be a waterbus operation to provide interest particularly for visitors. Unfortunately the policy of neglecting public access to the river will add to the capital as well as revenue costs but such investment should be made in an effort to improve Medway's poor image. Although such services would help to reduce future siltation, funds will have to be found for expensive dredging unless commercial shipping can also be attracted. The recent visit of the Black Prince cruise ship indicates an opportunity which should be explored because the highway traffic associated with that business arises outside of peak hours.	The River Medway policy encourages the protection and provision of piers for river taxis and other services.
	Question 22	GVA Grimley Ltd	Sheery Sassoon	We support the Council's general approach for delivering infrastructure improvements and proposals to improve public transport, particularly the upgrading of the Medway Valley Line as a strategic link to Gatwick. Details of how these improvements will be delivered should be included. We propose that the Council should issue a programme of infrastructure improvements including details of how these will be delivered. This will allow for sites surrounding infrastructure hubs to be developed efficiently, in accordance with PPS1. (Suggestion- Policy should include a programme setting out when and how infrastructure will be delivered.)	The Core Strategy will be accompanied by an infrastructure plan when it is submitted to the Secretary of State. The upgrading of the Medway Valley Line as a strategic link to Gatwick would need to be investigated at a strategic level. The South East plan does not address the issues nor is it included in the Kent Rail utilisation strategy and consequently it is not included in the Core Strategy.
	Question 22	The General Aviation Awareness Council	The General Aviation Awareness Council	Protecting General Aviation interests within the Medway area is vital, with particular reference to Rochester Airport. The availability of an airport within Medway is an asset that is currently under-used. Its potential to enhance the area's economic base has not been exploited due to lack of investment (which is in turn due to leases being of insufficient length to justify such expenditure).	The Transport and Movement chapter notes that Rochester is a licensed facility and subject to airspace safeguarding by the Council. The development strategy for the airport and the land surrounding it is set out in the draft core strategy.
	Question 22	Port Medway Marina Ltd	Port Medway Marina	A waterbus operation would be beneficial for tourism, transport links and Medway businesses. Increased river activity would also assist in reducing future siltation, which is worsening due to the considerable reduction in shipping movements (which is in turn a consequence of riverside re-development projects). Increased siltation could also have an impact upon flooding.	The River Medway policy makes provision for river taxis.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 22		Vivienne Parker	This section links poor air quality with areas of traffic congestion, but the worst area for air quality is Hoo Peninsula with traffic congestion not an issue but pollution from power stations is. Air quality in Medway is getting worse and this needs to be addressed in other ways apart from just tackling transport issues.	The policy on Health and Social Infrastructure seeks to promote, protect and improve the health of Medway's population. A more specific policy on air pollution will be included in a subsequent development plan policy document.
	Question 22		I.H. Smith	better public transport i.e. later in the evenings	Public transport is principally a matter for private transport providers but is promoted in the core strategy.
	Question 22	FWCA Frindsbury and Wainscott Community Association	J R Masey	- Evening bus service - Bridge for Stonehorse Lane, Frindsbury - More use made of Mineral railway to Grain - Controlled parking zone near Strood station has moved on-street parking elsewhere i.e. Banks Way, Frindsbury - Should be more control over people	Given that there are two nearby bridges across the by-pass at Rochester Road and Dillywood Lane, a new bridge at Stonehorse Lane is difficult to justify. There are no proposals to introduce passenger services on the Grain railway lane. Detailed parking issues are not a matter for the Medway Core Strategy. Public transport is principally a matter for private transport providers but is promoted in the core strategy.
	Question 22		Dr D Brighton	No. Linked bus/ train season tickets. Why does Medway have to share so much of Hitachi SE trains costs- they are not fast from Chatham.	The transport policy promotes the introduction of linked bus/train ticketing.
	Question 22	RSPB	Fay Martin	No. Paragraph 4.55 of the Core Strategy – Issues and Options Report highlights that Rochester Airport would “require significant investment to bring it up to modern standards”. It is not clear from paragraph 4.55 whether it is proposed to upgrade or increase air services at Rochester Airport. Aviation is the fastest growing source of greenhouse gas emissions, and airports can cause direct or indirect damage to wildlife sites. Rochester Airport is near to Medway Estuary and Marshes Special Protection Area (SPA) and Holborough to Burham Marshes SSSI. Any expansion of facilities or services has the potential to have an impact on internationally and nationally important bird populations through disturbance. We strongly recommend this matter be thoroughly appraised in the AA of the Core Strategy and we would welcome the opportunity to comment further on this matter prior to the publication of that document.	The Transport and Movement chapter notes that Rochester is a licensed facility and subject to airspace safeguarding by the Council.  The development strategy for the airport and the land surrounding it is set out in the draft core strategy.  As the Core Strategy does not propose to increase air services at Rochester Airport, this will not be an issue for the Appropriate Assessment. However if, in future, an expansion is proposed, the impact on wildlife sites will need to be addressed.
	Question 22	Open Spaces Society	Patricia Wilson	Although much has been mooted about a lower Thames Crossing, possibly including the Hoo Peninsula, would strongly oppose this. The Peninsula not only parades open space in stark contrast to the large conurbation which is largely concreted over, but provides also good Grade agricultural land likely to increase in importance as demand grows for home-produced” food. It comprises a variety of conservation interests which include internationally & nationally valuable sites.	The issue of the Lower Thames Crossing is dependant on decisions by government and, if necessary, will be dealt within a future review of the Core Strategy.  Good quality agricultural land will be safeguarded by the application of the guidance in PPS7.
	Question 23			<b>Q23: Should a scheme be developed for another crossing of the Medway to link Chatham with Medway City Estate, for the use of pedestrians, cyclists and public transport?</b>  Answers for question 23 (from questionnaire & website): 12 Yes/ Agree 9 No/ Disagree 0 Don't Know	
	Question 23	CPRE Kent	Brian Lloyd	Yes, in principle this seems a good idea worth exploring in more detail.	The Core Strategy do not propose a new Medway crossing but the Transport Plan Appendix identifies the investigation of a new crossing as an action to be carried out by the Council.
	Question 23	Groundwork Kent & Medway	Simon Green	Yes and this would best be addressed through a water ferry system which could link St Mary's Island, Upnor, Chatham Dockyard, MCE, Star Pier, MCE again and Strood Pier (with link to station) as well as possibly further up and down stream. This would be more cost effective, environmentally sensitive and flexible than a fixed link like a bridge, tunnel or cable cars. It requires good piers to attract passengers and operators.	The River Medway policy supports the principle of a river taxi.
	Question 23	Viridor Waste Ltd	Mandeep Jutley	This issue needs further investigation. The Medway City Estate includes a number of warehouse/industrial types of uses. The types of servicing and delivery vehicles reflect the nature of these uses. As such, any conflict between the existing uses, and their possible intensification, with a crossing for pedestrians, cyclists and public transport needs to be carefully considered.	The Core Strategy do not propose a new Medway crossing but the Transport Plan Appendix identifies the investigation of a new crossing as an action to be carried out by the Council.
	Question 23	Barratt Strategic		Yes there should be another crossing of the Medway to provide pedestrians and cyclists with easier access between Chatham and Medway City Estate. Furthermore this link should be opened to public transport providers to enhance public transport links between Chatham and Medway City Estate	The Core Strategy do not propose a new Medway crossing but the Transport Plan Appendix identifies the investigation of a new crossing as an action to be carried out by the Council.
	Question 23	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	We can see potential practical difficulties with this, but would support it.	The Core Strategy do not propose a new Medway crossing but the Transport Plan Appendix identifies the investigation of a new crossing as an action to be carried out by the Council.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 23		Mari-Anne Harstad	Yes strongly agree. This is key to linking up these and the surrounding areas with the centre.	The Core Strategy does not propose a new Medway crossing but the Transport Plan Appendix identifies the investigation of a new crossing as an action to be carried out by the Council.
	Question 23	Dickens Country Protection Society	Chris Fribbins	Would support this, although recognise the problems of providing sufficient access on the Chatham side of the river (especially road access for buses etc.)	The Core Strategy does not propose a new Medway crossing but the Transport Plan Appendix identifies the investigation of a new crossing as an action to be carried out by the Council.
	Question 23	Kent County Council	Richard Feasey	This would help to ease congestion. However with improved ventilation is there scope for pedestrians and cyclists to use the Medway tunnel?	This has been fully investigated and has not been found to be viable.
	Question 23			Response from Bloomfields Ltd on behalf of Elm Court Estate Developments Ltd; The General Aviation Awareness Council; Medway Sports and Leisure Park Ltd; Mid Kent College; Port Medway Marina; Medway Rewind Services Q23/25. The greater the provision of transport links and initiatives the more attractive the area will be to investors and inward migration.	Noted.
	Question 23		Vivienne Parker	A pedestrian crossing over the Medway would impede use of the Medway by local sailors.	The Core Strategy does not propose a new Medway crossing but the Transport Plan Appendix identifies the investigation of a new crossing as an action to be carried out by the Council.
	Question 23	FWCA Frindsbury and Wainscott Community Association	J R Masey	A cable car system over river to & from Chatham preferable to bridge, that may interfere with shipping. Although a crossing may not be needed if the Canal Rd bus service to & from Chatham becomes available.	The Core Strategy does not propose a new Medway crossing but the Transport Plan Appendix identifies the investigation of a new crossing as an action to be carried out by the Council.
	Question 23	Frindsbury and Wainscott Community Association	A Wade	Another crossing from City Estate to Chatham on a possible flood plain? Chatham will have to improve considerably to justify an expensive crossing. When the Medway Tunnel was under construction we requested facilities for walkers and cyclists It was refused on financial grounds. A short sighted policy in the event.	Noted
	Question 23		Dr D Brighton	No. Not a Tunnel. Ferry (foot, motorboat) too slow, even from Sun Pier. Extend Dockside through the tunnel to the trading estate.	Noted
	Question 23	RSPB	Fay Martin	Q23 - 25: No. The RSPB supports the approach set out in paragraph 19 of PPG13, which states "a key planning objective is to ensure that jobs, shopping, leisure facilities and services are accessible by public transport, walking, and cycling" we would therefore welcome a positive approach to promoting non-car travel, including improved pedestrian and cycle links. Any proposals for additional transport infrastructure will however need to be balanced with the environmental constraints of the area. In the wrong location and/or without effective mitigation transport infrastructure proposals could have a negative impact on features of nature conservation concern, including internationally designated sites, for example by increasing opportunities for access to those sites. We therefore strongly recommend this matter be thoroughly appraised in the AA of the Core Strategy and we would welcome the opportunity to comment further on this matter prior to the publication of that document.	As the Core Strategy is not proposing a new crossing of the Medway, this will not be the subject of an Appropriate Assessment. However the environmental impact of such a scheme will need to be part of the Council's investigation of the concept.
	Question 24			<b>Q24: How can public transport capacity be increased to tackle the additional demands that will arise from the regeneration of the area? Should this include greater priority for buses if linked to substantial service improvements?</b>  Answers for question 24 (from questionnaire & website): 8 Yes/ Agree 2 No/ Disagree 4 Don't Know	
	Question 24	CPRE Kent	Brian Lloyd	Yes, we consider that enhanced public transport should be at the heart of the regeneration of the area. We agree that this should include greater priority for buses linked to service improvements. Importantly, this should include increased frequency of services along with dedicated bus lanes. As part of this we would support the extension of Fastrack into Medway. There should also be improved quality of the buses used to make them more attractive to users, and services must be affordable to attract new passengers. Such improvements to the public transport services will require a significant financial commitment from the Council, and must be fully embraced by those who wish to undertake development in the area.	Measures proposed in the transport chapter include increasing capacity, reliability and quality of public transport, fast track styles services, park and ride sites, improved interchanges with railway stations, improved railway stations, high quality real time information and cross mode ticketing systems.
	Question 24	Government Office for the South East	Hazel Long	How does this feed into the transport objective of sustainable travel, accessibility and social inclusion; - where will the funding come from for the expansion of the Fastrack model into Medway?	An increase in the capacity of public transport will help to encourage a shift away from the use of the private car and provide a greater accessibility to all the population. The funding of fast track is addressed in the Infrastructure Delivery Plan.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 24	Barratt Strategic		We would support the principle of the expansion of the fast track bus model within Medway. In addition we would suggest that the council look at bus only areas within the town centres. If traffic congestion is a serious issue then the means of tackling this will need to be weighed against other infrastructure contributions normally sought of developers. The council has the ability to decide what it's priorities are and to seek contributions accordingly – as long as these are fairly and reasonable related to the proposed development. The introduction of higher parking charges/road pricing will only affect those who are already disadvantaged. Likewise park and ride facilities are not in our opinion likely to be successful as the nature and level of congestion is such that unless these are located some way from the main urban areas they will not have any really effect – the lessons learnt in Maidstone should be taken into account on considering this proposition	Measures proposed in the transport chapter include increasing capacity, reliability and quality of public transport, fast track styles services, park and ride sites, improved interchanges with railway stations, improved railway stations, high quality real time information and cross mode ticketing systems.
	Question 24	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Concern about the limited amount of road space to achieve segregation for buses. Rural areas usually need private transport more than the urban areas to access basic retail and other social infrastructure, so can be affected more by restrictions - such as reduced/expensive parking provision and any congestion caused by bus priority.	Measures proposed in the transport chapter include increasing capacity, reliability and quality of public transport, fast track styles services, park and ride sites, improved interchanges with railway stations, improved railway stations, high quality real time information and cross mode ticketing systems.
	Question 24	Lafarge Cement UK	David Simms	Public transport capacity is not only about providing adequate service levels, it is also about delivering an integrated and effective network. Where Section 106 contributions are sought from new development towards public transport provision, this should be on the basis of contributing to a coordinated strategy which recognises that combining contributions from adjacent sites can be an effective and efficient way of delivering public transport improvements which achieve greater benefits than through a sequence of individual interventions. This approach would allow a range of measures to be implemented as part of a package, delivering integrated solutions.	Measures proposed in the transport chapter include increasing capacity, reliability and quality of public transport, fast track styles services, park and ride sites, improved interchanges with railway stations, improved railway stations, high quality real time information and cross mode ticketing systems.
	Question 24		Mari-Anne Harstad	Cycle paths, bus and scooter lanes are all required. Buses should have more investment.	Noted.
	Question 24	Kent County Council	Richard Feasey	Improved services more routes, increased frequency. Better links from different parts of Medway to other urban areas e.g. Rochester to Maidstone.	Measures proposed in the transport chapter include increasing capacity, reliability and quality of public transport, fast track styles services, park and ride sites, improved interchanges with railway stations, improved railway stations, high quality real time information and cross mode ticketing systems.
	Question 24		Vivienne Parker	Public Transport capacity cannot be increased all the time. Arriva want more and more public cash to maintain existing services. Consideration should be given to provision of in house public transport to areas where there are high levels of free bus pass users and Arriva are reducing services as a result.	Measures proposed in the transport chapter include increasing capacity, reliability and quality of public transport, fast track styles services, park and ride sites, improved interchanges with railway stations, improved railway stations, high quality real time information and cross mode ticketing systems. The Council subsidises a number of bus services but any expansion would depend on the demand and availability of funds.
	Question 24		I.H. Smith	More bus lanes- more by passes	Measures proposed in the transport chapter include increasing capacity, reliability and quality of public transport, fast track styles services, park and ride sites, improved interchanges with railway stations, improved railway stations, high quality real time information and cross mode ticketing systems.
	Question 24		Carl Kroon	Medway buses are run as a monopoly by Arriva. Buses stop running at 7pm week days and forget about travel on Sundays. Medway is hills and valleys	Measures proposed in the transport chapter include increasing capacity, reliability and quality of public transport, fast track styles services, park and ride sites, improved interchanges with railway stations, improved railway stations, high quality real time information and cross mode ticketing systems.
	Question 24	FWCA Frindsbury and Wainscott Community Association	J R Masey	Agree to fast track if roads will accommodate it.	Noted.
	Question 24		W Mann	Integrated bus services/fast track/trolley buses. Better use of railway line from Hoo junction to Grain to serve the Peninsula and Lodge Hill in particular	Noted. Measures proposed in the transport chapter include increasing capacity, reliability and quality of public transport, fast track styles services, park and ride sites, improved interchanges with railway stations, improved railway stations, high quality real time information and cross mode ticketing systems. There are no proposals for trolley buses or passenger use of

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
					the Grain railway line.
	Question 24		Dr D Brighton	Yes. Buses as required, extended as required.	Noted.
	Question 24	Open Spaces Society	Patricia Wilson	Priority devices for bus transport can only work if "substantial service improvements" are guaranteed. Many bus services are irregular, do not run on time and there are few indicators at bus stops to help passengers. The central bus station is depressing and needs an inspired face-lift. The system (Arriva) does nothing to encourage users to seek speedy address.	Measures proposed in the transport chapter include increasing capacity, reliability and quality of public transport, fast track styles services, park and ride sites, improved interchanges with railway stations, improved railway stations, high quality real time information and cross mode ticketing systems. Construction of a new bus station at Globe Lane, Chatham, has started.
	Question 25			<b>Q25: Should a case be made for the upgrading of the Medway Valley Line as a strategic link to Gatwick?</b>  Answers for question 25 (from questionnaire & website): 13 Yes/ Agree 6 No/ Disagree 0 Don't Know	
	Question 25	CPRE Kent	Brian Lloyd	This may be worthy of further examination, but we suspect that there will be significant difficulties in delivering it.	The upgrading of the Medway Valley Line as a strategic link to Gatwick would need to be investigated at a strategic level. It is not the Kent Rail utilisation strategy and consequently it is not included in the Core Strategy.
	Question 25	Government Office for the South East	Hazel Long	The Kent RUS does not recommend a link to Gatwick from the Medway area. Could this be privately funded or the issue raised through Network Rail?	The upgrading of the Medway Valley Line as strategic link to Gatwick would need to be investigated at a strategic level. It is not included in the Kent Rail utilisation strategy and consequently it is not included in the Core Strategy.
	Question 25	Barratt Strategic		We would support the upgrading of the Medway Valley Line as a strategic link to Gatwick. Whilst this strategy would require co-operation with a number of other authorities, the Medway valley line is to all intense and purposes underutilised. The possibility of upgrading this line, and we would suggest, enhancing the interchange at Strood, will not only enhance public transport provision, but help in the regeneration of the area as it would make connectivity with Maidstone, Tonbridge/Tunbridge Wells much more user friendly. Whilst we acknowledge the investment required around Redhill to help facilitate this, we would suggest that discussion are initiated with Reigate and Banstead Borough Council as Reigate/Redhill is both an identified regional hub and growth point in the South East Plan and development within this area could also assist in bringing forward what would be a very useful east west rail link.	The upgrading of the Medway Valley Line as strategic link to Gatwick would need to be investigated at a strategic level. It is not included in the Kent Rail utilisation strategy and consequently it is not included in the Core Strategy.
	Question 25	Lafarge Cement UK	David Simms	We would support proposals for making more effective use of the Medway Valley line and which recognised the need to enhance facilities at Strood station in support of this. Any such proposals should recognise the physical or environmental constraints which might influence proposals, particularly as the line passes through existing residential areas.	The upgrading of the Medway Valley Line as strategic link to Gatwick would need to be investigated at a strategic level. It is not included in the Kent Rail utilisation strategy and consequently it is not included in the Core Strategy.
	Question 25	Lafarge Cement UK PLC	David Simms	Lafarge would support proposals to upgrade the Medway Valley Line, including proposals for it to be upgraded as a strategic link to Gatwick. It is an important line linking the Medway Towns and Maidstone and it would benefit the area if it were to be upgraded, irrespective of whether it provides a strategic link to Gatwick. The line is also important as a strategic link to Ebbsfleet International Station, with its high speed rail links to central London and to Europe	The upgrading of the Medway Valley Line as strategic link to Gatwick would need to be investigated at a strategic level. It is not included in the Kent Rail utilisation strategy and consequently it is not included in the Core Strategy.
	Question 25		Mari-Anne Harstad	Yes it would relieve pressure from our existing roads	The upgrading of the Medway Valley Line as strategic link to Gatwick would need to be investigated at a strategic level. It is not included in the Kent Rail utilisation strategy and consequently it is not included in the Core Strategy.
	Question 25	Dickens Country Protection Society	Chris Fribbins	We recognise the real difficulties of getting capacity on the line from Redhill to Gatwick and therefore that a full service would be difficult to implement, but this should be explored and perhaps other solutions investigated.	The upgrading of the Medway Valley Line as strategic link to Gatwick would need to be investigated at a strategic level. It is not included in the Kent Rail utilisation strategy and consequently it is not included in the Core Strategy.
	Question 25	Network Rail (Town Planning)	Mike Smith	At present Network Rail is investigating schemes to reduce bottlenecks at Redhill and Gatwick Airport, if and when capacity can be released there it is highly likely there will be conflicting demands for additional capacity therefore the Kent RUS does not recommend services from Medway Towns to Gatwick within the current control period.	The upgrading of the Medway Valley Line as strategic link to Gatwick would need to be investigated at a strategic level. It is not included in the Kent Rail utilisation strategy and consequently it is not included in the Core Strategy.
	Question 25	Kent County Council	Richard Feasey	Kent's Local Transport Plan supports improved rail connections to Gatwick from Kent and given the catchment population within the Medway Towns making full use of the potential of the Medway Valley Line in this regard from its terminus in Medway would make sense in both improving the nodality of the Medway Towns as a regional hub and in improving their connectivity with other regional hubs (Maidstone, Tonbridge /Tunbridge Wells and Redhill/Reigate).	The upgrading of the Medway Valley Line as strategic link to Gatwick would need to be investigated at a strategic level. It is not included in the Kent Rail utilisation strategy and consequently it is not included in the Core Strategy.
	Question 25		Carl Kroon	Medway is major urban area in Kent and has no direct access to Gatwick. It would also provide access to towns on the way.	The upgrading of the Medway Valley Line as strategic link to Gatwick would need to be investigated at a strategic level. It is not included in the Kent Rail utilisation strategy and consequently it is not included in the Core Strategy.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 25		Dr D Brighton	No. Too expensive, slow. National type coach firm Hempstead Valley, direct (not via Victoria Coach station)	The upgrading of the Medway Valley Line as strategic link to Gatwick would need to be investigated at a strategic level. It is not included in the Kent Rail utilisation strategy and consequently it is not included in the Core Strategy.
	Question 25	Open Spaces Society	Patricia Wilson	This is welcome in principle, as would reduce pressure on M25.	The upgrading of the Medway Valley Line as strategic link to Gatwick would need to be investigated at a strategic level. It is not included in the Kent Rail utilisation strategy and consequently it is not included in the Core Strategy.
	Question 26			<b>Q26: Should formal protection be given to local wharves and Chatham Docks over the long term?</b>  Answers for question 26 (from questionnaire & website): 16 Yes/ Agree 4 No/ Disagree 1 Don't Know	
	Question 26	CPRE Kent	Brian Lloyd	Yes, we consider that this would be desirable in order to help facilitate greater use of the river.	The River Medway policy safeguards wharves and Chatham Docks.
	Question 26	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Although we recognise the problems of getting access to the Brighton Mainline, we would support the provision of a reliable and regular Gatwick link - it has not been reliable or frequent enough in the past to gain and retain high levels of use.	Noted.
	Question 26	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Yes - but where public access to the riverside is not compromised	The safeguarding of wharves and docks inevitably precludes public access to working areas.
	Question 26	Kent Wildlife Trust	Debbie Salmon	The Trust has no objection to safeguarding of wharves and docks being preserved however if boat traffic is increased this will need to be appraised for disturbance impacts on protected bird species.	Noted.
	Question 26	Dickens Country Protection Society	Chris Fribbins	Public access to the river should be a main priority, but where the use of wharves and docks can be managed they should be protected.	Noted.
	Question 26	Kent County Council	Richard Feasey	Questions 26/27 Many of the wharves and docks along the Thames and Medway are of historic importance and relate to earlier periods in Medway's history. The enhanced care and protection of such heritage assets based on an appropriate assessment would be supported. Safeguarding of future scope for leisure/public transport movements along the Medway would be judicious given the extensive urban regeneration/intensification that is planned	The River Medway policy safeguards wharves, piers and jetties. Where such facilities are recognised as historically important, such as the Historic Dockyard, these are given protection by the historic assets policy.
	Question 26	The Peel Group	The Peel Group	Peel Land and Property (Ports) Ltd. consider that no formal protection should be given to Chatham Docks and object to any protection given to the site as a working Port in subsequent rounds of the Core Strategy consultation. Para 4.53 of the report states 'Use of the River Medway for commercial shipping has been declining for many years, but remain important for both the local and regional economies. A number of local wharves are currently safeguarded but there is some uncertainty over the long-term future of Chatham Docks, due to a trend towards larger ships and the condition of the locks.' As previously identified Para 4.10 of the report acknowledges that 'ever larger ships are causing consolidation in the ports industry, with fewer larger facilities in deep-water locations.' Both of these issues do not accord with the option of giving Chatham Docks formal protection over the long term. The decline in demand for shipping use at Chatham Docks is making the operation increasing unviable, and the improvement/expansion of more suitable facilities elsewhere along the Medway (e.g. Peel Ports' aspirations for the expansion of Port of Sheerness) are likely to exacerbate these trends, but also offset the loss of Chatham Docks. As well as the declining suitability of Chatham Docks for modern shipping requirements, any long term safeguarding of the wharves and dock use would also fail to respond to the significant opportunities that this site presents. Currently the land is under-utilised, with a low employment density and many vacant and large hard-standing areas. The site has the potential to significantly diversify the local economy and to continue to support a range of economic opportunities. There is also the potential, through regeneration, to open up a currently inaccessible part of the waterfront and integrate the site with its surroundings. These opportunities would be stifled and would not come forward if Chatham Docks was afforded any long term formal protection as a dock. This will result in higher levels of vacancy and under-use and the site will not contribute to the local economy. We also highlighted that South East Plan Policy T10 does not identify Chatham Docks as a 'Gateway Port' or a 'Regionally Significant Port'. Therefore, not giving formal protection to Chatham Docks as a port over the long term would not be inconsistent with the hierarchy and approach set out in the RSS. Whilst Chatham Docks should not be afforded any protection over the long term due to the declining condition of the locks and trends to larger vessel sizes, there are a number of other third party terminals which are served directly off of the River Medway and hence their continued existence and potential expansion are more suited and would be beneficial to Medway Borough. These operational terminals in third party ownership include: • National Grid (LNG); • Foster Yeoman (Aggregates); • BP Terminal (Oil); • Oakhamness Jetty (Oil); • Kingsnorth Jetty (Coal);	The River Medway policy safeguards port capacity at Chatham Docks. The transport chapter states that it has a long term commercial role, complementing the larger ports catering for deep sea traffic and handling vessels too large for local wharves and jetties. Accordingly it is intended that it should continue to be safeguarded.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				<ul style="list-style-type: none"> <li>• Euro Wharf (Aggregates);</li> <li>• Scotline Wharf (Forest Products); and</li> <li>• Crown Wharf (Forest Products)</li> </ul> Peel Ports Medway would support the safeguarding of these terminals and the contribution they can continue to make to operations on the River Medway.	
	Question 26		Vivienne Parker	Q26 & 27. Wharves and piers need to be maintained to serve the needs of the local sailing and fishing fraternity.	The River Medway policy safeguards wharves, jetties and piers.
	Question 26		Dr D Brighton	No. Docks have store rooms	Noted.
	Question 26	RSPB	Fay Martin	Q26 - 27: No. The RSPB would be concerned about any plans that could increase boat traffic in the Medway. Numbers of birds in the estuary have declined, and it is possible that this is, at least in part, due to disturbance. Therefore, any plans must be tested under the Habitats Regulations to ensure no adverse impact on internationally important bird populations.	Noted. Medway Council is currently discussing the scope and extent of the appropriate assessment with Natural England, the Environment Agency and adjoining authorities prior to preparing a screening document and appointing a consultant to carry out the assessment.
	Question 27			<b>Q27: Should formal protection be given to the existing network of piers and jetties along the river, notwithstanding the difficulties of promoting river taxi services?</b>  Answers for question 27 (from questionnaire & website): 17 Yes/ Agree 2 No/ Disagree 1 Don't Know	
	Question 27	CPRE Kent	Brian Lloyd	Yes, we consider that the existing piers and jetties should be protected, as their removal would mean that any prospect of a viable river taxi service would also be removed. With a growing population, and positive promotion through the regeneration agenda, the prospect of a viable river taxi service should increase.	The River Medway policy safeguards wharves, jetties and piers.
	Question 27	Groundwork Kent & Medway	Simon Green	Yes. Without the piers, cross river improvements would be impossible and it is very unlikely that fixed links (bridges, tunnels or cable cars) could ever be financed. However a flexible approach has to be taken. For example if a developer wanted to promote a scheme on or next to a pier that was acceptable in other planning terms and retained the pier facility this should be supported. An analogy is the redevelopments over urban railway stations.	The River Medway policy safeguards wharves, jetties and piers.
	Question 27	London Thamesport (Hutchison Ports UK Ltd)	Nicholas Orbell	This policy proposal can only be considered in the context of a wider, cohesive linked transport network proposal. There are merits to promoting river services as environmentally sustainable and to avoid road congestion. The Council may want to consider appropriate measures as a wider green travel initiative involving appropriate developments.	Noted.
	Question 27	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Because of the tourist potential (the river could provide a very important link between heritage sites) we would support this. There are real problems in trying to use the river as a regular public transport option.	Noted.
	Question 27	Kent Wildlife Trust	Debbie Salmon	If a regular taxi service were established it should be routed so there is no disturbance to sensitive areas in and around the estuaries.	The River Medway policy encourages the establishment of river taxis.
	Question 27	Dickens Country Protection Society	Chris Fribbins	Many piers and jetties have been damaged and not repaired. Use of the river for tourism and as an alternative to heavy goods traffic should be encouraged.	The River Medway and Tourism chapters recognises the potential for river Taxis and supports their provision.
	Question 27	Port Medway Marina Ltd	Port Medway Marina	The River Medway is a vital element of this area which is wholly under-used at present due to lack of investment and the loss of many river based employment sites due to regeneration proposals. We have a client who has already expressed an interest in operating a river taxi service and wishes to promote this concept as a way of generating interest in the river, boosting the local (and wider) economy, providing new transport links and adding to tourist attractions in the area. This service would also restore existing piers and bring them back to serve their original function.	The River Medway chapter recognises the potential for river taxis and supports their provision.
	Question 27		John Hill	It is important that Strood Pier to Sun Pier Chatham are re-opened as soon as possible.	Noted.
	Question 27	Frindsbury and Wainscott Community Association	A Wade	With improved protection the river could be used as an alternative highway.	Noted.
	Question 27	Open Spaces Society	Patricia Wilson	In principle it is retrograde to see these constructions disappear but these seems no burning enthusiasm to re-establish river traffic. [If the council could not devise river transport to link council offices at Strood with Compass Centre, as Medway flowed past both, these seems little hope. However, with the spokesman for Chatham Dockyard appealing passionately for greater revenue, it could be the making of tourism for there to be a seasonal river taxi service linking it with the 'honey-pot' of central Rochester Cathedral and Castle etc]	The River Medway chapter recognises the potential for river taxis and supports their provision.



Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 28			<b>Q28: Should a formal safeguarding regime be introduced for the microlight facility at Stoke?</b> Answers for question 28 (from questionnaire & website): 6 Yes/ Agree 6 No/ Disagree 6 Don't Know	
	Question 28	CPRE Kent	Brian Lloyd	This is a small facility that would not warrant specific reference or safeguarding in the Core Strategy.	Agreed.
	Question 28	Groundwork Kent & Medway	Simon Green	No. See comment above re para 4.56	The Core Strategy does not identify a safeguarding area for microlights.
	Question 28	London Thamesport (Hutchison Ports UK Ltd)	Nicholas Orbell	The conflicts with other proposals need to be better understood. In particular, the focus of the estuary area for power related developments, including potential onshore wind projects (recognising the existing BP scheme) may of greater significance and benefit. The potential development of tall structures, notably power lines and stacks, should be properly evaluated. Alternative sites for the Microlight leisure activity may be identified, avoiding future conflict, and consideration given in the longer term to a encouraging relocation of this amenity to avoid planning related conflicts.	The Core Strategy does not identify a safeguarding area for microlights.
	Question 28	ScottishPower	Chris Girdham	Safeguarding proposals should be compatible with Civil Aviation Authority (CAA) guidelines.	The Core Strategy does not identify a safeguarding area for microlights.
	Question 28	Kent Wildlife Trust	Debbie Salmon	If further air traffic is planned from this facility it must be ensured that this has no impact on the SPA bird species.	No Additional air traffic is proposed for this site.
	Question 28	Dickens Country Protection Society	Chris Fribbins	Although we would not object to this use, it is located by major electric pylons and can generate some noise nuisance - especially if it was to grow significantly perhaps special safeguarding is unnecessary.	No Additional air traffic is proposed for this site.
	Question 28		Goodman	There is no basis for introducing a safeguarding regime for Stoke Airfield and the introduction of such a provision in the Core Strategy could serve to constrain the delivery of the important economic development objectives on the Hoo Peninsula. In particular, no safeguarding restrictions should be introduced that would adversely affect the approved development of the Kingsnorth Employment area pursuant to permission MC2008/0370. It should be noted that the operation of Stoke Airfield was considered in detail in an Aviation Statement submitted in support of above referenced permission, which concluded that, in any event, Stoke Airfield's operations would not constrain the development of the Kingsnorth Employment Area.	No Additional air traffic is proposed for this site.
	Question 28	Open Spaces Society	Patricia Wilson	Surely this can scarcely warrant special Strategic policy?	Noted..
<b>Economy</b>					
			Goodman	The best method of ensuring that the Kingsnorth Employment Area is able to continue effectively to the delivery of the five strategic priorities which have been identified is to continue to provide a broad employment allocation on the land for a mix of Class B uses. It is agreed that Kingsnorth Employment Area may be an appropriate location to accommodate businesses specialising in environmental technologies, however it is also an appropriate location to accommodate a range of other businesses that are not specialising in environmental technologies. The policy context for Kingsnorth Employment Area should not restrict the ability of Goodman to effectively market the site for a range of occupiers.	The core strategy's economic development policy does not restrict the employment opportunities at Kingsnorth.
			I.H. Smith	Bring in some lower tech jobs.	Noted.
		Medway Renaissance	John Finlayson	Higher skilled employment needs to be created. Regeneration can be the catalyst for improving employment. To compliment the development of the Thames Gateway as an eco region environmental technology needs to be promoted. Per-conditions to foster environmental technologies already exist on Hoo peninsular- DEGW study provides evidence base. A key element of Medway as an improved place will be the development of Chatham into a full functioning city centre with a vibrant retail offer and strong office market. Development of higher skilled employment at Rochester Airport needs to be promoted.	Both regional policy and the core strategy are encouraging higher quality jobs as a key to raising the prosperity of the area. The regeneration, economic and retail town centre policies support the development of Chatham as a city centre and the development of environmental technology.
		Natural England	Josh Nelson	Natural England would expect any economic development to be of the highest standards in environmental sustainability terms, appropriately located to avoid impacts on the natural environment (in particular, statutory nature conservation sites and the Kent Downs AONB), and contribute where possible to the provision of multi-functional green infrastructure in accordance with the South East Green Infrastructure Framework. Lodge Hill – if this settlement community proposal has an employment function designed to meet more than local needs, sufficient public transport links – particularly to the Medway towns – should be provided, funded by developer contributions as appropriate.	Policies on energy efficiency, climate mitigation sustainable design, landscape, natural assets and open space, make provision for environmental sustainability, protection of the natural environment and provision of green infrastructure. The policy on Lodge hill/Chattenden makes provision for improved public transport.
	4.59		Barry Knight	Due, no doubt, to a healthy shadow economy	Noted.
	4.61	University College for the Creative Arts at Rochester	David Hawkins	a. The University looks forward to working with the Council, and others, to ensure that its graduates are provided with an opportunity to remain in the area and to make an even more important contribution to the local economy than currently. b. A dialogue with students, through workshops and surveys (to ascertain their needs), might assist.	The issues of student housing, graduate support programmes and working closely with the Universities are addressed in the housing, education and economic development chapters.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	4.62	tbh developments ltd & helvig ltd	tbh developments/helvig	The findings of the Council's own draft Economic Development Strategy is that there is a dearth of good quality employment sites in the Borough. The Core Strategy needs to address how this situation is to be remedied with clear proposals for the delivery of new, quality employment development sites.	The Strategic Land Availability Assessment has identified a substantial supply of a wide range of size and quality sites for all types of employment development. Provision for this is made in the economic policy.
	4.64	National Grid Property Holdings Limited		Representation made on behalf of National Grid Property Holdings Ltd by Planning Perspectives LLP. Agree that the land at the Isle of Grain is one of only a few very large (brownfield) sites in the greater southeast and is of strategic significance. For this reason the site should continue to be allocated for employment uses in the emerging Medway LDF.	Noted.
	4.66	Groundwork Kent & Medway	Simon Green	We would agree with these comments for Medway City Estate. Due to the way it was developed, there is a high degree of fragmentation, poor environment in most parts, unadopted roads and a "loop" road with a break in it because the two arms are misaligned and separated by a building. Consideration should be given to proposals for redevelopment that address these issues successfully and contribute to an overall improvement. MCE is unsuitable for a change of use to residential but in some locations there could be more office (particularly back office) developments than at present if the small industrial users can be provided with new, economically priced accommodation nearby. To some extent higher buildings (eg 6-7 stories) could be allowed if of high visual quality which would increase the density which is very low for a near city centre location. However significant changes will need to address the poor public transport connections, especially with Strood Station and across the river.	Noted. The principle of improvement of existing employment areas is addressed in the economic development strategy where reinvestments strategies will be promoted for each area.
	4.66	Viridor Waste Ltd	Mandeep Jutley	It should be acknowledged that existing employment areas are suitable for all types of uses which generate employment (including waste and resource management uses). Any re-investment in the area should not have a detrimental impact on the operations of existing operators.	Noted.
	4.69		Lillian Harrison	The 4th bullet point fails to recognise that some existing employment sites would be difficult to move and it would be better and more sustainable to encourage growth at these existing sites where other reasons dictate (for example proximity to the source of raw materials and/or proximity to facilities for onward transportation of goods or end products). Therefore there should be an additional bullet point specifying that existing employment areas should be encouraged to grow wherever possible.	The core strategy does not aim to move existing employment sites, only to improve them and increase densities where appropriate.
	4.69	tbh developments ltd & helvig ltd	tbh developments/helvig	This comment relates to the fourth bullet point. The draft Medway Economic Development Strategy 2009-2011 in para 10.15 refers to all the key actions listed as being necessary to ensure the adequate provision of employment space. It does not refer to them as sequential steps towards making adequate employment land available. Consequently, promoting employment development around Rochester Airfield is not a final step in employment land provision it is one of a number of parallel actions. The review of potential for better utilisation of existing employment sites is a complex exercise and needs to be based on a proper assessment of the existing pattern of freehold and leasehold premises within an area and when these might be freed up for redevelopment, rather than being aspirational based.	Noted.
	4.69	University College for the Creative Arts at Rochester	David Hawkins	The University looks forward to working with the Council, and others, to ensure that these objectives are met.	Noted.
	Question 29			<b>Q29: Do you agree with the five strategic priorities proposed in the draft Medway Economic Strategy, namely concentrating on specific sectors, upskilling the workforce, developing higher education, improving the availability of employment sites and improving the image of the area? If not, what alternatives would you suggest?</b>  Answers for question 29 (from questionnaire & website): 14 Yes/ Agree 6 No/ Disagree 0 Don't Know	
	Question 29	CPRE Kent	Brian Lloyd	We generally agree with the five strategic priorities, though we note that retaining existing employment related to energy and shipping is not included as a priority.	The expansion of existing economic functions, including energy and port related uses is included in the economic policy.
	Question 29	Viridor Waste Ltd	Mandeep Jutley	We agree that the key 5 strategic priorities are acceptable. In respect of Strategic Priority 1 (Sector Development), one of the key actions is 'an exploration of the potential for establishing centres of excellence in environmental technologies and building products/construction.' We support recognition that energy and environmental technologies are capable of generating significant employment opportunities, and that the development of this sector would be entirely consistent with the Thames Gateway's 'eco-region' concept (Page 20). This should be reflected clearly in the Core Strategy. It should also be acknowledged that Medway City Estate is favoured for non-office uses. We note reference to Medway City having been developed in piecemeal manner and now accommodating a 'an unhappy mix of users, who between them fail to make the most effective use of the site as well as in some cases occupying high value land with low value/non-intensive uses. In addition, getting into and out of the Estate at peak times is notoriously difficult. That having been said, this remains a popular location' (page 31). We understand that the Medway City Estate's Vision study seeks to provide a strategic framework for the redevelopment of the estate, illustrate its potential and establish strategies for realising this potential. We note that Medway Renaissance and the commissioned consultants are progressing matters. We have reviewed the document titled 'Five Towns Make A City Medway - A Concept for Medway's Future' published by Medway	The five principles of the Medway Economic Development Strategy are reflected in the economic chapter. The appendix to the transport chapter identifies a short term priority for dealing with access problems to Medway City Estate. Investigations are underway. The core strategy does not propose any residential development on Medway City Estate.

