

**Chatham Interface Land
Consultation Responses**

Consultee	Comment	Response/Action
<p>Agate, Mark</p> <p>Chairman Medway Urban Parks and Green Spaces Forum</p>	<p>(Response left in written format at consultation exhibition)</p> <p>Needs a look at the area in question first. I query where appropriate leisure/ recreation green space/park areas will be provided. Also need more detail on how many people will be accommodated, either residential/business or both</p>	<p>Comments noted.</p> <p>Open space has been provided for within the SPD on the former location of the South Mast pond.</p> <p>Form of development has not been fixed at this stage, to allow for flexibility within the site, therefore the number of residents / tenants is unknown.</p>
<p>Agate, Mark</p> <p>Chairman Medway Urban Parks & Green Spaces Forum</p>	<p>Following your letter of 13 August 2010, I attended the first Exhibition at The Royal Dockyard Church on 19 August 2010.</p> <p>We understand the project is a follow-up to similar plans of about two years ago by developers who I'm told went bankrupt. Not too sure if those plans ever got into the previous, since discarded, LDF.</p> <p>Our comments are cross-referenced to the views asked for and numbered 1-6 in the introductory leaflet.</p> <p>1. & 2. The land in question is owned in respective parts by Medway Council or SEEDA (which is being disbanded at the end of the year and assets presumably being transferred to another Government Dept). English Heritage, Chatham World Heritage Bid and CABA also involved. Of 13 sites highlighted nine are shown as "Proposed Building Plots" but it did not seem to be formally known if this was Residential, Commercial or a mixture, Although a view was expressed there was more income from Residential. The leaflet does indicate "appropriate mixed use development" Some of these units are shown as up to 10 stories to the South West and North and up to four stories to the South East. It was pointed that the two existing Quay buildings are 16 and 20 stories respectively – and that Melville Court is nearby – which would bear out a leaning towards residential.</p> <p>1. & 6. It was not known how many people were being catered for. I recorded my attendance as Forum Chairman and looked for Green Space where this was shown as a reference on one of the display boards, only to be told it was in fact over the river!</p> <p>2. The project seems to make more sense when seen from the Mast Pond vicinity - and when I took the opportunity since of looking from over the River Medway at Upnor – with regard to use of land and maximum height of buildings in the areas mentioned. Sight-lines do seem to have been researched.</p> <p>2. & 6. The overgrown area to the North East looks suitable for a grass leisure / recreation / park area.</p> <p>3. & 6. The leaflet provided does show a green border around the former South Mast Pond, which is entirely "hard" landscape but shown as an "Open Space Public Realm"</p> <p>3. It will be of concern that Slips 5 and 6 – not 4 and 5 as shown on the SPD - are shown as a four-level (including ground floor) car park. We would not be in favour of anything more than use for ground floor parking. (I understood at the Exhibition – in error as I found later – that Slip 7 was planned as the car park which would have been totally unacceptable.)</p> <p>4. & 5. Reference is made to buried archaeological remains, including the old river wall and that these will be "in some cases" protected, which I think would need further clarification. It has been noted there is a maximum flood risk of one in every 200 years and I am aware of concern at LSP LA21 presentations from the Environment Agency about increasing risk from North Sea surge into the Thames and the Medway, particularly from the Dockyard to Rochester Bridge, with waterfronts up to and beyond the M2 / High Speed train bridges.</p> <p>4. We would certainly be in favour of conservation of all above ground heritage features and archaeology. What may be seen now as not worth keeping will become more interesting as years go by.</p> <p>5. Below ground archaeology similarly should be exposed or linked to an above ground viewer. This should certainly be examples of all different types / ages etc. Understood that it may not be practical for everything to be exposed but perhaps ground markings, display boards etc should be provided.</p> <p>2. The project seems to make more sense when seen from the Mast Pond vicinity - also when I took the opportunity since of looking from over the River Medway at Upnor – with regard to use of land and maximum height of buildings in the areas mentioned. Sight-lines do seem to have been researched. The overgrown area to the North East looks suitable for a grass leisure / recreation / park area.</p> <p>6. We strongly urge that as much provision as possible is made for grass-based</p>	<p>Comments noted.</p> <p>The SPD has no relation to the previous City Loft application that went out to consultation in 2008.</p> <p>The SPD has promoted flexibility in future uses by not specifying land uses, and in turn residential or employment numbers. Further comment on more specific land use has been added to the SPD.</p> <p>Open space will be provided on the former location of the South Mast pond. The layout, in relation to hard or soft landscape treatment, will be subject to detail design. It would not be suitable to provide a grassed park within the site as this would not reflect the areas industrial past and mass of built development.</p> <p>In order to provide the required car parking to replace that lost from the South Mast Pond, the SPD is suggesting it is accommodated within Slips 5 and 6.</p> <p>The resolution of the car parking will be at the detail design stage. Slip 7 falls outside the defined boundary of the Interface Land and is currently in private ownership.</p> <p>The SPD has considered flood risk and has consulted with the Environment Agency about the Interface Land.</p> <p>The SPD promotes the protection of buried and aboveground archaeological features and the opening up and promotion of these features is recommended as part of future detailed design.</p>