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				Renaissance. This refers to redeveloping Medway City Estate to provide a high density mixed use development with employment and residential opportunities. The Estate is not vacant brown field land, and nor is it a Greenfield site. Therefore treating it as such is likely to lead to unfeasible and non-deliverable strategies. The Core Strategy should look to develop and re-invest in the area without a detrimental impact on the existing operators and uses in the area.	
	Question 29		Gary Brook	Object Our client in principle agrees with the five strategic priorities but has concerns that these five priorities identified will not be sufficient to provide for future employment needs and demands for the area. We express particular objection to bullet point 4, of the strategic priorities. The Council should consider providing flexibility for alternative uses where existing employment uses can be proven to be surplus to requirements, are unviable in the current use and are located in an unsustainable location. Subject to the introduction of flexibility, the Council should consider alternative uses on existing employment sites where the alternative use is clearly of more benefit to the amenity of the area and will facilitate significant benefits sought by the LDF Core Strategy that would outweigh the loss of the existing employment use, or improve the balance of uses in a particular location. This is of particular concern within town centre locations where employment use may not necessarily be appropriate. Where this is the case, the Council should adopt a flexible approach when considering alternative uses on existing employment sites.	Over the last 25 years many old industrial areas have been developed for other uses as part of Medway's regeneration strategy, However, in order to help retain employment in the area without releasing greenfield sites for development the economic policy protects the remaining employment areas from losses to other classes of development.
	Question 29		Lillian Harrison	The 4th bullet point fails to recognise that some existing employment sites would be difficult to move and it would be better and more sustainable to encourage growth at these existing sites where other reasons dictate (for example proximity to the source of raw materials and/or proximity to facilities for onward transportation of goods or end products). Therefore there should be an additional bullet point specifying that existing employment areas should be encouraged to grow where-ever possible.	See response to William Harm's on para, 4.69.
	Question 29	ScottishPower	Chris Girdham	The choice of Strategic Priorities is generally supported. However, there should be greater recognition within the emerging Strategy of the positive contribution that can be made towards meeting the objectives of these priorities by the established and emerging energy generating sector. For example, Strategic Priority 1 states: 'the most significant opportunities lie in the further development of sectors it can grow from within, most notably creative industries and tourism'. These sectors should include energy generation and associated and emerging opportunities in, for example, carbon capture and storage together with other environmental technologies. Indeed demonstrable positive contributions could be made to all of the Strategic Priorities by the energy and associated environmental technology sectors. These opportunities are recognised in the Medway Enterprise Vision 2020 Report (MEV) which is referred to within the draft Medway Economic Strategy (MES). The MEV concludes that 'onshore and offshore wind farms, a biomass hub, district heating and a world class centre for carbon capture and storage research are just some of the potential high level environmental cluster catalyst products (that are) viable for Medway'. There is also recognition at paragraph 5.11 of the MES that emerging energy proposals at Kingsnorth could catalyse further job creation in energy and/or environmental industries through the development of a cluster of related businesses. To realise such potential, the energy sector in Medway should be encouraged and prioritised by greater emphasis and support for the sector within both the MES and Core Strategy.	The expansion of existing economic functions, including energy and port related areas are included in the economic policy. It states that the energy and environmental technology sectors will be encouraged.
	Question 29	tbh developments ltd & helvig ltd	tbh developments/helvig	See comment on para 4.69 above.	Agreed.
	Question 29	Kent Wildlife Trust	Debbie Salmon	The Trust welcomes the promotion of environmental technology. We recommend that when assessing unused sites Medway bear in mind that some abandoned brownfield sites act as biodiversity hot spots within the urban area. These sites should be fully surveyed before planning permission is granted. Although employment facilities have less recreational impact on European sites than housing effects such as emissions, noise and water pollution will need to be assessed within the AA. Damage from emissions is especially pertinent to the North Downs Woodland SAC. Pollution of the watercourses could have an impact on all SPAs within the locality.	The natural assets policy addressed the issue of wildlife on development sites. Medway Council is currently discussing the scope and extent of the appropriate assessment with Natural England, the Environment Agency and adjoining authorities prior to preparing a screening document and appointing a consultant to carry out the assessment.
	Question 29	Dickens Country Protection Society	Chris Fribbins	Supported, but not convinced it will deliver more economic development in Medway, but willing to give it a chance.	Noted.
	Question 29	dha planning	Klaire Lander	The five strategic priorities emphasise the need to provide 'higher value economic activities'. However, it should not be overlooked that a significant amount of land is also required for employment uses which are not high value technological or office based. The needs of land hungry uses such as general industry and construction industries should be accounted for, and sufficient land should be identified to meet this need. This is particularly the case due to the location of Medway within the Thames Gateway, where a large amount of construction will take place and industries are required to support this. The redevelopment of large swathes of former employment land for housing has meant that there is now an inadequate supply of general industrial land within Medway. It is crucial therefore that one of the Council's strategic priorities in relation to the 'economy' is ensuring that adequate land is made available for general open storage and industrial uses, including companies to support the construction industry. It should also be recognised that town centres are not always the best locations for such land-hungry developments as these sites are better suited to housing and other less land-intensive or intrusive business uses. Therefore, existing employment sites located outside of town centres and well separated with neighbouring housing should be retained. A policy should be included within the Core Strategy to allow for the retention of existing employment sites, in accordance with existing saved Local Plan policy ED3.	The Strategic Land Availability Assessment has identified a substantial supply of a wide range of size and quality sites for all types of employment development. Provision for this is made in the economic policy.  Provision is also made for the retention of existing employment land.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 29	South East Marine Association	Laraine Soliman	<p>Comments on Q29-36</p> <p>Medway's economic policies have failed to halt the areas continuing relative deterioration. Many of the questions confirm the Council's misconception of what is required to provide investment and jobs. Medway needs an abundance of space for a wide variety of SME's particularly along the riversides. Trying to find space for yet more riverside intensive residential development damages investment and employment. It is silly to speak of "a more concentrated form of development" when there is a dearth of employment land. Although there is unmet demand for sites where our members (and new investors) would provide new jobs they do not necessarily make good neighbours with residential development. Obviously some involves work which may be noisy or have to be carried out in the open (e.g. on hauled-out or new vessels).</p>	The Strategic Land Availability Assessment has identified a substantial supply of a wide range of size and quality sites for all types of employment development. Provision for this is made in the economic policy.
	Question 29	BAE Systems	BAE Systems	<p>Representations made by CB Richard Ellis on behalf of BAE Systems.</p> <p>BAE Systems (BAES) asks that the Council takes into consideration the representations they submitted on 15th May 2009 in relation to the draft Medway Economic Development Strategy 2009-2012.</p> <p>With regard to Strategic Priority 1, Sector Development, we note that the Council had ambitions to attract sector-specific interests in high technology and pharmaceutical businesses; however, this has previously been overly optimistic (paragraph 10.4, draft Medway Economic Development Strategy 2009-2012). In seeking to promote sector specific interests, we request that the Council adopts a positive and constructive approach which is flexible enough to respond to changing economic circumstances and specific local demand.</p> <p>With regard to Strategic Priority 4, Employment Space, BAES strongly supports the intensification of employment uses on appropriate sites, particularly given that Medway's potential to generate significant new employment opportunities could be severely constrained following reallocations of employment land for residential use and the general lack of good quality sites in the Borough. Our client welcomes the prioritising of appraising Rochester Airfield and neighbouring sites for further development opportunities as a key action under Strategic Priority 4, as set out in the draft Medway Economic Development Strategy 2009-2012. BAES is aware that there has been a strong historical aspiration for the land adjacent to Rochester Airfield to become a high quality, business, scientific, technology, and knowledge-based cluster, notably within Policy S11 of the Medway Local Plan (2003) and within the Kent &amp; Medway Structure Plan (2004). Adopted RSS Policy KTG3 reiterates the desire for high quality proposals for intensifying or expanding the technology and knowledge sectors on land adjacent to Rochester Airfield. This is reflected in Core Strategy paragraph 4.60 where BAES is cited as having the potential of 'anchoring' a cluster of complementary businesses of regional significance at Rochester Airfield. Certainly the area's redevelopment accords with the national and regional prioritisation of focusing development on brownfield, urban land. The site is also located close to the M2 motorway and served by the Park &amp; Ride to the north of the site, thereby meeting PPG4 requirements to locate businesses in locations well served by transport infrastructure so as to avoid unnecessary congestion. Our client welcomes the opportunity to assist the Council in delivering economic growth, provided policies and strategies support its business aims.</p>	Noted. Where sites have a locational or another advantage for attracting high tech or high quality investment, it would be inappropriate to open them up for other types of development which could be easily accommodated elsewhere.
	Question 29	BAE Systems	BAE Systems	<p>Representations made by CB Richard Ellis on behalf of BAE Systems.</p> <p>Comments to Q29-36.</p> <p>Our client wishes to stress the need for the Council to maintain a flexible approach to development of the economy which accommodates site-specific considerations and up-to-date assessments of need, supply, and demand. This will ensure development is achievable and deliverable across the Plan period and is particularly important given the broad definition of economic development in draft PPS4, where it is defined as that which provides employment opportunities, generates wealth or produces or generates economic output/product, and includes retail, leisure, offices, arts and tourism. Regional policy also requires Local Authorities to be flexible in their approach to employment land supply in order to be able to respond positively to changes in global, regional, and local economies (RSS Policies RE1 and RE3). This is all the more important given the current economic climate.</p>	Noted. Where sites have a locational or other advantages for attracting high tech or high quality investments, it would be inappropriate to them up for other types of development which could be easily be accommodated elsewhere.
	Question 29		Ian Mawer	<p>SEEDA is broadly supportive of the five strategic priorities proposed in the draft Medway Economic Strategy. We particularly welcome support for development of specific sectors including creative industries, environmental technologies and building products/ construction plus. SEEDA is eager to see genuine transformational opportunities come to fruition, and we support the development of key sector consortia including South East Media Network and South East Centre for the Built Environment (see Action 3.1 of the RES)</p> <p>The approach to identifying appropriate employment sites seems sensible, and will of course need to be fully evidenced through the ELR and SHLAA.</p> <p>We consider that the identification of strategic employment sites such as Kingsnorth and Grain is appropriate within the Core Strategy, and welcome consideration of promotion of sites for specific business sectors to deliver physical and economic regeneration. Such proposals should be properly evidenced and where possible, linkages made between job creation and the skills priorities for the borough. Priority 4 for the Coastal South East seeks to 'ensure that sufficient employment land is provided through redevelopment of brownfield land and refurbishment of existing stock, to provide new and flexible employment space'</p>	Noted.
	Question 29	The Peel Group	The Peel Group	The five strategic priorities identified represent a good basis upon which to shape the future economy in Medway. Particularly, strategic priority iv. 'improving the availability of sites by first reviewing existing mixed use allocations, then assessing the potential to better utilise existing employment areas, then carrying out an audit of underused sites' will help to improve the use of currently under-utilised employment areas.	Noted.
	Question 29	Rochester Bridgewood Ltd	Rochester Bridgewood Ltd	It is essential that the availability of employment sites within Medway is improved. There is a dearth of such sites given the re-development of many former large scale industrial sites such as all those located at Rochester Riverside. It is vital to broaden the area's economic base through the provision of a wide range of new sites that meet the needs of a diverse range of businesses. These should not only be of differing sizes but also be in locations where people want to work or visit. To give an example, land at Rochester Bridgewood offers some 1.5ha that is very well related to other employment sites, has excellent transport linkages and is in the area recommended by the Council's economic consultants.	Land at Bridgewood, to the east of Rochester Road has been rejected in the Strategic Land Availability Assessment for employment or other development.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 29	Elm Court Estate Developments Ltd	Elm Court Estate Developments Ltd	Encouragement should be given to the retention and creation of small-scale low cost start-up units as many of these have been lost to re-development for non-employment uses. Remaining sites (such as Elm Court) should be retained as they provide a range of units to meet the needs of businesses of different sizes.	The Core strategy seeks to retain all existing employment sites.
	Question 29	Port Medway Marina Ltd	Port Medway Marina	Q29-36. There is a need to provide land for a wide variety of small and medium sized businesses, especially fronting the river. While there is a place for some residential development by the River Medway, too much would damage investment and employment in the wider area.	Medway's long term strategy for the riverside at key sites, such as Rochester Riverside, Strood Waterfront and Medway Valley Park has been to open up the riverside to uses other than employment in accordance with the former Thames Gateway Planning Framework. Consequently most but not all new employment developments will take place away from the riverside.
	Question 29		Carl Kroon	Specific sectors are too specific and do not fit the people. Square peg into round hole Further up-skilling so far has not worked. The Council seems hell bent on shutting Rochester Airport. The biggest hurdle is positive image of the area. Outsiders may have heard of Chatham, Rochester or Gillingham but not of Medway. Keep on mentioning city this, city that, but city status was lost and there is no council impetus to get it back.	The need for image building is recognised in the economic development policy. As landowner Medway Council has had opportunities to close Rochester Airport but has not done so. The Core Strategy does not propose its closure.
	Question 29	NFU	Kevin Attwood	Whilst not disagreeing with the aims it would be a step forward to see agriculture and horticulture mentioned as they are pivotal not only to the landscape but also food security. I have enclosed the latest NFU booklet on 'Why Farming Matters to Every Part of the UK'.	Agriculture is addressed in the economic policy and the Hoo Peninsula and Medway Valley and Downs chapters.
	Question 29		W Mann	Yes. Key are availability of land for employment sites and transport links. - Develop Kingsnorth and Gain sites and upgrade their road and rail links including fast track. - Up-skill workforce by expanding Mid Kent College/Royal School of Engineering initiative at Brompton. - Further develop higher education.	The development of Kingsnorth and Grain and improvements to their access, up-skilling of the workforce and development of higher education are all addressed in the Core Strategy.
	Question 29		Dr D Brighton	Hope 'specific sector' include medical engineering, University Technology Park (for spin-off from R & D), the business park at Rochester Airport sounds too critic.	The economic policy includes health as one of the specific sectors to be encouraged.
	Question 30			<b>Q30: Do you agree that existing mixed-use allocations should be reviewed with a view to increasing their proposed employment capacity?</b>  Answers for question 30 (from questionnaire & website): 14 Yes/ Agree 4 No/ Disagree 1 Don't Know	
	Question 30		Alastair Blair	Yes, but keep focused on the use of Rainham and Capstone are rural habitats NOT housing	The Chapter on Options and Alternatives in the Core Strategy explains that the existing balance between employment and other uses or subject to supplementary planning documents will not be changed.
	Question 30	Viridor Waste Ltd	Mandeep Jutley	All existing employment allocations should be reviewed as well as existing mixed use allocations. Existing employment areas should be protected for employment generating uses, some of which may be industrial in nature.	The Chapter on Options and Alternatives in the Core Strategy explains that the existing balance between employment and other uses on sites subject to supplementary planning documents will not be changed.
	Question 30	Barratt Strategic		If existing mixed use allocations are to be reviewed to increase their employment capacity, and we can see why the council might feel this is necessary given the shortage of high quality office accommodation near to the river/ within the main urban areas, there will clearly be a need to review the manner in which the councils housing land supply requirements are to be met. This in our opinion strengthens our suggestion that the council have at least 2 strategic allocations – a reduced Chattenden, and smaller Hoo urban Extension.	The Chapter on Options and Alternatives in the Core Strategy explains that the existing balance between employment and other uses on sites subject to supplementary planning documents will not be changed.
	Question 30		Gary Brook	Object Our client objects to the review of the mixed use allocations in view of increasing employment capacity. We believe that mixed use policies should ensure flexibility which can incorporate potential for a range of uses. Whilst it may be appropriate to review the existing allocations this should be founded on a robust evidence base. It is highly inappropriate to seek to increase employment on mixed use sites without evidence to support this change as it could render these sites unviable for the mixed use scheme sought. This is of particular importance on sites in sustainable locations good transport facilities which would be best suited for mixed use schemes incorporating both residential and employment uses.	The Chapter on Options and Alternatives in the Core Strategy explains that the existing balance between employment and other uses on sites subject to supplementary planning documents will not be changed.
	Question 30		Lillian Harrison	YES allowing for re-investment / future growth at existing employment areas should be encouraged wherever possible.	Noted.
	Question 30	ScottishPower	Chris Girdham	The principle of this initiative is supported. However, where mixed uses are proposed they shouldn't prejudice existing or future expansion of industry. The scope of such an initiative should not only be concerned with raising capacity, it should also be needs based, properly focussed and support employment uses at locations that are sustainable. It should also recognise that certain areas offer greater sustainability advantages than others.	The Chapter on Options and Alternatives in the Core Strategy explains that the existing balance between employment and other uses on sites subject to supplementary planning documents will not be changed.
	Question 30	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Yes, mixed use should be explored and adopted, but would be wary of relying on local employment being supported by local housing except for very small businesses.	The Chapter on Options and Alternatives in the Core Strategy explains that the existing balance between employment and other uses on sites subject to supplementary planning documents will not be changed.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 30	Lafarge Cement UK	David Simms	This approach should be treated with caution. There remains an overarching need to deliver new homes, and a need to ensure that these offer a range and choice of housing types. Mixed use development - where there is a balance of homes and other uses, allows an opportunity for this. Where the employment content of sites is increased, there is a risk that the housing component may be marginalised, and that the balance of activity between daytime employment uses and evening and weekend residential activity (the benefit which mixed use proposals achieve) is lost. The opportunity for local facilities to be supported by a residential population is also reduced when employment uses become disproportionately dominant in a mixed use scheme.	The Chapter on Options and Alternatives in the Core Strategy explains that the existing balance between employment and other uses on sites subject to supplementary planning documents will not be changed.
	Question 30	tbh developments ltd & helvig ltd	tbh developments/helvig	It would appear too late for the Council to undertake such a review where planning permission for redevelopment has already been given (eg Rochester Riverside). This review would need to be carried out as a matter of extreme urgency to form part of the employment land availability evidence base for the Core Strategy. There must be doubts whether such a review in the timescale available is feasible.	The Chapter on Options and Alternatives in the Core Strategy explains that the existing balance between employment and other uses on sites subject to supplementary planning documents will not be changed.
	Question 30	Kent Wildlife Trust	Debbie Salmon	If further land take is planned, any impacts on biodiversity will need to be mitigated within the Green Infrastructure in line with PPS9. Business premises can provide further opportunities for extension of the Green Infrastructure. The Wildlife Trusts run a national accreditations scheme known as the Biodiversity Benchmark. Businesses are evaluated for biodiversity enhancements on site the Benchmark being awarded to companies that meet the high ecological standards of the scheme. This can then be used in marketing as evidence that the company encourages wildlife. (For further information regarding the Biodiversity Benchmark see <a href="http://www.wildlifetrusts.org/index.php?section=corporate:biodiversity:whatisit">http://www.wildlifetrusts.org/index.php?section=corporate:biodiversity:whatisit</a> )	Noted, The Chapter on Options and Alternatives in the Core Strategy explains that the existing balance between employment and other uses on sites subject to supplementary planning documents will not be changed.
	Question 30	Dickens Country Protection Society	Chris Fribbins	Mixed use supported, although there is limited scope except for very small business for residential/employment mix.	The Chapter on Options and Alternatives in the Core Strategy explains that the existing balance between employment and other uses on sites subject to supplementary planning documents will not be changed.
	Question 30	GVA Grimley Ltd	Sheery Sassoon	We support policies which increase employment opportunities and growth in the economy subject to relevant planning considerations. A number of uses which fall outside of the traditional 'B' Class uses create employment opportunities and the emerging policy should recognise the economic contribution these uses make. In accordance with draft PPS4, where it is considered necessary to safeguard land from other uses, a range of sites should be identified to facilitate a broad range of economic development including mixed uses. We support the current mixed use allocation at Colonial House and consider that this should be carried forward in the emerging policy. A flexible, mixed-use allocation at the site would help to deliver redevelopment of the site and bring back a vacant site into use, creating economic benefits for Chatham Maritime and Medway Council. (Suggestion- Employment-generating uses, including those which fall out of the traditional employment 'B' Class uses will be encouraged. Mixed use allocation at Colonial House to be retained.)	The encouragement of employment generating uses including those other than B use classes could lead to the development of retails and other uses which the Core Strategy seeks to locate in the town centres. The future of Colonial House can be dealt with through the development management system.
	Question 30	The Peel Group	The Peel Group	Both existing mixed-use allocations and other sites that have the potential to increase employment capacity through creating a mix of uses on site should be reviewed. This will allow currently underutilized sites to bring forward more jobs as well as a range of other uses.	The Chapter on Options and Alternatives in the Core Strategy explains that the existing balance between employment and other uses on sites subject to supplementary planning documents will not be changed.
	Question 30	RSPB	Fay Martin	Q30 - 33: No. The RSPB believes that the planning system has a key role to play in achieving sustainable development and therefore supports a constraints based approach to identifying the most appropriate locations for development. In the wrong location and/or without effective mitigation, employment development in the Medway area could have a negative impact on features of nature conservation concern, including internationally designated sites, for example by increased noise and disturbance due to construction activities. We therefore strongly recommend that this matter be thoroughly appraised in the AA of the Core Strategy and we would welcome the opportunity to comment further on this matter prior to the publication of that document.	Medway Council is currently discussing the scope and extent of the appropriate assessment with Natural England, the Environment Agency and adjoining authorities prior to preparing a screening document and appointing a consultant to carry out the assessment.
	Question 31			<b>Q31: Do you agree that re-investment in and a more concentrated form of development should be promoted in established employment areas?</b>  Answers for question 31 (from questionnaire & website): 10 Yes/ Agree 6 No/ Disagree 2 Don't Know	
	Question 31	CPRE Kent	Brian Lloyd	We agree that it would be beneficial to make more intensive use of existing employment sites where this can be achieved without adverse impact on the environment, highway network and residential amenity. Therefore, this needs to be considered on a site by site basis rather than as a blanket objective.	Noted.
	Question 31	Groundwork Kent & Medway	Simon Green	Yes in respect to our comments on para 4.66 re Medway City Estate	Noted. The principle of improvement of existing employment areas is addressed in the economic development strategy where reinvestments strategies will be promoted for each area.
	Question 31	Viridor Waste Ltd	Mandeep Jutley	Avenues for potential re-investment in employment areas should be welcomed. Where this involves intensification of uses with no significant detrimental impacts, it should be encouraged.	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 31		Lillian Harrison	It is not always possible to 'concentrate' operations in established employment areas, where such uses need large areas for storage or raw materials and products as well as space to facilitate the onward shipping of products. Growth of these commercial businesses - in order to increase employment and invest in the area, may often need an expansion of existing employment sites. This issue should be recognised. Re-investment is a commercial decision which cannot be assumed to be acceptable or achievable in all established employment areas, perhaps this should be 'encouraged' rather than 'promoted'?	Reinvestment in existing employment sites is only one element of the economic strategy. The provision of additional employment land complements the intensification of existing estates.
	Question 31	ScottishPower	Chris Girdham	The principle of this initiative is supported. However, the emphasis should not only be on raising capacity, it should also be needs based, properly focussed and support employment uses at locations that are sustainable. It should also recognise that certain areas offer greater sustainability advantages than others.	Noted.
	Question 31	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Yes - but road infrastructure issues need to be considered.	Noted.
	Question 31	Dickens Country Protection Society	Chris Fribbins	Yes - although care has to be taken to ensure road infrastructure is sufficient to support it.	Noted.
	Question 31	BAE Systems	BAE Systems	Representations made by CB Richard Ellis on behalf of BAE Systems. BAES strongly supports the intensification of employment uses on appropriate sites, the principle of which accords with RSS Policy RE3. This seeks to, amongst other things, make efficient use of existing and underused sites and premises through increasing the intensity of use on accessible sites. This is particularly significant for Medway, given that its potential to generate significant new employment opportunities could be severely constrained following reallocations of employment land for residential use and the general lack of good quality sites in the Borough.	Noted.
	Question 31	GVA Grimley Ltd	Sheery Sassoon	In principle, we support policies which encourage the investment of employment generating uses, including established employment areas. Details of the employment areas which will benefit from the investment should be included as well as how the investment will be secured and applied. (Suggestion- The policy should how investments for employment areas will be secured and applied.)	The economic policy promotes re-investment strategies for existing employment areas. This will need to be done in co-operation with site owners with investment coming from the private sector.
	Question 31	The Peel Group	The Peel Group	Whilst re-investment in employment areas is important, this should not be at the expense of potential to create mixed-use development on existing areas of employment, which may provide greater community, economic and environmental benefits. More concentrated forms of development should be promoted in established employment areas, although this should involve recognising the potential for introducing other uses to ensure maximum benefit and enable increased employment levels.	The policy of the economic strategy is to safeguard existing employment areas.
	Question 31	Rochester Bridgewood Ltd	Rochester Bridgewood Ltd	While the improvement of existing established employment areas is to be welcomed, such action would not result in the provision of adequate employment land throughout the Medway Council area. There has been a significant loss of sites ranging from the very large to small, to other forms of development, partly due to the pressures to accommodate new housing predominantly on brownfield land. This has resulted in a shortfall of alternative sites for new business to be established or for existing businesses to relocate. Sites such as Rochester Bridgewood would assist in meeting this need. It is close to urban development, being surrounded by industrial sites and has excellent access to primary routes.	Land at Bridgewood, to the east of Rochester Road has been rejected in the Strategic Land Availability Assessment for employment or other development.
	Question 31	FWCA Frindsbury and Wainscott Community Association	J R Masey	Do not agree with employment land on Med. City Estate to go for housing. The council had the chance to improve the estate with the retention of wardens lake. Short-sighted decision.	No housing is proposed on Medway City Estate.
	Question 31		W Mann	Q31 & 32. Would implementation lead to further congestion?	Access congestion will need to be taken into account.
	Question 31	Open Spaces Society	Patricia Wilson	Agree that intensification of development should be considered where individual cases warrant it to limit expansion into green open space.	Noted.
	Question 32			<b>Q32: Do you agree that previously developed land around Rochester Airfield should be the focus for higher value economic activities?</b>  Answers for question 32 (from questionnaire & website): 9 Yes/ Agree 5 No/ Disagree 1 Don't Know	
	Question 32	CPRE Kent	Brian Lloyd	This could be appropriate, provided it did not result in the closure of the airfield and a reduction in the open green corridor.	There is no proposal to close the airfield in the Core Strategy.
	Question 32	Barratt Strategic		We can see the sense in promoting the area around Rochester Airfield as high tech business park and feel the council should actively encourage this.	Noted.
	Question 32	Rochester City Airport	Paul Britten	Para 4.69 - We agree that the focus around the airfield should be for higher value (possibly aeronautical) economic activities. Please see Q10 where we also believe this should be in conjunction with higher education. In turn this also brings other employment opportunities for all of working age. None of this should be to the detriment of airport operations which are of course protected by the airports safeguarding plan.	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 32	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Yes - although it is remote from the railway stations and would tend to rely on road access from the M2 and M20. Public transport provision from Chatham/Rochester/Strood would need to be improved.	Both Rochester Road and Maidstone Road are bus routes. The level of services is a matter for the bus companies. Although contributions can be sought from the developers if the scale of development warrants it.
	Question 32	tbh developments ltd & helvig ltd	tbh developments/helvig	This question is not understood. What is meant by "previously developed land around Rochester Airfield"? This terminology needs to be precisely defined. Similarly, how does the question arise from any statement or information in the Issues and Options Report? This is an unsatisfactory question until a more precise definition of its meaning is given.	Previously developed land is defined in PPS3.
	Question 32	Kent Wildlife Trust	Debbie Salmon	The Trust would require more information as to the wildlife present before we were able to express an opinion regarding this location.	The natural assets policy makes provision for dealing with wildlife on development sites.
	Question 32	Dickens Country Protection Society	Chris Fribbins	Yes, although this area will be primarily served by M2 and the M20 - unless some significant investment in links to the town centres can be provided.	Both Rochester Road and Maidstone Road are bus routes. The level of services is a matter for the bus companies. Although contributions can be sought from the developers if the scale of development warrants it.
	Question 32	BAE Systems	BAE Systems	Representations made by CB Richard Ellis on behalf of BAE Systems. Our client welcomes the prioritising of appraising Rochester Airfield and neighbouring sites for further development opportunities. BAES is aware that there has been a strong historical aspiration for the land adjacent to Rochester Airfield to become a high quality, business, scientific, technology, and knowledge-based cluster notably Policy S11 of the Medway Local Plan (2003) and within the Kent & Medway Structure Plan (2004). Adopted RSS Policy KTG3 reiterates the desire for high quality proposals for intensifying or expanding the technology and knowledge sectors on land adjacent to Rochester Airfield. This is reflected in Core Strategy paragraph 4.60 where BAES is cited as having the potential of 'anchoring' a cluster of complementary businesses of regional significance at Rochester Airfield. Certainly the area's redevelopment accords with the national and regional prioritisation of focusing development on brownfield, urban land. The site is also located close to the M2 motorway and served by the Park & Ride to the north of the site, thereby meeting PPG4 requirements to locate businesses in locations well served by transport infrastructure so as to avoid unnecessary congestion. However, BAES considers that the Council's past over-optimism for the site emphasises the importance of maintaining a flexible approach to economic development on previously developed land around Rochester Airfield. This will ensure that any (re-)development of the site adapts to meet market demand in accordance with PPS4. Our client welcomes the opportunity to assist the Council in delivering economic growth, provided policies and strategies support its business aims.	Noted
	Question 32	The General Aviation Awareness Council	The General Aviation Awareness Council	Rochester Airport and its hinterland should be protected. The closer development comes to the edges of the airport, the less it can be used. This site needs proper investment (based upon a long lease) to help in realise its potential to add to the Medway area's transport links to the rest of the UK and Europe. This is an under-used asset and could add to the wider economy. While employment related development in the immediate vicinity may create some jobs, optimum use of the Airport could lead to far higher numbers.	Building on adjacent land would be controlled to ensure the safety of operations at the airport. The Core Strategy includes no proposals for the airport itself.
	Question 32		Dr D Brighton	Not the business park. what higher value activities do you mean?	A business park was proposed on the airport in the Medway Local Plan but this is no longer being pursued. Higher value activities generally means development in the use class B1 (a) and (b) categories.
	Question 33			<b>Q33: Should the new settlement at Lodge Hill, Chattenden be identified as an employment location meeting more than purely local needs?</b>  Answers for question 33 (from questionnaire & website): 9 Yes/ Agree 6 No/ Disagree 2 Don't Know	
	Question 33	CPRE Kent	Brian Lloyd	It is proposed that a significant part of the site (20 - 25 ha) will be provided for employment uses and therefore it will inevitably be more widely attractive whether it is promoted as such or not. It's primary purpose, though, should be to provide local employment for local people which would suggest that it should be promoted for more general employment uses, with an emphasis on B1 type uses, rather than more specialist employment uses that would attract workers from further afield. It should also be well integrated with the proposed residential development with access on foot and by cycle given priority.	The new employment provision at Lodge Hill will be an important component of Medway's overall employment offer. Therefore, it is considered it will provide higher end employment opportunities. Given this, it is not considered that it will threaten in any way, the delivery of Medway's urban regeneration sites. The importance given to employment opportunities at Lodge Hill is reflected in the corresponding chapter within the Draft Core Strategy.
	Question 33	Barratt Strategic		Whilst there are some merits in identifying part of the new settlement at Chattenden as a strategic employment location (ala kings Hill) we do have some reservations about the effects this would have on the economic regeneration of the main urban areas, especially when access to these areas is seen as one of the impediments to regeneration. Providing a highly accessible strategic employment centre outside the main urban areas is bound to act as a counter draw and thus have the ability to prejudice the council's long term economic regeneration aspirations. Furthermore such a strategy is in our view less sustainable than concentrating the main employment locations within the urban area and leaving the employment provision proposed at Chattenden as that which would serve a local need.	The new employment provision at Lodge Hill will be an important component of Medway's overall employment offer. Therefore, it is considered it will provide higher end employment opportunities. Given this, it is not considered that it will threaten in any way, the delivery of Medway's urban regeneration sites. The importance given to employment opportunities at Lodge Hill is reflected in the corresponding chapter within the Draft Core Strategy.



Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 33	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	In practical terms it could not be anything else. Traffic movements would tend to work against the main 'commuter flow' so may not be an issue.	The point is noted.
	Question 33	Dickens Country Protection Society	Chris Fribbins	Yes, although these are likely to employ people from outside the area in practice - it is not Port Sunlight or Bourneville.	The point is noted.
	Question 33	FWCA Frindsbury and Wainscott Community Association	J R Masey	Yes, if not detrimental to site maybe less housing and more employment would be a good thing. With more use being made of mineral railway -a station maybe for passenger travel also.	The points are noted. However, it is not felt that the provision of a new passenger station is currently appropriate.
	Question 33	Open Spaces Society	Patricia Wilson	Chattenden should mainly cater for local employment needs rather than attracting recruits from further afield.	The new employment provision at Lodge Hill will be an important component of Medway's overall employment offer, Therefore, it is considered it will provide higher end employment opportunities. Given this, it is not considered that it will threaten in any way, the delivery of Medway's urban regeneration sites. The importance given to employment opportunities at Lodge Hill is reflected in the corresponding chapter within the Draft Core Strategy.
	Question 34			<p><b>Q34: What further efforts could be made to encourage graduate retention in Medway and the development of spin off businesses from the universities?</b></p> <p>Answers for question 34 (from questionnaire &amp; website):  3 Yes/ Agree  0 No/ Disagree  7 Don't Know</p>	
	Question 34	ScottishPower	Chris Girdham	Provide a land use strategy that provides further support to those sectors and industries that already create high value/skilled jobs and have the potential to form part of wider clusters/nationally or internationally significant centres of excellence. Energy is one such sector which provides the potential for establishing stronger links with education and skills training.	Agreed. These matters are addressed within the Draft Core Strategy.
	Question 34	University College for the Creative Arts at Rochester	David Hawkins	a. The University looks forward to working with the Council, and others, to ensure that its graduates are provided with an opportunity to remain in the area and to make an even more important contribution to the local economy than currently. b. A dialogue with students, through workshops and surveys (to ascertain their needs), might assist.	Noted.
	Question 34	FWCA Frindsbury and Wainscott Community Association	J R Masey	Have high principles in planning, not just monetary considerations.	Noted.
	Question 34		Dr D Brighton	Yes. University technology park	Noted.
	Question 35			<p><b>Q35: Should land at Kingsnorth and Grain be actively promoted as locations for environmental technology and related activities?</b></p> <p>Answers for question 35 (from questionnaire &amp; website):  16 Yes/ Agree  3 No/ Disagree  1 Don't Know</p>	
	Question 35	CPRE Kent	Brian Lloyd	Yes, this would seem desirable, particularly if linked with developing green technology.	Noted.
	Question 35	Groundwork Kent & Medway	Simon Green	Yes as Medway should seek to benefit from this large growth market and these are suitable locations with sea and rail access but this will imply that they have all the necessary infrastructure including high speed broadband and improvements to the rail corridor.	Noted.
	Question 35	Viridor Waste Ltd	Mandeep Jutley	The development of schemes that provide environmental technology and related activities should not be restricted to any given cluster vision. The Core Strategy should make clear that schemes which promote environmental technology and related activities will be welcomed in appropriate locations as well as identified cluster areas. Consideration should also be given to creating such a cluster within the Medway City Estate.	Noted. In terms of Kingsnorth and Grain, these clusters have evolved over a long time period. The Core Strategy will also support clusters of environmental technologies in other appropriate locations where they arise or exist.
	Question 35	ScottishPower	Chris Girdham	Due to existing operations and locational advantages, these areas are of strategic importance for energy generation and deliver nationally important benefits. The importance of the energy sector and the continued need to support it is recognised in the South East Plan. Therefore energy generation and related technologies, which may require provision for Carbon Capture and Storage	Noted. These matters are addressed within the Draft Core Strategy.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				(CCS), itself an environmental technology, should generally be accommodated at these locations. Synergies between energy development and related environmental technologies such as CCS should be provided for. Where opportunities exist to develop other forms of environmental technology and related activities, these should be supported provided they address environmental constraints.	
	Question 35	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Yes, this should be a growth industry and may offset some of the local power generation using fossil fuels.	Noted.
	Question 35	National Grid Property Holdings Limited		Representation made on behalf of National Grid Property Holdings Ltd by Planning Perspectives LLP. We have no objection to the land at Grain being promoted as a location for environmental technology and related activities, but this should not be at the expense of wider employment land uses. National Grid's landholding at the Isle of Grain is currently allocated for Class B1 (Business), Class B2 (General Industry), Class B8 (Storage and Distribution), special industrial uses and industrial uses not in a use class. These allocations should remain in place to allow the greatest flexibility for future uses of the site to encourage occupiers to locate their businesses on the Isle of Grain in order to maximise employment opportunities. These uses could include environmental technology and related activities but should not be limited to just these elements.	Noted. This matter is addressed within the Core Strategy.
	Question 35	Kent Wildlife Trust	Debbie Salmon	The Trust welcomes the promotion of environmental technology but due to their locations such facilities should ensure no impact on estuarine habitats.	Noted, the Core Strategy will seek to properly protect estuarine habitats.
	Question 35	Dickens Country Protection Society	Chris Fribbins	This could be just one option for these sites and although this is welcome it should not be the sole option.	Noted. In terms of Kingsnorth and Grain, These clusters have evolved over a long time period. The Core Strategy will also support clusters of environmental technologies in other appropriate locations where they arise or exist.
	Question 35	Kent County Council	Richard Feasey	Yes. Kingsnorth and Grain would be appropriate areas for environmental technologies and related activities building on the permission for the wind turbines and making use of the large sites that exist there.	Noted.
	Question 35	Rochester Bridgewood Ltd	Rochester Bridgewood Ltd	Land at Kingsnorth and Grain has been promoted for employment related uses for many decades with little take-up due to their relative isolation. Those sites which are better related to good transport links and the urban area are far more likely to be developed in the short to medium term.	Noted but there has recently been strong commercial interest in these sites. Therefore, the Council is confident of their ability to deliver major employment related activities within a reasonable time-period.
	Question 35	Frindsbury and Wainscott Community Association	A Wade	Yes. If linked with green technology and safeguarding protected areas.	Noted.
	Question 35		Dr D Brighton	Yes. Nurture industry of all sorts/ levels.	Noted.
	Question 36			<b>Q36: What further strategies might be proposed to bring benefits claimants of working age back into employment?</b>  Answers for question 36 (from questionnaire & website): 1 Yes/ Agree 1 No/ Disagree 3 Don't Know	
	Question 36	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Training should be made more accessible to older people	Noted.
	Question 36		Mike Walters	Apply a points scheme for work so working people get precedence over benefits claimants for housing.	Noted.
	Question 36		Vivienne Parker	The Council should encourage benefit claimants to work as volunteers for them within Gun Wharf and other council buildings in order to acquire new skills in a practical setting.	Noted.
	Question 36			Withdrawal of benefits.	Noted.
	Question 36		Carl Kroon	Providing jobs locally relevant to claimant skills. "Square pegs in round holes".	Noted.
	<b>Education &amp; skills</b>				
		Medway Renaissance	John Finlayson	The universities at Medway continue to prosper and Medway needs to develop as a student destination and respond to the increasing student population. Economic benefits of the universities need to be maximised with graduate retention, research and development and knowledge transfer. A new campus in Medway for the UCA would significantly help.	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	4.76	University College for the Creative Arts at Rochester	David Hawkins	For para. 4.76 -4.125 The University is pleased to see that the developing Core Strategy has a section on education and skills.	Noted.
	4.82	University College for the Creative Arts at Rochester	David Hawkins	For para. 4.82 -4.88. The University is pleased to see that the developing Core Strategy has a section on the universities at Medway, and that it acknowledges the contribution that the higher and further education sectors make to the local economy, and the learning opportunities they provide for residents.	Noted.
	4.88	Rochester City Airport	Paul Britten	Mid Kent College campus at Horsted has now closed and has been earmarked (with no development brief) for a large housing estate. It is a shame that with its location adjacent to BAe and the airport it was not used to further higher aeronautical education. Furthermore this major residential development with the certain prospect of being noise sensitive is being considered so close to the airport.	Noted. However, planning consent for residential development has already been issued, and construction activity has commenced on the site.
	4.89	Chatham Historic Dockyard Trust	Bill Ferris	Section 4.89 rightly makes much of the desire to help UCA develop a new campus in Medway. It is believed that similar encouragement should be given to University of Kent which, as the Council knows, has funds allocated to develop a major new learning facility within the Historic Dockyard designed to attract hundreds of creative arts students and help to increase the sustainability of the University's existing operation. There will be a need to encourage the University to continue its expansion in Medway, to assist it raise additional funding and to engage with the university to ensure that maximum benefit for the area can accrue. Highlighting UCA alone might not be perceived to achieve that.	Noted. The Core Strategy is supportive in principle of university related activities being sited at the Historic Dockyard given its close proximity to the existing cluster of university facilities, and overall suitability. Therefore, if proposals come forward from other universities, they will be treated in exactly the same way as any proposal from the University of Creative Arts (UCA)
	4.89	University College for the Creative Arts at Rochester	David Hawkins	a. The University is appreciative of the special mention made in this paragraph. b. However, the use of the words "University College" is incorrect, and those words should therefore be deleted.	Noted.
	4.9	University College for the Creative Arts at Rochester	David Hawkins	The University has stated that it will create a new campus in Kent, and Medway is one of the locations being considered.	Noted.
	4.120	University College for the Creative Arts at Rochester	David Hawkins	a. The University is appreciative of the special mention made in this document. b. The words "The Fort Pitt campus" should be replaced with "UCA's Fort Pitt campus", for the avoidance of any doubt.	Noted.
	4.121	Chatham Historic Dockyard Trust	Bill Ferris	Section 4.121 names the Interface Land as a potential site for the UCA development and there is certainly potential for this and land-owner support. Mention of other possible sites is made but they are not named. Later a specific question is asked to consultees about which might be a preferred site. With only one suggestion specifically given in the text this seems a self fulfilling prophecy, however appealing the Interface Land site might be this seems inappropriate!	Noted.
	4.121	University College for the Creative Arts at Rochester	David Hawkins	a. The University has stated that it will create a new campus in Kent, and Medway is one of the locations being considered. On that basis, it would seem sensible to identify sites in the Core Strategy that are considered suitable, and the University will work with the Council to ensure that potentially suitable sites are set out in the next version of the developing Core Strategy. However, the University must stress that no final decision has been made on this matter. b. As previously stated, if the University were to locate its new Kent campus in Medway, there is a concern that the existing supply of student accommodation would not be able to support the needs of the University.	Noted.
	4.125	Rochester City Airport	Paul Britten	We think that creating an employment cluster with relevant education facilities At Rochester Airport would make it a centre of excellence. Regrettably opportunities in this respect so far have been ignored. Policy KTG3 of the South East plan is quite clear on this point.	The Core Strategy is promoting the Rochester Airfield site as a technology and knowledge based hub.
	Question 37			<b>Q37: Should Universities at Medway be further promoted to create a higher education centre of regional or national significance?</b>  Answers for question 37 (from questionnaire & website): 12 Yes/ Agree 3 No/ Disagree 2 Don't Know	
	Question 37	Barratt Strategic		Barratt Strategic supports the concept of the universities of Medway being promoted to create a higher education centre of regional/national importance. This strategy would in our opinion enhance the image of the area. The range of subjects now on offer will help diversify the skills base of those who live in the local area, address the skills miss match that occurs in certain sectors, and bolster the areas economic regeneration.	Noted.
	Question 37	Kent Wildlife Trust	Debbie Salmon	If extra students are resident in Medway the recreational pressure they exert on the SPAs should be evaluated within the AA.	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 37	Frindsbury and Wainscott Community Association	A Wade	Not without corresponding infrastructure improvements.	Noted.
	Question 38			<p><b>Q38: Do you agree that a new campus of the University for the Creative Arts should be promoted in Medway? If yes, do you have a preferred location?</b></p> <p>Answers for question 38 (from questionnaire &amp; website):  12 Yes/ Agree  3 No/ Disagree  1 Don't Know</p>	
	Question 38	Groundwork Kent & Medway	Simon Green	Yes. UCA and its predecessors are something that Medway is rightly proud of. The 'Interface Land' between Dickens World and the Historic Dockyard would be an excellent location due to its proximity to the dockyard, the River and the other nearby universities with which it could share some facilities.	Noted.
	Question 38	Barratt Strategic		Barratt Strategic supports the principle of a new campus for the University of Creative arts being promoted in the borough. As per our response to question 10/11 the possibilities of accommodating enhanced facilities at Chattenden should in Barratt Strategic's opinion be investigated further	Noted.
	Question 38	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Yes, close as possible to existing higher education facilities	Noted.
	Question 38	Kent Wildlife Trust	Debbie Salmon	The proposed location appears to be in the locality of the Medway and Marshes SPA and increased occupation is likely to have an impact on the SPA. However this site could also provide important linkages within the Green Infrastructure. The Trust would recommend that natural habitat corridors be provided to ensure contact with nature for the students and linkages through the urban environment for wildlife.	Noted.
	Question 38	Dickens Country Protection Society	Chris Fribbins	Located close to new/existing higher education facilities	Noted.
	Question 38	GVA Grimley Ltd	Sheery Sassoon	Answer to Q38 & 39- We support the growth of the education sector to within Medway Council. It is considered that this could help to attract investment to Medway and bring a number of associated benefits such as creating employment opportunities. (Suggestion- The policy should encourage the growth of the higher education sector in Medway.)	Noted. A specific policy relating to education is included in the core strategy.
	Question 38	University College for the Creative Arts at Rochester	David Hawkins	The University has stated that it will create a new campus in Kent, and Medway is one of the locations being considered. On that basis, it would seem sensible to identify sites in the Core Strategy that are considered suitable, and the University will work with the Council to ensure that potentially suitable sites are set out in the next version of the developing Core Strategy. However, the University must stress that no final decision has been made on this matter.	Noted.
	Question 38		Vivienne Parker	Difficult to move UCA as it is preserving the remains of Fort Pitt within its structure and demolition of the building would leave a redundant site.	Noted.
	Question 38		John Hill	Possibly, if really needed.	Noted.
	Question 38		Carl Kroon	City Way college site and current site.	Noted.
	Question 38		W Mann	Yes. Near other universities so can share other facilities such as library, sports facilities and accommodation.	Noted.
	Question 39			<p><b>Q39: Should Mid Kent College promote its new campus as a regional hub for construction skills?</b></p> <p>Answers for question 39 (from questionnaire &amp; website):  13 Yes/ Agree  2 No/ Disagree  1 Don't Know</p>	
	Question 39	Barratt Strategic		As a national house builder with close ties to Medway, Barratt Strategic would be pleased to support Mid Kent College in promoting its new campus as a regional hub for construction.	Noted.
	Question 39	Mid Kent College	Mid Kent College	Mid Kent College's new £86m campus in Medway provides a range of courses in all aspects of construction and civil engineering from craft level to Foundation degree. In the design of the campus, care has been taken to ensure that current professional standards of equipment have been provided in the spacious workshops and classrooms. Good links with local industry have been forged over many years of operating courses in construction skills and help enhance the opportunities for students. The College also works with a number of partner schools in the delivery of link programmes for 14-16 year olds and the new Diplomas. The close proximity to the Royal School of Military Engineering (RSME), which boasts the largest construction training centre in Europe, and the fact that the College recently won the contract to deliver the civilian training there, is further evidence of the existing skills base and capacity to develop a regional hub at the College.	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 39	FWCA Frindsbury and Wainscott Community Association	J R Masey	As far as the Royal School of Engineering is concerned.	Noted.
	Question 40			<b>Q40: Do you support the concept of schools as 'community hubs'?</b> Answers for question 40 (from questionnaire & website): 10 Yes/ Agree 5 No/ Disagree 1 Don't Know	
	Question 40	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	We would support this - although there would need to be some financial input to schools to help them overcome some of the problems with access and security, heating and lighting.	Noted.
	Question 40	Dickens Country Protection Society	Chris Fribbins	Yes, if practical arrangements can be made that do need the whole school to be heated/lit etc.	Noted.
	Question 40	Kent County Council	Richard Feasey	Yes. Facilities can be concentrated and will allow greater access to all sections of the community. Sharing resources can reduce costs of additional building and this saving can be used to provide additional facilities.	Noted.
	Question 40		Vivienne Parker	but not at the expense of losing other community hubs like churches and community centres.	Noted.
	Question 40	FWCA Frindsbury and Wainscott Community Association	J R Masey	Possibly where amenities are short in certain areas.	Noted.
	Question 40		Dr D Brighton	No. encourage industry to invite schools visits, work days	Noted.
	Question 41			<b>Q41: What strategies should be promoted to improve the employment prospects of the more socially disadvantaged?</b> Answers for question 41 (from questionnaire & website): 2 Yes/ Agree 0 No/ Disagree 7 Don't Know	
	Question 41		Sara Fadil	I feel that more social enterprises within Medway should be considered to help the beggars off the streets to help those with mental health and learning difficulties. More funding should be ready, to support and help those businesses to get up and running.	Noted.
	Question 41		Vivienne Parker	The Council should encourage benefit claimants to work as volunteers for them within Gun Wharf and other council buildings in order to acquire new skills in a practical setting.	Noted.
	Question 41		Carl Kroon	Providing training for suitable the individual and for the job.	Noted.
	Question 41	FWCA Frindsbury and Wainscott Community Association	J R Masey	Q41& 42. Make adult education affordable and available.	Noted.
	Question 42			<b>Q42: What strategies should be promoted to encourage lifelong learning and up skilling in the workplace?</b> Answers for question 42 (from questionnaire & website): 3 Yes/ Agree 0 No/ Disagree 5 Don't Know	
	Question 42	Kent Wildlife Trust	Debbie Salmon	Providing opportunities to volunteer for practical conservation tasks and establishing wildlife orientated community groups will enable people to learn about ecology and habitat creation and management as well as providing them with a healthy pastime.(See Natural England's Revealing the Value of Nature at <a href="http://naturalengland.etraderstores.com/NaturalEnglandShop/CORP113">http://naturalengland.etraderstores.com/NaturalEnglandShop/CORP113</a> and Natural Health manifesto at <a href="http://www.naturalengland.org.uk/ourwork/enjoying/health/ournaturalhealthservice/default.aspx">http://www.naturalengland.org.uk/ourwork/enjoying/health/ournaturalhealthservice/default.aspx</a> for further details on health benefits of contact with nature).	Noted.
	Question 42		Sara Fadil	Q42-43 There should not be many spend (for instance) in helping someone start up a pub or retailer, but for businesses that will offer back something good into the community money (even tax payers money) should be considered for such ventures.	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 42		I.H. Smith	cheaper evening courses	Noted.
	Question 42		Carl Kroon	Financial cost is prohibitive for the individual. Time constraints are normally not possible.	Noted.
	Question 42		Dr D Brighton	Q42 & 43. Yes. Fund industry to train apprenticeships/ graduate training.	Noted.
	Question 43			<b>Q43: What strategies should be promoted to more closely match the skill needs of local employers?</b> Answers for question 43 (from questionnaire & website): 2 Yes/ Agree 0 No/ Disagree 5 Don't Know	
	Question 43	South East Marine Association's	Laraine Soliman	The investment envisaged by SEMA would create jobs for a wide range of employees including those who cannot at present find work locally because of the council's misguided employment policies; provision must be made for those who already live here and that requires a generous supply of small sites for SMEs particularly close to the river.	The core strategy acknowledges the importance of employment related activities along the River Medway. A specific chapter has been included in relation to this.
	Question 43		Mike Walters	Apply assisted funding to local youngsters who need vocational training at local colleges.	Noted.
	Question 43		I.H. Smith	Get employers involved	Noted.
	Question 43	FWCA Frindsbury and Wainscott Community Association	J R Masey	More liaison between employers and schools	Noted.
<b>Retailing &amp; Town Centres</b>					
				Council should support and promote town centre shopping. Why is it free to park at Hempstead shopping centre but not at town centres?	The Core Strategy makes provision for improved park & ride services. Free parking within town centre car parks is not considered practical and is beyond the scope of the core strategy.
		Medway Renaissance	John Finlayson	The future role of the 5 town centres and Hempstead Valley needs to be clearly set out. Substantial investment in retail in the recent past has not really been in the historic centres but has been in out of centre retail and large food stores. Chatham has been identified as one of 12 centres within the Thames Gateway for significant change. The LDF needs to deliver this successful change. Public realm improvements to Medway are already programmed.	The Core Strategy addresses this matter. One of its key aims is to significantly improve the retail offer within Chatham town centre. The Council has also just produced the Best Street / High Street Development Brief which sets out proposals for how new retail and other appropriate uses might be best accommodated. This has been adopted as a Supplementary Planning Document.
		Natural England	Josh Nelson	Retail provision at Lodge Hill should cater for the needs of the community at the proposed development in order to limit carbon from retail visits.	Retail provision at Lodge Hill will be required to be at an appropriate scale to serve local needs. It will not be allowed to be excessive in size, so as to threaten the commercial viability of other retail centres elsewhere in Medway.
	4.129		Barry Knight	The decline is not helped by increasing car park restrictions and car park prices. Medway town centre retailers need all the help they can get when the better off can easily drive to Hempstead Valley, Bluewater and Lakeside.	Noted
	4.135		Barry Knight	Due, perhaps, to unrealistic levels of business rates and over priced car parks (it is free at Hempstead Valle and Bluewater).	Noted.
	4.142	tbh developments ltd & helvig ltd	tbh developments/helvig	The NLP study has a number of deficiencies in its consideration of the need for additional convenience goods floorspace for a large foodstore. Firstly, there is significant leakage of food shopping expenditure outside of Medway from the Hoo Peninsula and other areas. Secondly, the existing large foodstores in Medway are overtrading. These deficiencies have two implications namely, that there will be a need for large food store sales floorspace before 2016 and that in the context of the revised draft PPS4 Medway is not benefiting as much as it should be from the significant number of retail jobs that new large foodstore floorspace would generate.	The NLP study is considered by the Council to be fully robust.
	4.151		Barry Knight	If trains stop at Strood it is hard to see how they can be "High Speed".	It is a fact that high speed rail services take little more than half an hour to travel between Strood and London St Pancreas.
	Question 44			<b>Q44: Should a major new retail development of at least 30,000 sq.m be a priority for Chatham?</b> Answers for question 44 (from questionnaire & website): 12 Yes/ Agree 5 No/ Disagree 2 Don't Know	
	Question 44	CPRE Kent	Brian Lloyd	We are unable to comment on the quantity proposed, but we would agree that the focus for new retail development should be at Chatham.	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 44		Paul Watson	Answer to Q44 & Q45 1. These questions are highly significant in terms of the way in which the strategy for the Medway area will be shaped over the next 20 years. They will also have an impact beyond the end of the plan period. 2. It is our submission that key to these matters is the statement made at paragraph 4.149 of the issues and options paper: "Other than Chatham, none of the centres is large enough to compete with other centres in Kent. Accordingly, the case for Chatham to be the main focus for retail investment is strong. Equally, it is also important that the other centres have defined roles."3. It is of course tempting to seek to spread development to a number of different locations on the basis that everyone should get some share of the additional retail development. Certainly a decision on which town should be seen as the prime location within the district can be politically sensitive with competing interests between the main towns in Medway. 4. However, the clear danger of a strategy based on diluting the retail focus away from one main town is that none of the centres will grow and provide the level of retail service and quality necessary to compete with the other major centres within Kent. 5. By focussing the majority of retail growth within Chatham there is a far greater prospect that higher order national retailers can be attracted to Medway. The presence of a major department store for example would provide a significant draw. 6. The Core Strategy can seek to focus new development in Chatham through the spatial policies relating to retail provision. However, it is considered that if Chatham is to attract the kinds of retailers that will lift the town and allow it to compete with the larger centres in Kent, this must go hand in hand with wider townscape improvements and improvements to public spaces. 7. An improved town centre environment will enhance Chatham's reputation as a retail destination. It is considered that improved public spaces could be designed as gateways at key points in the town centre and contain places to sit, eat and meet as part of the wider shopping experience. 8. We therefore support the potential strategy of focussing retail growth on Chatham combined with a programme of townscape and public space enhancements within Chatham as proposed in the Chatham Centre & Waterfront Development Brief.	<p>The strategy addresses this matter. One of its key aims is to significantly improve the retail offer within Chatham town centre. The Council has also just produced the Best Street / High Street Development Brief which sets out proposals for how new retail and other appropriate uses might be best accommodated. This document has been adopted as a Supplementary Planning Document.</p> <p>The need for major improvements to the public realm is also dealt with in the Core Strategy.</p>
	Question 44	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	There is a need to improve the retail offering and overall environment of Chatham Town Centre, and if this development does deliver this, it would be supported.	<p>The strategy addresses this matter. One of its key aims is to significantly improve the retail offer within Chatham town centre. The Council has also just produced the Best Street / High Street Development Brief which sets out proposals for how new retail and other appropriate uses might be best accommodated. This document has been adopted as a Supplementary Planning Document.</p> <p>The need for major improvements to the public realm is also dealt with in the Core Strategy.</p>
	Question 44	Kent County Council	Richard Feasey	In recent years major stores i.e. M&S and Next have ceased operating in Chatham the town and that has had a major impact on the retail offer in the town centre. The current shopping offer is very much lower end of the market which is not fitting to Chatham's role as a primary regional centre for significant change (RSS Policy TC1). Considerable redevelopment is required to encourage major high street stores to return/locate in the centre and the need for a major injection of core comparison floorspace is acknowledged.	<p>Noted. The strategy addresses this matter. One of its key aims is to significantly improve the retail offer within Chatham town centre. The Council has also just produced the Best Street / High Street Development Brief which sets out proposals for how new retail and other appropriate uses might be best accommodated. This document has been adopted as a Supplementary Planning Document.</p> <p>The need for major improvements to the public realm is also dealt with in the Core Strategy.</p>
	Question 44		W Mann	Yes when access/ transport issues proven to be overcome.	Highway improvements are currently being made in central Chatham. The Core Strategy proposes further park & ride provision.
	Question 44	Open Spaces Society	Patricia Wilson	Q44 & 45. No. With areas of empty retail units the council should concentrate on making the shopping experience more attractive or improving car parking and relocating the central bus station, also improving the river side path which is a disgrace and hazardous at the back of Staples for instance.	<p>The Core Strategy addresses this matter. One of its key aims is to significantly improve the retail offer within Chatham town centre. The Council has also just produced the Best Street / High Street Development Brief which sets out proposals for how new retail and other appropriate uses might be best accommodated. This document has been adopted as a Supplementary Planning Document. Work on a new dynamic bus facility is now underway. It is likely to be operational in spring 2011.</p>
	Question 45			<p><b>Q45: Should Chatham also be a priority area for townscape improvements and enhancements to public areas?</b></p> <p>Answers for question 45 (from questionnaire &amp; website):  17 Yes/ Agree  3 No/ Disagree  0 Don't Know</p>	

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 45	Kent Wildlife Trust	Debbie Salmon	Townscape improvements provide another opportunity to include enhancements and wildlife corridors within the town centre. Green roofs and walls lend themselves well to retail outlets, wildlife verges or indigenous hedgerows provide linear routes. Public spaces could be planted with indigenous or insect-attracting species and street trees planted in a natural medium will provide habitat for common birds and reduce the heat island effect within the centre, cooling the atmosphere and providing shade. (See The Kent Design Guide Biodiversity Appendix at <a href="http://www.kent.gov.uk/NR/rdonlyres/6C743069-88B1-49E2-AFA0-FB60FEEA9695/0/BiodiversityFinal.pdf">http://www.kent.gov.uk/NR/rdonlyres/6C743069-88B1-49E2-AFA0-FB60FEEA9695/0/BiodiversityFinal.pdf</a> for further details on townscape enhancement	These matters are addressed in the Core Strategy.
	Question 45	Kent County Council	Richard Feasey	Chatham town centre is very tired and run down and improvements to public areas is a necessity to encourage major retail stores.	The strategy addresses this matter. One of its key aims is to significantly improve the retail offer within Chatham town centre. The Council has also just produced the Best Street / High Street Development Brief which sets out proposals for how new retail and other appropriate uses might be best accommodated. This document has been adopted as a Supplementary Planning Document.
	Question 45	FWCA Frindsbury and Wainscott Community Association	J R Masey	Will be needed after all the disruption. The improvements done in 1992/3 made a big difference, but not appreciated it seems, please keep area open near river. Pedestrians not considered by demolishing St John Hawkins bridge.	The demolition of the bridge has opened up access to the river. The Council is keen that the regeneration opportunities that this presents are properly grasped.
	Question 45		W Mann	Yes, but need to improve other areas where people live (such as Luton High Street in particular) and not just public areas. Need to show public that regeneration is relevant to them.	Regeneration is at the heart of the Core Strategy. Reference is made in it to the need for neighbourhood plans in respect of certain areas.
	Question 45		Dr D Brighton	With Rochester/ Gillingham- small improvements. Do not tarmac concrete roads, like Arethusa road	Noted.
	Question 46			<b>Q46: Do you agree with the strategies for Strood capitalising on its public transport links and a central area plan to better 'knit' the centre together?</b>  Answers for question 46 (from questionnaire & website): 8 Yes/ Agree 5 No/ Disagree 0 Don't Know	
	Question 46	Lafarge Cement UK	David Simms	With the introduction of domestic high speed rail services, Strood has an important opportunity to benefit from enhanced connectivity within the sub-region. Whilst there is a clear need to consider the central area of Strood, its hinterland should not be ignored. The importance of schemes such as Temple Waterfront in supporting Strood's regeneration, both in terms of being sources of investment in public transport and in establishing important focal points for activity, should be recognised and incorporated as a key element of any such strategy.	Noted. The importance of Temple Waterfront to the regeneration of Strood is acknowledged within the Strood section of the Core Strategy.
	Question 46	Kent Wildlife Trust	Debbie Salmon	See question 45 for suggestions of wildlife enhancements within town centres.	Noted.
	Question 46	FWCA Frindsbury and Wainscott Community Association	J R Masey	There are good crossings for Strood High St so would not agree to pedestrianisation, as shops would suffer. Aveling & Porter building should be incorporated in new development. It is part of Stroods history many wish to save.	Noted. The Strood Masterplan has been produced in order to shape the future regeneration of the town centre.
	Question 47			<b>Q47: Do you agree with the strategies for Rochester retaining and developing its role as a tourist centre but with some new retail development to better meet the day-to-day needs of a growing local population?</b>  Answers for question 47 (from questionnaire & website): 20 Yes/ Agree 1 No/ Disagree 0 Don't Know	
	Question 47		Gary Brook	Support Our client supports the strategy for retaining and developing the tourist centre of Rochester as this is likely to help attract investment to the area. We consider the Town Centre of Rochester benefits from good transport links and would be an appropriate and sustainable location for a small to medium sized local convenience store. A development proposal of this kind would be well supported as part of the whole comprehensive redevelopment of the Corporation Street quarter to cater for existing population and future residents of the area. It is considered that redevelopment involving both retail and residential development in accordance with the Corporation Street Quarter SPD (2008) together with paragraph 4.154 of the Core Strategy issues and options report would be welcomed and supported.	Mixed-use regeneration in Rochester is a component of the Core Strategy. Proposals of an appropriate mix and scale will be strongly supported.



Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 47	Kent Wildlife Trust	Debbie Salmon	If further tourism is to be encouraged within Rochester this is likely to increase recreational pressure on the SPAs. The feasibility of extra tourists and the impact they may have on European sites should be explored within the AA.	Noted.
	Question 47	Kent County Council	Richard Feasey	provides a distinctive shopping experience in comparison with other centres in the Medway towns and this should be maintained. However the scope for some additional convenience retail to bolster the centre's role as a neighbourhood shopping centre is supported.	Noted.
	Question 47	Frindsbury and Wainscott Community Association	A Wade	Yes. There is a need for some food retail development -but it should be restricted to encourage local retailers to thrive.	Noted.
	Question 47	Open Spaces Society	Patricia Wilson	Yes, developing its tourism role; but provision of better retail outlets (especially food) to discourage so much travel to Strood, Chatham	Noted.
	Question 48			<b>Q48: Do you agree with the strategies for Gillingham focusing its efforts on meeting the needs of the rapidly growing student population and the development of Medway Park as a regional sports complex?</b>  Answers for question 48 (from questionnaire & website): 13 Yes/ Agree 2 No/ Disagree 1 Don't Know	
	Question 48	CPRE Kent	Brian Lloyd	As well as students, the strategy for Gillingham should also seek to meet the needs of the indigenous population.	Noted. The Strategy seeks to regenerate the town centre, and to reduce deprivation.
	Question 48	Groundwork Kent & Medway	Simon Green	Yes so long as this also benefits local residents. Many local people do not have cars (to get to other shopping areas) and their low incomes make paying bus fares etc difficult. Gillingham town centre has been damaged historically by Hempstead Valley, and might be more damaged as Chatham is improved so the focus needs to be a on a reasonable range of local retail services for people living and working within a reasonable walking distance.	The Strategy seeks to develop Chatham as a sub-regional retail centre. However, it also seeks to support the other town centres within Medway in order to maintain and boost their overall viability and vitality.
	Question 48	Kent Wildlife Trust	Debbie Salmon	Although primarily developed for sports there are opportunities to establish a wildlife corridor or stepping stones through Medway Park.	Noted.
	Question 48	FWCA Frindsbury and Wainscott Community Association	J R Masey	As long as we retain Deangate also.	Noted.
	Question 48		W Mann	What are 'student needs'?-pubs, bars, discos, cheap cafe, off-licence? Need to improve the area for the permanent residents.	The Strategy seeks to regenerate the town centre, and to reduce deprivation.
	Question 49			<b>Q49: Do you agree with the strategies for Rainham consolidating it's existing role and becoming a more obvious focus for local services?</b>  Answers for question 49 (from questionnaire & website): 15 Yes/ Agree 1 No/ Disagree 0 Don't Know	
	Question 50			<b>Q50: Do you agree with the strategies for Hempstead Valley being encouraged to diversify into a more typical district centre with re-investment in its retail function to retain its competitiveness over the longer term?</b>  Answers for question 50 (from questionnaire & website): 15 Yes/ Agree 2 No/ Disagree 1 Don't Know	
	Question 50	CPRE Kent	Brian Lloyd	Yes, this seems appropriate but efforts should also be made to integrate the centre into the local community and make it less car dependent.	Noted.
	Question 50	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Yes, although there is a need to assess impact on smaller local shopping parades etc.	Noted.
	Question 50	Kent Wildlife Trust	Debbie Salmon	See question 45 for suggestions of wildlife enhancements within town centres.	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 50	Kent County Council	Richard Feasey	Consideration should be given to the role of Hempstead Valley being broadened to include some community space, to facilitate night time activities, provide entertainment etc.	Noted.
	Question 50		Alastair Blair	Yes, but no footprint increase of buildings.	Noted.
	Question 51			<b>Q51: Should the current policy that seeks to retain all local groups and parades of shops be reviewed with a new emphasis being placed on the larger local centres, which serve defined neighbourhoods?</b>  Answers for question 51 (from questionnaire & website): 6 Yes/ Agree 10 No/ Disagree 2 Don't Know	
	Question 51	CPRE Kent	Brian Lloyd	No. Local shops fulfill a useful and valued role that contribute towards making local communities sustainable, and policies should be provided in the LDF that seek to retain them as important local services.	The Council will seek to protect local centres wherever these are still considered viable.
	Question 51	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	No, these are real local shopping they should be retained, but further work may be required to market them and make them more affordable for local residents.	The Council will seek to protect local centres wherever these are still considered viable.
	Question 51	Lafarge Cement UK	David Simms	Existing and emerging local centres should continue to be protected as part of a recognition of their importance to local communities and the way in which they support sustainable patterns of local movement. Creating larger centres will rely on establishing larger catchment areas, meaning that some residents may end up further from facilities. Local shopping parades can be an important community focus and provide day to day needs within the community and should therefore be afforded continued support.	The Council will seek to protect local centres wherever these are still considered viable.
	Question 51		Vivienne Parker	We need to be aware that an ageing population is also a less mobile population and keeping shopping is important socio-economically and is more environmentally sustainable.	The Council will seek to protect local centres wherever these are still considered viable.
	Question 51	FWCA Frindsbury and Wainscott Community Association	J R Masey	Should be retained.	The Council will seek to protect local centres wherever these are still considered viable.
	Question 51		W Mann	No. Would this lead to loss of corner shops and local P.O?	The Council will seek to protect local centres wherever these are still considered viable.
	Question 51	Open Spaces Society	Patricia Wilson	Local groups and parades of shops should be cherished in that they encourage local "loyalties" encourage users to use cycles and walking, so reducing car travel. Especially the council should support retention of lost offices.	The Council will seek to protect local centres wherever these are still considered viable.
	Question 52			<b>Q52: Should explicit protection be afforded to rural shops and associated uses, given the sustainability benefits to the rural area?</b>  Answers for question 52 (from questionnaire & website): 19 Yes/ Agree 1 No/ Disagree 0 Don't Know	
	Question 52	CPRE Kent	Brian Lloyd	Yes, we consider this to be essential. Protection and support should also be provided for other services and facilities in the rural communities, not just shops.	Noted.
	Question 52	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Yes we would support more investigation into how local village shops can be retained and improved. They are currently a very costly alternative and 'drive' those that can to travel long distances for shopping, those that cannot suffer high prices and sometimes very severe restrictions on choice.	Noted.
	Question 52	Trenport Investments Limited	C Hall	One of the most effective and best ways to protect rural shops and services would be to accommodate more housing and employment at appropriate rural settlements as this would give rise to more people and more spending power to support the local businesses and services. The number of rural shops and services has declined as household sizes have reduced; there has been greater mobility; and greater competition. This trend will inevitably continue unless the decline in the number of potential customers is reduced or reversed. Simply avoiding this fact and introducing policies to protect rural shops and services is unlikely to ensure that they are viable and remain open. A decline in the number of rural shops and services will mean that the rural area will become less sustainable as residents are forced to travel further for services, usually by car.	The Council is required to consider the overall sustainability of development. Therefore, development that is likely to generate significant new traffic movements to jobs and facilities some distance from it, is unlikely to be supported.
	Question 52		Mari-Anne Harstad	Yes strongly agree. Organic, local, fruit / veg / butcher and unique shops should also be protected.	Noted.
	Question 52	Dickens Country Protection Society	Chris Fribbins	Rural shops and facilities are likely to come under even more pressure so Rural Issues need to be considered in detail	The Council is required to consider the overall sustainability of development. Therefore, development that is likely to generate significant new traffic movements to jobs and facilities s some distance from it, is unlikely to be supported.
	Question 52		Vivienne Parker	Central Cliffe at Hoo now has no rural shops and given lack of public transport, funding should be sought urgently to develop a basic retail outlet which sources its fresh produce locally so elderly people in particular do not have to travel for their weekly	Noted, but this is not a matter that can be addressed at the Core Strategy level.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				shopping.	
	Question 52	NFU	Kevin Attwood	Whilst use or lose is fine as advice for rural communities where planning policy can protect, enhance and encourage rural shops it must be correct to do so to retain the benefits for rural communities. Medway does not have a large rural area but all too often it seems lost among city aspirations and regeneration policies. It would be good to see adequate reference in the CS.	The Council will seek to protect community facilities wherever they are still viable. The Hoo Peninsula and Isle of Grain, Medway Valley and retail policies within the Core Strategy explicitly address this matter.
	Question 52		Dr D Brighton	Yes. French supermarkets have to sell local product. Reduce small shops business rates.	Noted, but this is not a matter that can be addressed at the Core Strategy level.
	Question 52	Open Spaces Society	Patricia Wilson	Yes, rural communities need all the help they can get, and should be encouraged to support sale of farm produce which probably reduces the amount of packaging as compared with e.g. Supermarkets saves transport from rural people travelling to urban shops, also provide social services with café's facilities "pick your own", sometimes children's activities and education (rural).	Noted, but this is not a matter that can be addressed at the Core Strategy level.
	Question 53			<p><b>Q53: What retail function do you think the new settlement at Lodge Hill should have? Do you agree that its retail development should be carefully phased to limit the impact on nearby rural settlements?</b></p> <p>Answers for question 53 (from questionnaire &amp; website):  12 Yes/ Agree  0 No/ Disagree  3 Don't Know</p>	
	Question 53	CPRE Kent	Brian Lloyd	As part of the Lodge Hill development, retail provision should primarily be aimed at meeting the day to day needs of the resident population together with a range of other essential community services and facilities. It should not be developed as an out of centre retail destination that will attract people from the wider urban area. We agree that care will need to be taken to manage the introduction of this new retail, but this will be as much about the scale and nature of the retail provided, and the specific retailers involved, as it is about phasing. We consider that the key is to ensure that provision is truly aimed at meeting local needs, and that the size of the units provided is appropriate for this.	The views expressed with regard to local needs provision are dealt with in the Lodge Hill policy in the Core Strategy.
	Question 53	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	There is a mixed reaction to this in the Parish. Lodge Hill has the potential to provide many facilities that are lacking in other areas on the Hoo Peninsula, but this could also threaten what little provision some of our villages have - needs more investigation 'Rural Issues' topic	The Hoo Peninsula and Isle of Grain policy within the Core Strategy explicitly addresses this matter.
	Question 53	tbh developments ltd & helvig ltd	tbh developments/helvig	Retail provision at Lodge Hill should be of a scale to serve its resident population and not of a scale (particularly in terms of large foodstore provision) that would attract journeys by car from within the Medway Towns urban area. The new settlement would be an unsustainable location for any large scale retail development given its free standing location outside the urban area.	Retail provision at Lodge Hill will be required to be at an appropriate scale to serve local needs. It will not be allowed to be excessive in size, so as to threaten the commercial viability of other retail centres elsewhere in Medway.
	Question 53	Dickens Country Protection Society	Chris Fribbins	Although this has the potential to provide a better quality of provision and reduce the need to travel into the urban areas, there will also be impacts on remaining village shops which will need some support - perhaps as part of a 'collective/co-op' with Lodge Hill.	Retail provision at Lodge Hill will be required to be at an appropriate scale to serve local needs. It will not be allowed to be excessive in size, so as to threaten the commercial viability of other retail centres elsewhere in Medway.
	Question 53	Kent County Council	Richard Feasey	A local centre should be provided although the practicality of phasing needs further consideration.	The Lodge Hill section of the Core Strategy addresses this matter.
	Question 53		Alastair Blair	Suitable local shops, pub, church, schools, health services. All development should be phased to minimise impact on all influenced people and settlement.	The Lodge Hill section of the Core Strategy addresses this matter.
	Question 53		John Hill	I feel that only retail units to serve the new planned settlement should be provided and yes, this should be carefully phased to limit impact on nearby settlements.	Retail provision at Lodge Hill will be required to be at an appropriate scale to serve local needs. It will not be allowed to be excessive in size, so as to threaten the commercial viability of other retail centres elsewhere in Medway.
	Question 53		Carl Kroon	Lodge Hill retail should work within current local retail and enhance the new community.	Retail provision at Lodge Hill will be required to be at an appropriate scale to serve local needs. It will not be allowed to be excessive in size, so as to threaten the commercial viability of other retail centres elsewhere in Medway.
	Question 53	Frindsbury and Wainscott Community Association	A Wade	Any request for a possible food superstore should be resisted at all costs. The impact on the Hoo Peninsula would be unacceptable.	Retail provision at Lodge Hill will be required to be at an appropriate scale to serve local needs. It will not be allowed to be excessive in size, so as to threaten the commercial viability of other retail centres elsewhere in Medway. However, it is important that proper and adequate retail provision is made within the development in order to ensure that Lodge Hill residents' needs are fully provided for.
	Question 53		W Mann	Yes. Retail development for local needs- Lodge Hill and environments.	Retail provision at Lodge Hill will be required to be at an appropriate scale to serve local needs. It will not be allowed to be excessive in size, so as to threaten the commercial viability of other retail centres elsewhere in Medway. However, it is important that proper and adequate retail

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
					provision is made within the development in order to ensure that Lodge Hill residents' needs are fully provided for.
<b>Community &amp; Social Infrastructure</b>					
		Medway Renaissance	John Finlayson	Development and investment in these facilities needs to go hand in hand with the development of Medway as a 21st century city. The LDF should present a clear picture of the infrastructure requirements as a result of its policies. A robust evidence base should underpin the infrastructure requirements. The importance of this is further emphasised by the proposed introduction of the Community Infrastructure Levy.	An Infrastructure Delivery Plan is being produced in order to fully address likely infrastructure requirements over the plan period up to 2026.
		Natural England	Josh Nelson	Natural England would support the developments of health initiatives and programmes to connect people with the natural environment through outdoor recreation. To bring about health benefits to the citizens of Medway and encourage engagement with and use of Medway's green spaces, Natural England would recommend the commissioning of health services to enable every GP or community nurse in Medway to be able to signpost patients to an approved health walk or outdoor activity programme.	Noted, but this is not a matter that can be addressed at the Core Strategy level. Nevertheless the Strategy can, and does, address the provision of green spaces, and a green grid. It also promotes improved cycling and pedestrian provision within developments.
	Question 54			<b>Q54: With a shift away from direct provision to the commissioning of health and social care services how can future accommodation needs be established to allow sites to be identified and safeguarded?</b>  Answers for question 54 (from questionnaire & website): 2 Yes/ Agree 2 No/ Disagree 8 Don't Know	
	Question 54	Kent County Council	Richard Feasey	Commissioning future accommodation needs to take account of facilities which would enable people to live independently for longer, such as community facilities/hubs, combined health and social care resources, investment into technology to enable people to live in their own homes for longer. Future projections of population growth, including growth in the numbers of older people should be used to estimate the projected increase in numbers of health and social care clients.	These matters are addressed within the Housing chapter of the Core Strategy.
	Question 54		Carl Kroon	How about asking the charities, carers and users?	Noted.
	Question 54	FWCA Frindsbury and Wainscott Community Association	J R Masey	A survey should be carried out of the elderly to ascertain their preference for care facilities.	Noted.
	Question 54	Frindsbury and Wainscott Community Association	A Wade	Provision for respite care for elderly and special needs is non-existent on the west bank or soon will be with the sale of Shaws Wood. In spite of public petitions there is a real need for local neighbourhood care.	Noted.
	Question 54		Dr D Brighton	No. Commissioning- contract out, why? A Unitary Authority is funded to provide these, roads and waste etc. not to fund an army of administrators to do it.	Noted.
	Question 55			<b>Q55: Do you agree with the idea that, as far as possible, facilities should be clustered together at a neighbourhood level?</b>  Answers for question 55 (from questionnaire & website): 15 Yes/ Agree 2 No/ Disagree 0 Don't Know	
	Question 55	CPRE Kent	Brian Lloyd	We agree that it is sensible to co-locate services as far as possible, but it needs to be recognised that different services have different catchment areas. Also, it must be recognised that there needs to be a different approach to providing services in the rural and urban areas respectively. The concept of a 'neighbourhood' may be relatively easy to define in the urban context and they may have the critical mass and ease of access to support and sustain a wide range of services and facilities. In the rural areas, though, neighbourhoods will primarily comprise individual villages which often will have a more limited population but the demand for local easily accessible services is just as strong. The rural communities should not be disadvantaged by a 'one size fits all' approach to the provision of local services.	Noted.
	Question 55	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Yes - and more definition of what neighbourhood means in the context of the rural areas.	It is fully accepted that the needs of the inhabitants of rural areas need to be considered as part of neighbourhood provision.
	Question 55	Lafarge Cement UK	David Simms	As our response to question 51 demonstrates, we consider that local facilities should be at the heart of communities. In that context, where feasible, health and other community facilities should be located to support local centres - doing so provides greater footfall and a sense of focus which can help to support commercial operations - as well as providing a focus for activity.	Noted.
	Question 55	Kent County Council	Richard Feasey	Strongly agree that facilities should be clustered at neighbourhood level, to align with the Sustainable Communities agenda, and to enable communities to develop in the locality, as opposed to having to travel to the nearest town for services and facilities.	Noted.
	Question 55	Open Spaces Society	Patricia Wilson	The term 'neighbourhood' is very vague, it may be a cluster focused on a village; or on beach/ waterside activities (at Upnor) , or an groupings of ethnic determination.	It is accepted and recognised that different types of neighbourhoods exist. However, provision at a more localised level is likely to usually be beneficial in comparison

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
					to a more centralised approach.
	Question 56			<p><b>Q56: The Kent Fire and Rescue Service is currently reassessing its services in Medway. Do you have any views on what pattern of facilities should be promoted?</b></p> <p>Answers for question 56 (from questionnaire &amp; website):  5 Yes/ Agree  0 No/ Disagree  5 Don't Know</p>	
	Question 56	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	We would want to see steps to retain village fire stations, the fast response times are appreciated by local residents.	Noted, but this is ultimately a matter that will be determined by the Kent Fire and Rescue Service, rather than the Local Planning Authority.
	Question 56	Dickens Country Protection Society	Chris Fribbins	Village fire stations should be protected where possible	Noted, but this is ultimately a matter that will be determined by the Kent Fire and Rescue Service, rather than the Local Planning Authority.
	Question 56		I.H. Smith	More local stations - less large depots	Noted, but this is ultimately a matter that will be determined by the Kent Fire and Rescue Service, rather than the Local Planning Authority.
	Question 56			Tailor patterns suitable to meet needs now and the future but do not fund if developers will not.	Noted, but this is ultimately a matter that will be determined by the Kent Fire and Rescue Service, rather than the Local Planning Authority.
	Question 56		Alastair Blair	Obviously what is sufficient to meet local needs, now and in the future.	Noted, but this is ultimately a matter that will be determined by the Kent Fire and Rescue Service, rather than the Local Planning Authority.
	Question 56		Carl Kroon	With new Lodge Hill, Strood side would need expansion. Div HQ to use old Horsted college site once demolished.	Noted.
	Question 56	FWCA Frindsbury and Wainscott Community Association	J R Masey	The mud rescue gear should stay in Strood.	Noted.
	Question 56	Frindsbury and Wainscott Community Association	A Wade	Yes. Fire & Rescue need to be locally based bearing in mind the river and bridge can be a barrier.	Noted, but this is ultimately a matter that will be determined by the Kent Fire and Rescue Service, rather than the Local Planning Authority.
<b>Leisure, Culture &amp; Tourism</b>					
		Open Spaces Society	Patricia Wilson	Leisure. This heading/ definition lacks inclusion of informal and unorganised activities which is often catered for by open space (see Q66-68) and seems to equate rather with sport.	Sport, green space and green grid provision are all matters that are addressed in the Draft Core Strategy.
			I.H. Smith	Better marketed and fill empty shops quickly and support them	Noted.
		Medway Renaissance	John Finlayson	The regeneration benefits of cultural activity and facilities are recognised. The LDF needs to be clear as how Medway's current offer will be developed and promoted during the plan period. The overall tourist offer -Rochester/Chatham/Gillingham needs to be optimised. Identified weaknesses in relation to a poor evening economy in certain areas, particularly Chatham town centre need to be addressed and the number, location and quality of the hotels.	Noted. These are all important issues that have been addressed in the Draft Core Strategy.
		Natural England	Josh Nelson	Natural England would support recreational facilities - particularly outdoor facilities -providing they are not incompatible with the protection or enhancement of designated nature conservation sites or landscapes. Natural England would particularly support initiatives encouraging local people to use and value the natural environment and would encourage the Council to promote and reduce barriers to engagement with and use of Medway's green spaces; for instance, through participation in walking to health initiatives (WHI).	Noted. The Council is implementing various initiatives to encourage greater use of Medway's green spaces. It is also promoting various initiatives to encourage healthier lifestyles.
	4.199	The Theatres Trust	Rose Freeman	We are pleased to see at para. 4.199 & 4.202 that your theatres are acknowledged and that a new multi-functional cultural development is planned. However, there should be an overarching policy to promote and protect your existing community facilities in the Core Strategy as without such a policy it could become difficult to retain an essential community asset particularly where land values become higher for an alternative use. This policy should also state that the loss of an existing facility will be resisted unless it can be demonstrated that the facility is no longer needed, or it can be established that the services provided by the facility can be served in an alternative location or manner that is equally accessible by the community.	The supporting text to the culture and leisure policy in the Draft Core Strategy refers to the importance of Chatham's two theatres to the Medway economy.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	4.200	Chatham Historic Dockyard Trust	Bill Ferris	Chatham Historic Dockyard is the Lead Museum for Kent and part of one of four lead museums in the SE region under MLA funded Renaissance in the Regions. It is, however, not mentioned in section 4.200 where the other two excellent museums in Medway are credited. Medway should be proud to be home to such a significant institution and should use the status as further evidence of its existing cultural credentials. Even more surprisingly the new project – part funded by Medway Council, CLG and SEEDA - known as National Museums at Chatham (National Maritime Museum and Imperial War Museum) with its permanent and international standard touring exhibition gallery is not referenced at all. This project, due to open in 2010 received support and funding on the basis that it was a force for change in terms of Medway's cultural offer and positioning. Not referencing it is truly perverse and presents a false picture of future provision likely to distort planning and potentially lead to duplication of facilities.	Noted.
	4.201		Barry Knight	Why should it. We're right next door to London.	Noted.
	4.203	The Theatres Trust	Rose Freeman	The Medway Economic Development Statement is quoted on page 58 to firmly establishing Chatham as a city centre of cultural and leisure activities 'â€¦', therefore the protection of theatres is essential if future generations are to have the opportunity to experience the joys of drama, dance, music and opera and The Theatres Trust wishes to be assured that the Local Development Documents are robust enough to include specific guidance on protecting existing and encouraging new arts and cultural provision.	The supporting text to the culture and leisure policy in the Draft Core Strategy refers to the importance of Chatham's two theatres to the Medway economy.
	4.203	University College for the Creative Arts at Rochester	David Hawkins	The University is grateful for this acknowledgement.	Noted.
	4.204	Rochester City Airport	Paul Britten	There would appear to be no provision for an increase in tourism during the 2012 Olympics. Due to Rochester Airports location in Medway it would make an ideal out of London staging post to reach the games.	The Council has, and will continue to, work to maximise the opportunities for Medway to benefit from the staging of the 2012 Olympics in London. Various initiatives are in place in order to attract more tourists to the area at that time.
	Question 57			<b>Q57: Should provision be made for a major new stadium? If so where and what form might it take</b>  Answers for question 57 (from questionnaire & website): 5 Yes/ Agree 8 No/ Disagree 1 Don't Know	
	Question 57	CPRE Kent	Brian Lloyd	We are unable to comment on the need for a major stadium, but if such a facility is considered desirable it needs to be sited in a location that provides maximum accessibility by public transport. This would suggest that a site within the urban area would be the most appropriate, as close as possible to a railway station, rather than outside of the urban area on greenfield land.	Noted.
	Question 57	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	On balance the Parish Council would not support this - but if it was provided it must be near rail and major road access (M2 for example)	Noted.
	Question 57		Mari-Anne Harstad	No thanks, small is beautiful! Lets have more smaller event locations that will support more uses, afterall Medway is made up a number of towns and each one should have its own event arena (small or large) these I feel will be more sustainable and relevant to our many different needs. I also think these are far more likely to be used by local groups and visited by local people vs one large stadium that attracts strangers from outside Medway. Lets treat residents with respect and serve them first.	Noted.
	Question 57	Medway Sports and Leisure Park Ltd	Medway Sports and Leisure Park Ltd	Yes, provision should be made for a major new stadium as the existing site at Priestfield is wholly unsuited to modern day requirements. Gillingham FC is part of the history of the town and the only league football club in Kent. It is one of the few features that puts the locality 'on the map'. Its continued presence in Gillingham should be supported, it being of particular value to the local community. It should be recognised and given protection (paragraph 11, PPG17). It is an existing major sporting facility which needs to be enhanced. The Mill Hill site is unaffected by any of the constraints identified in paragraphs 27-30 of PPG17. Priestfield Stadium is unsuitable for its existing use (let alone improvement) and so Mill Hill accords with paragraph 25 of PPG17, being an urban fringe location. For many years alternative sites for the football club have been considered and discounted. It was concluded that Temple Marsh was unsuitable. The recently considered next alternative site at Chatham Docks would lead to a loss of jobs and would adversely affect the local economy as a consequence. Such a proposal would also be contrary to the provisions of policy T12 of the South East Plan. Indeed the Council at Q26 is considering whether the Dock be given special protection because it is an invaluable, irreplaceable and sustainable transport and employment site. There is no special need for such a resource to be developed for a stadium and housing when this use can be readily located elsewhere. If the Dock was to be developed for non shipping related purposes, this would result in a loss of wealth creation opportunities to the Medway Towns for generations to come. Developing the Docks for non B class employment uses will necessitate the provision of a similar site elsewhere (amounting to some 35 to 40 hectares), located close to the existing employment population. Furthermore, the cost of developing this site would be significant. The high existing use value of the Docks and the significant likelihood of expensive decontamination costs of the former Naval Base will result in the need for a very much higher level of enabling development than a greenfield site in order to ensure the financial viability of the Club. Gillingham Football Club should ideally be located in Gillingham, not Strood, or Chatham. Land at Mill Hill in Gillingham provides a very suitable alternative site for a major new stadium for the following key reasons: - Mill Hill is immediately available.	Noted. However the club have not promoted this, or any other, site to the Council in connection with the core strategy.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				<ul style="list-style-type: none"> <li>- Access is excellent as it is bounded by the Gillingham by-pass (Yokosuka Way). Public transport links can be readily provided.</li> <li>- It is close to the most densely populated parts of Medway.</li> <li>- It is well related to new residential development at Grange Farm, yet far enough away so as to cause little (if any) direct impact.</li> <li>- The site is of sufficient size to accommodate the Club, its associated parking and other facilities.</li> <li>- Recognising it is highly probable that the club will require some form of associated enabling development, the site is also capable of accommodating this.</li> <li>- Furthermore, the construction cost of such development would be significantly less in respect of a site such as Mill Hill than for previously developed land. For example, there would be no financial burden of decontamination.</li> <li>- Its development will assist in regeneration and much needed employment opportunities, especially in the deprived neighbouring districts of Twydall and Lower Gillingham.</li> <li>- Locations such as Kingsnorth and Chattenden are not in Gillingham, which is the historic home of the Club. They are unlikely to provide such regeneration benefits and are not sustainable locations in their own right.</li> <li>- It would draw people into the area and significantly boost the local economy.</li> <li>- There are no other sites in Medway that can match the advantages that Mill Hill offers.</li> <li>- The community, including residents and supporters, should no longer have to endure sub-standard facilities at the largest sporting facility in Kent and Medway.</li> <li>- In addition to being the home of Gillingham Football Club, it could serve a multi-purpose role – for example a venue for concerts, other sporting events and business conferences.</li> </ul> <p>In summary, Mill Hill is immediately available; will not compromise existing employment and business uses and is deliverable. It has the potential to bring an exemplar sporting facility to the Medway Towns. It would act as a regional attraction, and catalyst for regeneration for the area as whole.</p>	
	Question 57		Alastair Blair	Q57-61, All should have a long term plan to relate to the needs of the people in Medway now and to 2026 and beyond.	Noted
	Question 57		Carl Kroon	Combined Rugby/Football with easy access to motorway and rail and bus routes.	Noted
	Question 57		W Mann	Yes. Should primarily be for Gillingham FC, but be able to handle RU if need should ever arise. Need site with good road links e.g. Chatham Maritime alongside No.3 Basin/Pier Approach Road; Adjacent to A289 N of railway; Junction of A289+B2004; Along B2004-Matheus (derelict) riding school	Noted
	Question 57	RSPB	Fay Martin	No. In the wrong location and/or without effective a major new stadium could have a negative impact on features of nature conservation concern, including internationally designated sites, for example by increased disturbance during construction. We therefore strongly recommend this matter be thoroughly appraised in the Habitats Regulations Assessment of the Core Strategy and we would welcome the opportunity to comment further on this matter following the publication of that document.	Noted
	Question 58			<p><b>Q58: Should further sports hall provision be made? If so should this be in standalone locations, in conjunction with secondary schools or a combination of both?</b></p> <p>Answers for question 58 (from questionnaire &amp; website):  10 Yes/ Agree  3 No/ Disagree  3 Don't Know</p>	
	Question 58	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Yes - both. Also investigate usage of Buckmore Park with Tonbridge & Malling - currently a criminal waste of a facility.	Noted
	Question 58		Mari-Anne Harstad	Yes. Strood and or Hoo Peninsula would be great locations to deliver great sports and healthy living facilities. All should benefit not just schools, changing the culture and availability of sport/activity in our rural and poorest areas should be high priority.	Noted
	Question 58		Mari-Anne Harstad	Community centres could easily be developed to include Sports Halls.	Noted
	Question 58		Vivienne Parker	In conjunction with secondary schools.	Noted
	Question 58		John Hill	If really needed. In conjunction with schools.	Noted
	Question 58		Carl Kroon	Combination. New academies have halls and so do university complex. Also sports area a former scout HQ nr Bluebell Hill.	Noted
	Question 58	FWCA Frindsbury and Wainscott Community Association	J R Masey	Both but depends on demand and cost. What happened to Temple School Community Hall plans.	Noted
	Question 58		W Mann	Yes. If Black Lion/Medway Park is lost to average user for badminton, 5-aside, gym etc then need provision elsewhere in schools and/or stadium	Noted
	Question 59			<p><b>Q59: How might participation rates in sport be improved in Medway?</b></p> <p>Answers for question 59 (from questionnaire &amp; website):  2 Yes/ Agree  0 No/ Disagree</p>	

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				6 Don't Know	
	Question 59		Mari-Anne Harstad	1) Attractive discounts, money is the biggest barrier to participation. 2) Better choice and availability 3) Cheap / free transport to sports & healthy living facilities would encourage participation. My observation is the majority of gym users drive themselves to their club, if you do not own a car or buses or not available at the time and place you choose to go then this actively excludes a large proportion of the population. It is also not sustainable.	Noted
	Question 59			Make them cheaper- offer free passes to people with long term health issues like diabetes, heart conditions etc	Noted
	Question 59		Carl Kroon	Participation has to be because people want to. Time, cost and access are against participation.	Noted
	Question 59	FWCA Frindsbury and Wainscott Community Association	J R Masey	Promoted more in schools. And reduce costs to attend facilities.	Noted
	Question 60			<b>Q60: Should further significant provision be made for playing fields in Medway?</b>  Answers for question 60 (from questionnaire & website): 14 Yes/ Agree 4 No/ Disagree 0 Don't Know	
	Question 60	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Yes, we are short of provision. Some work perhaps in making these more general purpose as sports tend to only use them for part of the weekend.	Noted
	Question 60	Trenport Investments Limited	C Hall	Trenport would wish to comment that a significant area of additional playing fields could be provided at Cliffe as part of a residential development at the village, which has been promoted by Trenport, including the recent call for sites as part of the Strategic Land Availability Assessment.	Noted
	Question 60	Dickens Country Protection Society	Chris Fribbins	Playing fields need to be designed to be more multi-use and more varied than large areas of mown grass.	Noted
	Question 60		Carl Kroon	The local government and national government are directly the cause of obesity. They destroyed the curriculum and sold off school field to fill their own brown wallets.	Noted
	Question 60	Frindsbury and Wainscott Community Association	A Wade	Yes. Selling playing fields should be resolutely refused. Swimming facilities more locally based. There is a shortage/ non existent local tennis courts for informal use.	Noted
	Question 60		W Mann	Yes (particularly if Q57 leads to loss of playing fields) I suggest Hempstead (opposite Shopping Centre) per current plan.	Noted
	Question 61			<b>Q61: Is land required for any other significant sports developments? If so, for what and where?</b>  Answers for question 61 (from questionnaire & website): 4 Yes/ Agree 4 No/ Disagree 2 Don't Know	
	Question 61	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Protect what we have	Noted
	Question 61		Sara Fadil	I think that the land that lays around the war memorial on the Lines- the wooded area that goes toward Fort Amherst- As it is now just a spot for drinkers, druggies... etc	Noted
	Question 61		Mike Walters	Rede common would be ideal for promoting affordable model flying facility under British Model Aircraft Rules. See website officially recognises as a sport control line and small radio control.	Noted
	Question 61		Vivienne Parker	Creation of a water park for water sports training in the vicinity of St Mary Marsh to act additionally as a flood lagoon in the event of potential flooding from the Thames.	Noted
	Question 61		Carl Kroon	Children and youth require areas nearby where they can run, climb and ride bicycles/ skateboards.	Noted
	Question 61	FWCA Frindsbury and Wainscott Community Association	J R Masey	Would be nice to return to roller skating at casino in Rochester.	Noted



Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 62			<p><b>Q62: Should the Reach Project be the focus for new cultural provision, bearing in mind its potentially wider regeneration benefits?</b></p> <p>Answers for question 62 (from questionnaire &amp; website):  3 Yes/ Agree  4 No/ Disagree  5 Don't Know</p>	
	Question 62	The Theatres Trust	Rose Freeman	Questions 62 or 63: We are pleased to see a section on this topic but note that there are 5 questions relating to the provision of sporting facilities, two for cultural facilities and two for tourist related items. Cultural activities include the visual arts, music, performance arts, crafts, museums, libraries, theatre and cinema. A visit to the cinema, the theatre, the museum or the library can stimulate the imagination and promote mental well-being and aid lifelong learning and is equally important for residents and visitors as are playing fields and leisure centres.	Noted. The Core Strategy gives clear recognition to the importance of Medway's cultural assets, and to the need to safeguard and enhance these.
	Question 62		Vivienne Parker	The centre of Chatham is less accessible to large parts of Medway and inaccessible intervals of public transport after 7pm. It also denies the dispersed nature of Medway where it takes nearly an hour to travel by car from southern to northern extremities of Medway. Local cultural hubs should be promoted.	Noted
	Question 62	FWCA Frindsbury and Wainscott Community Association	J R Masey	Would be nice to keep the open aspect near the library.	Noted
	Question 63			<p><b>Q63: Should provision be made for any other significant cultural projects? ? If so, what and where?</b></p> <p>Answers for question 63 (from questionnaire &amp; website)::  3 Yes/ Agree  4 No/ Disagree  6 Don't Know</p>	
	Question 63		Mari-Anne Harstad	Yes a choice of venues should be available for a large Multi-Cultural Festival. Events like these that bring the different groups and stakeholders together to celebrate and promote what Medway truly has to offer.	Noted
	Question 63		Carl Kroon	Arts -painting, sculpting, writing, poetry and modelling seem to have been glossed over. Medway has a substantial Arts scene which is focused out of N.A.C. Perhaps in consort with UCA, a month long event highlighting the talent.	Noted
	Question 63	FWCA Frindsbury and Wainscott Community Association	J R Masey	Build a new theatre behind the facade of the theatre royal.	Noted
	Question 64			<p><b>Q64: Given a dispersed pattern of hotel development should future provision be restricted to more central sites?</b></p> <p>Answers for question 64 (from questionnaire &amp; website):  10 Yes/ Agree  5 No/ Disagree  0 Don't Know</p>	
	Question 64	CPRE Kent	Brian Lloyd	Yes, we agree that this should be the objective.	Noted
	Question 64	Lafarge Cement UK	David Simms	Whilst providing hotel accommodation in central, well connected locations reflects national planning policy guidance and will help to sustain centres, it is important to recognise the diversity in the hotel market, and the need to meet a range of demands - some hotels will therefore need to locate close to other important demand generators, such as strategic highway connections or important commercial activity zones.	It is accepted that there are different types of accommodation requirement that cannot all be met in the same way. The Core Strategy recognises the economic importance to Medway in providing additional visitor accommodation, particularly with regard to the higher end of the market.
	Question 64		Mari-Anne Harstad	Bed & breakfast and small guest houses owners should be better supported. New developments should make space for this type of accommodation all over Medway.	Noted.
	Question 64	GVA Grimley Ltd	Sheery Sassoon	We support the promotion of tourism related uses throughout Medway. We do not consider that hotel facilities should be restricted to town centres but should instead be promoted throughout Medway, including areas near Chatham Maritime such as Colonial House where there is an existing permission for a hotel and in areas where proven to be viable and where the development proposals can be demonstrated to have no detrimental impacts on townscape, the environment and infrastructure capacity. It is considered that the Council should complete a Hotel Needs Assessment to established the anticipated level of demand of tourist accommodation within Medway. (Suggestion- Hotel developments will be encouraged in locations where other tourist facilities are available and where a demand for the facility can be demonstrated through the hotels needs and visitor accommodation assessment.)	Noted.
	Question 64	Kent County Council	Richard Feasey	Hotel development should be focussed on Rochester, Chatham (especially if the Reach project on the Waterfront is achieved) and Chatham Dockyard as easily accessible to Dickens World and the Historic Dockyard.	Noted..

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 65			<p><b>Q65: Have you any suggestions as to how Medway's major tourist attractions might be better presented and marketed?</b></p> <p>Answers for question 65 (from questionnaire &amp; website):            5 Yes/ Agree            1 No/ Disagree            2 Don't Know</p>	
	Question 65	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Reduce the cost. Investigate heritage 'linkages' and investigate as part of LDF	Noted. Efforts to lengthen the time visitors spend in Medway are being made. Improved linkages between individual tourist destinations will be one way of achieving this, another means of doing so will be further and better visitor accommodation provision.
	Question 65	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Heritage topic in LDF. Exploit more heritage links between sites - a journey through Medway's Heritage	Noted. Efforts to lengthen the time visitors spend in Medway are being made. Improved linkages between individual tourist destinations will be one way of achieving this, another means of doing so will be further and better visitor accommodation provision.
	Question 65	Kent Wildlife Trust	Debbie Salmon	The Trust would have concerns regarding the Medway and Thames Estuary and Marshes SPA being marketed as a tourist attraction. We understand the importance of environmental tourism within Medway but this will need to be managed in order to avoid impacts on European sites.	Noted.
	Question 65		Mari-Anne Harstad	A more 'joined up' approach is required. Without it we will not attract the inward investment we need. The World Heritage bid and Great Lines Heritage Park could be a good catalyst for getting this started.	Noted. Efforts to lengthen the time visitors spend in Medway are being made. Improved linkages between individual tourist destinations will be one way of achieving this, another means of doing so will be further and better visitor accommodation provision.
	Question 65	Dickens Country Protection Society	Chris Fribbins	Suggest more linkages between current and underused facilities.	Noted. Efforts to lengthen the time visitors spend in Medway are being made. Improved linkages between individual tourist destinations will be one way of achieving this, another means of doing so will be further and better visitor accommodation provision.
	Question 65	Natural England	Josh Nelson	<p>Major tourist attractions: Natural England is pleased to see the recognition of tourism opportunities afforded by environmental assets, including the internationally designated nature conservation sites of the Thames and Medway Estuary and Marshes. Although we are glad to see recognition of potential human pressures on designated nature conservation sites, we would like to see greater recognition of the potential sensitivity to disturbance of nature conservation interests and the consequent need for nature conservation sites to be well managed in order to ensure that their special interest is not damaged. Preservation and enhancements of landscapes (by reference to landscape character assessment) is important to promoting and sustaining tourism in Medway. Preservation and enhancement of landscape character and biodiversity resources in the Thames and Medway Estuary and Marshes could make a vital contribution to tourism in Medway as long as visitor pressure on these internationally important nature conservation resources is sensitively and sustainably managed. Concentrating on improving biodiversity value in The Great Lines City Park would increase its attractiveness to visitors. In this and all other projects and proposals for green infrastructure provision in Medway, Natural England would recommend the Council are guided by and incorporate the principles set out in the South East Green Infrastructure Framework.</p>	<p>The 'preservation and enhancement of natural assets' section of the Core Strategy deals with impacts on sites of nature conservation importance.</p> <p>The 'countryside and landscape' section of the strategy addresses the issue of landscape character.</p>
	Question 65	Kent County Council	Richard Feasey	<p>The list of tourism attractions in 4.204 identifies most of the major attractions in Medway although it possibly underestimates the potential of the river Medway itself. There are a range of smaller, more local, attractions in Medway that would benefit from improved conservation and presentation and that could in turn contribute significantly to the regions wellbeing, sense of place, and economic potential. Medway has long been an area of military significance for the UK. Much of this importance is derived from the presence of the historic dockyard and the Issues and Options Report suggests that this is appreciated. However, the potential of the defence systems that surround the dockyard are less recognised. In particular, the fortifications of Grain constitute one of the most powerful and varied sets of defence sites in the country. These could play a much greater role in Medway's tourism industry which could be particularly important given the range of challenges faced by that part of Medway. There are additional defence sites along the Medway that could be incorporated into river-based tourism, even if some, such as forts Hoo and Darent could not be visited. Within the Hoo peninsula the remnants of the Second World War GHQ Stop Line forms one of the most complete military landscapes of the Second World War in Kent and in conjunction with the nearby military remains at Chattenden could again play an important economic and social role in this growth area. Further to the west, Cliffe Fort also has an undeveloped tourism potential. Promotion of the cycling and walking opportunities in Medway particularly linked to the wildlife and natural assets of the area. Promotion of a water taxi particularly linking the Chatham Dockyard/Marina to Upnor providing facilities for walkers and cyclists on board to encourage trips over to the Isle of Grain and the Hoo Peninsula.</p>	Noted. The Core Strategy now includes a chapter specifically dealing with the River Medway.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 65		Sara Fadil	local advertising/ online (facebook)	Noted.
	Question 65		Mike Walters	Park and ride facilities on major festivals to alleviate Strood traffic jams.	Noted.
	Question 65		Vivienne Parker	Tie each attraction in with high quality restaurants instead of low quality cafes.	Noted.
	Question 65		John Hill	Refer to truth under their area name (i.e. Rochester or Gillingham) and not Medway.	Medway is the borough's name. However, the individual five towns that form it are still highly valued in their own right.
	Question 65		Carl Kroon	Medway's Big Problem. What is Medway? Medway is a river. City Status.	Medway is the borough's name. However, the individual five towns that form it are still highly valued in their own right. Medway is strongly committed to achieving city status.
	Question 65	FWCA Frindsbury and Wainscott Community Association	J R Masey	Keep Visitors Centre in Rochester open. Also use Aveling & Porter building for culture i.e. gallery, archive, community centre etc.	Noted.
	Question 65		Dr D Brighton	Castle gardens band concerts on Sunday 2-4pm, Jun-Aug. Morning dancing on Sunday, afternoon at central car park area. Eastgate House- central social club, for meeting. Dickens cottage- open (guided) More choir concerts rather than Cathedral organ concerts. Flags outside the Information Centre. Flags on the High Street, June -September	Noted.
	Question 65	Open Spaces Society	Patricia Wilson	Rochester information centre is excellent and cannot be faulted. I doubt that tourism is so well promoted in Chatham and Gillingham. Many interesting sites are not signed well enough to encourage exploration. Council support for Medway little theatre and Medway film society is welcome, both are first-rate, the same cannot be said for the decor of the Brook Theatre, and for lack of tea/ coffee bar.	Noted.
<b>Landscape, Wildlife, Countryside &amp; Open Space</b>					
		Environment Agency	Jennifer Wilson	The appraisal of the area has not included the significant freshwater/estuarine resource of the Medway River and tributaries. This is a key issue due to the potential opportunities and constraints it may pose to development, with regard to biodiversity and other environmental limits such as water quality. Watercourses also provide a valuable contribution to green networks as corridors, providing great biodiversity and recreational resource. The Water Framework Directive requires all water bodies to reach good ecological quality, and to not deteriorate in ecological quality, with development being an important way in which improvements and deterioration can occur. We look to the Development planning system to be a support to the aims of this Directive, and thus for protection to be afforded to this resource through the councils policies. As lead for the protection of aquatic habitats and species, the Environment Agency will seek to ensure that the protection of aquatic biodiversity is addressed at all levels and stages of the planning system. Beyond this, we believe that the consultation document has picked out the key issues and that a core strategy based on these will provide protection to the valuable components of the Medway area.	Noted. A core strategy cannot deal with the matter in detail but a range of policies provide a basis for ensuring that water quality is fully taken into account.
	4.215	Groundwork Kent & Medway	Simon Green	This section should be expanded and a policy needs to be developed relating to it. There is a very large amount of community and charity activity related to improving and maintaining green and open spaces. Apart from the many voluntary groups affiliated to the Countryside Forum, Medway benefits from three significant professional charities: Groundwork, Kent Wildlife Trust and RSPB. The LDF should recognise and support the role these organisations have in this field.	Noted but the core strategy is not the best vehicle to recognise their un doubted contribution..
	4.216	NFU SE Region	John Archer	The comments on 'insensitive' and 'modern' farming practices are some 20-30 years out-of-date. Since 1987, more than 17,000km of hedgerows have been restored through agri-environment schemes and there are now about 515,000km of hedges on English and Welsh farms. Since 1997 the Hedgerow Regulations have prevented the unrestricted removal of hedges. Modern farming practices do not include the over-application of insecticides. The agricultural use of chemicals is highly regulated both by government agencies and by the industry-led Voluntary Initiative. Apart from improvements in application methods, the usage has reduced from 35.6 million kg in 1997 to 22.4 million kg in 2006. Some cases of pesticide pollution have been traced back to amenity users, including local authorities. On the other hand, 6 million hectares of farmland is in Environmental Stewardship of some sort (65% of all eligible land). Farmers and growers are fully engaged in improving environmental conditions and providing cost effective landscape management for the wider public good. Repeating tired anti-farming propaganda from a bygone age is not likely to engender enthusiastic co-operation from farmers today.	Noted. The Council recognises the importance of conservation work undertaken by farmers, and is committed to assisting it wherever possible.
	4.222	NFU SE Region	John Archer	The NFU agrees with the Government position. The plethora of existing statutory designations is sufficient protection and we agree that criteria-based policies should be used. Admittedly our interest is based on experience of non-statutory designations adding to the restrictions on agricultural development in the countryside. All our valued landscapes are semi-natural and were shaped originally by farming. The unreasonable restriction of agricultural development will simply hasten the removal from the land of the very people whose forebears created the landscape and who now manage it as part of their day-to-day business.	Noted.
	Question 66			<b>Q66: Should adaptation to climate change be a cornerstone for our strategy for the countryside, given the probable need to protect large areas to allow habitats to adapt and species to migrate as global temperatures rise?</b>  Answers for question 66 (from questionnaire & website): 20 Yes/ Agree 4 No/ Disagree 0 Don't Know	
	Question 66	CPRE Kent	Brian Lloyd	Yes, the need to understand the impact of climate change on the countryside is extremely important and the LDF needs to be proactive in identifying and delivering necessary adaptations.	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 66	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Yes adapt AND protect habitats.	Noted.
	Question 66	Trenport Investments Limited	C Hall	No. The cornerstone for Medway's strategy for the countryside should be to support rural communities, including maintaining levels of services and facilities, possibly through additional development and expansion of suitable settlements, if necessary, and diversifying the rural economy. (See response to question 52 for amplification of this issue).	The Council is committed to ensuring the long-term sustainability of Medway's rural communities. The policy on landscape and the countryside allows for development in accordance with PPS4 and PPS7 subject to a number of safeguards.
	Question 66	Kent Wildlife Trust	Debbie Salmon	The Trust would support landscape scale enhancement to mitigate the effects of climate change on the natural world. As global temperatures rise flora and fauna species will need to move to cooler climates. Landscape scale enhancement will also provide the following benefits. <ul style="list-style-type: none"> <li>• Provide buffering for internationally, nationally and locally designated sites to protect them from impacts of increased population and construction.</li> <li>• Provide safe migration corridors through the urban environment.</li> <li>• Ensure increased contact with biodiversity for urban populations.</li> <li>• Connect, create and extend Biodiversity Action Plan habitats.</li> <li>• Contribute to the national and international BAP targets</li> <li>• Enable urban population to enjoy wildlife increasing physical and mental health.</li> <li>• Ensure connections between districts and across county boundaries to enable species to move throughout Britain.</li> </ul> Within discussions with Swale and Gravesham the Trust has proposed that to ensure protection of the three estuarine SPAs extensive connected habitat networks should be created as mitigation for all developments within the three districts. For the proposed habitat creation to be delivered contributions from developers would need to be pooled and the network mapped, to ensure no impact on the European sites or the birds that use them. The Biodiversity Opportunity Areas, if adopted would help in the delivery of landscape scale enhancement and would enable Medway Unitary Authority to conform to the Principals contained within Defra's guidance on Conserving biodiversity in a changing climate: guidance on building capacity to adapt at <a href="http://www.ukbap.org.uk/Library/BRIG/CBCCGuidance.pdf">http://www.ukbap.org.uk/Library/BRIG/CBCCGuidance.pdf</a> The Trust would be happy to discuss this further and we would also recommend that Medway Council contact the Kent Biodiversity Partnership for further information on BOAs. (See attached report produced by the RSPB and KWT in consultation with the EA on possible impacts arising from development planned within Swale, Medway and Gravesham.)	Noted although these are matters to be addressed primarily through the development management system..
	Question 66		Mari-Anne Harstad	My opinion is this is far too a specific question to ask. A more active debate should explore to fully understand what implications would be. Can we have some soft strategies in the local development framework which include practical actions to engage and empower the local community so that people can connect to the development and regeneration that directly affect them.	Noted. The Core Strategy identifies a number of bodies and projects which involve people in the implementation of environmental policies
	Question 66	Dickens Country Protection Society	Chris Fribbins	This is probably just one of a number of strategies and would not stand on its own	Noted. Policies on natural assets, landscape, open space and climate change seek to protect, extend and enhance natural habitats.
	Question 66	Natural England	Josh Nelson	Natural England would agree strongly that adaptation to climate change should be a cornerstone for the Council's strategy for the countryside given the increasing evidence of impacts upon habitats, landscapes and species associated with rising global temperatures. Natural England would support the use of policies to both preserve and enhance existing environmental assets but also to extend these areas where possible; and further to allow for the creation and maintenance of habitat stepping stones and functional corridors to assist species migration in response to changing climatic conditions. Natural England would recommend that the regional Biodiversity Opportunity mapping produced by the South East England Biodiversity Forum is used to inform policies on habitat creation and enhancement.	Policies on natural assets, landscape, open space and climate change seek to protect, extend and enhance natural habitats.
	Question 66	Environment Agency	Jennifer Wilson	Yes. Key issues surrounding this are the need to mitigate for the loss of intertidal habitat through coastal squeeze, and ensuring that biodiversity has the scope to move through the landscape in response to changing conditions, and that the landscape has the ability to adapt and continue to provide ecosystem services. The first stage of this is recognising what services are provided and the threats to these. We would recommend that a strategic green network is identified and that this is protected, through core strategy policies and potentially also through a Supplementary Planning Document, as part of adaptation to climate change and to give a clear direction to development now and in the future.	Policies on natural assets, landscape, open space and climate change seek to protect, extend and enhance natural habitats. However, land has not yet been safeguarded to create habitat in mitigation for the loss of intertidal habitat as the approach to be taken has not yet been raised by the Environment Agency.
	Question 66	Kent County Council	Richard Feasey	Yes. Adaptation to climate change should be a cornerstone of countryside strategy. It should take into account projects such as BRANCH and the Wildlife Trust Living Landscapes. Providing habitats for species does not mean that people are excluded from the area - users can get increased enjoyment from areas which are beneficial to biodiversity. Additional comments - When considering areas for expansion/development the impact they will have on protected species and habitats (through scoping surveys and if necessary further specific protected species surveys) should be considered as an integral part of the design of development in order to incorporate them rather than having to provide mitigation for the loss of habitat. If any habitats and protected species will be impacted (indirectly or directly) mitigation strategies should be produced to ensure there is no net loss of habitat.	Policies on natural assets, landscape, open space and climate change seek to protect, extend and enhance natural habitats. The open space policy makes provision for a green grid, which encourages public access to green spaces. The natural assets policy seeks the incorporation of wildlife habitat in development schemes.
	Question 66	NFU	Kevin Attwood	No. The effects of climate change at the level of Medway are not yet sufficiently quantified or understood to make it the cornerstone of a countryside strategy.	Policies on natural assets, landscape, open space and climate change seek to protect, extend and enhance natural habitats.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 66	RSPB	Fay Martin	Yes. The RSPB considers that climate change presents one of the greatest threats to biodiversity. The planning system has a key role play in protecting the environment, including addressing the causes and effects of climate change. The RSPB would therefore welcome a proactive approach to protected areas to allow habitats and species to adapt to the effects of climate change. We would therefore welcome a requirement for development to pursue a net gain in biodiversity as this is promoted by PPS9.	The policy on natural assets makes provision for environmental compensation to be sought on more than a like-for-like basis.
	Question 67			<p><b>Q67: Given Government advice to replace landscape designations with criteria based policies and local character areas, which of the following options should be considered for landscape protection:</b></p> <p><b>1. Retention of Areas of Local Landscape Importance?</b></p> <p><b>2. Use of criteria based policies as advocated in Government guidance?</b></p> <p><b>3. A new system of Integrated Land Management based on individual landscape character areas?</b></p> <p>Answers for question 67 (from questionnaire &amp; website):  1: (12 Yes/ Agree; 1 No/ Disagree; 1 Don't Know)  2: (4 Yes/ Agree; 10 No/ Disagree; 0 Don't Know)  3: (9 Yes/ Agree; 6 No/ Disagree; 1 Don't Know)</p>	
	Question 67	CPRE Kent	Brian Lloyd	Firstly, we would highlight that part of the Kent Downs AONB falls in Medway and being an important national designation this clearly needs to be acknowledged in the Core Strategy. Although Government guidance generally discourages repetition of policy at the local level, we consider that it is appropriate for the Council to include a policy in the Core Strategy that sets out the importance of the AONB in the Medway context and to present how AONB policy will be applied locally. With regard to the local landscape designations (special landscape areas as well as ALLIs), we note from the State of Medway Report on Natural Assets and Open Space (paragraph 1.4) that these may be retained if a special justification can be made. We would like to explore in detail with Medway Council what would comprise this special justification, as we are of the view that these important, and widely valued, designations should be retained if possible. Indeed, we note that the Secretary of State specifically saved Policy BNE34 of the Local Plan (Areas of Local Landscape Importance) to give the opportunity to the Council to justify their retention in the LDF. PPS7 encourages the use of a generic policy approach to landscape character, rather than local designations. We accept that there is merit in this approach in that it would recognise the landscape character of all parts of the countryside, provided it is based on a robust landscape character assessment that is adopted as Supplementary Planning Guidance and which is specifically referred to in policy. However, we are more attracted by the 'Integrated Countryside Management' approach as potentially a more sophisticated approach, especially if this means that specific character areas area defined on the Proposals Map. Before endorsing this alternative approach, however, we would wish to better understand how it would operate and how it might change the established approach to development in the countryside.	They Council considers that, together with policies on the protection of natural assets and open space, the criteria based policy on landscape and countryside together with the Medway Landscape Character Assessment provides a more comprehensive means of protecting the countryside as a whole, than ALLI's alone. It does not see the need to pursue the integrated land management course, as this would require a reassessment of the landscape character to a greater level of detail than is required for the purpose of countryside protection.
	Question 67	Barratt Strategic		We feel the council have to use a criteria based policy, rather than landscape character assessments when looking at how to protect local landscape areas. Para 24 of PPS7 is clear on this point. It states:-"The Government recognises and accepts that there are areas of landscape outside nationally designated areas that are particularly highly valued locally. The Government believes that carefully drafted, criteria-based policies in LDDs, utilising tools such as landscape character assessment, should provide sufficient protection for these areas, without the need for rigid local designations that may unduly restrict acceptable, sustainable development and the economic activity that underpins the vitality of rural areas."Para 25 goes on to state:-"Local landscape designations should only be maintained or, exceptionally, extended where it can be clearly shown that criteria-based planning policies cannot provide the necessary protection. LDDs should state what it is that requires extra protection, and why. When reviewing their local area-wide development plans and LDDs, planning authorities should rigorously consider the justification for retaining existing local landscape designations. They should ensure that such designations are based on a formal and robust assessment of the qualities of the landscape concerned."Given the above we do not see how the council can try to retain the Areas of Local Landscape Importance. Likewise we do not feel that a new system of individual landscape character areas would be a realistic approach to adopt.	The Council considers that together with policies on the protection of natural assets and open space, the criteria based policy on landscape and countryside together with the Medway Landscape Character Assessment provides a more comprehensive means of protecting the countryside as a whole, than ALLI's alone. It does not see the need to pursue the integrated land management course, as this would require a reassessment of the landscape character to a greater level of detail than is required for the purpose of countryside protection.
	Question 67		Lillian Harrison	The use of criteria based policies as specified in Government Policy (not guidance) should be the chosen route for this issue. Designation of local landscape areas (including ALLIs) in emerging LDFs places far too much, un-necessary restriction on future economic development.	The Core Strategy advocates this approach within its 'countryside and landscape' policy. Medway Council considers that together with policies on the protection of natural assets and open space, the criteria based policy on landscape and countryside together with the Medway Landscape Character Assessment provides a more comprehensive means of protecting the countryside as a whole, than ALLI's alone. It does not see the need to pursue the integrated land management course, as this would require a reassessment of the landscape character to a greater level of detail than is required for the purpose of countryside protection.
	Question 67		Owen Sweeney	1.I should like to endorse the arguments and support others who request the retention of ALLIs in Medway, particularly the views put forward by Medway Countryside Forum. 2.This position is based partly on personal experience of Public Inquiries in both Medway and Swale which provides additional evidence of the need for ALLIs. 3.Inspectors at those Public Inquiries listened carefully to the numerous cases put forward by landowners and potential developers-and their lawyers-to encroach onto or nearly eliminate some of the existing ALLIs for housing and other development.In addition to their pleas to build on specific sites within the ALLI designated areas, it was clear that, during these PI discussions but also more generally, developers collectively were conducting a massive campaign and attack on the whole concept of ALLIs.They used every opportunity to denigrate their existence	Medway Council considers that, together with policies on the protection of natural assets and open space, the criteria based policy on landscape and countryside together with the Medway Landscape Character Assessment provides a more comprehensive means of protecting the countryside as a whole, than ALLI's alone. It does not see the need to pursue the integrated land management course, as this would

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				and made no bones about their wish to see them removed totally from Local Plans. 4.It was equally clear that the local councils and planners involved, in those cases pursued by developers against existing local plan intentions, wanted to prevent development and ably used to the full in their arguments the overt ALLI designations to justify their opposition to such development. 5.In the end, Inspectors in the disputed cases found in favour of the local councils and it was clear that the act of designation weighed heavily, if not totally, on that publicly well-supported layer of landscape protection in the Inspectors' minds. 6.We should think very carefully, therefore, about the consequences of losing any part of that hierarchy of landscape designations which appropriately complements the existing wildlife hierarchy through local, county/unitary, national and European/International levels. And nowhere more so than in Medway. 7.Why do we say this? Of all the councils here in Kent, local residents know the pressures Medway is under for houses, employment land, transport etc stemming from the Thames Gateway regeneration. Medway Countryside Forum has consistently said over recent years that whilst the Thames Gateway planning documents claimed that this was a balanced framework, virtually all of the emphasis and publicity went on the building and development side of the coin and so relegating the importance of the need for green "infrastructure", urban green lungs, buffer-zones, fringe areas, visual amenities etc equally there in the framework and particularly for heavily-urbanised conurbations like Medway. 8.In that sense, we are not like much of the rest of Kent. Although many residents did not want a unitary authority here, what is the point of being different in Medway if our Council does not make use of the separate and unique powers it possesses to relate them specifically to the needs of Medway? What we are saying is that Medway has already taken too many hits on its ever-reducing natural environment recently and if we are to have any hope of protecting the last remaining "separations", green lungs etc the last thing we should be doing is removing a tried and tested layer of protection which has served us well in the past, because of its clarity and definition, and replacing it with an ambiguous, fuzzy and vulnerable assessment capable of subjective argument and partisan advocacy. Make no mistake, landowners/ developers would love to see the removal of ALLIs and replaced with a policy full of loopholes owing to its lack of designation. For the sake of Medway residents, our Council/planners should not forego this effective means of development control. 9.We say that Medway Council should acknowledge that the existing ALLIs do reflect those green areas in the towns and their surrounds which deserve specific retention, as designated areas, even if they are grounded on criteria-based character assessment. And if Medway is the only part of Kent which retains ALLIs, with their vital act of definition, then so be it for there is a good case that Medway needs ALLIs more than the rest of Kent because of its built-up nature and Thames Gateway responsibilities. 10.To summarise our case:- - ALLIs have served Medway - and outside Medway - well in the past in protecting such valued green lungs from development - we do not believe that Government dictates that Medway Council has to drop ALLIs for the option is there to argue for them and we wish our Council to do this, please - there is nothing to be ashamed of in having a hierarchy of landscape designations alongside a wildlife hierarchy. If we are dismissive of ALLIs, does this go for SLAs too and, in the future, perhaps AONBs? A ladder with only one rung is hardly a ladder. Yes, we know that the K&MSP is no longer extant but that does not mean that the Inspector - who accepted our arguments for the retention of ALLIs and SLAs at the last Examination in Public - was wrong in his reasoning and conclusions after that serious debate - by all means use criteria-based landscape character assessment or any other favoured methodology but it is the act of designation that counts - the act of defining ALLIs is also a signal to residents that this is a valued piece of green environment locally which should be respected and appreciated. It can also act as a spur against dereliction by landowners which our Council can use, if necessary, to encourage those who may be negligent - appreciating defined ALLIs is all part of encouraging local residents to take more "ownership" and concern for their nearby natural environment without necessarily travelling to more distant hot- spots/attractions - please remember that Medway Countryside Forum is not just a few community-minded individuals. Those who have loyally attended meetings over many years/commented thoughtfully on many Council documents etc often speak for tens or hundreds of people in their respective nature conservation bodies, residents/community associations etc and we should like our Council to recognise such on issues important as this - because of its key position in the Thames Gateway, Medway of all places in Kent needs ALLIs. 11.For the above reasons, we reject any dismissal of ALLIs by Government, planners or others that to support ALLIs is backward-looking and out-of-date or that other ways are self-evidently more "intelligent". We believe they have proved their worth, are recognised and supported by the public, and any moves towards a less defined, ambiguous and amorphous status for these essential green lungs for Medway would seriously endanger their future existence. Please retain designated ALLIs for the sake of Medway residents and those who follow us.	require a reassessment of the landscape character to a greater level of detail than is required for the purpose of countryside protection.
	Question 67	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Retain Areas of Local Landscape Importance (in some cases explain their part in Medway's heritage). Also use criteria based policies where appropriate Would want to investigate more the benefits, or otherwise of Integrated Land Management	Medway Council considers that together with policies on the protection of natural assets and open space, the criteria based policy on landscape and countryside together with the Medway Landscape Character Assessment provides a more comprehensive means of protecting the countryside as a whole, than ALLI's alone. It does not see the need to pursue the integrated land management course, as this would require a reassessment of the landscape character to a greater level of detail than is required for the purpose of countryside protection.
	Question 67	tbh developments ltd & helvig ltd	tbh developments/helvig	Once again the evidence base is not available on which to make a properly informed judgement on the options set out. Option 1 appears at face value contrary to Government guidance in PPS7 and therefore unacceptable. Option 2 cannot be properly evaluated without knowing what the criteria based policy will be (or would this be a separate policy for each character area?); Option 3 again cannot be properly evaluated without knowing the details of individual land management strategies.	Medway Council considers that together with policies on the protection of natural assets and open space, the criteria based policy on landscape and countryside together with the Medway Landscape Character Assessment provides a more comprehensive means of protecting the countryside as a whole, than ALLI's alone. It does not see the need to pursue the integrated land management course, as this would require a reassessment of the landscape character to a

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					greater level of detail than is required for the purpose of countryside protection.
Question 67		Kent Wildlife Trust	Debbie Salmon	<p>Integrated Land Management is usually not based on Landscape Character Assessments as generally these focus as much on the man made environment rather than what should be naturally present, however Canterbury City Council has commissioned Jacobs to undertake a Landscape and Biodiversity Assessment. This is a groundbreaking document, which combines landscape character with biodiversity goals. The Trust supports this document and would recommend that Medway Council consult with Canterbury regarding the method used.</p> <p>The Ecosystems Approach is put forward by the Convention on biological Diversity and international organisation, which has three main aims.</p> <ul style="list-style-type: none"> <li>• the conservation of biological diversity.</li> <li>• The sustainable use of its components</li> <li>• The fair and equitable sharing of the benefits from the use of genetic resources.</li> </ul> <p>The ecosystems approach has been formulated to endeavour to achieve the aims. The restoration of natural landscapes is advocated for example grazing marsh with efforts to increase water quality and flood previously drained land. There would also be a push to reconnect large areas to ensure resilience to any changes in for instance climate. The main aim is to increase biodiversity with exploitation of the resources that natural management provides. In the case of grazing marsh this could be meat production, flood attenuation or tourism. The local population should be fully involved in the management process and should reap the rewards. However all activities should have no impact on the ecosystem so tourism should not cause bird disturbance and grazing should be at levels which will maintain the grazing marsh rather than damaging it.</p> <p>Both national policy PPS9 and The Natural Environment and Rural Communities Act and regional policy NRM5 and CC8 reflect this approach as do the Biodiversity Opportunity Areas, the Branch Project and the Living Landscapes work undertaken by the Wildlife Trusts. The Trust would urge Medway to examine these projects when considering their Green infrastructure as adoption of BOA's will ensure links are contiguous throughout Britain .(For further information on The Ecosystem Approach see <a href="http://www.cbd.int/doc/speech/2009/sp-2009-06-29-japan-en.pdf">http://www.cbd.int/doc/speech/2009/sp-2009-06-29-japan-en.pdf</a> and <a href="http://www.cbd.int/ecosystem/sourcebook/">http://www.cbd.int/ecosystem/sourcebook/</a> For Biodiversity Opportunity Areas map for the South East see <a href="http://strategy.sebiodiversity.org.uk/map.php">http://strategy.sebiodiversity.org.uk/map.php</a> for report on method used to identify the BOAs see <a href="http://strategy.sebiodiversity.org.uk/data/files/BOA/opportunity_area_mapping_methodology_0808.doc">http://strategy.sebiodiversity.org.uk/data/files/BOA/opportunity_area_mapping_methodology_0808.doc</a> For biodiversity opportunity statements see <a href="http://www.kentbap.org.uk/resources/boas/">http://www.kentbap.org.uk/resources/boas/</a></p>	The Medway Core Strategy advocates a criterion-based approach in line with government policy. This is set out in the 'countryside and landscape' policy.
Question 67			Mari-Anne Harstad	Too often we accept Government 'guidance' without challenging what is right for our own area. Each location is unique and should be treated as such.	Noted.
Question 67		Dickens Country Protection Society	Chris Fribbins	A mixture of ALL of these is required.	Noted.
Question 67		Natural England	Josh Nelson	Natural England would support the Council in its desire to move away from the use of local landscape designations in line with government guidance, as long as sufficient recognition and protection is given to important landscapes outside the protective designation of the Kent Downs AONB. Natural England would welcome the use of our work on Ecosystems Services in formulating an appropriate approach to the protection and enhancement of Medway's important landscapes; we would be happy to assist the Council in developing any approach the Council wishes to put forward to deal with any replacement of current local landscape designations.	Noted.
Question 67		Environment Agency	Jennifer Wilson	All options should be considered. An SPD may be relevant for landscape protection in order to explore the issue in more detail and give stronger guidance to developers as to what is necessary -this may introduce the system of Integrated Land Management.	Noted and a landscape character assessment has been prepared.
Question 67		Rochester Bridgewood Ltd	Rochester Bridgewood Ltd	Areas of Local Landscape Importance should be deleted as a countryside protection tool as the broad-brush approach is a blunt instrument that does not recognise the individual characteristics of specific areas. Their status has been diminished over time with Central Government guidance advising that little weight should be afforded to land with such a designation. The time has come for this to be removed completely.	Medway Council considers that together with policies on the protection of natural assets and open space, the criteria based policy on landscape and countryside together with the Medway Landscape Character Assessment provides a more comprehensive means of protecting the countryside as a whole, than ALLI's alone. It does not see the need to pursue the integrated land management course, as this would require a reassessment of the landscape character to a greater level of detail than is required for the purpose of countryside protection.
Question 67			Mercer	PPS7: Sustainable Development in Rural Areas states that criteria based policies such as Landscape Character Assessments should provide suitable protection to Areas of Landscape Importance not subject to national designations, as rigid local designations may unduly restrict acceptable sustainable development. Accordingly, Areas of Local Landscape Importance should be replaced with a criteria based policy approach.	Noted.
Question 67			John Hill	Q67-72. Provided that full "safeguards" are incorporated.	Noted.
Question 67		NFU	Kevin Attwood	Government guidance in PPS7 advocates criteria-based policies and this should be the basis of the CS to follow government guidance and be soundly based. The integrated land management system is a step beyond government guidance and is not appropriate. Rather recognition of agriculture and its role as custodian of the landscape would be preferable.	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 67	Medway Countryside Forum	David Murr	Q67(2). Refers to criteria-based landscape policies as advocated by the government. We believe that the existing policy BNE34 (Areas of Local Landscape Importance) in the adopted Medway Local Plan is indeed based on a set of "criteria - or statements " justifying the designation of specific areas where the retention of the essentially rural character should be the first priority with reference to integrated land management, this need not be precluded by a policy of retaining designated landscapes.	Noted.
	Question 67	Frindsbury and Wainscott Community Association	A Wade	1) Yes. Retention of Areas of Local Landscape Importance is of paramount importance. Necessary criteria already exist in the adopted local plan page 83 Policy BNE33 para.3 -what other criteria is necessary? We suspect a development agenda. No mention of conservation areas 2)No. Protection of green belt 3)No. Retaining and protecting the Strategic Gap between Medway and Maidstone -why not?	Noted.
	Question 67	Open Spaces Society	Patricia Wilson	This Society is strongly in favour of Option 1 namely the Retention of Areas of Local Landscape importance for the following reasons: 1. As a voluntary worker for this Society, formerly the Commons Open Spaces and Footpaths Preservation Society founded in 1865, the cornerstone for my work has been the Medway Local Plan (2003). The guidance provided for the Built and Natural Environment by Policy BNE 34 was and is first-rate in its simple analysis of sites, many of which have been the subject of our comments, such as Hogmarsh Valley, Horsted Valley, Chattenden Ridge, Nashenden Valley, Mierscourt/ Meresborough, Cliffe Pools and Halling Common. The nub of this Policy is 'the area's landscape character and function.... Providing an attractive setting to the urban area and surrounding villages, and so marrying the green infrastructure to urban areas and rural settlements. 2. This designation as distinct from many others in the Local Plan received special mention by the Inspector in linking it to the Thames Gateway- a greenspace strategy for Thames Gateway" (2004) on its very first page asserts that the core principles outlined need to inform the regional spatial strategies and local development framework that combine to shape environmental quality in this area. Why, therefore, should either Option 2 or 3 be superimposed on Thames Gateway? 3. Greening the Gateway (6.16) stresses that local people have a vital role to play and there is need for community involvement, going so far as to say the success of the Gateway landscape will be determined in large part by the extent of support from local people in establishing and caring for their local element of greenspace network, and reinforcing local distinctiveness. However, if this is to translate into action and achievement, we 'locals' need all the help we can get, since the Unitary Authority is such a large and diverse area. What we need to hang on to is relatively straightforward comprehensive Guidance, and this we have in the designations currently provided in the Local Plan for Areas of Local Landscape Importance. We view with dismay any projected abandonment of such a valuable tool. 4. There is added virtue in retaining this designation to encourage involvement of local citizens. With widespread concern about the loss of social cohesion, here is what may prove to be a common interest in where we live and what our surroundings are like- in other words, a sense of place. Action may vary from individual to groups, from physical to literary such as participating in the planning process, but if one does not understand the basic values of landscape, then citizens are loth to become involved. 5. In your Core Strategy report we welcome positive comments at paras. 4.210 and 4.220 about the present ALLO designation, which endorse the conclusions of the MLP. The fact that 'local people have consistently strongly supported these designations' encourages us to hope that you will avoid the confusion of imposing another different layer of methodology in the Thames Gateway. You explain that Government favours a change which it openly admits would reduce "need for rigid designations that might unduly restrict acceptable development". Acceptable to whom we ask? We ask you to support Option 1.	Noted.
	Question 68			<b>Q68: Which 'strategic' countryside projects and initiatives should be incorporated into the Core Strategy?</b>  Answers for question 68 (from questionnaire & website): 5 Yes/ Agree 0 No/ Disagree 6 Don't Know	
	Question 68	CPRE Kent	Brian Lloyd	We would support all of the projects outlined in paragraph 4.217 of the Issues and options document, and there should be a strong commitment in the Core Strategy to delivering them.	These projects are recognised in the Core Strategy.
	Question 68	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	All applicable projects and initiatives should be included - and room for more.	Noted.
	Question 68	Lafarge Cement UK PLC	David Simms	Lafarge is committed to the 'Valley of Visions Project' for the bringing forward a range of enhancement projects in the Medway Valley. This strategic countryside project should be incorporated into the Core Strategy.	The Valley of Visions is included in the landscape and countryside chapter in the Core Strategy.
	Question 68	Kent Wildlife Trust	Debbie Salmon	All conservation activities within the area should be identified and their work incorporated into the habitat network. To ensure multifunctionality, organisations from e.g. conservation, archaeology historical societies and leisure services, should work together to deliver and manage the Green Infrastructure.	Agreed.
	Question 68		Mari-Anne Harstad	The LDF is a good tool to assist enable delivery of ALL countryside projects and initiatives including the Biodiversity Action Plan. They are all in existence for a reason and so a collaborative approach is required to maximise this opportunity. The diversity in the groups/organisations/plans/strategies must not be a barrier to representing their vision, values and people they represent.	Noted.



Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 68	Natural England	Josh Nelson	Strategic countryside projects and initiatives We would agree with inclusion within the Core Strategy of the plans strategies and projects set out at paragraph 4.217 of the Issues and Options Report, namely: - Greening the Gateway and Thames Gateway Parklands - The Kent Downs AONB Management Plan - The Valley of Visions Project - Four Parishes Plan - Medway Green Grid We would recommend strongly that the Council refers to and incorporates the guiding principles of the South East Green Infrastructure Framework in bringing forward specific projects and, also, in its approach generally to green infrastructure provision in Medway1. We would request the Council pays sufficient regard to the potential development and recreational pressures on designated nature conservation sites in its bringing forward of any projects that could affect such sites and that proposals are designed to and/or incorporate measures to avoid any adverse effects on nature conservation interests. 1 Available to download from <a href="http://www.gos.gov.uk/497648/docs/171301/SEGIFramework.finaljul09.pdf">http://www.gos.gov.uk/497648/docs/171301/SEGIFramework.finaljul09.pdf</a>	Noted.
	Question 68	Environment Agency	Jennifer Wilson	TE2100 and Environment Agency Regional Habitat creation plan identify the need for managed realignment sites and the associated freshwater grazing marsh. Several sites within Medway Council's authority could provide the potential for creating this habitat providing opportunities for enhanced biodiversity. The South East Biodiversity Strategy aims to provide a framework for the delivery of biodiversity targets. Biodiversity Opportunity Areas identify priority areas for the restoration and creation of Biodiversity Action Plan habitats to restoring ecosystems and ensuring wildlife can respond to climate change, maintaining and enhancing Medway's biodiversity value.	The 'Core Strategy provides a clear policy framework in relation to this.
	Question 68		Vivienne Parker	Protection of the countryside corridors into the town centre to preserve the "trefoil" appearance of Medway and the nearness of everyone to the countryside.	The open space policy aims to protect countryside corridors into the urban areas.
	Question 68		Alastair Blair	Maintain all existing rural areas (Rainham, Capstone and Hoo) as a legacy for future generations.	Policies on natural assets, landscape and open space offer protection to the rural area
	Question 68		Carl Kroon	Greening the Gateway Medway Green Grid Valley of Visions Four Parishes Increase number of allotments	The 'Core Strategy provides a clear policy framework in relation to this.
	Question 68	FWCA Frindsbury and Wainscott Community Association	J R Masey	Protection of farmland. Stonehorse Lane should be returned to a wildlife corridor and stepping stones as it was before being severed.	Noted.
	Question 68		W Mann	-Implement Green Grid - Implement 4 parishes project - Implement climate amelioration per Q8 - Turn Sir Terry's vision into a practical plan and implement - Get RSPB moving at Cliffe Pools, contrast what we have there with RSPB site at Rainham, Essex	The 'Core Strategy provides a clear policy framework in relation to this
	Question 68		Dr D Brighton	Yes. Marked walking routes be mapped better, e.g. Upper Halling to Cuxton. -potted history of Rochester, including Abdication house. - Rochester Museum down protected history, like Museum of London. = London Story	Noted.
	Question 68	RSPB	Fay Martin	Yes. Given the South East Plan requirement to deliver 16,300 dwellings in Medway by 2026, the RSPB considers that Medway should liaise with Natural England in respect of the specialist work that is being undertaken to investigate the existing and predicted recreational pressures on the internationally designated sites. This work can help to inform appropriate mitigation measures to offset the negative impacts of development. Mitigation is likely to include areas of alternative green space, access management and wardening of water based recreation. Policy CC8 (Green Infrastructure) of the South East Plan recognises the potential broader role of open space in mitigating the impact of growth on sites of international nature conservation importance. We would therefore welcome a commitment provide appropriate mitigation, including alternative green space to reduce recreational pressure on European Sites.	The 'Core Strategy provides a clear policy framework in relation to this
<b>Minerals</b>					
	4.233		Lillian Harrison	It should be clarified that the 13.25mtpa related to LAND WON sand and gravel (not including marine dredged/secondary and recycled or imports, which are identified elsewhere as 'assumptions' in the Guidelines),	The up to date government national and regional guidance for land won aggregate supply is reflected in the Medway Core Strategy policy for aggregate mineral supply.
	4.234		Lillian Harrison	The figure referred to in the second sentence, appears to be incorrect. The current SEERA consultation for land-won sand and gravel is for 9.01mtpa, a considerable reduction on the June 2009 CLG Guideline figure for the south east (which equates to 12.18mtpa). In later editions of this CS, it should be explained that this figure is going to be (or has been) subject to scrutiny at the Examination in Public of the South East Plan Land-won Minerals Policy (M3) in October 2009.	The inaccuracy is noted and will be corrected in the next iteration of the Medway Core Strategy.
	Question 69			<b>Q69: Do you agree that sand gravel reserves at Grain and south east of Hoo St. Werburgh are the most suitable to meet Medway's required regional contribution? If not, what alternative locations would you propose and have you any evidence that they could be commercially exploited?</b>  Answers for question 69 (from questionnaire & website): 9 Yes/ Agree 5 No/ Disagree 2 Don't Know	
	Question 69	CPRE Kent	Brian Lloyd	These are environmentally sensitive areas, but we are unable to comment in detail as we are not sure of the extent of the land involved. We would wish to see more detail before providing specific comments.	The need to safeguard mineral bearing areas will be represented graphically in the Core Strategy.
	Question 69	ScottishPower	Chris Girdham	The extraction of these mineral resources is supportable in principle, provided that any further mineral extraction or related development is compatible with other important land uses, which include energy generation, and any other environmental and socio-economic priorities	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 69	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	This is supported, although there would need to be positive management of lorry movements on and off site.	Noted.
	Question 69	National Grid Property Holdings Limited		Representation made on behalf of National Grid Property Holdings Ltd by Planning Perspectives LLP. We assume that the sand gravel reserves at Grain are those located on the Medway Produced plan entitled "KEY ISSUE: Options for Mineral Extraction; Hoo and Grain"? If this is the case, we note that the options for extensions include the area of land either side of the Grain Road just to the north of the National Grid landholding. There is no in principle objection to these landholdings being utilised for this purpose, but this should not interfere with the significant strategic development potential, energy related uses and employment opportunities that exist on the wider National Grid, Isle of Grain landholding. There should not be a specific LDF allocation for aggregate mineral extraction on the Grain site, because this could impinge upon its significant employment land potential. We feel that the existing allocations proposed in the existing Medway Local Plan should remain as they are, because this gives greater flexibility and will allow the most appropriate development to take place on this strategically important site in the future.	The geological evidence does not support the presence of river terrace gravel deposits of any material economic size within the area owned by the National Grid at Grain.
	Question 69	Kent Wildlife Trust	Debbie Salmon	It will be important when considering locations for gravel and sand extraction on the Hoo peninsular and Grain that any effects on the SPAs are taken into account within the AA and appropriately mitigated. In all cases the Trust would recommend that once extraction ceases the pits be enhanced for wildlife. (For further details on restoration of minerals sites for Biodiversity see After Mineral Restoration for Nature and Communities at <a href="http://www.afterminerals.com/projectinfo.aspx">http://www.afterminerals.com/projectinfo.aspx</a> )	Noted.
	Question 69	Dickens Country Protection Society	Chris Fribbins	Yes, although lorry movements need to be managed.	Noted.
	Question 69			Minerals exploitation should not be undertaken in designated nature conservation sites or outside such sites in a fashion, extent or manner that would adversely impact on the nature conservation interest of the sites. Protection of wharves for aggregate importation should likewise ensure that designated sites are protected. We would refer to our answer to question 7 for further detail on the terminal at Cliffe.	Noted.
	Question 69	Natural England	Josh Nelson	Minerals exploitation should not be undertaken in designated nature conservation sites or outside such sites in a fashion, extent or manner that would adversely impact on the nature conservation interest of the sites. Protection of wharves for aggregate importation should likewise ensure that designated sites are protected. We would refer to our answer to question 7 for further detail on the terminal at Cliffe.	Noted..
	Question 69	Mineral Products Association	Andrew Bromley	This is an unusual question to be asking the public. It is the responsibility of the council to decide which sand and gravel resources are most suitable to meet Medway Councils required regional apportionment.	The point is noted.
	Question 69	Kent County Council	Richard Feasey	Yes - subject to confirmation of deliverability. Consideration of mineral reserves should be extended expanded to the need for safeguarding of resources beyond the current plan period including the role of 'buffering' around mineral safeguarding areas to protecting them from inappropriate development. Substantial gravel reserves by Grain power station could provide potential supplies for the long term. Para 4.235 refers to Perry's Farm having an estimated 150,000 tons remaining whilst the earlier of State of Medway Minerals Report refers to estimated reserves of 165,000 -214,500 tons . Are these two references to capacity compatible?	Updates from aggregate monitoring exercises now indicate that there are no longer any (June 2010) economically viable deposits at Perry's Farm, Grain.
	Question 69		Alastair Blair	River and sea dredging should be considered. Plus a more positive thrust through recycling. The Dutch do it and they export to Kent.	These are in terms of land based facilities but extraction below the high water mark is not subject to the planning regime.
	Question 69	FWCA Frindsbury and Wainscott Community Association	J R Masey	Providing the land is returned to the same condition as agreed now.	Noted..
	Question 69	RSPB	Fay Martin	No. Although no details are provided on the precise location or boundaries of the potential sand and gravel reserve sites at Hoo St. Werburgh and Grain, the broad locations are closely related to the Medway Estuary & Marshes SPA and Ramsar sites and the Thames Estuary & Marshes SPA and Ramsar sites, respectively. The RSPB's view is that direct land take from designated nature conservation sites must be avoided, as must land take from sites with existing non-designated nature conservation value. Sites adjacent to SPA / Ramsar wetlands must be avoided to ensure that extraction operations do not cause a disturbance impact on internationally important bird populations. We strongly recommend this matter be thoroughly appraised in the Habitats Regulations Assessment of the Core Strategy and we would welcome the opportunity to comment further on this matter following the publication of that document All mineral extraction sites should have a presumption that restoration will be to nature conservation after use, including reedbed and open-water habitats. This will enable Medway to make a positive contribution to Kent Biodiversity Action Plan targets.	Restoration of mineral workings is a requirement of the mineral planning system under the Environment Act 1995. The actual form of restoration suitable to the locality would be a matter addressed at the planning application stage.
	Question 70			<b>Q70: Do you agree that Medway's existing minerals importation wharves should be safeguarded for the long term?</b>  Answers for question 70 (from questionnaire & website): 16 Yes/ Agree 2 No/ Disagree 0 Don't Know	

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 70		Lillian Harrison	YES. National Policy in MPS1 makes it clear that aggregate wharves and their associated infrastructure (including railheads, wharfage and associated storage, handling and processing facilities for the bulk transport by sea or rail of minerals) should be safeguarded. This policy also extends to requiring existing concrete batching plants to be safeguarded. This policy also requires potential storage, handling & processing areas at these facilities to be safeguarded. It is therefore essential that the aggregate importation facility and associated infrastructure (including railhead) at Cliffe are safeguarded in the Medway CS as a nationally/regionally important strategic site for aggregates.	Noted.
	Question 70	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Yes, but as previously commented - there needs to be protection/enforcement of use of railway connections where available for offsite movement. The potential conflict of access to the river side and heritage sites such as Cliffe Fort needs to be managed.	The fortification at Cliffe is a Scheduled Ancient Monument protected by the provisions of the Ancient Monument and Archaeological and Areas Act 1973. The operator of the North Sea Terminal at Cliffe will have to ensure that the fortification is secured from any adverse impacts or the Secretary of State is able to enforce the provisions of the act. Access to the riverside along defined Public Rights of Way have to be maintained by the authority to ensure access can safely be maintained and allow the operation of the marine aggregate wharf to continue.
	Question 70	Kent Wildlife Trust	Debbie Salmon	The Trust has no objections to the importation wharves being safeguarded so long as there is no increase in container traffic that could affect the SPAs. However any increase in size or volume will need to be assessed as to its impacts on European sites.	Noted.
	Question 70	Dickens Country Protection Society	Chris Fribbins	Yes, but note previous comments regarding sensitive management of riverside location and heritage.	Noted.
	Question 70	Mineral Products Association	Andrew Bromley	Yes, all infrastructure related to the strategic transport of minerals should be safeguarded in line with national policy (MPS1, Para.13.).	Noted.
	Question 70	Kent County Council	Richard Feasey	Yes -see also comments under Question 7 above. .	Noted.
	Question 70	RSPB	Fay Martin	The existing minerals importation wharves at Thamesport and Cliffe are situated in a highly sensitive location, adjoining the Thames Estuary & Marshes SPA and Ramsar sites (Thamesport and Cliffe) and Medway Estuary & Marshes SPA and Ramsar sites (Thamesport only). Any such proposals for the intensification of the port activities would have the potential to undermine the integrity of the European Sites. We strongly recommend this matter be thoroughly appraised in the Habitats Regulations Assessment of the Core Strategy and we would welcome the opportunity to comment further on this matter following the publication of that document.	Noted. Medway Council is currently discussing the scope and extent of the appropriate assessment with Natural England, the Environment Agency and adjoining authorities prior to preparing a screening document and appointing a consultant to carry out the assessment.
	Question 71			<p><b>Q71: Do you agree that there is no case for safeguarding chalk and clay reserves as there are no specific national or regional requirements to do so and there is no current quarrying taking place for the cement industry?</b></p> <p>Answers for question 71 (from questionnaire &amp; website):  6 Yes/ Agree  6 No/ Disagree  3 Don't Know</p>	
	Question 71	Lafarge Cement UK PLC	David Simms	<p>Separate representations have been made by Lafarge Cement UK PLC pointing out that there is a strong case for safeguarding chalk reserves in the vicinity of the proposed Medway Works.</p> <p>These representations state:</p> <p>1.0 Introduction</p> <p>1.1 Lafarge welcomes the opportunity to respond to the above consultation. The comments below are in response to the 'Minerals' section of the consultation, specifically 'Non aggregate Minerals' (paragraphs 4.250 – 4.261 and Question 71).</p> <p>1.2 In summary, Lafarge considers that there is a case for safeguarding chalk reserves and the basis of this view is set out below.</p> <p>2.0 Background to Cement Manufacture in the South East</p> <p>2.1 For 150 years the heart of British cement manufacture, the South East now hosts no active manufacturing at all. Northfleet cement works was the last, closing in 2008. Nor is there any longer any operational clinker manufacturing capacity in adjoining regions. Westbury cement works (Wiltshire) was mothballed in 2009 and Barrington (Cambridgeshire) was closed at the same time.</p> <p>2.2 Currently, therefore, the nearest British manufacturing capacity to Medway is at Caudon (Staffordshire) Hope (Derbyshire) and Ketton (Rutland).</p> <p>2.3 Medway, the South East and adjoining regions therefore depend upon imported cement, either via road and rail from Hope, Ketton or other more distant factories, or via sea from Europe to one of several import terminals, including Theale (Berkshire), Northfleet and West Thurrock (Essex).</p> <p>2.4 In November 2001 planning permissions were granted to Lafarge for Medway cement works, between Halling and Snodland.</p>	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				<p>Although the majority of the cement works and quarry areas lie within Kent and Tonbridge &amp; Malling, a significant portion is within the administrative area and planning control of Medway Council. In 2003 planning permissions were granted by both Medway and Kent for the rail sidings to serve the works. Medway and Kent County councils, therefore, share the planning control over the developments.</p> <p>2.5 All of these permissions have been implemented and development has been taken to the point of preparations for the actual cement works construction. However difficult and, recently, deteriorating commercial conditions have meant that it has not yet been possible to bring Medway works to completion.</p> <p>2.6 It is however wrong of the I&amp;O Report to say, as it does at paragraph 4.254, that the UK is too expensive for cement manufacturing. Although cement is typically more expensive to manufacture in the UK (and Western Europe) than in, say, the Near or Far East, what matters to a customer and to an economy as a whole is the cost at the point of use: that is, the manufacturing and distribution costs. As cement is a high bulk, medium value, product, transport costs loom large in the overall delivered cost. Lafarge, as a world-wide cement manufacturer, certainly trades cement between countries, including importing into the UK, but such movements are – to use a parallel with electricity generation – “peak load” supplies. The “base load” of supply is usually better handled by local manufacturing, which also has benefits to local economies and avoids the logistic difficulties of sea-borne import.</p> <p>2.7 In recent years a further important consideration has come to the fore. In addition to relative economics, customers and specifiers are increasingly influenced by the carbon footprint of the cement they buy/specify. It will therefore be critical that a majority of cement is manufactured locally with imports used only to “top up” to deal with fluctuating demand.</p> <p>2.8 This approach is endorsed by the fact that all four UK cement manufacturers have pursued similar policies of modernising their best-placed cement works and all, despite the current economic difficulties, continue to develop projects intended to improve UK manufacturing and cement transport capabilities.</p> <p>2.9 It is, therefore, Lafarge’s firm intention to develop Medway Works through to production. Although in the current the economic downturn global cement companies’ investment plans have been thrown into turmoil, the continued rise and volatility in energy prices and the need for a sustainable UK cement industry should result in further consolidation to fewer larger and more energy-efficient cement making facilities.</p> <p>2.10 In turn the chalk reserves currently permitted at Medway, and possible extensions thereof, should be safeguarded in both Medway and Kent. They are world class deposits that will one day form an integral asset for inward investment and become part of a valuable UK manufacturing asset and result in cement manufacturing continuing in the South East for many years to come.</p> <p>3.0 Conclusion</p> <p>3.1 Therefore, Lafarge considers there is a strong case for safeguarding chalk reserves in the vicinity of the Medway Works project (1). The basis of safeguarding is set out in MPS1 paragraph 13, where the first bullet point suggests Mineral Safeguarding Areas in order that proven resources are not needlessly sterilised by non-mineral development; the third bullet point suggests defining Mineral Safeguarding Areas (MSAs) in Local Development Documents “to alert prospective applicants for non-minerals development to the existence of valuable mineral resources.”</p> <p>3.2 Such an approach would also secure the future of the permitted reserves against conflict with future alternative development within, say, a 500m stand-off from the planning permission limits. While the risk currently is minimal, as the land concerned is currently owned by Lafarge, that might not remain the case during the longer term. In that event, the public interest in a major South East cement manufacturing facility could be protected by safeguarding.</p> <p>1 Traditional cement manufacture used chalk and clay, usually quarried in separate quarries. Medway Works will use chalk and marl (the clay-rich lower chalk strata), won from a single quarry. Lafarge therefore has no argument to make that clay per se should be safeguarded but chalk and its underlying chalk marl should be.</p>	
	Question 71	Kent Wildlife Trust	Debbie Salmon	The Trust supports the conservation of habitat from excavation if possible, however if quarries are needed the Trust would recommend that they be enhanced for wildlife when excavation ends.	Noted.
	Question 71	Dickens Country Protection Society	Chris Fribbins	We would agree that there is very limited scope remaining	Noted.
	Question 71	Mineral Products Association	Andrew Bromley	No, MPS1 (Para.13) does not specify what minerals should be safeguarded, however there is a requirement for Mineral Planning Authorities to define Minerals Safeguarding Areas (MSAs) for all resources that are, or may become economically viable in the foreseeable future. As both clay and chalk have been quarried historically they must be of value and therefore safeguarded.	MPS1 makes clear in paragraph 13 that it is the presence proven resources that should be safeguarded. Proven means that the nature of the deposit has been investigated and documentation to demonstrate the economic nature of the deposit supports the safeguarding of the area where the resources are presumed.
	Question 71	South East England Partnership Board	Tom Kingston	With reference to question 71, chalk reserves need to be safeguarded in line with South East Plan Policy M4. We recognise the points in paragraph 4.256; however safeguarding does not necessarily mean the mineral will be exploited and it is needed to protect against sterilisation from non-minerals development.	Noted.
	Question 71	Kent County Council	Richard Feasey	There may be a distinction to be drawn between not identifying preferred areas for working in the absence of currently quantifiable requirements and safeguarding of resources for the longer term. The latter should certainly be closely considered. Kent currently has one active site producing London Clay (Norwood on Sheppey). This site has only a 3 year reserve. As we have jointly discussed the potential for locally sourced London clay of the purpose of flood defence maintenance and enhancements needs to be pursued /confirmed with the Environment Agency in the interests of both the Medway CS and the Kent MWDF CS.	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 71			Out of town sites, which do not impact on major communities.	Noted
	Question 71		Carl Kroon	Events are changing all the time and to not have access to local chalk and clay would be foolish.	The Chalk is a massive geology in the area and despite being significantly covered by landscape protection designations access could be made for the sustainable exploitation of this resource if the 'need' were to outweigh the environmental impact(s).
	Question 71			May be a need to examine the cement industries needs in more detail to establish if chalk safeguarding is required.	The point is noted.
	Question 71	FWCA Frindsbury and Wainscott Community Association	J R Masey	Understood planning was passed for works at Holborough.	The planning permission has been implemented by the developer/operator put progress to fully implement the quarrying and plant site has not yet occurred.
<b>Waste</b>					
			Alastair Blair	Waste management should focus on recycling everything. Development of South London waste partnership could be used as a model.	Noted. The waste hierarchy recognises that it will generally be the case that not everything can be recycled.
				Transfer stations should have a second area where items are bought- money to the council. Examples can be found in Hampshire.	Noted.
		Medway Renaissance	John Finlayson	National waste targets will require 50% of waste in Medway to be recycled/composted by 2026. Yet no question about promoting recycling, The LDF needs to be clear as to how the Council will provide, develop and implement a more sustainable waste strategy.	Noted.
		Environment Agency	Jennifer Wilson	The waste strategy does not really identify any synergy with waste and energy, although reference is made to Allington and Belvedere WtoE incinerators. However Medway is served by important port facilities and transport links, which potentially make it a key area for possible waste/energy enterprise parks and innovative waste treatment, linked to the work being done by the cluster of universities in hazardous waste streams, including paper & power stations ashes and other wastes like pharmaceutical wastes and river dredging. This should be a consideration. There is also no significant mention of secondary construction and demolition wastes and recycling allowing replacement of virgin aggregate.	These matters are addressed in the draft core strategy..
		Natural England	Josh Nelson	Waste facilities should be designed and constructed to avoid detrimental impacts on the natural environment and, in particular, statutorily designated nature conservation sites and the Kent Downs AONB.	Noted.
			Barry Knight	No mention of neighbourhood waste and the scarcity of litter bins in the parts of Gillingham that I frequent. It doesn't exactly encourage people not to litter.	Noted but these are not matters that can effectively be addressed through the core strategy.
	Table 4	Environment Agency	Jennifer Wilson	The table within this paragraph should be amended to clarify that the figures quoted are in thousands of tonnes, the table as it stands does not state this, so is misreporting the figures by a factor of 1,000.	The table is correct; the figures are in real tonnages
	Table 5	Viridor Waste Ltd	Mandeep Jutley	We understand that Plot L includes Pelican Reach. It would be helpful for the Core Strategy to make clear what site / area is being referred to,	Noted but the core strategy cannot define such areas.
	4.282	Viridor Waste Ltd	Mandeep Jutley	In accordance with PPS 10, we support the approach in the Core Strategy for communities to take more responsibility for their own waste - to enable sufficient and timely provision of waste management facilities to meet the needs of their communities, particularly through waste disposal at nearest appropriate installations (PPS10 para 3)	Noted.
	4.289	Viridor Waste Ltd	Mandeep Jutley	We support the approach to creating industry clusters in appropriate locations, and believe Medway City Estate is a candidate. Although Medway City Estate is an employment area, the nature of uses within this area is comparable with industrial areas. As recognised in the Waste Report (January 2009), there is capacity for waste recovery at land between Royal Eagle Close and Clipper Close, and this site should therefore be allocated.	The Medway Core Strategy will not allocate sites as a site specific Development Plan Document would. If further capacity to divert wastes from landfill is required the quantum and general location where it can be delivered will be in the plan.
	4.291	Viridor Waste Ltd	Mandeep Jutley	We question why it is desirable to have a network of smaller facilities to handle a full range of materials collected from local companies. This site would remain suitable for a waste transfer station as well as for other recovery processes. This should be acknowledged in the Core Strategy.	Noted.
	4.293	Environment Agency	Jennifer Wilson	Whilst it has been recognised void space is soon to run out in the district, the options infer if markets allow for London Clay to be a viable product, void space would subsequently be made available for landfill. Seeing landfill in the future as a possible solution to disposing of waste does not seem to embrace new technology and processes in dealing with waste, with little reference possible energy production from waste, i.e. anaerobic digestion processes.	Noted and the matter is addressed in the draft core strategy.
	Question 72			<b>Q72: What provision should be made for additional waste disposal capacity, based on in vessel composting and other new technologies?</b>  Answers for question 72 (from questionnaire & website): 2 Yes/ Agree 2 No/ Disagree 3 Don't Know	
	Question 72	Viridor Waste Ltd	Mandeep Jutley	The Core Strategy should recognise and build on the recovery capacity at land between Royal Eagle Close and Clipper Close, as identified in the Waste Report (January 2009).	This recovery capacity has been well understood and reflected in the waste policy of the Core Strategy.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 72	Biffa Waste Services	Mary Tappenden	<p>Provision clearly needs to be made for additional waste management capacity in Medway for recycling, treatment and disposal. The plan identifies that waste is currently being transported out of the district to Rainham in Essex, an arrangement that it is acknowledged cannot continue. Tables 5 to 8 identify the scale of the shortfall in capacity but in order to be considered sound the plan needs to go further.</p> <p>Recent draft guidance on minerals and waste policies in LDF's issued by PINS states at paragraph 2.3 that "essentially the Core Strategy should indicate WHAT minerals and waste management developments and facilities are required; WHERE they are to be located; WHEN they are to be provided; and HOW they will be delivered.... Where specific sites can be identified, they should form the subject of allocations, either as strategic allocations in the Core Strategy, or in subsequent site allocations DPD's. Otherwise broad locations and/or areas of search should be clearly identified in the text and shown in the key diagram. Where there are cross boundary issues such as the transfer of minerals and/or waste from one administrative area to another, these should be addressed. This is particularly important where there is a reliance on another area to provide part of the strategic requirement for minerals or where waste is managed and disposed of outside the plan area".</p> <p>The Core Strategy as it stands identifies WHAT is required but does not indicate WHERE new facilities are to be located. We consider that the plan should at least identify areas of search for recycling and treatment facilities to meet the identified need. The Core Strategy should be technology neutral and should not rely on in vessel composting as a solution.</p> <p>Where landfill is concerned, the plan identifies that approximately 3 million tonnes of residual waste from the Medway area may need to be disposed of by 2026. Further at paragraph 4.293 the plan identifies that there is no existing permitted void space in the area and that only landfills/landraise in London Clay may be acceptable. The Core Strategy needs to illustrate the extent of London Clay in the Medway area and to identify potentially suitable sites for landfill/landraise. It is incumbent upon the Local Authority to investigate such sites with relevant landowners to determine deliverability. For example you will be aware that Biffa submitted a planning application for a northern extension to the Shakespeare Farm site. Although this land is not within our control and we therefore cannot promote it through this plan, consultations on our previous application showed that such a facility could be technically viable. Potential proposals such as this should be investigated through the plan process.</p> <p>Finally, paragraph 4.292 identifies that there is substantial capacity at the permitted Belvedere and Allington Energy from Waste Plants and the inference is that waste from Medway could be handled by these facilities without the need to provide further capacity in North Kent. Whilst this may be the case, there is no evidence to support this claim. The Core Strategy needs to identify how much capacity there is at these two facilities and how much is already committed and for how long. The two facilities were promoted on the basis that they were required to meet a pressing need for London and the South East Region and it is not clear whether there is any spare capacity for Medway's waste.</p>	Noted and provision is made in the draft core strategy.
	Question 72	tbh developments ltd & helvig ltd	tbh developments/helvig	<p>Unlike other parts of the Issues and Options Report, this chapter seems to have a reasonably comprehensive evidence base, although the statistics for commercial and industrial waste become confusing. What is lacking is any clear indication that the Council has a Core Strategy in mind on which to consult. For example, the report states that incineration capacity in North Kent outside Medway is likely to be adequate to meet needs (implicitly including Medway's needs) but then cites a need for new landfill capacity. This appears somewhat contradictory. If there is no contradiction this needs to be explained. The report seems to largely ignore the impact of regeneration initiatives at Temple Marsh on waste handling capacity for commercial and industrial and construction waste because several waste management facilities will be lost by redevelopment within that area. What is very evident is that there is a need for new waste management capacity in Medway for facilities to recover waste as a raw material or for re-use, or to process waste so that it can be recycled. This capacity is needed across most if not all waste streams (that is municipal, commercial and industrial, and construction). The Core Strategy should clearly identify what additional capacity is required and how and where this can be provided. The Issues and Options report has also been based on a premise that the Medway Council 25 year municipal waste contract has been let which is not, as a matter of fact, the case. The municipal contract is being re-tendered and will not be let for a further 2 years. The Core Strategy must therefore make provision for the necessary facilities to collect, treat and dispose of Medway Council's waste within its own area if a sustainable municipal waste strategy is to be incorporated in the LDF.</p>	These matters are addressed in the draft core strategy..
	Question 72	Dickens Country Protection Society	Chris Fribbins	<p>New ways of processing waste are going to be required. Locations need to be sensitive to their environment and issues such as lorry movement, external lighting, noise and smell need to be managed carefully.</p>	Noted.
	Question 72	Environment Agency	Jennifer Wilson	<p>For the reasons presented in paragraph 4.283 we would suggest that provision for new waste management capacity based on recycling and recovery technologies may be best made in partnership with neighbouring authorities, as happens elsewhere in the country. Waste management planning is in many ways becoming more strategic as European and Government policies are forcing a movement away from the traditional solution of cheap landfill towards technologies that recover value from waste. These new technologies are typically capital intensive. Waste minimisation and recycling mean that after many decades of growth, waste volumes are beginning to level off and fall in some cases, and that waste is being managed in more diverse ways. The more this happens the wider the catchment area for a particular waste facility becomes. This means that new facilities may be developed on a county or regional level. That said, given the existing population of Medway, and the proposed development of additional housing, the borough could be an appropriate location for new waste recycling and recovery operations, and would provide a local market for the export of products from those processes, such as electricity or heat. Consideration should also be given to planning new capacity to treat and recycle construction and demolition waste. An Environment Agency study which estimated the amounts of construction and demolition waste that may be produced as a result of the Governments housing targets for the Thames Gateway suggest that additional capacity to manage this waste stream will be required, and that some of this capacity, most probably as a Soil Treatment Centre, could be located in Medway. The estimates for Medway are for around 230,000 tonnes of non hazardous</p>	Noted. The Council is always happy to work in partnership and many of these points are covered in the draft core strategy.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				waste from construction of new homes, and from demolition, clearance and excavation of sites prior to construction around 380,000 tonnes of inert waste 420,000 tonnes of non hazardous waste and nearly 350,000 tonnes of hazardous waste. In terms of managing contaminated soils, we would support the use of a hub and cluster type approach, or the development of fixed soil treatment centres.	
	Question 72		Carl Kroon	Q72 & 73."In Vessel" areas need to be sited where populations are, they need to be subdivided more and include more types. They need to be emptied more often or actually emptied; the use of Allington incinerator needs to be transportation by barge up River Medway to Allington. Dredging of river which has been neglected.	Noted.
	Question 72	RSPB	Fay Martin	No. The RSPB supports the waste management hierarchy: Reduce - Reuse - Recycle - Recover. On the basis of the above hierarchy the focus should be placed on achieving higher levels of waste reduction and recycling before other technologies such as energy recovery or ultimate disposal should be considered.	Noted.
	Question 73			<b>Q73: Should a cluster of complementary facilities be promoted for waste handling, treatment and disposal? If so, in what location?</b>  Answers for question 73 (from questionnaire & website): 8 Yes/ Agree 1 No/ Disagree 3 Don't Know	
	Question 73	Viridor Waste Ltd	Mandeep Jutley	As set out previously, the land between Eagle Way and Clipper Close is an ideal location. The Medway City Estate attracts non-office based industries, and this would provide a focus and steer for the area.	Noted.
	Question 73	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	We would support a wide range of waste processing options.	Noted.
	Question 73	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	From our understanding there is likely to be little benefit to the rural areas of this.	Noted.
	Question 73	tbh developments ltd & helvig ltd	tbh developments/helvig	The former Alloy Wheels site (now called Temple Park) at Priory Road, Strood, offers the opportunity for such a cluster of waste handling, treatment and disposal facilities and is a sustainable location being previously developed land within the urban area where the majority of Medway's waste is produced.	The Medway Core strategy will not identify specific sites; overall capacity has to match arisings to effect sustainable self-sufficiency
	Question 73		Mari-Anne Harstad	I would like to see a more sophisticated waste management system in Medway and wish for more investment to be made.	Noted.
	Question 73	Environment Agency	Jennifer Wilson	We would support the development of a synergistic waste economy within Medway, with waste transfer, treatment and reprocessing capacity to turn treated waste in a raw material that could be used as raw materials in the manufacture of new products. However, we do not believe that it is a necessary prerequisite to new waste developments, as other factors such as environmental constraints, proximity to waste producers or end users, access to good transport links, land availability, economic and social have a bearing on the decisions that are taken. A planning policy that ensures that permissions are only granted to high quality, low environmental impact, good neighbour waste management facilities would encourage this type of approach. By creating synergies, demand is created for the collection and treatment of recycled material which provides a more stable market for the providers and users of recycled materials.	Noted.
	Question 73		I.H. Smith	In an area of very low population	Noted.
	Question 73	FWCA Frindsbury and Wainscott Community Association	J R Masey	Extension of Viridor's on Medway City Estate maybe!	Noted.
	Question 73		W Mann	Yes. Utilise Kingsnorth	Noted.
	Question 74			<b>Q74: Should provision be made for the creation of new landfill void or a land raising option considered to address Medway's long term landfill requirements? If so, in what location?</b>  Answers for question 74 (from questionnaire & website): 5 Yes/ Agree 6 No/ Disagree 3 Don't Know	
	Question 74	CPRE Kent	Brian Lloyd	No, we do not consider that landfill or land raising is an acceptable means to dispose of waste.	Noted.
	Question 74	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	We see no justification for this or, especially, any suitable sites.	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 74	National Grid Property Holdings Limited		Representation made on behalf of National Grid Property Holdings Ltd by Planning Perspectives LLP. There is a suggestion by Medway Council that there is a need to identify an area within Medway for a specialist waste facility. Whilst the National grid landholding at the Isle of Grain could be seen to be a suitable location for this type of facility, we do not think that it should be designated for this purpose at this stage in time. If the existing allocations for B1 (Business), Class B2 (General Industry), Class B8 (Storage and Distribution), special industrial uses and industrial uses not in a use class remain in place at the Isle of Grain, this does allow some scope for this kind of facility in the future if it is deemed to be necessary. However, other more mainstream employment uses should be investigated to ensure that the Isle of Grain's potential as a strategic employment location is fully explored in the first instance.	Noted.
	Question 74	Kent Wildlife Trust	Debbie Salmon	As this is primarily a landscape issue it is beyond our remit however if either method were to be used the location should be of low biodiversity value with no protected sites or BAP habitats or species being affected.	Noted.
	Question 74	Dickens Country Protection Society	Chris Fribbins	No suitable locations remain. Would not support excavate and fill.	Noted.
	Question 74	Environment Agency	Jennifer Wilson	The Environment Agency's study into CD and E waste arisings suggests that additional landfill capacity will be required around the Medway area to deal with waste produced as a result of the construction of new housing to meet Government targets. It may therefore be appropriate to consider suitable sites where additional landfill capacity could be provided in future.	Noted.
	Question 74	Kent County Council	Richard Feasey	The potential for provision of additional landfill capacity for non-hazardous landfill should be assessed in those parts of the authority's area which have clay geology.	Noted and this has been undertaken.
	Question 74		Carl Kroon	London Clay void is most practical. Spoil clay for land raising on flood plains, use in pottery, sea defences.	Noted.
	Question 74			There is a need to have a representation of all elements of the recognised waste hierarchy in the Medway area. There will always be a need to have final disposal to land as part of that provision. This will be a critical resource that should, as far as practicable, be used for the residues of the reuse, recycle and recovery activities higher up in the hierarchy and for those irreducible wastes and hazardous wastes that cannot be further treated. To say landfill/landraise should not happen in Medway is a specious argument that simply ignores the realities of sustainable waste management.	Noted.
	Question 74	Medway Countryside Forum	David Murr	It is difficult to give a view on this without knowing what locations might be considered, and the details of any such proposals.	Noted.
	Question 74	Frindsbury and Wainscott Community Association	A Wade	Landfill locations will never be adequate even with recycling if excessive packaging - over use of paper e.g. newspapers - supplements containing superficial rubbish, plastics - is not nationally restricted.	Noted.
	Question 74		Dr D Brighton	Yes. Medway mudflats	The Thames and Medway Estuary areas are highly protected European designated conservation areas; subject to the Conservation (Naturals Habitats & Sea.) Regulations 1994. As amended in 2009. New landfill or landraise operations would be very likely to be entirely incompatible with the recognised conservation status of these areas..
	Question 74	RSPB	Fay Martin	The RSPB supports the waste management hierarchy: Reduce -Reuse - Recycle - Recover. On the basis of the above hierarchy the focus should be placed on achieving higher levels of waste reduction and recycling before other technologies such as energy recovery or ultimate disposal should be considered. In terms of the location of landfill facilities, the RSPB's view is that landfill on the Hoo Peninsula or Grain should only be considered as a last resort, and only if it can be shown that there will be no detrimental impact on the Thames Estuary & Marshes SPA and Ramsar sites or Medway Estuary & Marshes SPA and Ramsar sites.	Noted.
	Question 75			<b>Q75: Do you agree that a network of local waste transfer facilities should be encouraged?</b>  Answers for question 75 (from questionnaire & website): 10 Yes/ Agree 1 No/ Disagree 1 Don't Know	
	Question 75	Viridor Waste Ltd	Mandeep Jutley	This option should be investigated further. Information on possible alternative options should be provided.	Noted.
	Question 75	Kent Wildlife Trust	Debbie Salmon	The Trust would support localised disposal of waste as this will limit emissions due to transporting waste to bigger facilities and damage to protected site via increase water traffic.	Noted.
	Question 75			We would encourage the management of waste as close to source as is practicable, in line with the proximity principle; this may favour the establishment of a local network of waste transfer facilities. However, we recognise that improved waste management and treatment of waste higher up the waste hierarchy can favour a smaller number of larger, more strategic sites with a wider catchment area. In either event we would wish to see waste facilities that are of high quality, designed and operated to high standards. Not only does this benefit site employees through improved working conditions and the local environment through less pollution, it also makes such facilities more publicly acceptable, broadening the range of potential sites and making them more likely	Noted.



Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				to receive planning permission.	
	Question 76			<b>Q76: Do you have any preferences as to where, if at all, the Hoath Way and Pier Road facilities should be relocated?</b>  Answers for question 76 (from questionnaire & website): 1 Yes/ Agree 4 No/ Disagree 4 Don't Know	
	Question 76	tbh developments ltd & helvig ltd	tbh developments/helvig	Pier Road facilities can be re-located to the former Alloy Wheels site at Priory Road, Strood.	Noted but not centrally located.
	Question 76	Kent Wildlife Trust	Debbie Salmon	The Trust's only interest would be that these facilities are not situated on sites with biodiversity interest or on sites that would affect the biodiversity interest within the locality.	Noted.
	Question 76		Mike Walters	Grain and Hoo where you dug the sand out.	Noted.
	Question 76		Carl Kroon	They need to stay and others established.	Noted.
	Question 76		W Mann	Retain Hoath Way for current uses	Noted.
<b>Energy</b>					
		Medway Renaissance	John Finlayson	LDF needs to underpin Medway being at the centre of an eco region. There should be a strong presumption in favour of the use of renewable technologies and the Merton Rule. De-centralised heating needs to be encouraged. District heating and a range of additional options should be a requirement of any power generating development. The EON feasibility study is nearing completion.	Noted but the government's commitment to the Eco-region concept is uncertain.
	4.294	ScottishPower	Chris Girdham	Government energy policy recognises that the production of electricity by gas generation is part of the long term mix. As a technology, gas generation is becoming cleaner, and has demonstrably lowered the UK's carbon emissions in recent years. Therefore the development of new generating infrastructure, which provides potential opportunities for Carbon Capture and Storage (CCS) and Combined Heat and Power (CHP), will make an important contribution towards meeting national objectives relating to securing our domestic energy supply and reducing carbon emissions. By 2010, gas imports could be meeting up to a third or more of the UK's total annual gas demand, potentially rising to around 80% by 2020 on the basis of existing policies. By 2020, around 80% of our fuels are likely to come from overseas. (Energy White Paper 2007). It should be recognised that the North Sea is one of several sources of natural gas. In order to address security of supply from less flexible and reliable parts of the world, the development of new gas storage infrastructure in the UK is an important part of addressing the security of supply issue and Scottish Power is progressing its plans for additional gas storage.	Noted.
	4.298	ScottishPower	Chris Girdham	The Energy Markets Report published by the Department of Energy and Climate Change (DECC) in December 2008 suggests that 'the UK will need investment in some 47GW of new capacity by 2020, about 57% of current total capacity and an average annual deployment for new capacity of roughly 4GW, which represents a significant challenge' (EMOR Paragraph 4.6.18) This latest Government estimate of the anticipated generating gap emphasises the urgent need for additional capacity.	Noted.
	4.299	ScottishPower	Chris Girdham	ScottishPower is at the forefront of Carbon Capture & Storage (CCS) development initiatives and is involved in the national, Government sponsored competition. The proposed Dam Head Creek 2 Combined Cycle Gas Turbine (CCGT) scheme would increase potential CCS compatible generating capacity in Kingsnorth/Medway. Its development would also be compatible with aspirations to develop a CCS cluster on the Hoo Peninsula, which in turn would lead to other potential benefits, placing Medway at the forefront of CCS innovation	Noted.
	4.300	ScottishPower	Chris Girdham	Government energy policy recognises that fossil powered energy generation will remain part of the energy infrastructure capacity mix. However both Combined Cycle Gas Turbine (CCGT) and new coal stations would require to be carbon capture ready (CCR) and have much lower emissions than older, conventional thermal generating plant.	Noted.
	4.300	CPRE Kent	Sean Furey	The CCS demonstration would only be for 400MWh peak output from a new power station, which in effect means 1 of 4 turbines at a new Kingsnorth power station. We are deeply concerned that the remainder of the plant would be allowed to have unabated emissions and if the CCS fails then we would be locked into burning 'dirty' coal for another 30-40 years, which is unacceptable. CCS should be applied to all of the emissions from day one of a new plant, such as Kingsnorth, being operated.	This is a matter for the Secretary of State in determining the current planning application.
	4.301	Viridor Waste Ltd	Mandeep Jutley	In accordance with national and regional planning policy, this should be encouraged.	Noted.
	4.302	ScottishPower	Chris Girdham	The Climate Change Act 2008 imposes an obligation to ensure 'the net UK carbon account for the year 2050 is at least 80% lower than the 1990 baseline' and that the carbon budget, for the period including the year 2020, must be at least 26% lower than the 1990 baseline. However, in the April 2009 Budget, the Chancellor of the Exchequer announced the world's first ever carbon budget, which commits the UK to cut carbon emission by 34 per cent by 2020. This target is set out in the UK Low Carbon Transition Plan. In July 2009, the Government published their Renewable Energy Strategy. The Strategy was produced as a response to the binding renewable energy targets to 2020 set out in the new EU Energy Directive (COD/2008/0016). The Strategy recognises the need for an increase in the use of renewable energy to 15% in 2020. Whilst efforts continue to increase renewable energy capacity in the UK, low carbon generation from technologies including Carbon Capture Ready (CCR) Combined Cycle Gas Turbine (CCGT) will continue to make a major contribution to reducing emissions.	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	4.303	ScottishPower	Chris Girdham	Energy suppliers have a role to play in promoting domestic and commercial energy efficiency. ScottishPower has recently announced plans to assist low income households. The Savings Challenge campaign promotes energy efficiency and measures to reduce consumption. Scottish Power also has tariffs in place aimed at assisting those in fuel poverty. Measures include providing winter rebates for vulnerable customers.	Noted.
	4.306	London Thamesport (Hutchison Ports UK Ltd)	Nicholas Orbell	Medway has a particular situation on Isle of Grain, where it is proven by BP that the area is suitable for onshore wind renewables. Medway should recognise that such sites are comparatively scarce, and actively encourage similar renewable developments, protecting these from other less location-sensitive uses. There is a particular potential conflict with the microlight activity at Stoke airfield, and arguably the value attaching to this location for wind-renewables outweighs in economic and other benefits the amenity value. Such conflicts need to be carefully managed through this planning process, and may advocate appropriate assumptions being made where evidence exists that renewable development can be undertaken.	Noted.
	4.310	ScottishPower	Chris Girdham	It is recognised by Government that gas derived electricity generation is part of the long term energy supply mix. As a technology, particularly Combined Cycle Gas Turbine (CCGT) it is becoming cleaner and has demonstrably lowered the UK's carbon emissions. Therefore the development of new generating infrastructure designed to be carbon capture ready (CCR) and Combined Heat and Power (CHP) compatible, will address important national objectives relating to securing domestic energy supply and reducing carbon emissions; in turn such development will ultimately contribute to regional and local strategies seeking to reduce per capita carbon emissions. CCGT's reliance on pipeline fuel supply, negates the need for significant levels of HGV movements, further reducing the potential emissions.	Noted.
	4.312	London Thamesport (Hutchison Ports UK Ltd)	Nicholas Orbell	The BP application affirmed the suitability of the estuary area for onshore wind projects. This form of development has merit in the context of energy development in the lower reaches of the Medway, and the sustainable energy proposals. More significantly, existing commercial landowners and occupiers, including London Thamesport, have sites that are capable of integrating onshore wind turbines within existing operations in a manner demonstrated by BP. Development of this nature on commercial sites would complement the Council's broader ambitions for sustainable energy.	Noted.
	4.312	ScottishPower	Chris Girdham	Wherever possible, new renewable energy development should be supported as an important component of the energy supply mix, as flexible back up supply for base load energy generation. However, PPS 22 recognises that renewable energy capacity can only be developed at locations where it is viable. Therefore the promotion of other forms of power generation, such as Combined Cycle Gas Turbine (CCGT), will continue to be major contributors to energy supply.	Noted.
	4.315	London Thamesport (Hutchison Ports UK Ltd)	Nicholas Orbell	The successful development of these renewables in larger commercial situations has been demonstrated in Europe. In particular, the use of large roof areas (as found on logistics and distribution buildings) for photovoltaic panels offers significant opportunity (provided the economic viability can be improved). The proposed policy should recognise that the current lack of fiscal support and other economic limitations on these technologies may change in the future, and should support and encourage this form of development.	Noted.
	4.316	ScottishPower	Chris Girdham	The sector's "national significance" is recognised in the South East Plan. The need to replace existing capacity arises from the need to meet national emission reduction objectives and as a result of the anticipated decommissioning of much of the UK's domestic nuclear generating capacity. Medway's older coal and oil powered generating capacity needs to comply with the Large Combustion Plants Directive. This may result in the need to reduce older plants' hours of operation, having potential consequential impacts on levels of power generation output. Ultimately, the replacement of older, conventional plant with new cleaner and more efficient plant will contribute to national objectives seeking security of supply and reductions in emissions. Notwithstanding the above, the locational advantages of the Kingsnorth/Hoo Peninsula together with the South East Plan's recognition of the sector's importance to the national and regional economy, support the principle of the area's further development for energy generation and related purposes.	Noted.
	4.317	London Thamesport (Hutchison Ports UK Ltd)	Nicholas Orbell	Please see comments in 4.312 above. Medway must recognise the need for related infrastructure development (power lines, substations etc).	Noted.
	4.317	ScottishPower	Chris Girdham	Wherever possible, new renewable energy development should be supported as an important component of the energy supply mix, as flexible carbon free back up supply for base load energy generation and as a form of energy generation that will demonstrably contribute to addressing the identified energy generation gap. However, PPS 22 recognises that new renewable energy capacity can only be developed at locations where it is viable. Therefore the promotion of other forms of power generation, such as Combined Cycle Gas Turbine (CCGT), will continue to be major contributors to energy supply with the potential to replace Medway's older coal and oil powered stations with lower carbon generating capacity. Due to existing operations and locational advantages, areas such as Kingsnorth/Hoo are of strategic importance for energy generation and deliver nationally important benefits. The importance of the energy sector in the Thames Gateway and the continued need to support it is recognised in the South East Plan. Therefore further energy generation and related activities, which may require provision for Carbon Capture and Storage (CCS), should not only be expected in Medway, regional policy requires that they are also supported. Potential synergies between energy development and related environmental technologies such as CCS should also be encouraged.	The Core Strategy supports both renewable and conventional energy generation.
	4.318	ScottishPower	Chris Girdham	There are opportunities to progress a Carbon Capture and Storage (CCS) cluster given the generating plant in the area. It is noted that SEEDA and Medway Council are facilitating discussion with power companies to explore the opportunities that could arise	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	4.319	ScottishPower	Chris Girdham	<p>The principle of CHP use for residential and commercial use is supported. However, there does not appear to be any explicit policy or legislative requirement on developers to provide heating grids. We would question whether this is the 'role' of the Core Strategy and would suggest that the absence of a policy/legal basis makes such a proposed initiative unviable. If Medway were to adopt a policy that sought contributions towards establishing a CHP network, this should not be focussed on the suppliers of surplus heat, but the potential recipients.</p> <p>The principle of CHP use for residential and commercial use is supported. District heating, together with opportunities for other forms of renewable energy development, has the potential to deliver carbon reductions. However, other related initiatives including those that are proven and viable such as CCGT will continue to play an important part in securing these necessary reductions.</p>	Noted.
	Question 77			<p><b>Q77: Should any future conventional power generating development in Medway be made conditioned to require the ability to provide district heating?</b></p> <p>Answers for question 77 (from questionnaire &amp; website):            9 Yes/ Agree            5 No/ Disagree            2 Don't Know</p>	
	Question 77	CPRE Kent	Brian Lloyd	Yes. However any future 'conventional' generating power will be conditional on the viability of CCS, which is uncertain. The sustainability of biomass is dependent on fuel source.	Noted.
	Question 77	Groundwork Kent & Medway	Simon Green	In principle, yes but it would be difficult to make this enforceable and positive incentives may be more effective.	Noted.
	Question 77	ScottishPower	Chris Girdham	No. This goes beyond Government advice and policy. There is no explicit policy basis for this and it is unnecessarily prohibitive. Opportunities to investigate how district heating provision could be related to new generating capacity should be progressed, on a case by case basis, only where it is viable to do so, giving due consideration to commercial, technical and environmental constraints.	It is understood that 'promotion' rather than 'requirement for' district heating is the proper role of the Medway Core Strategy policy.
	Question 77	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Although we can see the potential for this, we have concerns about the practicality and potential to harm the area if adopted by the bigger power stations. More appropriate for local power generation	Noted..
	Question 77	Dickens Country Protection Society	Chris Fribbins	District heating is only practical on the local level and unfortunately the power stations have been built away from urban centres - good to see some use of Grain heat recycling in the natural gas terminal. Power stations need to be more efficient	Noted.
	Question 77	Environment Agency	Jennifer Wilson	We welcome the recognition given by the authority of the importance of combined heat and power (CHP) in using energy resources more efficiently and reducing CO2 emission through conventional power generation. We are also pleased to see that the contribution waste management technologies (such as incineration, gasification and anaerobic digestion) can make to CHP has also been acknowledged. We believe that CHP has a central role to play in using our natural resources more wisely and reducing carbon emissions. We support the proposal that any future development of conventional power generating facilities should be conditional on CHP being provided. We would ask that the council be cautious of schemes which describe themselves as being CHP ready or CHP capable. There are numerous examples of schemes which claim to be CHP ready, but which in reality are not CHP, and may never become so. A classic example is the South East London Combined Heat and Power (SELCHP) Incinerator, opened in 1994 in Lewisham. Though its name suggests the use of CHP, the incinerator is in fact providing energy in the form of electricity only. A number of schemes have recently been sought planning approval on the basis of being CHP ready, however, we are concerned that once granted approval such schemes may never utilise CHP. Because of this uncertainty we would ask that such schemes should be deemed as not complying with the proposed policy.	Noted.
	Question 77	GVA Grimley Ltd	Sheery Sassoon	We support policies which encourage the use of efficient energy sources. However, we oppose to the wording of the policy on the basis that it does not take into consideration the individual site specific circumstances where it may not be possible to provide district heating. (Suggestion- Developments will be encouraged to provide connection points for district heating, where possible.)	Noted but no policy was included within the Issues and Options report.
	Question 77	Kent County Council	Richard Feasey	As indicated any conventional power generating development is likely to be of scale where the decision will rest with the Government rather than Medway. There is now a Government expectation that new power station development is designed to include combined heat and power capability notwithstanding whether the potential or viability exists for a district heat network at that point in time. Given the life of a power stations could be 40-50 years during which new opportunities may arise, the requirement should be a condition of development.	Noted..

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				Heat off-take from conventional power generation will play an important role in the UK meeting it's obligation to provide 15% of total energy consumption from renewable sources by 2020. The UK Renewable Energy Strategy (DECC, 2009) outlines that to contribute to achieving this figure that 12% of heat demand in 2020 could come from renewable sources with large potential for biomass heat, paragraph 2.25 states: "Analysis by independent consultants (published alongside this Strategy) looked at possible ways of achieving increased deployment of renewable heat by 2020 in the least-cost way for the overall economy. The analysis confirmed that there is a large cost-effective potential for biomass heat with significant potential in the non-domestic sector." Despite the Government encouraging the use of district heating from power generating stations there is no indication in national policy that it should be a mandatory requirement. Providing district heating through Combined Heat and Power (CHP) is not always a feasible option for power generating stations. The UK Biomass Strategy (DEFRA, 2007) recognises that for the system to be economical there needs to be consistent demand for the heat that in reality is not always present. Consequently, the strategy states the best sites for CHP are often industrial sites that are in continual operation. In certain cases for example, if a dedicated biomass plant was forced to provide district heating it may ultimately make the development unviable and result in a missed opportunity for carbon neutral electricity being produced. This would not be in accordance the Government agenda on climate change. A recent Government consultation paper, the Heat and Energy Saving Strategy (DECC, 2009), outlines that as the renewable heat is a newly emerging market that large consumers of heat are reluctant to commit or invest due to uncertainty over the security of supply and high financial risk for both parties (paragraph 7.28). Future incentives should change this although these measures have not yet been implemented. Peel Energy is in favour of an incentivised approach to encourage increased generation of renewable heat, such as the Governments forthcoming Renewable Heat Incentive, but does not believe that a 'conditioned' approach is appropriate.	The information is noted.
Question 77		The Peel Group	The Peel Group		
Question 77			Goodman	Q77 & Q78 No. The heating and/or cooling requirement of businesses at the Kingsnorth Employment Area will not be known until specific occupiers have been identified. Therefore, in this example, a requirement for a district heating system would be inappropriate. The strategy for energy generation, including use of renewables, should simply accord with the adopted provisions of the SE Plan.	The energy efficiency and renewable energy policy promotes district heating schemes on the condition that they are feasible.
Question 77		FWCA Frindsbury and Wainscott Community Association	J R Masey	In principle its good as it reduces waste energy. The problem is the practicability and cost of the district heating infrastructure and the potential of a stranded network, as D.H. infrastructure could last longer than the generating plant (Battersea!).	The energy efficiency and renewable energy policy promotes district heating schemes on the condition that they are feasible.
Question 77			W Mann	Yes. New development at Kingsnorth should provide heating for Lodge Hill	Noted.
Question 77			Dr D Brighton	No. District heating only for housing within 200m of Kingsnorth	Point is noted.
Question 77		RSPB	Fay Martin	Q77 - 80: The RSPB supports the Government's goals set out in The White Paper to cut CO2 emissions by 80% by 2050. The Society considers that the Core Strategy can assist in meeting these targets by requiring developments to achieve BREEAM or Code for Sustainable Homes targets. We would welcome the inclusion of a policy that requires development to be designed according to the principles of passive solar design as this approach can deliver significant reductions in the energy demand of buildings. We would also welcome the inclusion of targets for on-site energy generation for residential, commercial and public buildings and consider that a minimum figure of 10% should be sought.	Noted.
Question 78				<b>Q78: Should new development, over a minimum size, be required to install a heating grid? If yes, should this be applied universally in Medway or only in areas where connection to a larger grid can be reasonably demonstrated</b>  Answers for question 78 (from questionnaire & website): 12 Yes/ Agree 4 No/ Disagree 3 Don't Know	
Question 78		Groundwork Kent & Medway	Simon Green	Yes it should be in areas selected in terms of feasibility. A heating grid implies recirculation of the heating vehicle (probably hot water) and would advantageously utilise waste heat normally characterised as district heating. The most obvious source of waste heat will be the new power stations which can reasonably connect to Lodge Hill and Riverfront developments. Infrastructure costs will be high and related to location and routing of steam or hot water pipes (and return systems). In the right circumstances however the investment will be recouped by heating service charges to each housing unit. The grid can also provide heat to commercial premises so a similar condition could apply.	Noted.
Question 78		ScottishPower	Chris Girdham	If this is accepted and provided that the purpose of any resulting policy is to require developers of major new housing/commercial developments to install grid infrastructure at the construction stage, the principle of this initiative is supported.	Noted.
Question 78		CPRE Kent	Sean Furey	Yes: where there is a source of heat there should be a heating grid for new development, unless there is a more efficient option (such as in-house options or a localised renewable solution).	Noted.
Question 78		Lafarge Cement UK	David Simms	Where it can be demonstrated that there is strong likelihood of the future implementation of a heating grid, the benefits of requiring installation of grids in anticipation of future implementation would be logical. However, it is unreasonable and inefficient to require the installation of grids where no realistic prospect exists for use to be made of it. A clear and effective strategy for planning and implementing proposals must be in place before any such requirement is established as a matter of policy.	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 78	Environment Agency	Jennifer Wilson	We support the proposal that new developments over a minimum size should be required to include a district heating grid. Such a policy would help to create the market for heat that energy generators look for when developing CHP schemes. We believe that this policy should be applied universally, and should not be constrained by the current potential to be part of a wider grid. The CHP schemes themselves need not necessarily be centralised energy generation, but could be decentralised district schemes, which may evolve to become part of a wider heat network.	Noted.
	Question 78	GVA Grimley Ltd	Sheery Sassoon	We support policies which encouraged developments to adopt sustainability measures. However, we oppose the current policy on the basis that it does not consider individual circumstances of development proposals where it may not be possible or viable to install a heating grid. (Suggestion- Developments will be encouraged to install a heating grid, where possible.)	The Medway Core Strategy promotes/supports rather than specifies such heating grid systems in new developments.
	Question 78	Kent County Council	Richard Feasey	There are different ways of meeting the obligation for low carbon energy solutions for new development. Installing a heating grid implies the provision of a district heating solution. The scale of development, density, mix of uses and ultimately heat load to be serviced must be factored in to ensure that it is a viable solution. There are other ways of meeting energy needs sustainability which could be around greater levels of insulation and micro technologies or other community scale solutions. Nonetheless the LDF should encourage consideration of district heat networks particularly as they could also benefit surrounding areas through network extension.	Noted.
	Question 78		Carl Kroon	Only where connection to a larger grid can be done.	Noted.
	Question 78	FWCA Frindsbury and Wainscott Community Association	J R Masey	Yes, only in areas where connection to a larger grid can be reasonably demonstrated. If district heating is only for new development it appears to be relying on commercial growth new development, as there is only requirement for 16,300 dwellings. Why mention 100,000 unless there are plans to retrofit to existing homes. Or is it to be offered to outside Council boundaries. Who would be the provider? As complex (elec/gas) utility ownership -generator, distributor, supplier. Legislation Issues.	Noted.
	Question 79			<b>Q79: Should there be a stronger presumption in favour of the use of renewables technologies, including wind, combined heat and power, solar and photovoltaics?</b>  Answers for question 79 (from questionnaire & website): 24 Yes/ Agree 1 No/ Disagree 1 Don't Know	
	Question 79	CPRE Kent	Brian Lloyd	Combined Heat and Power is not a renewable technology per se, it is the use of low grade heat for heating after it has generated electricity via turbines. CHP can be driven by coal, oil, gas or biofuels so the fuel type needs careful consideration even though the overall efficiencies are much higher than electricity generation alone. Wind needs careful siting to be effective, with most micro-wind systems being ineffective in much of the South East where wind speeds are too low. Larger onshore wind turbines would have numerous site-specific issues to address. Solar Thermal, PV and PV-T should be actively promoted as our area has some of the best sunshine hours in the UK.	Noted.
	Question 79	Groundwork Kent & Medway	Simon Green	Yes, particularly wind, CHP and biomass. Solar should be increasingly encouraged but at present the technology is immature and not cost effective. It should be emphasised that biomass generation can enhance woodland management. The main reason woodland management is inadequate is that there is no sales outlet for arisings such as woodchip so no income from managing the wood which is costly. Coppicing is widely recognised as being beneficial to biodiversity but has largely ceased to happen. A positive policy towards woodland biomass in Medway could lead to more environmentally sustainable power generation and better woodland management. Biomass generators can often be located on a small scale in rural locations alongside farm buildings etc and the LDF should be positive about this. Biomass grown specifically on land otherwise needed for food growing has now been largely discredited and should not be encouraged in Medway.	Noted.
	Question 79	London Thamesport (Hutchison Ports UK Ltd)	Nicholas Orbell	The policies should recognise that the viability of renewables will change during the period of the next Plan, and encourage appropriate integration and development of these technologies through planning policy. As outlined in 4.3.2 above, the BP onshore wind project demonstrated the suitability of the Medway estuary for this particular form of development, and the significance of this should be recognised to both encourage and assist other commercial landowners to bring forward similar proposals to meet the broader renewable policy objectives and Central Government targets. Similarly, a policy approach that actively facilitates the integration and provision of renewable technologies within appropriate development proposals for commercial businesses, without being too prescriptive, should be adopted to promote this form of sustainable development as such technologies become more affordable and deliverable.	Noted.
	Question 79	ScottishPower	Chris Girdham	Support for any form of energy technology should reflect national and regional policy.	Noted.
	Question 79	CPRE Kent	Sean Furey	Yes. Feed in Tariffs and Renewable Obligation Certificates (ROC) can mean that business and homeowners can generate income and energy. Adding a solar thermal system to a new build home only costs an additional £1000, whereas it would cost around £3,500 to retrofit, it therefore makes sense for them to be mandatory so there is a level playing field for all developers across the authority.	Noted.
	Question 79	Kent Wildlife Trust	Debbie Salmon	There are a number of differing ecological issues surrounding different forms of renewable energy production. Wind Energy See Kent Wildlife Trust's wind farm policy sent by separate email Combined heat and power We support in principal methods of energy production that reduce carbon emissions. Solar and photovoltaics We support in principal methods of energy production that reduce carbon emissions	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 79	Dickens Country Protection Society	Chris Fribbins	Yes. Landscape issues need to be considered however.	Noted.
	Question 79	Natural England	Josh Nelson	Natural England agrees in a stronger presumption in favour of the use of renewable technologies; however, we would be keen to ensure that proposals for renewable energy projects are located so that designated nature conservation sites and the Kent Downs AONB are not adversely affected.	Noted.
	Question 79	Environment Agency	Jennifer Wilson	We support the proposed stronger presumption in favour of the use of renewables.	Noted.
	Question 79	GVA Grimley Ltd	Sheery Sassoon	We support policies which encourage the use of renewable technologies. We propose a flexible approach towards the use of renewable technologies and propose that the suitability for the provision of wind turbines, combined heat and power, solar and photovoltaics should be assessed in viability terms. To achieve the Council's objectives of incorporating renewable technologies, incentives should be offered to developers such as the provision of a flexible approach towards Section 106 contributions, affordable housing, scale and / or mix of developments. (Suggestion- Developments will be encouraged to incorporate renewable technologies wherever possible.)	Noted.
	Question 79	Kent County Council	Richard Feasey	Yes, it is now accepted that planning policy has an important role to play in bringing forward renewable energy solutions and increasing the take up of renewable technologies.	Noted.
	Question 79	The Peel Group	The Peel Group	Peel Energy strongly believes that Medway Council should hold a stronger presumption in favour of the use of renewable technologies, including but not limited to those listed. In addition to the renewable technologies the council has named, Peel Energy would like to see the same support for low-carbon technologies, such as fossil fuel use with carbon capture storage technology. A significant part of the Government meeting its objectives on how to tackle climate change is reliant on the increased use of renewable and low-carbon energy technology. In terms of the land use planning system, instruments have been put in place that encourages local planning authorities to look favourably upon such development. The principle documents that the council should have regard to when establishing Core Strategy policies are Planning Policy Statement 1: Planning and Climate Change (PPS1), and also Planning Policy Statement 22: Renewable Energy (PPS22). The key principles of PPS22 are based on renewable energy developments being located throughout England; development plans containing policies that promote and encourage rather than restrict the development of renewable energy sources; the wider economic and environmental benefits of renewable energy projects being given 'significant weight' and; local planning authorities not making assumptions about the technical and commercial feasibility of renewable energy projects. Peel energy requests that these form the underlining principles of Medway Council's emerging Core Strategy and its stance on renewable energy development. Peel has significant experience in sustainable development including use of renewable technologies such as tri-generation, CHP, wind farms, waste and biomass proposals. It is agreed there should be a presumption in favour of the use of renewable technologies in schemes. The Chatham Docks site provides a real opportunity for creating a high class sustainable community scheme potentially incorporating renewable technologies.	Noted.
	Question 79		Carl Kroon	Wind in Medway is not regular or of sufficient strength to warrant the use of domestic turbines.	Noted.
	Question 79	Frindsbury and Wainscott Community Association	A Wade	Yes. Solar provision for dwellings should be encouraged and funded if necessary.	Noted.
	Question 79		W Mann	Yes. Good long term objective, in short term may have to use more conventional sources	Noted.
	Question 79		Dr D Brighton	No. Nuclear and coal	Noted.
	Question 80			<p><b>Q80: The Merton Rule requires new development to generate at least 10% of its energy needs from on-site renewable energy equipment. Should a Merton Rule be introduced for Medway? If yes:</b></p> <ul style="list-style-type: none"> <li>• Should this be in addition to making provision for district heating?</li> <li>• What percentage of on-site renewable energy should be required as a minimum standard?</li> </ul> <p>Answers for question 80 (from questionnaire &amp; website):</p> <ul style="list-style-type: none"> <li>- Should a 'Merton Rule' be introduced for Medway? (13 Yes/ Agree; 2 No/ Disagree; 3 Don't Know)</li> <li>- Should this be in addition to making provision for district heating? (4 Yes/ Agree; 1 No/ Disagree; 3 Don't Know)</li> <li>- What percentage of on-site renewable energy should be required as a minimum standard? (6 for 15%, 3 for 10%)</li> </ul>	
	Question 80	CPRE Kent	Brian Lloyd	Yes, we consider that it would be appropriate to introduce a 'Merton Rule' and we would suggest that this should be set at 16% in accordance with policy MRM13 of the South East Plan. In achieving this, we consider that solar thermal and solar PV (and PV-T) offer the best potential in Kent. Biomass boilers using locally coppiced wood is also another good option.	Noted.
	Question 80	Groundwork Kent & Medway	Simon Green	Yes. 15-20% would be a reasonable target to be waived if fully integrated into a district heating scheme. However the priority should be towards reduction of the heat requirements through insulation, heat exchangers etc. This is not new technology, it just needs applying. Those meeting a sufficiently high standard of energy input reduction could be excluded from on site generation.	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 80	London Thamesport (Hutchison Ports UK Ltd)	Nicholas Orbell	Please refer to response to Q79; the policy must recognise that the availability and viability of renewable technologies will change during the period, and a balance must be presented between the objective of encouraging integrated renewables and the cost of development now, and in the future. Furthermore, Medway has the opportunities for significant stand-alone renewable development (eg onshore wind) and must consider the integration of both major projects with more local schemes to achieve a cohesive policy.	Noted.
	Question 80		Steve Banfield	The Merton Rule seems totally inappropriate; unless you can justify the extra space and cost (this especially applies to option 1 - right near a huge power station (maybe) and also near a container ship natural gas distribution point).	Noted.
	Question 80	Barratt Strategic		Whilst Barratt Strategic supports the principle of providing for renewable energy sources on new developments, the standards should in their opinion be as per policy CC1 of the South East Plan i.e. 10%. In the context of the above, the council must appreciate that it is not always feasible to install district heating systems, and it would be inappropriate to require 10% renewables on top of a district heating system. As per our response to questions 4, 5 and 12, the council should be looking at how best to achieve the most from renewable sources of energy as set out in the Climate Change supplement to PPS1. The Core Strategy should seek to adopt a renewable energy strategy that looks to a minimum requirement in line with the RSS. Thereafter it should be for the development industry to choose what particular energy source would be most effective for their development, given the nature of the scheme, its location etc	Noted.
	Question 80	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Yes, also need to consider multiple applications in same area/site. Suggest increasing % of on-site renewable energy generation required.	Noted.
	Question 80	Trenport Investments Limited	C Hall	Trenport objects to this rule which it believes is far too crude an approach. A more flexible site by site approach should be applied to reflect the specific development proposals, the characteristics of the site itself and the characteristics of the surrounding area and the implications of applying the rule when considered against other considerations. For example are wind turbines and solar panels acceptable on development in a conservation area or next to a listed building or would they be effective on a well treed site or on a site surrounded by trees?	Noted.
	Question 80	Lafarge Cement UK	David Simms	The Merton Rule, when part of a considered policy approach, can provide an important mechanism for achieving development which is more sustainable. The policy should be considered as one aspect of an approach, and should not, for example, be an additional requirement to other policy requirements such as district heating. The extent of requirement should be consistent with Policy NRM11 of the South East Plan, and be set at 10%.	Noted.
	Question 80	Kent Wildlife Trust	Debbie Salmon	The Trust believes that the Merton rule should be introduced in Medway. We fully support any technology which limits the use of processes that emit CO2. The Trust would advocate that the highest percentage possible be achieved from renewable energy generated on site.	Noted.
	Question 80	Dickens Country Protection Society	Chris Fribbins	Yes, and look to increase the percentage of local generation and heating efficiency	Noted.
	Question 80	Wm Morrisons supermarkets plc	Wm Morrisons Supermarkets plc	Comments submitted by Peacock and Smith on behalf of WM Morrison Supermarkets PLC: It is acknowledged that a number of Local Authorities are seeking a percentage of onsite renewable energy generation in new development and in principle our client supports this approach. However, we consider that any such policy should incorporate an element of flexibility to allow for circumstances where it will not be viable or suitable to incorporate renewable energy equipment to reduce CO2 emissions by a given percentage. Paragraph 8 of PPS22 states that local planning authorities may include policies in Local Development Documents that require a percentage of energy requirements to come from onsite renewable energy generation, however this guidance is subject to the caveat that such policies: i) should ensure that a requirement to generate on-site renewable energy is only applied to developments where the installation of renewable energy generation equipment is viable given the type of development proposed, its location and design; ii) should not be framed in such a way as to place an undue burden on developers, for example, by specifying that all energy to be used in a development should come from on-site renewable generation. In our view the absence of any such flexibility conflicts with the intentions of Government guidance within PPS22 and its companion guide. Accordingly, our client requests that any such policy on renewable energy includes text to confirm that the percentage requirement will be subject to tests of viability and suitability.	Noted.
	Question 80	Natural England	Josh Nelson	Natural England would support the use of on-site renewable power generation in new development proposals to assist in achieving more carbon sustainable development to reduce the effects of climate change on species, habitats and landscapes.	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 80	Environment Agency	Jennifer Wilson	<p>We would support the adoption of a 'Merton rule' for Medway, which should be in addition to provision made for district heating (as typically this will be from combustion of gas or other fossil fuels). A number of Local Authorities have gone beyond the 10% threshold set by Merton, with the Mayor of London, Barking &amp; Dagenham and Three Rivers DC to mention a few adopting a target of 20%, Kirklees Council setting a target of 30% and other authorities setting targets of 15% (source Town &amp; Country Planning Assoc 2006). We therefore suggest consideration be given to a target of between 20% to 30%.</p> <p>The Medway SOM report for waste seems a fair assessment of the current position.</p> <p>Medway Waste Position:</p> <p>European and National policies and targets demand progressive increases in the proportion of waste recovered by way of recycling, composting and recovery of energy and to divert waste from landfill.</p> <p>The Defra Waste Strategy 2007 sets Government targets for the achievement of Landfill Directive diversion and sets out targets for the recycling and composting of household waste and the recovery of municipal waste.</p> <p>Central to the delivery of these recovery and diversion targets is the commitment from waste authorities and the waste industry to provide suitable waste management capacity, to explore new approaches to collection, separation and to secure increased community participation. To be successful, there must be economically sustainable markets for the recycled and composted material and investment in significant new infrastructure to enable collection, storage and transfer of such materials.</p> <p>Our data shows that communities in the Medway area are producing more waste per capita than the rest of the County and are behind on recycling and recovery targets. The net result is that more needs to be done in order to meet the Government's targets.</p> <p>Fly-tipping rates for the area are second highest in the county, further demonstrating the need for accessible legitimate recovery or disposal routes along with appropriate education and illegal disposal deterrent methods."</p>	Noted.
	Question 80	GVA Grimley Ltd	Sheery Sassoon	<p>We support the growth and development of renewable technologies. We consider that development proposals should seek to integrate renewable technologies as far as possible. We do not support the application of a target to securing renewable technologies but rather each scheme should be assessed on its merits with regard to site specific circumstances and viability. We propose that the borough should work within the guidance set out at regional and national level, subject to the viability of individual schemes. (Suggestion- Developments will be encouraged to incorporate renewable technologies wherever possible.)</p>	Noted.
	Question 80	Kent County Council	Richard Feasey	<p>A 'Merton Rule' style policy should be included in the LDF. The policy can be worded to the effect that district heating is one of the ways in which the obligation contained in the policy could be met. The general rule has seen LPAs just follow suit and adopt a standard 10% of energy requirement with 10 unit and 1000 sq.m thresholds. Its time this was moved on to a more challenging level consistent with the progression towards zero carbon buildings. Some LPAs have introduced a requirement for 15% and even 20%. Some thought should be given as to how this requirement overlaps with the Code for Sustainable Homes and BREEAM standards in the case of non-domestic buildings. There is no longer a need for thresholds for the application of this type of policy; a point has been reached where this needs to be integral to all new buildings.</p>	Noted.
	Question 80		Carl Kroon	<p>15%. There is a large number of 1900's properties in Medway that do not orient correctly for solar/PV and wood is no use. What is to become of these properties. The regulations regarding installation, double glazing for low income are deliberately indicative and for most households the problems of meeting energy regulations is a minefield. This needs to change. New build should be new. New look with new technology, new materials positioned to use wood and power, raised out off flood plain. UK has most expensive domestic power gas/electric in Europe yet we have gas fired, oil fired, coal, nuclear, wind and wave power. Why government incompetence. We have pioneered wave and wind power yet we don't use it.</p>	Noted.
	Question 80	Open Spaces Society	Patricia Wilson	<p>This seems a good idea, but I imagine options would have to be determined on a site by site basis. i.e wind energy may vary. Solar energy should make a worth-while contribution, but as the Government has signally failed to promote this over years we would start from a lower level.</p>	Noted.
<b>Climate change</b>					
		Medway Renaissance	John Finlayson	<p>Issue of greenhouse gases needs to be tackled from all angles. Design of new buildings is one strand but the LDF should also promote mitigation e.g. reducing vehicular emissions, adoption through retrofitting existing buildings and the LDF should also provide the lead on behaviour change. General - Waste, Energy and Climate Change Waste, Energy and Climate change are the key components of sustainability. Corporately Medway is a signatory of the Nottingham Declaration on Climate Change. The LDF should be robust and forward thinking in tackling all sustainability issues in a co-ordinated manner with a major directional shift to 'greening the city'.</p>	Noted..
		Environment Agency	Jennifer Wilson	<p>Sea level rise is constantly being reviewed and predicted figures are liable to change frequently. Therefore the following statements in the following sections could become out of date. -4.323 - "although recent work has forecast that this will be less than previously thought"; and.... - 4.325 - "on the positive side sea level rises in Thames and Medway..."</p>	Noted.
4.326		ScottishPower	Chris Girdham	<p>The Climate Change Act 2008 imposes an obligation to ensure 'the net UK carbon account for the year 2050 is at least 80% lower than the 1990 baseline' and that the carbon budget, for the period including the year 2020, must be at least 26% lower than the 1990 baseline. However, in the April 2009 Budget, the Chancellor of the Exchequer announced the world's first ever carbon budget, which commits the UK to cut carbon emission by 34 per cent by 2020. This target is set out in the UK Low Carbon Transition Plan. In July 2009, the Government published their Renewable Energy Strategy. The Strategy was produced as a response to the binding renewable energy targets to 2020 set out in the new EU Energy Directive (COD/2008/0016). The Strategy recognises the need for an increase in the use of renewable energy to 15% in 2020.</p> <p>Whilst efforts continue to increase renewable energy capacity in the UK, low carbon generation from technologies including carbon capture ready Combined Cycle Gas Turbine (CCGT) will continue to make a major contribution to reducing emissions.</p>	Noted.



Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	4.329	Environment Agency	Jennifer Wilson	Flooding: There is no mention of a Strategic Flood Risk Assessment (SFRA). Medway have an SFRA but it requires updating as it was produced under PPG25 rather than PPS25. It is important that reference is made to this. The Issues and Option Report makes no reference to the existing SFRA. It should take account of the findings within the SFRA, bearing in mind that it requires updating to reflect changes in planning policy (PPS25)	It is referred to in the draft core strategy.
	4.333	NFU SE Region	John Archer	Contour ploughing is popularly presented as a way that farmers could help to prevent runoff if only they would take the trouble to do it. This is a simplistic argument. In fact, the Farm Practices Survey indicates that 71% of farmers already employ contour ploughing. The technique is less effective on heavy clay soils or on complex slopes, where ponding can occur particularly at low points, resulting in a break through the furrow and a more concentrated runoff problem. Some mechanised harvesting methods (for example potatoes) are not suited to contour ploughing. The same survey revealed that 57% of farmers use, or plan to use, minimum tillage rather than ploughing, which will reduce what problem there is. Most farmers already actively manage their land to control surface water runoff as part of agri-environment schemes, cross compliance and Catchment Sensitive Farming projects.	Noted.
	4.333	Environment Agency	Jennifer Wilson	The Authority refers to changing farming practices to reduce their impact on the environment and mitigate the effects of climate change, how would this be carried out by the Council? Is this something we can work together with along with the catchment sensitive farming initiatives as this will contribute to our goals?	The Council would be happy to work in partnership with the Agency on this matter but it cannot be addressed in detail in a core strategy.
	4.338	Environment Agency	Jennifer Wilson	Medway Council's "State of Medway Report: Water Supply" (November 2008) provides a good breakdown of the requirements relating specifically to water resources from several policy documents. We hope that this document is used, as it factually sets out the current situation within the district and identifies current supply options being discussed by the Water Companies. The strategy refers to 'overview & scrutiny task group' this group included Environment Agency representative, Nigel Hepworth, SEP Water Resource Team Leader.	Noted.
	Question 81			<b>Q81: Do you agree with the principle of protecting key green space corridors, networks and stepping stones, particularly in and around the main urban area to allow habitats to adapt to climate change?</b>  Answers for question 81 (from questionnaire & website): 25 Yes/ Agree 1 No/ Disagree 0 Don't Know	
	Question 81	CPRE Kent	Brian Lloyd	Yes. These corridors and areas need to be clearly defined and in many cases habitat enhancement will be required to make them effective at allowing wildlife to thrive and migrate as necessary. The mechanism of protection needs to be defined, e.g. as Site of Nature Conservation Interest, as they may not qualify for SSSI status. Where possible, such corridors should be integrated with new and retrofitted Sustainable Urban Drainage (SuDS) and recreation and amenity (e.g. foot and cycle paths). However this needs proper design as there are some potential conflicts - e.g. disturbance caused by noise and street-lighting.	Noted.
	Question 81	Kent Wildlife Trust	Debbie Salmon	Nationally, regionally and locally, the Wildlife Trusts are focusing their work on landscape-scale restoration of wildlife habitats in order to create a coherent ecological network; see the Wildlife Trusts' document 'A living landscape – A call to restore the UK's battered ecosystems, for wildlife and people', which can be downloaded from <a href="http://www.wildlifetrusts.org/index.php?section=environment:livinglandscapes">http://www.wildlifetrusts.org/index.php?section=environment:livinglandscapes</a> , and the regional version, 'A living landscape for the South East', from <a href="http://www.kentwildlifetrust.org.uk/pdfs/conservation/A_Living_Landscape_for_the_South_East.pdf">http://www.kentwildlifetrust.org.uk/pdfs/conservation/A_Living_Landscape_for_the_South_East.pdf</a> . In the South East, work to develop the South East Biodiversity Strategy ( <a href="http://strategy.sebiodiversity.org.uk/">http://strategy.sebiodiversity.org.uk/</a> ) has produced a detailed spatial framework of Biodiversity Opportunity Areas, which forms the basis of Kent Wildlife Trust's living landscape work in Kent and Medway. While corridors, networks and steppingstones are important to assist biodiversity in adapting to climate change, they are only part of the solution, and we would refer you to Defra's guidance on this issue, as set out in 'Conserving biodiversity in a changing climate: guidance on building capacity to adapt' ( <a href="http://www.ukbap.org.uk/Library/BRIG/CBCCGuidance.pdf">http://www.ukbap.org.uk/Library/BRIG/CBCCGuidance.pdf</a> ): 1 Conserve existing biodiversity 1a Conserve Protected Areas and other high-quality wildlife habitats 1b Conserve range and ecological variability of habitats and species 2 Reduce sources of harm not linked to climate 3 Develop ecologically resilient and varied landscapes 3a Conserve and enhance local variation within sites and habitats 3b Make space for the natural development of rivers and coasts 4 Establish ecological networks through habitat protection, restoration and creation 5 Make sound decisions based on analysis 5a Thoroughly analyse causes of change 5b Respond to changing conservation priorities 6 Integrate adaptation and mitigation measures into conservation management, planning and practice	Noted..
	Question 81	Natural England	Josh Nelson	Natural England agrees with and would support closely the Council in seeking to bring forward mechanisms and policies to address the challenges and opportunities disclosed in questions 81 – 86. As noted in our response to question 66, Natural England agrees strongly with the need to create and protect multi-functional green corridors, networks and stepping stones to assist species and habitat adaptation to the effects of climate change. Natural England would recommend that the regional Biodiversity Opportunity mapping produced by the South East England Biodiversity Forum is used to inform policies on habitat creation and enhancement.	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 81	Environment Agency	Jennifer Wilson	Yes. Key issues surrounding this are the need to mitigate for the loss of intertidal habitat through coastal squeeze, and ensuring that biodiversity has the scope to move through the landscape in response to changing conditions, and that the landscape has the ability to adapt and continue to provide ecosystem services. The first stage of this is recognising what services are provided and the threats to these. We would recommend that a strategic green network is identified and that this is protected, through core strategy policies and potentially also through a Supplementary Planning Document, as part of adaptation to climate change and to give a clear direction to development now and in the future.	Noted.
	Question 81	Abbey Developments Ltd	Abbey Developments Ltd	<p>Whilst we recognise the importance of protecting key green spaces from large scale 'significant' development we do however consider that this should mean that no development should take place adjacent to the existing urban areas within the green corridors.</p> <p>We consider that any parcel of land, put forward for development, which is adjacent to the existing urban area should be assessed in terms of its contribution towards ecology, biodiversity, agricultural production and settlement separation. If through this assessment it is found that these sites do not meet any of the above criteria we consider that they should be included within the urban area.</p> <p>Our client's land to the east of Rainham lies adjacent to the existing urban area. The site does not contribute significantly to the ecology or biodiversity of the area and is not used for any agricultural purposes. The site does not extend beyond the existing built urban area and we consider that development on the site would better define the edge of the built up area. The land does not contribute to the separation of Rainham from Sittingbourne and we don't consider that its development would conflict with Policy KTG1 as set out in the South East Regional Spatial Strategy. As can be seen from the attached aerial photo, the site is bounded to the east by Meresborough Road and to the south there is a strong field boundary. Development on this land would not extend further east towards Sittingbourne past the existing line of development. Therefore, it would not conflict with the aim of maintaining a 'green swathe' between the two towns.</p>	The Core Strategy gives priority to the development of previously developed land before Greenfield development and consequently urban extensions are not proposed. It also protects land to the east of Rainham as it seeks to avoid coalescence between Medway and Sittingbourne. The site has been rejected in the Strategic Land Availability Assessment.
	Question 81	University College for the Creative Arts at Rochester	David Hawkins	The University is working with The Carbon Trust to identify ways of reducing its carbon footprint.	Noted
	Question 81	The Peel Group	The Peel Group	<p>Some Energy projects can co-exist with, or even enhance, habitats therefore the protection of key corridors, networks and stepping stones should not imply that all development should be restricted in these key areas. When considering the location of renewable energy projects, Paragraph 15 of PPS22 states:</p> <p>"Local landscape and local nature conservation designations should not be used in themselves to refuse planning permission for renewable energy developments. Planning applications for renewable energy developments in such areas should be assessed against criteria based policies set out in local development documents, including any criteria that are specific to the type of area concerned"</p> <p>The Core Strategy should give consideration to the fact renewable energy projects can only locate where the natural resource exists, and where economically feasible. Renewable energy projects should not have to satisfy sequential testing that other forms of development may be subjected to. These points are in accordance with national planning policy.</p>	Noted..
	Question 81		Vivienne Parker	Encourage building of garages on the ground floor in properties below 10m above sea level to protect properties against flooding.	Noted.
	Question 81	NFU	Kevin Attwood	Climate change is not the main degradation cause, it is urban fringe issues. To that end policies to control or manage that effect would be more beneficial.	Noted.
	Question 81	RSPB	Fay Martin	<p>Q81 and 85: Yes. Policy CC8 (Green Infrastructure) of the South East Plan recognises the potential broader role of open space in mitigating the impact of growth on sites of international nature conservation importance. This policy evolved partly in response to the Appropriate Assessment of the South East Plan, which identified a number of European Sites for which it was not possible to conclude no adverse effect due to increased recreational pressure associated with development under the South East Plan. Thames Estuary and Marshes, Medway Estuary and Marshes and the Swale SPA and Ramsar sites are listed among those European sites. The RSPB therefore supports the principle of protecting green infrastructure, particularly in and around urban areas. The society also supports the multi-functional role of these spaces, including as space for recreation, for urban cooling and as a biodiversity resource. We would also welcome the recognition of a broader definition of green infrastructure, to include features such as green roofs and walls, which have excellent insulation and cooling properties, can reduce rainwater runoff from roofs, and can help promote biodiversity in urban areas.</p>	Green infrastructure is protected and promoted by policies on natural assets, landscape and countryside, open space and climate change.
	Question 82			<p><b>Q82: Do you agree with the principle of earmarking areas now for habitat creation over the long term to offset the consequences of coastal squeeze?</b></p> <p>Answers for question 82 (from questionnaire &amp; website):  19 Yes/ Agree  2 No/ Disagree  0 Don't Know</p>	
	Question 82	CPRE Kent	Brian Lloyd	Yes. However regard should also be given to the loss of homes, businesses and agricultural land lost from managed re-alignment. These are currently exempt from all forms of compensation, however habitats are afforded greater legal protection because the of Habitats Directive regulations.	Noted. Whilst the flood risk chapter refers to areas of habitat creation, they are not defined in the policy because the Environment Agency has indicated that they may not be required for 50 years, well beyond the life of the Core Strategy.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 82		Lillian Harrison	The term 'earmarking' is hard to understand in terms of the Core Strategy. Do you mean that 'earmarking' equates to 'site allocations' in the Proposals Map? In which case, NO, it is far too early on to identify sites for habitat creation as such without considering wider sustainability/feasibility issues including landownership & economic matters regarding the areas being considered. It is wrong to single out wildlife interests as being the most important aspects of climate change to be considered by 'earmarking' at this stage in the plan process.	Noted. Whilst the flood risk chapter refers to areas of habitat creation, they are not defined in the policy because the Environment Agency has indicated that they may not be required for 50 years, well beyond the life of the Core Strategy.
	Question 82	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Concerned about implied loss of marshes in our area - these can be and should be protected.	Noted.
	Question 82	Kent Wildlife Trust	Debbie Salmon	Coastal squeeze is a major issue for the survival of our coastal habitats and creation of habitats is essential if the rich biodiversity currently present in Kent's coastal habitats and the seas around the County are to be conserved. However coastal squeeze is not the only threat to habitats and species and consideration will need to be given to other threats when planning the location and extent of connected habitats. <ul style="list-style-type: none"> <li>All habitats will need to be protected and buffered from the effects of recreational pressure.</li> <li>Core sites need to be connected via extensive corridors of natural habitats to alleviate fragmentation and ensure flora and fauna can migrate as climate changes.</li> <li>Access to natural habitat is required to ensure the increasingly large urban population do not become disassociated from the natural world. Evidence shows that contact with nature alleviates physical and mental health problems.</li> <li>The maintenance, enhancement and extension of Biodiversity Action Plan habitats to ensure these habitats and the species that use them are preserved and enhanced for future generations.</li> <li>Appropriate management of the created network needs to be ensured to create healthy well functioning ecosystems, as laid out in the Ecosystems Approach.</li> </ul>	Noted.
	Question 82	Dickens Country Protection Society	Chris Fribbins	Yes, although care must be taken not to destroy one valuable habitat for another	Noted.
	Question 82	Natural England	Josh Nelson	As noted in our response to question 8, Natural England agrees that areas suitable for habitat creation to address potential habitat losses through coastal processes should be identified now and that measures to secure such areas are put in place. Natural England would recommend that the regional Biodiversity Opportunity mapping produced by the South East England Biodiversity Forum is used to inform policies on habitat creation and enhancement.	Noted. Whilst the flood risk chapter refers to areas of habitat creation, they are not defined in the policy because the Environment Agency has indicated that they may not be required for 50 years, well beyond the life of the Core Strategy.
	Question 82	Environment Agency	Jennifer Wilson	Key issues surrounding this are the need to mitigate for the loss of intertidal habitat through coastal squeeze, ensuring that biodiversity has the scope to move through the landscape in response to changing conditions, and that the landscape has the ability to adapt and continue to provide ecosystem services. The first stage of this is recognising what services are provided and the threats to these. We would recommend that a strategic green network is identified and that this is protected, through core strategy policies and potentially also through a Supplementary Planning Document, as part of adaptation to climate change and to give a clear direction to development now and in the future.	The core strategy includes a policy on the green grid. However, until agreement has been reached on habitat creation to offset coastal squeeze with the Environment Agency, under the auspices of the Thames Estuary 2100 project, no areas are being defined or safeguarded.
	Question 82	Kent County Council	Richard Feasey	Yes – see response to Question 8. . It is sensible to identify sites now. It should be noted that all those areas likely to be identified as potential new habitats or flood storage areas are likely to contain numerous archaeological sites and perhaps also historic structures. Depending on the nature of any works involved in habitat creation, and on the indirect impact of those works, all these sites could be affected. Similarly the use of areas as flood storage may well also impact on heritage assets. It will be essential to ensure that a strategy is employed such that damage to these sites is avoided as far as possible. The effects of habitat creation on the historic environment need to be assessed before locations are chosen.	Noted. Whilst the flood risk chapter refers to areas of habitat creation, they are not defined in the policy because the Environment Agency has indicated that they may not be required for 50 years, well beyond the life of the Core Strategy.
	Question 82	The Peel Group	The Peel Group	In line with our response to Question 81, Peel Energy believes any action in this regard needs careful consideration so as not to impose barriers to other national policies that are trying to reduce climate change.	Noted.
	Question 82	NFU	Kevin Attwood	A matter for the EA and private landowners not MC blighting private farmland with ill informed policy or prejudicing EA plans.	Noted.
	Question 82		Goodman & W Mann	Please see response to Q8.	Noted.
	Question 82	RSPB	Fay Martin	Yes. The RSPB is concerned that through sea level rises and increased sea erosion, large parts of the Thames Estuary could experience 'coastal squeeze', where the coastal margin is squeezed between the fixed landward boundary and the sea level. Any development on such a potentially dynamic area of coast could inhibit future sustainable coastal management, and prove costly to protect. The Society therefore supports the conclusion of the Thames Estuary 2100 Consultation Plan that land needs to be set aside for habitat creation to offset the effects of coastal squeeze. Although it is not possible at this stage to identify the scale of habitat creation required, we are happy to work with Medway Council to identify work that needs to be undertaken to investigate this issue further and to evaluate the sites that have been identified.	Noted.
	Question 83			<b>Q83: Do you agree with the principle of earmarking areas now for the storage of water to offset the effects of flash floods?</b>  Answers for question 83 (from questionnaire & website): 21 Yes/ Agree 1 No/ Disagree	

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				0 Don't Know	
	Question 83	CPRE Kent	Brian Lloyd	Yes. A strategic approach to SUDS has been taken in the Ashford growth area and it is recommended that Medway take a similar view and have a specific SUDS Supplementary Planning Document (contact ABC for details). Good design is important as dry storage areas planted with amenity grass are of limited wildlife and amenity value. Where possible measures, such as reed beds, should be used to tackle diffuse urban pollution as well as attenuating runoff rates. In dense urban locations where there is insufficient space and storage tanks have to be used, there should be effort to ensure that a part of the stored water is retained for non-potable water uses as a way of reducing water demand (e.g. toilet flushing in commercial buildings).	The flooding policy includes a requirement for new development to provide SUDS in appropriate circumstances.
	Question 83	Kent Wildlife Trust	Debbie Salmon	Yes. The creation of wetland, ponds, the incorporation of SUDS containing natural habitat into development, the restoration of river corridors by development pulling back from the riverside and the preservation and connection of gardens and other green spaces in the urban environment will alleviate flash flooding as well as providing huge biodiversity gains.	The flooding policy includes a requirement for new development to provide SUDS in appropriate circumstances.
	Question 83	Environment Agency	Jennifer Wilson	Yes. We would support a proposal to provide storage areas to alleviate the consequences of flash flooding. Once areas are earmarked they should of course, be protected from development. Identifying these areas could form part of an updated Strategic Flood Risk Assessment (SFRA). In addition to these areas may be valuable for biodiversity improvements and as contribution to habitat networks – i.e. forming wetlands with spare capacity for holding floodwaters. In addition, this would be making efficient use of a resource that is plentiful during times of flood, if this were to be used to supply water to the wetland areas in partnerships with organisations such as RSPB this would reduce the burden on them having to abstracted directly from sources at other times, currently most water already abstracted during winter under licence by the Environment Agency. These storage areas could be used to supply the councils own requirements for amenity purposes such as watering of parks and gardens especially with the proposed increase in green space this would be a sustainable method in irrigating the areas and reduce the pressure on public water supplies. Little reference in the document to Water Quality issues and ensuring development is fully integrated wastewater infrastructure, below are the following STW in the district with details of capacity: Main Sewage Treatment Works (STW): Motney Hill, Whitehall Creek north of Strood, Stoke & Grain on the Isle of Grain and Ham Hill at Snodland. Motney Hill discharges into the Medway Estuary, identified as having adverse affects on European Habitat Directive sites and is to have a PR09 National Environment Programme (NEP) scheme to restrict copper and ammonia. STW expected to reach volumetric capacity by 2020. White Hall STW will require an upgrade by 2020 - it currently has less than 10% flow capacity spare to its consent so SW will be planning to extend capacity through PR09 (as this is predicted 'growth' this will be in their programme, not NEP). Stoke & Grain has spare capacity at 2020. Ham Hill STW is in Tonbridge and Malling District but receives flows from Cuxton and Halling. Projected flow capacity problems by 2020 but also 'achievable' treatment levels. Southern Water Services will be planning to expand Ham Hill as necessary. The Water Framework Directive requires all water bodies to reach good ecological quality, and to not deteriorate in ecological quality, with development being an important way in which improvements and deterioration can occur. It is essential that the districts planning policies support this and take full opportunity to enhance and improve areas via development proposals. Currently groundwater quality for the Medway Chalk block has been assigned an over chemical category of 'poor status'.	Noted. No areas have been identified for flood storage although the flooding policy protects the flood plain from development.
	Question 83	The Peel Group	The Peel Group	In line with our responses to Questions 81 and 82, Peel Energy believes that if the Council believe it to necessary to earmarking areas for this purpose then careful consideration should be given to the forms of development that will be permitted in the proposed designated area. Peel Energy requests that the Council gives significant weight to the recent consultation document produced by the Department for Communities and Local Government that proposed changes to Planning Policy Statement 25: Flood Risk (PPS25). The proposed changes state that wind turbines should be classified as "essential infrastructure" and as such should be permitted in the functional flood plain without having to satisfy a sequential test.	Noted.
	Question 84			<b>Q84: Do you agree with the principle of earmarking areas now for buffers around our more significant areas of nature conservation importance?</b>  Answers for question 84 (from questionnaire & website): 21 Yes/ Agree 4 No/ Disagree 0 Don't Know	
	Question 84	CPRE Kent	Brian Lloyd	Yes. This is important to ensure that the quality of those areas of nature conservation are properly protected.	Noted.
	Question 84		Lillian Harrison	NO. (The meaning of 'earmarking' is unclear ...does this equate to 'safeguarding' or 'protecting'?). Nor is there any definition of 'our more significant areas of nature conservation'. Does this question relate to international/national or locally designated areas etc etc? PPS9 doe not require any such blanket protection and to adopt such a policy now would be contrary to national policy on this matter and would therefore be likely to be found to be 'unsound' at EIP.	Noted.
	Question 84		Mari-Anne Harstad	Buffer zones around significant areas fo nature conservation should be created/maintained.	Noted..
	Question 84	Kent Wildlife Trust	Debbie Salmon	This is of paramount importance if areas of nature conservation importance are to be preserved from the threats mentioned above. (See previous responses for further details on the buffering of protected sites)	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 84	Dickens Country Protection Society	Chris Fribbins	Buffer zones are essential to protect some of our areas.	Noted.
	Question 84	Natural England	Josh Nelson	Natural England would agree with earmarking areas at this stage for buffers around significant areas of nature conservation interest - both to allow for the effects of climate change but also to help address potential development and recreational pressures on nationally and internationally important nature conservation interests.	Noted.
	Question 84	Environment Agency	Jennifer Wilson	Yes, however it must be clear what will be allowed or required in these areas. We will always seek biodiversity enhancements to be incorporated within development, and will object to development where this will have a detrimental impact on biodiversity and in particular aquatic habitats and species. It should be acknowledged that the requirements for protection of sites of nature conservation importance will vary from site to site, and that these may not be immediately obvious (e.g. protecting the catchment area of a wetland site rather than just the immediate surroundings). It should also be acknowledged that in some cases new development will be an improvement to the current situation through improved water management or corridors for wildlife. Therefore this approach should be carefully considered prior to implementation.	Noted.
	Question 84	The Peel Group	The Peel Group	Peel Energy do not agree that specific protection should be afforded. We do not believe buffers are an appropriate mechanism with regard to all development. Peel Energy agrees that areas of nature conservation importance should be protected from inappropriate development. However, in setting Core Strategy policies the council should make reference to PPS22 and the approach to renewable energy developments and buffer zones. Paragraph 13 states: Regional planning bodies and local planning authorities should not create buffer zones around international or nationally designated areas and apply policies to these zones that prevent the development of renewable energy projects. It follows that if international or international designated sites should not have buffer zones associated with them, locally designated areas should not either.	Noted
	Question 84	NFU	Kevin Attwood	No. Better management of those assets should come first. Again a policy thought which has no basis in government guidance and has the potential to affect landowners engaged in agriculture.	Noted.
	Question 84	RSPB	Fay Martin	Yes. The RSPB supports the proposal to earmark areas for buffers around areas of nature conservation importance as part of an overall mitigation strategy to offset increased recreational disturbance on Natura 2000 sites. This approach is supported by Para 9.20, Policy NRM5 of the South East Plan which states: 'Where necessary, local planning authorities will need to identify opportunities for avoidance and mitigation when testing proposed plans and projects, including the options for the spatial distribution of housing allocations. In some circumstances, this may require an approach to be developed and implemented across administrative boundaries.'	Noted.
	Question 84	Open Spaces Society	Patricia Wilson	Buffers essential, larger zones are needed than are estimated, especially where devise development nearby is involved where green open space may easily become debased.	Noted.
	Question 85			<b>Q85: Do you agree that specific protection should be afforded to urban green spaces and significant garden areas to offset heat island effects and manage surface water run off?</b>  Answers for question 85 (from questionnaire & website): 23 Yes/ Agree 0 No/ Disagree 1 Don't Know	
	Question 85	CPRE Kent	Brian Lloyd	Yes. However it needs to be clear how this protection would work and what weight it would have when it comes to assessing an incoming planning application.	Noted.
	Question 85		Mari-Anne Harstad	Yes and the serious flooding in the UK over the past few years demonstrates this is essential.	Noted.
	Question 85	Kent Wildlife Trust	Debbie Salmon	Yes (See Response for Question 83 for further details).	Noted.
	Question 85	Dickens Country Protection Society	Chris Fribbins	Yes - these can be significant areas of habitat creation	Noted.
	Question 85	Natural England	Josh Nelson	Natural England would agree that specific protection should be given to urban green spaces to provide cooling islands to assist climate change adaption strategies.	Noted.
	Question 85	The Peel Group	The Peel Group	Peel is of the view that changes to the Town and Country Planning (General Permitted Development) Order 1995 already go some way towards reducing the potential for the loss of urban green space, in that permission must now be sought for the hard surfacing of front garden areas.	Noted.
	Question 85	Open Spaces Society	Patricia Wilson	Unfortunate that page 89 illustrates just what the council is preaching but is shown not to be practising i.e. reducing Strood Town Centre to an almost unrelieved area of hand-surfacing. Of particular import is the protection of 'significant garden areas' especially given the steep hillsides throughout the conurbation. To what extent can the Council's planners exercise control over hard surfacing of garden areas for car-parking? I think the council misses a real strategy for individual household endeavour in matters of climate/water conservation/garden waste; they could promote installation of water-butts and of composting-bins; if gardens were redundant use for communal gardening and/or allotments could be promoted. Where are roof gardens promoted for heat insulation? Where are semi-basements ..cool...for	Planning permission is now required for hard surfacing of front gardens. Some of these issues are addressed in the climate change policy of the Core Strategy.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				utility rooms considered? Such a strategy would involve public participation.	
	Question 86			<p><b>Q86: Do you support the principle of more active environmental management being built into new developments to reduce resource consumption and limit heat island effects?</b></p> <p>Answers for question 86 (from questionnaire &amp; website):  20 Yes/ Agree  1 No/ Disagree  1 Don't Know</p>	
	Question 86	CPRE Kent	Brian Lloyd	Yes. Medway should try to lead the way in this regard. The areas of new development and redevelopment give an opportunity for these concepts to inform the urban design as well as the individual building architecture and systems. Of key importance are: - minimised water use - minimise pollution risk and diffuse pollution (e.g. from runoff, processes and foul-water misconnections) - replacement of combined sewers with separate foul and surface runoff. - minimised electricity and energy use - encourage efficient, low resource use, low waste generation behaviour, such as recycling, walking and cycling etc. - use passive adaptation technologies in preference to active measures, such as air conditioning. To assist in this, the LDF should set out its requirements on applying the Code for Sustainable Homes and the BREEAM standard for non-residential development. We would draw your attention to paragraphs 9.33-9.68 and Policy CS10 of the adopted Ashford Core Strategy in this regard, though in the light of the more recent Climate Change legislation we consider that more ambitious targets need to be set than is the case in Ashford. We consider that Code Level 4 should be set as the minimum starting point for all residential developments, rising to Code Level 6 by 2016 in accordance with Government's intentions. For BREEAM, the minimum standard sought should be excellent.	Noted.
	Question 86	London Thamesport (Hutchison Ports UK Ltd)	Nicholas Orbell	The appropriate use of environmental measures to balance heat and cooling needs is well proven, and should be encouraged in developments. The integrated use of renewable technologies must be considered in the same context to achieve similar aims, recognising that both the technologies and their economic viability will change during the period of the policy.	Noted.
	Question 86	Barratt Strategic		Whilst Barratt Strategic supports the principle of providing more active environmental management techniques into new developments to reduce resource consumption and limit heat island effects, the cost of providing for this have to be balanced against other competing demands.	Noted.
	Question 86	Kent Wildlife Trust	Debbie Salmon	The Trust fully supports active environmental management in new development. The addition of street trees living roofs and living walls have been proved to have a cooling effect on the urban environments. Tree cool the air thus reducing the heat island effect and living roofs and walls cool building in summer and insulate them in winter, thus saving on heating and air conditioning costs and reducing CO2 emissions..	Noted.
	Question 86	Natural England	Josh Nelson	Natural England would support an emphasis on designing in environmentally sustainable building techniques in new developments as a proportionate response to assist climate change adaption strategies.	Noted.
	Question 86	FWCA Frindsbury and Wainscott Community Association	J R Masey	Should be a limit on block paving in gardens.	Noted.
	Question 87			<p><b>Q87: Would you like to propose any additional strategies that should be considered in relation to climate change effects in Medway?</b></p> <p>Answers for question 87 (from questionnaire &amp; website):  11 Yes/ Agree  3 No/ Disagree  1 Don't Know</p>	
	Question 87	CPRE Kent	Brian Lloyd	The outline challenges and responses corresponds well to the recommendations set out in our 'Tomorrow's Kent' report, which is encouraging - see <a href="http://www.cprekent.org.uk/publications/Technical%20Report/tomorrowskent.pdf">http://www.cprekent.org.uk/publications/Technical%20Report/tomorrowskent.pdf</a> . A major challenge is how can the LDF, and other policies from Medway Council, encourage the retro-fit of water efficiency, energy efficiency, SUDS, micro-renewable energy generation etc into existing housing and commercial building stock. The council should set out a strategy for doing this.	Noted. The Core Strategy recognises that retrofitting is expensive and difficult to achieve. However programmes are in place to upgrade the publicly owned stock and housing design policy supports retrofitting in appropriate cases..
	Question 87	Kent Wildlife Trust	Debbie Salmon	The Trust would be delighted to discuss any of the issues contained within this response in more detail and work closely with Medway on the formulation of your mapping and policy.	Noted.
	Question 87	Environment Agency	Jennifer Wilson	Yes. The SFRA will need to be updated to take account of PPS25 (previous SFRA was produced under PPG225).	Noted. The Strategic Flood Risk Assessment is being revised.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 87	Kent County Council	Richard Feasey	Yes As above it should link in to projects such at the BRANCH Project and the Wildlife Trust Living Landscapes. Additional comments - When ear marking areas for protection, buffers or habitat creation cross boundary (both district and county) should be considered. The impacts across a wider area should be considered when looking at the impacts of climate change.	Noted.
	Question 87		Carl Kroon	Use the heat storage in Medway like radiators. Council to maintain open areas. The use of more Uk heat tolerant trees for shade and to be maintained. The sun denying use of solar or PV. Collection of rainwater runoff.	Noted.
	Question 87	Medway Countryside Forum	David Murr	Our Forum has expressed opposition to excessive development on the grounds that it is damaging to both urban and rural environments. There are also strong concerns about the effect on natural resources, including damage to water environments by over abstraction. These effects may be aggravated by climate changes.	Noted.
	Question 87	FWCA Frindsbury and Wainscott Community Association	J R Masey	Drains should be checked more often, to help deal with flooding.	Noted.
	Question 87	Frindsbury and Wainscott Community Association	A Wade	- Loss of garden space for parking space Should be discouraged. - Inadequate drainage especially in new developments - More garage facilities in new designs - not sufficient Green space	Noted.
	Question 87		W Mann	Yes. On shore wind farms - Tidal generation using the Medway's high tidal range (this was proposed as part of a rail crossing of the outer estuary, but could be carried out as an independent project)	Whilst supporting renewable energy the Core Strategy recognises the sensitivity of locating wind farms on the Hoo Peninsula and does not identify areas where these might be located. There are no proposals for tidal power generation.
	Question 87		Dr D Brighton	Yes. Check seawall heights for sea level rise. Is Water storage adequate for warmer dense population?	Thames Estuary 2100 is studying the future of sea defences and flood storage.
<b>Lodge Hill, Chattenden</b>					
				This development should be actively supported to be the showcase for development to 2026.	Noted
			Alastair Blair	Lodge Hill is already a site of housing. Technique for building here will overcome any physical difficulties. This development should be activity supported.	Noted.
	4.443	Environment Agency	Jennifer Wilson	It has been identified that water resource is an 'issue', stating that the Code for Sustainable Homes will be set at level 6. Will this level be made policy and applied to all new developments within the district? Under 'Greening the Gateway' does this development have the same aspirations of being 'water neutral' like the Thames Gateway developments?	The Sustainable Homes Code is a national requirement and does not need to be repeated in the core strategy. The objective of water neutrality id being advanced through the detailed planning of the settlement.
	4.443	University College for the Creative Arts at Rochester	David Hawkins	For para. 4.443 -4.460. This section should state that part of the site is suitable for higher education, in accordance with the relevant planning policy documents.	Noted.
	4.447		Lynn Ballard	There is a case for reviewing the assumption that the scale of development at Lodge Hill/Chattenden should be limited to 5,000 houses in the light of changes to the economic climate and to national and regional housing targets that have occurred since a new settlement of this size was first proposed at Lodge Hill, almost 15 years ago. The recent appointment of Land Securities, who are looking afresh at development delivery in active consultation with the local community, provides an opportunity to re-assess how the most appropriate size of settlement to meet the aims of adequate provision of houses, jobs, social and community facilities and services and other infrastructure can be attained. Given that the planners of new rural settlements, such as Northstowe in Cambridgeshire have found that they need to build in excess of 5,000 houses to support a range of employment and community facilities and services, the release of a limited amount of adjacent greenfield land that relates sensibly to the Lodge Hill development should be considered in the early stages of the masterplanning process. There is insufficient evidence to justify confining the new settlement solely to the defence estate particularly when decisions about new access roads and the economic/employment role that Lodge Hill should play in the local area.	The policy on Lodge Hill / Chattenden includes details of the mix of uses which the development will provide. This is based upon work carried out by Land Securities and included in the Master Plan and reflects a balance of uses which could be supported by a settlement of about 5000 dwellings. Medway Council does not consider that a larger settlement is necessary to support an adequate range of uses and facilities.
	4.447		Jean Jones	There is a case for reviewing the assumption that the scale of development at Lodge Hill/Chattenden should be limited to 5,000 houses in the light of changes to the economic climate and to national and regional housing targets that have occurred since a new settlement of this size was first proposed at Lodge Hill, almost 15 years ago. The recent appointment of Land Securities, who are looking afresh at development delivery in active consultation with the local community, provides an opportunity to re-assess how the most appropriate size of settlement to meet the aims of adequate provision of houses, jobs, social and community facilities and services and other infrastructure can be attained. Given that the planners of new rural settlements, such as Northstowe in Cambridgeshire have found that they need to build in excess of 5,000 houses to support a range of employment and community facilities and services, the release of a limited amount of adjacent greenfield land that relates sensibly to the Lodge Hill development should be considered in the early stages of the masterplanning process. There is insufficient evidence to justify confining the new settlement solely to the defence estate particularly when decisions about new access roads and the economic/employment role that Lodge Hill should play in the local area.	The policy on Lodge Hill / Chattenden includes details of the mix of uses which the development will provide. This is based upon work carried out by Land Securities and included in the Master Plan and reflects a balance of uses which could be supported by a settlement of about 5000 dwellings. Medway Council does not consider that a larger settlement is necessary to support an adequate range of uses and facilities.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
4.448		tbh developments ltd & helvig ltd	tbh developments/helvig	The statement in the second bullet point needs to be justified.	The second bullet point of paragraph 4.448 of the Issues and Options report states that Lodge Hill would complement rather than compete with the well established regeneration strategy for the urban area. The justification for this statement is set out in the third bullet point. This states that it would provide a very different location to the urban waterfront and town centre sites and be more suited to a variety of housing types, including family housing, so providing choice and addressing the housing market as a whole. In other words, there will be a higher concentration of flats and fewer family houses on the higher density sites in the urban area than at Lodge Hill where a more balanced mix of housing types is expected.
4.449			Lynn Ballard & Jean Jones	There appeared to be a consensus amongst the local people who attended one of Land Securities-Movement-workshops held in Lodge Hill that a new access road to the Lodge Hill development should be constructed as close as possible to the Four Elms Hill A228 roundabout and that construction traffic and vehicles accessing the new settlement should not be directed to use to the existing Chattenden Lane. The impact of the new settlement on existing properties should be considered at an early stage of the masterplanning process. Established properties on the east side of Chattenden Lane and on Four Elms Hill do not form part of the development site but will be affected in the construction phase and need to be taken into consideration now to ensure that they do not become isolated from the new settlement by virtue of the new transport and rights of way network.	This issue will be addressed at the detailed planning stage when the alignment of the access roads has been determined.
4.458			Lynn Ballard & Jean Jones	It is not too early in the process to consider options for the role that the new settlement could play in the economic growth of the Medway area. The allocation of employment land for different types of business/retail use should be considered at this early stage to demonstrate how much land would be required, where it should be located and the access arrangements that would need to be put in place. The early economic roles of Lodge Hill will be instrumental in shaping its long-term future. It will influence the skills and aspirations of the people who will live there.	The type and location of employment and retail land is addressed in the Lodge Hill policy and master plan.
4.459			Lynn Ballard & Jean Jones	The ancient woodland that surrounds the development site needs to be protected and actively managed. These sensitive sites need to have green buffers around them and additional green spaces need to be created to provide for general outdoor recreation.	Noted.
Question 88				<p><b>Q88: Is the intended development programme of 4,500 dwellings constructed between 2012 and 2026, for the Lodge Hill development realistic and achievable, bearing in mind its proposed contribution towards meeting the requirements set out in the South East Plan?</b></p> <p>Answers for question 88 (from questionnaire &amp; website):  11 Yes/ Agree  9 No/ Disagree  1 Don't Know</p>	
Question 88		CPRE Kent	Brian Lloyd	No. The delivery of 4,500 homes plus the necessary supporting infrastructure over the period 2012 to 2026 seems very optimistic. This would mean an average of 321 dwellings being completed every year - from day 1. There will be a significant planning lead-in time. The Core Strategy will not be adopted until March/April 2011; the Chattenden Area Action Plan will not be adopted until March/April 2012; the Master Plan can only be adopted after that date, and then planning permission will have to be sought and the necessary S106 agreement made. Once planning permission is granted, there is likely to be significant preparation works, including undoubtedly some upfront infrastructure. Given this, it is extremely unlikely that residential development will commence in 2012 and when it does commence it will not be at a rate of 321 homes a year from year 1. Therefore, we consider that the expected delivery from this site should be reduced for the Core Strategy period. See also our comments on question 96.	The Council is no longer pursuing an area action plan for Chattenden and is replacing it with a strategic allocation. This will facilitate an early submission of a planning application. Land Securities are aiming to engage with several housing development companies to carry out simultaneous development on site.
Question 88			Lynn Ballard	The development programme should start as soon as possible in order to meet South East Plan housing targets and to reduce the uncertainty for home owners whose properties are being blighted by the prospect of a new settlement adjacent to them. A first priority should be the construction of a new access road close to the Four Elms Hill roundabout to protect Chattenden Lane from increased traffic. This would open up the area neighbouring the school and church to accommodate the first phase of the development and would allow consideration of adjacent windfall sites.	Noted.



Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 88	Barratt Strategic		<p>The Core Strategy suggests that development will not start at Chattenden until 2012 at the earliest. Notwithstanding the Core Strategy maintains that 4500 units will be delivered by 2026 i.e. within 14 years. This would equate to a build rate of 321 units a year.</p> <p>Independent research by the University of Glasgow on Factors Affecting Housing Build-out Rates for CLG Housing Markets and Planning Analysis Expert Panel (Feb 08) advises at para 2.5 that:-</p> <p>"Most builders generally appear to set a target of between 40 and 80 units built and sold from each outlet annually. One volume builder thought that annual rates of 150-200 would not impose significant inefficiencies. However, he added that it would be impossible to sell houses at this rate without building in a well-defined urban market and offering a range of well-differentiated products"</p> <p>Even with 3 developers operating at maximum the site is only likely to deliver 240 units a year (80x3). This build rate will only be achieved once certain clearance works have taken place, any necessary infrastructure is in place and any ecological mitigation completed, which is not in our opinion likely to occur as soon as the site is free for development. The preliminary works could delay commencement of build works for over a year.</p> <p>In our opinion, and having regard to the above we would suggest that the site is more likely to deliver a maximum of 3000 units by 2026, the residual 2000 being delivered by 2036.</p> <p>It is totally unrealistic to expect the Chattenden site to deliver 4500 units by 2026</p> <p>It is on this basis and given the deliverability of the regeneration sites that we have, in answer to question 96 suggested an alternative strategic option – 3000 units at Chattenden by 2026 (with the residual 2000 being delivered by 2036), and 1500 units being delivered on a reduced extended Hoo site (encompassing Hoo, St Werburgh, and the nearby villages of High Halstow and Cliffe Woods).</p>	Sufficient sites have been identified in the strategic Land Availability Assessment to make up for any shortfall in delivery rates at Lodge Hill.
	Question 88	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Yes it is achievable but several issues remain - impact on local village facilities and more important road access to and from the location.	Noted.
	Question 88	Trenport Investments Limited	C Hall	4,500 dwellings in a 14 year period would mean an average of 321 dwellings per year, although the number would be likely to be significantly less at the start, during the development start up period. This number may be achievable during a boom period but would be unlikely to be achieved during times of economic downturn, as at present. There is inevitably likely to be another downturn in the 14 year period bearing in mind the cyclical nature of the property market. Overall we consider that the development programme is too optimistic and this number of dwellings is unlikely to be achieved. The policy of promoting only Lodge Hill is effectively putting all the eggs in one basket, which is a risky strategy. It would also effectively put all of the housing in the control of one landowner / developer which is also risky. The required number of dwellings would be more likely to be achieved if there was a range of sites available, spreading the risk and giving greater choice. One such development which would compliment the proposals for Lodge Hill would be Trenports proposals for Cliffe.	A wide range of sites and a substantial surplus of housing land has been identified in the Strategic Land Availability Assessment to make up for any shortfall in delivery at Lodge Hill.
	Question 88	Kent Wildlife Trust	Debbie Salmon	The Trust is concerned that, within the issues to be addressed within paragraph 4.449, the protection, enhancement and extension of Chattenden Woods SSSI have not been identified. For the Trust to be satisfied that 5000 houses can be provided on this site, there will need to be significant mitigation to ensure that the SSSI is protected from harm. As a nationally designated site Chattenden Woods SSSI is a major core site within the Green Infrastructure and will need to be connected into the larger network, buffered with extensive woodland corridors extending through the development. The protection of the SSSI is seen as a very important issue and we are disappointed that this is not given more significance within the document. One of the major threats to ancient woodland is trampling. Constant access destroys the important ground flora present on such sites, and can be a significant cause of disturbance to nesting birds.. For these reasons the Trust would expect to see effective management of access to the woodland, with alternative woodland walks being provided and possibly a wardening service to deter residents from using the SSSI.	The issue of the protection of the SSSI is being addressed with Land Securities as the planning of the site progresses. Policies in the Core Strategy allow for mitigation or compensation if adverse impact occurs.
	Question 88	Dickens Country Protection Society	Chris Fribbins	Yes, although big problem of access has not yet been resolved	Noted.
	Question 88	Natural England	Josh Nelson	Development at lodge Hill, as presently envisaged, would involve the provision of 4,500 new dwellings in close proximity to the nearby internationally protected Thames and Medway Estuary and Marshes SPA and Ramsar Sites and the SSSI at Chattenden Woods. This number of dwellings could have the potential for significant recreational and other human pressures on the vulnerable nature conservation interests. Achievable delivery of this number of houses would need to show that there would not be an adverse effect on the conservation integrity of the nearby internationally protected sites and that the interest features of the Chattenden Woods would not be damaged. As the Issues and Options report indicates at paragraph 4.21, the projected total of houses for the South East Plan period is in excess of 3,000 over the plan periods required provision. We would request the Council give careful consideration to whether the proposed Lodge Hill redevelopment area can sustain the number of projected dwellings considering the nearby vulnerable nationally and internationally protected nature conservation sites. We would also request that the Council gives careful consideration as to whether the landscape could absorb a development of a size and scale that 4,500 dwellings would entail without a significant detrimental effect on the local landscape character and resource.	The impact on protected sites and landscape is being addressed with Land Securities as the planning of the site progresses. Policies in the Core Strategy allow for mitigation or compensation if adverse impact occurs.
	Question 88		Jean Jones	The development programme should start as soon as possible in order to meet South East Plan housing targets and to reduce the uncertainty for home owners whose properties are being blighted by the prospect of a new settlement adjacent to them. A first priority should be the construction of a new access road close to the Four Elms Hill roundabout to protect Chattenden Lane from increased traffic. This would open up the area neighbouring the school and church to accommodate the first phase of the development and would allow consideration of adjacent windfall sites.	Noted.

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	Question 88	FWCA Frindsbury and Wainscott Community Association	J R Masey	Would prefer less homes and more employment.	The Lodge Hill policy in the Core Strategy seeks a balance between housing and employment provision.
	Question 88	Frindsbury and Wainscott Community Association	A Wade	No. The projected figure of 4500 dwellings is not sustainable. It will not protect the sensitive ecological balance i.e. SSSIs and habitat. The numbers should be halved and even then it would present many problems. To achieve this figure by 2026, 320 dwellings would need to be constructed annually. Given the sensitivity of the site - access problems, the impact on the surrounding area and open space issues we do not believe this to be acceptable or even possible unless planning restraints and consultant advice is ignored. We are not in favour of massive development in Medway.	Noted.
	Question 88	RSPB	Fay Martin	No. The Medway Broad Spatial Options Map set out in Chapter 5 of the Core Strategy – Issues and Options Report illustrates the broad location of Lodge hill, Chattenden. At present however the precise boundaries of the site are not known however the broad location of Lodge Hill, Chattenden indicates that site is potentially within 3km of the Medway Estuary & Marshes SPA. The introduction of up to 5000 addition homes in this location could significantly increase recreational pressure on the European Sites. We recommend that Medway liaise with Natural England in respect of the specialist work that is being undertaken to investigate the existing and predicted recreational pressures on the internationally designated sites. We also strongly recommend this matter be thoroughly appraised in the AA of the Core Strategy and we would welcome the opportunity to comment further on this matter prior to the publication of that document. Paragraph 4.446 of the Core Strategy – Issues and Options Report states that the Lodge Hill site includes Chattenden Woods SSSSI. Paragraph 8 of PPS9 prescribes that “where a proposed development on land within or outside a SSSI is likely to have an adverse effect on an SSSI (either individually or in combination with other developments), planning permission should not normally be granted”. Paragraph 8 continues “Local authorities should use conditions and/or planning obligations to mitigate the harmful aspects of the development and where possible, to ensure the conservation and enhancement of the site’s biodiversity or geological interest”. The requirements of PPS9 should be taken into account when formulating the Lodge Hill proposals. We would welcome the opportunity to comment further when more details are available of the location and extent of the proposed development.	The precise boundaries of the Lodge Hill site are now known.  Medway Council is currently discussing the scope and extent of the appropriate assessment with Natural England, the Environment Agency and adjoining authorities prior to preparing a screening document and appointing a consultant to carry out the assessment.  The requirements of PPS9 are being taken into account as the planning of the site progresses.
	Question 88	Open Spaces Society	Patricia Wilson	If built development is to be concentrated on the previously developed areas of the site we think that 4500 dwellings is an unrealistically high number to be realised. (See Housing, Q16. We would hope that all the standards outlined that question would be adopted at Lodge Hill. We fear that it will militate against provision of adequate buffer zones especially far the Chattenden Woods SSSI.	Noted.
	Question 89			<b>Q89: What tests do you consider should be used to assess proposed transport and access solutions for the development?</b>  Answers for question 89 (from questionnaire & website): 0 Yes/ Agree 0 No/ Disagree 9 Don't Know	
	Question 89	CPRE Kent	Brian Lloyd	It is unclear what is meant by 'tests', but the objective should be to deliver a development that fully embraces sustainable means of transport as a priority and that reliance on the private motor car is minimised.	Noted.
	Question 89		Lynn Ballard	The transport model should be tested on the following factors: 1. Impact of proposed transport and access solutions on existing traffic and residents – can these improve traffic flow, ease congestion, improve safety, persuade people to walk, cycle or use public transport? 2. Deliverability – are potential access routes on land that it is in the ownership/control of Defence Estates or other public bodies. If not, are private owners on potential access routes willing to sell their land/properties? 3. Value for money – e.g., will developers be persuaded to contribute to the cost of the transport and access solutions? 4. Realistic – e.g., will people co-operate to reduce car dependence and will alternatives be managed effectively to ensure that they are used consistently in preference to car travel? 5. Carbon reduction – feasibility of a new rail link to Gravesend using the existing railway line to the Isle of Grain.	Noted. At a strategic level, the impact of development at Lodge Hill upon the wider highway system is being assessed using Medway’s SATURN computer model in conjunction with other development proposed in the Core Strategy.
	Question 89		Mari-Anne Harstad	The wording 'test' is unclear to me. The current usage and availability of transport in and around Chattenden and the Hoo Peninsula need to be much improved so more innovative solutions need to be available. If 'tests' refer to a technical term of assessing suitability then I think we should look for good practice examples in Europe where they are far more advanced in this area.	Noted.
	Question 89		Jean Jones	The transport model should be tested on the following factors: 1. Impact of proposed transport and access solutions on existing traffic and residents – can these improve traffic flow, ease congestion, improve safety, persuade people to walk, cycle or use public transport? 2. Deliverability – are potential access routes on land that it is in the ownership/control of Defence Estates or other public bodies. If not, are private owners on potential access routes willing to sell their land/properties? 3. Value for money – e.g., will developers be persuaded to contribute to the cost of the transport and access solutions? 4. Realistic – e.g., will people co-operate to reduce car dependence and will alternatives be managed effectively to ensure that they are used consistently in preference to car travel? 5. Carbon reduction – feasibility of a new rail link to Gravesend using the existing railway line to the Isle of Grain.	Noted. At a strategic level, the impact of development at Lodge Hill upon the wider highway system is being assessed using Medway’s SATURN computer model in conjunction with other development proposed in the Core Strategy.

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	Question 89	Kent County Council	Richard Feasey	The development needs to have a public transport system in place very early on to ensure that significant traffic movement between the development and Gravesham are not created. In general the Medway Towns, do not have a significant amount of parking associated with their railway stations and this is compounded by Lodge Hill by the existing poor public transport links. Therefore there is the risk of significant migration to Gravesham to access the rail system, if new public transport linking the site to more proximate railway stations is not incorporated.	Noted.
	Question 89		I.H. Smith	up-to-date road survey	This will form part of the comprehensive Transport Assessment for the development.
	Question 89	FWCA Frindsbury and Wainscott Community Association	J R Masey	Traffic Impact Study carried out. Access from Four Elms roundabout across Woodfield Road to Low Chat Road for developers, and used for main access afterwards, along with Chattenden Lane and Dux Court Rd which hopefully will stay as a lane, any farmland lost should be compensated to farmer. Maybe a station so the Grain line could be utilised for passenger also.	Noted.
	Question 90			<b>Q90: What headline sustainability principles should be applied in planning the settlement?</b>  Answers for question 90 (from questionnaire & website): 3 Yes/ Agree 0 No/ Disagree 6 Don't Know	
	Question 90	CPRE Kent	Brian Lloyd	It would be appropriate for the development to accord with the sustainability principles being developed for eco-towns, as presented in the eco-town supplement to PPS1.	Noted.
	Question 90	Groundwork Kent & Medway	Simon Green	Low energy requirement due to maximum insulation, use of heat exchangers etc. District heating from nearby power stations essential. Integrated on site generation by affordable and visually attractive renewable energy. Designed to maximise public transport routes around the development and to nearby urban areas (maybe a terminus of proposed Fastrack). Integrated cycle/pedestrian routes. High quality design inside and out. Consider inclusion of cohousing schemes which enable shared use of some facilities. Investigate potential passenger services on adjacent freight railway. Look at examples of best practice throughout Europe and emulate.	Noted.
	Question 90	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Waste minimisation, recycling, local energy generation, sustainable community - schools, shops, doctors etc.	Noted.
	Question 90		Mari-Anne Harstad	Direction should be taken from the EU Sustainable Development Strategy, Leipzig Charter and Bristol Accord. Create local jobs for local people, find innovative transport/accessibility/mobility solutions and implement them in such a way that everybody can benefit.	Noted.
	Question 90	Kent Wildlife Trust	Debbie Salmon	<ul style="list-style-type: none"> <li>• Protection and buffering of Chattenden Woods SSSI.</li> <li>• A fully connected, multifunctional Green Infrastructure throughout all open spaces, housing and employment areas.</li> <li>• Reduction of emissions from cars and households to the lowest possible levels.</li> <li>• A public transport system and a fully connected pedestrian and cycle network to reduce emission to the minimum.</li> <li>• A full appraisal of impacts on European sites both individually and in combination within the Core Strategy AA.</li> </ul>	Noted.
	Question 90	Dickens Country Protection Society	Chris Fribbins	Maximise energy efficiency. Be self sustaining wherever possible (limit need to travel), Quality public transport links (including rail or other rail station links).	Noted.
	Question 90	Natural England	Josh Nelson	The Council should use any Lodge Hill development as an exemplar for sustainable development considering its location in the Thames Gateway Eco region. In light of Natural England's concerns over the ability for species, habitats and landscapes to adapt to the effects of climate change, we would urge the Council to consider requiring energy saving and reduction technologies and measures incorporated to a standard over and above the usual required planning and building regulation control standards. We would also suggest that the Council requires a significant proportion of on-site renewable energy generation for the same reasons. In order to promote a sustainable balanced mixed community, Natural England would like to see sufficient retail and employment services provided on site to reduce use of the private car and thereby contribute to carbon reduction. With a development of anything like the scale proposed, Natural England would wish to see extensive on-site provision of high quality, multi-functional green infrastructure as a guiding sustainable development principle. We would refer the Council to the South East Green Infrastructure Framework for guiding principles. Considering the nearby designated nature conservation sites and their vulnerability to recreational and other human disturbance, the nature and extent of on-site green infrastructure planning and provision would be a vital tool in reducing the potential for significant effects to be caused to protected nature conservation interests.	Noted.
	Question 90	Kent County Council	Richard Feasey	Code for Sustainable Homes -water and energy efficient measures should be incorporated. Good access to public transport and walking and cycling routes.	Noted.
	Question 90		Vivienne Parker	Insulation standards on ALL buildings to at least grade, provision of at least 2 wind turbines nearby, local shopping parade with a school/church/community hall/doctors surgery. Rerouting of the bus service to take in the new development. Creation of nearby allotments.	Noted.
	Question 90		I.H. Smith	None as the development should not take place. The council is grab, with no concern for existing residents and their needs,.	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 90	FWCA Frindsbury and Wainscott Community Association	J R Masey	Protection of woodlands essential, with such a large development planned no way should development merge with High Halstow and Cliffe Woods.	Noted.
	Question 91			<b>Q91: Do you have any preferences as to the economic role that the new settlement could fulfil?</b> Answers for question 91 (from questionnaire & website): 0 Yes/ Agree 5 No/ Disagree 4 Don't Know	
	Question 91	CPRE Kent	Brian Lloyd	See response to question 33.	
	Question 91		Lynn Ballard	In the Economy section, it is noted that Medway is currently underrepresented in relation to managerial and professional jobs, that there is a predominance of micro businesses with potential to grow, that there is scope to encourage graduates to start businesses in the area and that there is a shortage of grow-on space for businesses as they expand. There is an opportunity for the new settlement at Lodge Hill to be an aspirational place, particularly in terms of employment. It could respond to the deficiencies mentioned above whilst not competing with other business parks in the Medway area. In para. 4.64, mention is made of the attractiveness of the Isle of Grain for environmental and construction products businesses but that its remote location has been a barrier to investors. There is an opportunity to capitalise on the proximity of the new settlement at Lodge Hill to develop businesses that are aligned to, and support these sectors. This would give new residents of Lodge Hill a choice to work locally in higher skilled and potentially higher paid jobs that could compare favourably to commuting to London.	Noted. The policy on Lodge Hill seeks to create a new focus for higher value economic activity.
	Question 91	Barratt Strategic		As per our response to question 33, whilst there are some merits in identifying part of the new settlement at Chattenden as a strategic employment location (ala Kings Hill) we do have some reservations about the effects this would have on the economic regeneration of the main urban areas, especially when access to these areas is seen as one of the impediments to regeneration. Providing a highly accessible strategic employment centre outside the main urban areas is bound to act as a counter draw and thus have the ability to prejudice the council's long term economic regeneration aspirations. Furthermore such a strategy is in our view less sustainable than concentrating the main employment locations within the urban area and leaving the employment provision proposed at Chattenden as that which would serve a local need	Noted.
	Question 91	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	Potential to provide many larger more efficient retail and other facilities, but impact on other villages need to be assessed.	Noted.
	Question 91	tbh developments ltd & helvig ltd	tbh developments/helvig	It is unacceptable that any evaluation of the Lodge Hill, Chattenden new settlement should identify a potential employment area of 25 hectares before the economic role of the new settlement has been determined. An employment zone of 25 hectares would be of strategic significance within the Kent Thames Gateway not only in Medway. Such an area would certainly not function just as local employment area for the new settlement. The employment function of the new settlement and the timing of the development of employment land at the new settlement need to be considered and agreed in the context of the overall housing, economic development and employment strategy for Medway up to 2026, taking into account the current availability of employment land and employment land commitments such as land adjacent to Rochester Airfield. The evidence base is not yet available to allow these employment land issues to be considered.	Noted
	Question 91		Mari-Anne Harstad	Eco tourism, new 'green' technologies, specialist education (wildlife/nature, biodiversity research & management, science, land management), life skills training (parenting, family constellation work), new comprehensive and greener recycling & waste management research.	Noted.
	Question 91	Kent Wildlife Trust	Debbie Salmon	The Trust has no preference as to the economic roles providing there are no impacts on European sites, the SSSI and biodiversity in general.	Noted.
	Question 91		Jean Jones	In the Economy section, it is noted that Medway is currently underrepresented in relation to managerial and professional jobs, that there is a predominance of micro businesses with potential to grow, that there is scope to encourage graduates to start businesses in the area and that there is a shortage of grow-on space for businesses as they expand. There is an opportunity for the new settlement at Lodge Hill to be an aspirational place, particularly in terms of employment. It could respond to the deficiencies mentioned above whilst not competing with other business parks in the Medway area. In para. 4.64, mention is made of the attractiveness of the Isle of Grain for environmental and construction products businesses but that its remote location has been a barrier to investors. There is an opportunity to capitalise on the proximity of the new settlement at Lodge Hill to develop businesses that are aligned to, and support these sectors. This would give new residents of Lodge Hill a choice to work locally in higher skilled and potentially higher paid jobs that could compare favourably to commuting to London.	Noted. The policy for Lodge Hill seeks to create a new focus for higher value economic activity.
	Question 91	University College for the Creative Arts at Rochester	David Hawkins	This section should state that part of the site is suitable for higher education, in accordance with the relevant planning policy documents	Noted.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 91	FWCA Frindsbury and Wainscott Community Association	J R Masey	Employment, such as to allow less commuting to be necessary.	Noted.
	Question 92			<b>Q92: Do you agree that the new settlement should contribute towards a wider green vision or strategy for the Hoo Peninsula and the Isle of Grain?</b>  Answers for question 92 (from questionnaire & website): 18 Yes/ Agree 2 No/ Disagree 0 Don't Know	
	Question 92	CPRE Kent	Brian Lloyd	Yes, the development would provide the opportunity to do this and we would welcome further details on this.	The wider green strategy is addressed in the open space, green grid and public realm policy in the Core Strategy.
	Question 92	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	On balance, yes, as new significant development - but issues remain	Noted.
	Question 92	Trenport Investments Limited	C Hall	Yes. Bearing in mind the scale of development proposed the proposals should contribute towards a greener vision for the Hoo Peninsula and the Isle of Grain.	Noted.
	Question 92	Dickens Country Protection Society	Chris Fribbins	By definition this will reduce the amount of green space, so compensatory management of the local environment will be needed.	Noted.
	Question 93			<b>Q93: Have you any suggestions/proposals that should feature in the delivery strategy for the new settlement and that can help achieve the timely provision of necessary infrastructure and services?</b>  Answers for question 93 (from questionnaire & website): 2 Yes/ Agree 3 No/ Disagree 2 Don't Know	
	Question 93	CPRE Kent	Brian Lloyd	The details of the proposed development are not yet known, so it is difficult to comment on the delivery strategy. However, the priority should be to ensure that essential infrastructure is provided up front as far as possible particularly those necessary to provide access.	Noted.
	Question 93	ScottishPower	Chris Girdham	Potential synergies with energy generation should be identified within any new settlement delivery strategy. Energy consumption requirements should be shared with energy providers and Combined Heat and Power (CHP) needs and capacity should be determined where possible.	Noted.
	Question 93		Mari-Anne Harstad	Begin to use the site immediately, allow the local and existing communities in the area access to the fishing lakes, historical buildings and green space. This site has long been out of bounds for many Medway residents, it should be opened up for all to visit so people can begin to understand the site and its meaning before it is 'transformed' into something else. There is already a strong community in the Chattenden area and some groups could make use of the site through new or old buildings at a much earlier stage than is presently thought, for example churches for religious groups.	Noted.
	Question 93	Kent Wildlife Trust	Debbie Salmon	The Green Infrastructure the buffering and management of Chattenden Woods SSSI and habitat creation in open spaces should be created as soon as possible to enable habitats to become mature and to provide good habitat for species that may need to be translocated. Finances for management and monitoring of the SSSI and the Green Infrastructure will should be sought from developers.	Noted.
	Question 93	FWCA Frindsbury and Wainscott Community Association	J R Masey	Suggest employment site developed first.	Noted.
	Question 93		W Mann	Implement as proposed but consider Lodge Hill, Kingsnorth and Grain as part of the same project. Together they present a significant population and commercial need, and a significant opportunity toward implementing Q92 successfully. On the back of all 3 sites it should be possible to justify and fund significant improvements to road and rail links, and also implement a wider green vision.	Both Kingsnorth and the Isle of Grain already have planning permission for substantial development and are therefore a number of years ahead of Lodge Hill in their development timetable.
				<b>5. Spatial Choices or Options</b>	

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
		University College for the Creative Arts at Rochester	David Hawkins	a. This is the only part of the document that sets out both the issue, and options designed to deal with that issue. b. Issues are presented in the other sections of the document - for example, on housing, on transport, on the economy, on education and skills etc -but different options designed to deal with those options are not explicitly set out. c. This is disappointing, as central government guidance indicates that options should be clearly presented.	Noted.
		Kent County Council	Richard Feasey	The preference within the strategic spatial options for a new settlement at Lodge Hill Chattenden is noted and supported as consistent with preceding strategic policy for Medway. If the alternative spatial options were to be pursued there would be cross boundary implications to consider e.g. in relation to service provision that would require inter authority working e.g. between Kent and Medway Education Authorities. Comments below relate specifically to those options of urban expansion sites that are situated close to the County border, i.e. - Option 3 Capstone Urban Extension - Option 4 East of Rainham Extension - Option 5 North of Rainham Extension (to a lesser extent) Substantial new housing developments in these locations will require additional new schools to serve the increased population. The generation of new pupils and the provision of pupil places at new schools will, in turn, have a knock on effect on local existing schools. Education arrangements and provisions to meet forecast demand will have to be managed carefully by both authorities working together and accommodated by provisions within the Medway LDF documents to ensure that the provision of new pupil places is not to the detriment of the existing schools. Substantiating documents from KCC include all of the usual relevant planning policy documents plus KCC's Service Provider Statement.	Given that the Core Strategy is pursuing the Lodge Hill option, the cross border issues in relation to development at Capstone Valley and Rainham will not arise.
5.18			Wendy Lane	Gravesham BC understand the clear rationale for the development of Lodge Hill as a primarily PDL site identified within RPG9a. However it is difficult to comment on the optimum / maximum size for the new settlement without more information about the potential infrastructure requirements. Transport impacts on the M2 / A289 junction which is within Gravesham not Medway incl. potential commuters to Ebbsfleet is a key issue for us. Also would need to know likely impacts on the A226 as well as impact from new rail users at Higham. Impacts during the construction phase is also fundamental and we look forward to closer working on this in the future.	Noted.
<b>The Options</b>					
5.21			Lynn Ballard & Jean Jones	The option to develop a freestanding settlement focussed on the defence estate and where appropriate, on adjacent land in the existing village situated on Four Elms Hill and Chattenden Lane is supported.	The Lodge Hill option does not include development on adjacent land on Four Elms Hill.
5.25				The Council received 43 letters & 350 signatures from local residents to oppose option 3-Capstone urban extension.	Noted.
5.26		Maidstone Borough Council	Darren Bridgett	Maidstone Borough Council does not support this option and does not support any development proposed in relation to this option that is within the Maidstone administrative area. Policy AOSR7 of the South East Plan 2009 directs the Maidstone local development framework to "avoid coalescence between Maidstone and the Medway towns conurbation", which development here would undoubtedly do. In addition, the supporting text to this policy requires an indicative 90% of new housing in Maidstone (11080 dwellings 2006-2026) to be developed in or adjacent to the town. The section of the Capstone Valley that is within the Maidstone administrative boundary is not an appropriate location for rural housing, and would not provide a sustainable type of settlement, or support the needs of the Borough's rural population. The 10% of new housing in Maidstone Borough that is directed towards the rural area will go towards established settlements that already serve a functioning role in this area.	Noted.
5.29		Upchurch Parish Council	John Catford	Strongly oppose this option which erodes the Medway Swale gap.	Noted.
<b>Evaluation of the Options</b>					
Table 11			Alastair Blair	Do not build on this land. It is an area of natural beauty	
Option number 5			Steve Banfield	Although I like the sentiment about Option 5 assessment 5, it is not quite right due to the size of Hempstead Valley. It does have a severe problem with roads cutting into the present lanes, though (to allow access to the shopping complex.)	
Question 94				<b>Q94: Have the right options been considered? Are there any other options you think should be considered?</b>  Answers for question 94 (from questionnaire & website): 5 Yes/ Agree 2 No/ Disagree 3 Don't Know	
Question 94	CPRE Kent		Brian Lloyd	We are not aware of any other options.	Noted.
Question 94	Viridor Waste Ltd		Mandeep Jutley	The options section only relate to the new settlement. It would be helpful to have sight for the various options for the other topics being addressed in the Core Strategy.	The Core Strategy addresses the issue of Options and Alternatives.
Question 94	Barratt Strategic			As indicated in our response to question 96, we feel there is an alternative option that should be tested. This would comprise a reduced scale of development at Chattenden, as we only believe it can deliver 3000 units maximum during the current plan period. The residual 2000 should be carried over to the next plan period. In addition to the above a reduced scale of development equivalent to a mini extended Hoo should be assessed. This could provide for 1500 units in and around Hoo, St Werburgh, High Halstow and Cliffe Woods.	Medway Council considers that 4,600 dwellings can be delivered at Lodge Hill by 2026 and if this target is not achieved, there are sufficient residential sites identified to meet overall requirements without the need for the release of land at Hoo St.Werburgh, High Halstow and Cliffe Woods.

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 94	Trenport Investments Limited	C Hall	No. The right options have not all been considered. A further option which should be considered is the option of expansion of the village of Cliffe, as proposed by Trenport. This could be either on its own or as part of a strategy to locate additional housing at key rural service centres, such as Cliffe, to maintain the level of shops and other rural services in the villages and maintain their relative levels of sustainability (see comments on Question 52). This could possibly form part of a variation to Option 2 Expanded Hoo (village 'cluster') to include Cliffe. For the reasons set out in the response to Question 52 the option of effectively stopping any further development at village such as Cliffe would mean that the level of rural services will decline making them less sustainable.	The release of greenfield land at Cliffe for development is not required to meet Medway's housing requirements.
	Question 94	Kent Wildlife Trust	Debbie Salmon	In order to express an opinion we would need to see more detailed environmental impact assessment. We would expect the choice of spatial options to reflect the principles of sustainable development, and particularly the protection and enhancement of biodiversity.	Noted.
	Question 94	Dickens Country Protection Society	Chris Fribbins	Reluctantly support the option of Lodge Hill as opposed to extension of other villages and coalescence of Hoo and Chattenden	Noted.
	Question 94	BAE Systems	BAE Systems	<p>Representations made by CB Richard Ellis on behalf of BAE Systems.</p> <p>Answer of Q94-96:</p> <p>Whilst we do not dispute the merits of Lodge Hill being brought forward as a strategic housing allocation we do believe that a flexible and distributed supply of housing should be provided. A scheme as ambitious to deliver as Lodge Hill will be subject to many variables and will probably be delivered at the tail-end of the plan period. Other sites should be allocated in order to spread the housing requirement and meet the 5 year supply.</p> <p>Paragraph 4.46 of PPS 12 states that a, 'strategy is unlikely to be effective if it cannot deal with changing circumstances. Core strategies should look over a long time frame – 15 years usually but more if necessary. In the arena of the built and natural environment many issues may change over this time. Plans should be able to show how they will handle contingencies: it may not always be possible to have maximum certainty about the deliverability of the strategy. In these cases the core strategy should show what alternative strategies have been prepared to handle this uncertainty and what would trigger their use. Authorities should not necessarily rely on a review of the plan as a means of handling uncertainty.'</p> <p>Paragraph 52 of PPS3 states that, 'The Government's objective is to ensure that the planning system delivers a flexible, responsive supply of land. Reflecting the principles of 'Plan, Monitor, Manage', Local Planning Authorities and Regional Planning Bodies should develop policies and implementation strategies to ensure that sufficient, suitable land is available to achieve their housing and previously-developed land delivery objectives.'</p> <p>Local Planning Authorities should identify sufficient specific deliverable sites to deliver housing in the first five years. To be considered deliverable, sites should, at the point of adoption of the relevant Local Development Document:</p> <ul style="list-style-type: none"> <li>– Be Available – the site is available now;</li> <li>– Be Suitable – the site offers a suitable location for development now and would contribute to the creation of sustainable, mixed communities; and</li> <li>– Be Achievable – there is a reasonable prospect that housing will be delivered on the site within five years.</li> </ul> <p>Short term housing sites should also be identified in addition to Lodge Hill.</p> <p>Conclusions</p> <p>Hoo St Werburgh falls within the Kent Thames Gateway Sub-region, as defined on the Key Diagram that accompanies The South East Plan: The Regional Spatial Strategy for the South East of England (RSS, May 2009). As such it is located within a Growth Area which, under Policy H2, is identified for accelerated housing delivery. The policy further provides scope to identify additional sources of supply by encouraging opportunities on suitable previously developed sites. This includes appropriate opportunities for change of use of non-residential sites to secure either mixed use residential development or residential development. It also highlights the need to address any backlog of unmet housing needs within the housing market areas they relate to, in the first 10 years of the Plan. RSS Policy KTG1 seeks to greatly increase the supply of new housing, and affordable housing in particular, in Kent Thames Gateway.</p> <p>The Council's Annual Monitoring Report (AMR, 2008) states that housing completions fell below the Structure Plan target of 780 pa. Even more significantly, the AMR housing trajectory is based on the Kent and Medway Structure Plan target of 11,500 units to 2016. This policy expired on 6th July 2009 and has been superseded by RSS Policy H1. This specifies a housing target of 16,300 additional units across Medway to 2026, or 815 units pa. This would suggest that the Council is going to struggle to meet its housing target going forward.</p> <p>While we are aware that the Council expects to make up the current shortfall in its housing trajectory, most notably for years 5-15, with LDF allocations, the shortfall is substantial with only 8,374 units presently identified. Given that the BAE Systems Sports and Social Club site is available and deliverable within the Plan period and is not reliant upon infrastructure delivery, in this respect it offers a logical opportunity to boost the Council's housing delivery.</p> <p>The BAE Systems Sports and Social Club site is clearly an exceptional case. While it is allocated as open space, it is privately owned and the Club's closure is both imminent and inevitable. Efforts to secure planning permission to retain the facilities have not been supported by the Council. Rather than abandon the site and leave it unused, it is logical to reallocate the site for alternative use, namely residential.</p> <p>The site is partially brownfield and it is clear from the AMR (2008) that the Council is flexible in its approach to development on previously developed land. Moreover, Medway has a significant housing shortfall to make up, and the BAES site is suitable, achievable, and deliverable for residential development.</p>	<p>The Strategic Land Availability Assessment (SLAA) demonstrates that a wide variety of housing sites, distributed around the urban areas and Chattenden, have been identified to meet Medway's housing requirements.</p> <p>The BAE Systems Sports and Social site has been rejected in the SLAA.</p>

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 94		Peel Investments (Intermediate) Ltd	<p>Peel Investments (Intermediate) Limited do not consider that the right options have been considered. The Wooley's Orchard site falls within the Rainham North Urban Extension Area option.</p> <p>Whilst significant growth in this area may not be preferable to the Chattenden Barracks development, this should not preclude the ability of small urban extensions to come forward where these are well related to existing residential areas, infrastructure and services. The Wooley's Orchard site meets these criteria and it should be considered as a potential location for small scale urban expansion.</p> <p>The Core Strategy Issues and Options report only considers large scale alternatives to the Lodge Hill Chattenden Barracks proposal, which the Council already identify is their preferred option, and not how development could be disaggregated across a number of smaller sites to minimise the impact and maximise sustainability. In the context of the analysis contained within the Core Strategy Issues and Options report, the Rainham North Urban Extension Area may be portrayed as a poor substitute for Lodge Hill. However, at a site specific level certain sites may be suitable for development and should not be ruled out on the basis of the broad and overall analysis contained within the report, but on site specific factors identified through the SLAA.</p> <p>For example whilst the Rainham North Urban Extension Area is appraised as high negative impact on 'integration with urban with existing urban form' and on 'impact on natural assets', the Wooley's Orchard site as a standalone opportunity would score much better than the area as a whole, because it is bounded by existing residential areas and well integrated with the Rainham Urban Area. The site is also not in agricultural use nor has much potential for agriculture use and as such would have less impact on natural assets. The Core Strategy Issues and Options fails to recognize the role that these sites could play and the role the SLAA has in identifying and assessing these individual sites.</p>	The Woolley's Orchard site has been assessed and rejected in the Strategic Land Availability Assessment. The SLAA shows that a substantial number of small sites have been identified throughout the urban area.
	Question 94	RSPB	Fay Martin	No. Although the RSPB does not have a specific geographic preference for the location of residential development, we would support a constraints based approach to identifying the most appropriate locations for development. PPS3 highlights the importance of constraints "such as physical access restrictions, contamination, stability, flood risk, the need to protect natural resources e.g. water and biodiversity and complex land ownership issues". The RSPB therefore recommends that the precise location of future development in the Medway area be considered in light of its relationship to nature conservation designations and flood risk.	Noted
	Question 95			<p><b>Q95: Do you agree with the appraisal of the options? If not please give your reasons</b></p> <p>Answers for question 95 (from questionnaire &amp; website):  10 Yes/ Agree  5 No/ Disagree  2 Don't Know</p>	
	Question 95	CPRE Kent	Brian Lloyd	The assessments seem generally reasonable and highlight serious concerns with options 2 to 5. Consequently we strongly support the Council in rejecting them. Option 1 (Lodge Hill) receives a generally favourable assessment, though we consider that its full impact will not be known until further detailed assessments have been undertaken.	Noted.
	Question 95	Groundwork Kent & Medway	Simon Green	Yes. We would particularly concur with the Council's opposition to Capstone Valley and Rainham North. Both these areas are of very high landscape and nature conservation value and are greenfield sites. They provide essential links to the open countryside to the south and the estuary to the north and development would block wildlife corridors isolating locations such as Darland Banks, Capstone Country Park etc. These areas are also important green lungs and amenity leisure and recreation areas for the dense housing areas that are adjacent to them. The transport access problems cannot be overcome.	Noted.
	Question 95	Barratt Strategic		<p>Barratt Strategic do not agree with the councils appraisal of an extended Hoo. 1 Conformity with the South East Plan:- The contention that an extended Hoo would fail to respect or enhance the character and distinctiveness of existing settlements is in Barratt Strategic's opinion wholly subjective. Developers are capable of designing urban extensions that have regard to/complement existing settlements. Further more the landscape strategy adopted within urban extensions can also draw from and complement the surrounding landscape. Thus there is no reason why an extended Hoo would conflict with the aims and objectives of policy CC6 of the South East Plan. Similarly we do not see why it would be difficult to assimilate an extended Hoo, especially a reduced extended Hoo as set out in our response to question 96, with existing communities. If taken forward in conjunction with a reduced Chattenden (see response to question 86) an extended Hoo (also reduced) would in our opinion comply with KTG1 of the South East Plan. The priority would be brown field development. In fact even as a replacement to Chattenden, the scale of urban regeneration proposed within Medway would mean that the majority of development was brown field. 2 Impacts on Natural Assets:- If, as we suggest in our response to que 96, the council work with the developers with an interest in the Extended Hoo area, they should be able to formulate a development strategy that has the least impact on the local areas of ecological interest. 3 Transport Impacts:- The potential scale of development being proposed at an Extended Hoo should enable a collaborative approach to be taken to local highway improvements and enhanced public transport links. If, as we suggest in our response to que 96, a reduced level of development is bought forward at Hoo, and it is acknowledged that only 3000 units will be developed at Chattenden over the course of the plan period a coordinated strategy to highway improvements in the area, and enhanced public transport services can be formulated. In addition to the above we would like to point out that the assessment set out in the Core Strategy Issues and Options conflicts starkly with para 5.4.10 of the current Local Plan where in Hoo is described as having a good frequency of bus serves to the urban area and beyond. 4 Integration with the existing urban form:- As indicated above developers are capable of designing urban extensions that have regard to/complement existing settlements. Additional development within an extended Hoo (including Hoo, St Werburgh, High Halstow and Cliffe Woods), would bring about enhanced services, and new employment opportunities. Again these opportunities could be designed into a development brief to be compiled by the council in consultation with the developers with an interest in the area to ensure that the infrastructure associated with/required as a result of the development of this area is delivered in a timely and organized fashion. In addition to the above we would like to point out that the assessment set out in the Core Strategy Issues and Options conflicts starkly with para 5.4.10 of the current Local Plan where in</p>	<ol style="list-style-type: none"> <li>Given the scale of development considered in the option i.e. about 5000 dwellings, the character and distinctiveness of Hoo would inevitably change, as a substantial expansion would occur. The Council does not accept that a reduced level of development at Lodge Hill up to 2026 will occur and even if housing development proved to be slower then expected, sufficient residential sites have been identified in the Strategic Land Availability Assessment to meet requirements without development at Hoo.</li> <li>Even if the impact on areas of ecological interest could be minimised, the M.A.F.F. agricultural land classification maps show that Hoo, High Halstow and Cliffe Woods are all surrounded by top grade agricultural land.</li> <li>In the absence of a traffic impact study, the concerns expressed in relation to the expanded Hoo option, still remain.</li> <li>Expansion of the scale proposed, would radically alter the existing character of all three settlements. Whilst it is accepted that improved service facilities and employment opportunities could occur.</li> <li>Noted</li> <li>Noted. Development at the three settlements would all be on Greenfield land whereas the majority of development</li> </ol>



Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				<p>Hoo is described as having a wide range of social and community facilities. 5 Effective use of existing infrastructure/need for new infrastructure: ' whilst new investment may be needed to accommodate the scale of development proposed, and the introduction of this infrastructure might cause some disruption to existing networks, infrastructure upgrades are completed all over the country to accommodate new development. This is not a new issue and not insurmountable. 6 Accessibility to Existing Services:- Whilst an extended Hoo might perform poorly now compared to the proposed urban extensions, the comparison should have regard to the situation when development is completed and services/facilities are in place. As set out above a development brief compiled by the council in consultation with the developers with an interest in the area could ensure that the infrastructure associated with/required as a result of the development of this area is delivered in a timely and organized fashion. Issues 7-9- see comments above. Overall we do not feel the impacts upon the area are as severe or negative as proposed by the council. Many of the issues are capable of being addressed during the course of design process and thus are capable of mitigation. In the context of the above we note that the initial sustainability appraisal (July 2009) indicates at para 3.56 that the main impacts from this solution on the natural environment would be in terms of encroachment onto green field land. This however is inevitable with any development not on previously developed land. As far as highway impact is concerned the initial sustainability appraisal (July 2009) indicates at para 3.54 that there would be limited impact on traffic congestion and travel choice due to the proximity to the existing road network. The initial sustainability appraisal (July 2009) also indicates that this solution would make a positive contribution to the economic competitiveness of the area, maintaining and developing the workforce, as well as improving educational achievements, beginning in the short term and continuing into the medium and longer term. There may also be some potential for some benefit from this solution to conserving and enhancing the historic environment and other material assets of the area. Furthermore we note that the initial sustainability appraisal indicates at para 3.51 that the development of an extended Hoo would still preserve the space between the villages that would make up the extended Hoo area. To conclude Barratt Strategic feel that the council's assessment of the extended Hoo site is flawed. We do not feel the impacts upon the area are as severe or negative as proposed by the council. Many of the issues are capable of being addressed during the course of design process and thus are capable of mitigation. The initial sustainability appraisal is a lot less critical of the effects of development in this area, and we would suggest the council review their position having regard to the above.</p>	at Lodge Hill would be on previously developed land.
	Question 95	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	In so far as it concentrates development on a new community in place of significant other new areas, expansion of current settlements and joining built up areas - this is supported as the least, worse, option.	Noted.
	Question 95	Trenport Investments Limited	C Hall	No we disagree with the appraisal of the options. We would make the general comment that the assessment seems to be biased in favour of Lodge Hill. For example the answers to questions 6 in the appraisal (re: proximity to existing services) for Hoo Expansion and Lodge Hill get very similar comments but Hoo Expansion has existing services whereas Lodge Hill does not, so there should be a clear distinction in favour of Hoo. However, the summary assessment gives the impression that the opposite is the case. Also there is no assessment of the impact of the options on existing services. With the same examples Hoo Expansion may help support existing rural services, whereas Lodge Hill may compete with them leading to a decline, and making the existing villages less sustainable as custom is drawn away from them.	Noted. Medway Council has given the greatest weight to the national policy of giving priority to the development of previously developed land, compared with the other assessment criteria.
	Question 95	Kent Wildlife Trust	Debbie Salmon	Within the appraisal more importance needs to be given to international, national and local wildlife sites and their protection	Considerable importance has been given to the protection of wildlife sites in the Core Strategy.
	Question 95	RSPB	Fay Martin	No. We recognise that the Sustainability Appraisal of the Core Strategy has evaluated the housing options and has concluded that "In terms of the spatial options being used to accommodate housing, there are similarities between Lodge Hill, Chattenden and the Extended Hoo options in that they would have a beneficial effect on social, economic and also environmental objectives". This statement is of significant concern given that Hoo is presently less than 500 metres from the Medway Estuary & Marshes SPA and the Lodge Hill, Chattenden site is potentially within 3km. The introduction of up to 5000 additional homes in either of these locations could significantly increase recreational pressure on the European Sites. Without having undertaken technical studies to investigate the existing and potential future recreational pressure on the European Sites, it is not clear how the conclusion of the SA/SEA has been reached. We recommend that as part of the appraisal of housing options, Medway should liaise with Natural England in respect of the specialist work that is being undertaken to investigate the existing and predicted recreational pressures on the internationally designated sites. We also strongly recommend that the above matters be thoroughly appraised in the AA of the Core Strategy and we would welcome the opportunity to comment further on this matter prior to the publication of that document.	Noted.
	Question 96			<p><b>Q96: Do you support the option, endorsed by the Council, for a new settlement at Lodge Hill?</b>  <b>If not, which of the following alternatives do you support?</b></p> <ul style="list-style-type: none"> <li>• Greater Hoo</li> <li>• Capstone urban extension</li> <li>• East of Rainham urban extension</li> <li>• North of Rainham urban extension</li> </ul> <p>Answers for question 96 (from questionnaire &amp; website):</p> <ul style="list-style-type: none"> <li>- Do you support the option, endorsed by the Council, for a new settlement at Lodge Hill? (21 Yes/ Agree; 3 No/ Disagree; 1 Don't Know)</li> <li>- If not, which of the following alternatives do you support?</li> <li>- Greater Hoo (1 for support, 2 not support)</li> <li>- Capstone urban extension (The Council received 43 letters &amp; 350 signatures from local residents to oppose option 3-</li> </ul>	

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				<p>Capstone urban extension.)</p> <ul style="list-style-type: none"> <li>- East of Rainham urban extension (2 not support)</li> <li>- North of Rainham urban extension (4 support &amp; 2 not support)</li> </ul>	
	Question 96	CPRE Kent	Brian Lloyd	<p>We consider that a mixed-use development at Lodge Hill focused on previously-developed land is preferable to making major greenfield land releases. However, there are a number of major issues relating to the site that will need to be considered through the Core Strategy including the scale and mix of development; the integration of development into the existing transport network; the potential impact on the nearby rural communities; and the need to retain greenspace and biodiversity. It will also be necessary for the Core Strategy to set out the specific requirements for the site, and how they will be delivered. In particular, we do not consider that the planning of the site should be driven by setting a target for a specific amount of development (either residential or employment). Rather, the amount and type of development considered appropriate should be a product of the site assessments and the delivery of key sustainability and eco targets. The sites presents a unique opportunity to provide a high quality and environmentally sensitive development, and this opportunity should not be squandered for the sake of maximum development return.</p>	<p>The issues raised have been addressed in a masterplan, which is part of the evidence base. It is necessary to identify an approximate level of development from the outset but as the masterplan has been developed the implications in terms of density and layout have emerged. Each phase of development will be subject to the normal development management process and will need to meet the environmental requirements policy.</p>
	Question 96		Lynn Ballard	<p>Yes, I support the option endorsed by the Council for a new free-standing mixed-use settlement at Lodge Hill of an appropriate size that could also provide Chattenden with much needed services and facilities as it is currently starved of locally accessible retail, leisure, health, community and employment opportunities.</p>	<p>Noted.</p>
	Question 96	Cliffe and Cliffe Woods Parish Council	Chris Fribbins	<p>Support Lodge Hill as least worst option. Still have concerns about additional housing and the practicalities of bring new employment to the area. The scope of S106 may need to be extended to allow more contribution to local village facilities - as outlined by a new Rural Issues strategy.</p>	<p>Noted.</p>
	Question 96	Trenport Investments Limited	C Hall	<p>No. Trenport does not support the option for a new settlement at Lodge Hill. The Expanded Hoo option, modified to include Cliffe, is supported, for the reasons given in respect of questions 52 and 94. Alternatively a new option involving the expansion of key rural service centres, including Cliffe, is suggested and supported.</p>	<p>The Council is required to consider the overall sustainability of development. Therefore, development that is likely to generate significant new traffic movements to jobs and facilities some distance from it, is unlikely to be supported. The release of greenfield land at Cliffe for development is not required to meet Medway's housing requirements.</p>
	Question 96	Kent Wildlife Trust	Debbie Salmon	<p>Lodge Hill This site is very near to Chattenden Woods SSSI. Consideration will need to be given to its protection from construction and recreational pressure. The Impact on the Thames Estuary and the Medway Estuary and Marshes SPAs and other European sites from recreational impact will need to be considered within the AA for the Core Strategy. (See questions 88-93 for further details)</p> <p>Greater Hoo The Trust would have a number of reservations regarding this proposed extension including:-</p> <ul style="list-style-type: none"> <li>• The site's proximity to the Medway Estuary and Marshes SPA</li> <li>• The impacts on the SPA from recreational pressure.</li> <li>• The site's proximity to two important ancient woodland SSSI namely Northward Hill and Chattenden Woods</li> <li>• Connectivity within this area will be severed with important open corridors that could be enhanced for wildlife being destroyed between the three villages.</li> </ul> <p>Capstone Urban Expansion The Trust would be very concerned if this option were to be chosen as this would go against the ethos of Green Infrastructure creation. The proposed extension would sever an important green corridor, coalescing Gillingham and Chatham and impacting on the permeability for wildlife within the area.</p> <p>Within the proposed expansion there are also a number of important Local wildlife sites that benefit from the openness of the countryside. These are ME04 Darland Banks and adjacent woodland, ME06 Luton Banks, ME11 Hook Wood and ME20 South Wood. Capstone Country Park is also within the area (this information is the subject on an earlier report submitted to Medway Council as background information by Kent Wildlife Trust). For the above reasons the Trust would object to this extension.</p> <p>East of Rainham urban extension and North of Rainham urban extension Within this area there are a number of designated sites that would be affected by both proposed expansions. The Medway Estuary and Marshes SPA is extremely close to both areas. This extension is probably the closest of the options to the European sites and would leave little space for any buffering. It is therefore likely that 5000 houses in this locality would be unviable as impacts on the SPA would be too great.</p> <p>There are also a number of important designated sites within the area with SW43 Yaughar Woods LWS and Queensdown Warren SSSI. These sites would need to be protected and buffered within the development and linked into the larger Green Infrastructure.</p> <p>There are a number of old orchard sites within the area that would also need protection.</p>	<p>Noted.</p>
	Question 96	Church in Society	Helen Perry	<p>I would like to support the Lodge Hill Chattenden Option because of the use of Brownfield land. Having attended Land Securities consultations, I believe the project to be realistic and achievable. As you have mentioned, transport is an issue with the site, as is other infrastructure - the local churches on the Peninsular have told me there is an issue with water supply and GP's. Community facilities should be included from the beginning of the development where possible, to ensure residents do not feel cut off and isolated. The Diocese wish to be involved with this provision in a creative way.</p>	<p>Noted. The involvement of the Church in Society can be encompassed in the implementation of the scheme.</p>
	Question 96		Jean Jones	<p>Yes, we support the option endorsed by the Council for a new free-standing mixed-use settlement at Lodge Hill of an appropriate size that could also provide Chattenden with much needed services and facilities as it is currently starved of locally accessible retail, leisure, health, community and employment opportunities.</p>	<p>Noted.</p>

Ref	Consultation points	Company / Organisation	Name	Comments	Recommended Response
	Question 96		Susan Webber	East and North of Rainham Options would have too significant an impact visually on the landscape and on best agricultural land. Use of Greenfield sites in visually prominent location is not supported. The use of Brownfield sites is a sustainable way of building housing development and makes the best use of redundant previously developed land. East and North of Rainham should be designed to protect this land from future development to protect the landscape and prevent the closing of the gap between Rainham and Sittingbourne. I agree with the reasons set out in para. 4.448 why the Lodge Hill site is the most appropriate location for future development.	The landscape and countryside policy of the Core Strategy safeguards land to the north and east of Rainham from development.
	Question 96		Vivienne Parker	North and East of Rainham are both areas that will be at increased risk of flooding due to climate change. Parts of greater Hoo will also be subject to flooding in 25 years' time.	Noted. The Core Strategy is only proposing the Lodge Hill option.
	Question 96	City of Rochester Society	John Liddiard	Support North of Rainham urban extension. Closer to existing urban area. Better located to other transport and community facilities. More sustainable than other options Past decisions have seen a ridiculous scattergun approach with options being promoted on the Hoo Peninsular – miles from other community facilities and employment facilities. With no realistic improvements to public transport available.	The Lodge Hill development will be of such a scale as to include community facilities, employment opportunities and improved public transport. Existing employment opportunities are located nearby at Kingsnorth, Hoo and Medway City Estate.
	Question 96			Support. Other earmarked areas as Rochester Riverside should be moved forward together with Lodge Hill	Noted
	Question 96		Alastair Blair	Support with Lodge Hill option and disagree with all other options. Lodge Hill provides sufficient area to provide housing numbers to fulfil the requirements set under Thames Gateway. Other already agreed development need to be moved forward also.	Noted
	Question 96		John Hill	It will not infringe on completely unspoilt rural land. But I do hope that roadways etc. will be less urban in appearance with a varied mix of materials and not so much standard concrete kerbing etc.	Noted..
	Question 96		Carl Kroon	Has required space. Will have been previously used -not new green. An additional community in the area.	Noted.
	Question 96	Medway Countryside Forum	David Murr	Yes. We are very strongly opposed to all other alternative options. It is noted that the proposed urban extensions put forward by developers in response to the Strategic Land Availability Assessment affect currently designated areas of local landscape importance, which have previously come under persistent attack. This in our view reinforces the case for the retention of the ALLI designations as the first line of protection for our local protection.	Noted.
	Question 96	FWCA Frindsbury and Wainscott Community Association	J R Masey	In supporting the settlement at Lodge Hill (although not the number of dwellings) would hope to save some of the other areas from development, especially Capstone.	Noted.
	Question 96		Mann	Yes. Lodge Hill – will require minimum take of farmland - will have minimum visual impact as is in a valley - will be close to new employment opportunities at Kingsnorth and Grain - could use Kingsnorth to provide neighbourhood heating - would need better road links but these would also be used by current and proposed industrial sites/power stations/docks at both Kingsnorth and Grain - could develop good rail links to Gravesham, London and high speed main line as well as to Medway Other sites would merely add to current urban sprawl and would increase local traffic, increase pressure on facilities with none of the positives.	Noted.
	Question 96		Dr D Brighton	Yes. Poor farming land. Room for industrial development	Noted.