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	<p>areas and soft landscaping.</p> <p>I made relevant comments in a book supplied on type of development, planned use of number 7 Slip (which was erroneous but my impression at the time and since corrected – see comments above), numbers of people to be accommodated, be it residential / commercial / mixture, also provision of green space.</p>	
Barker, J	<p>Medway City Bid 2012.....5 towns make a City, Strood, Rochester, Gillingham, Rainham and Chatham.</p> <p>Chatham `Pentagon` Centre.....the `heart` and cultural centre of Medway.</p> <p>Chatham Dockyard Interface Development.....to create a unique sense of place by using a `Pentagon` shape (5 sided polygon) in the design of buildings, structures and auxiliary fixtures and fittings within the site will achieve this.</p>	<p>No change to the SPD. Comments noted.</p> <p>The form of the development will be a matter for detailed design and is not addressed within the SPD.</p>
<p>John Jones</p> <p>Chairman Brompton Village Association</p>	<p>I write on behalf of the Brompton Village Association as part of the consultation undertaken between August and September 14th. Our response is ordered in the way you have outlined.</p> <p>1.We believe the principle of regenerating the site through mixed-use development with the aim of reconnecting parts of the former Dockyard is entirely proper. To this end we concur that the development should engage the range of uses that you have proposed.</p> <p>2 We support the vision and objectives that you outline.</p> <p>3 Brompton Village Association believes that the proposed character areas correctly reflect the past uses as well as appropriately pointing to future uses.</p> <p>4 We agree with the proposals for conserving the above ground features. We note, however, that there are considerable changes of use proposed for the slip to be used for car-parking. Whilst concealing the vehicles offers a considerably tidier solution than at present we are concerned that the internal changes may impinge on the proposed World Heritage site bid. We rely therefore on the control exercised by the landowners and the local authority to ensure that this part of the bid and indeed its general approach will not be detrimental.</p> <p>5 Within terms of the need for development we agree that the proposals will do as little damage as is possible.</p> <p>6 The arrangements for future users will necessarily impinge on the way existing users and most importantly residents experience the site as part of the Historic Dockyard. We believe that the proposals have approached this issue with sensitivity in terms of scale and massing. Clearly the building design will still need to be compatible with the demands of this site.</p> <p>Overall we believe that the draft SPD will fulfil the demands of building a consensus between landowners, existing users and future proposals.</p>	<p>Comments noted.</p> <p>The proposed use of the Slip buildings for car parking will not impinge on the proposed World Heritage Site bid. Through detailed design the internal fabric of the Slip buildings can be protected.</p> <p>Any changes to the Slip buildings will also need to be in accordance with the conservation area designation.</p>
<p>Joanne Cable</p> <p>Chatham World Heritage manager - Medway Council</p>	<p>On behalf of the Chatham World Heritage steering group, I would like to thank you for the opportunity to comment on the Interface Development Framework.</p> <p>The Chatham World Heritage steering group adopted a Development Protocol in June 2009 to guide how and when it comments on planning applications and planning policy formulation and, very occasionally, notifications outside of the planning system. The following comments fall within the scope of the adopted protocol, and relate to the identified Outstanding Universal Value of the site:</p> <p>(1) (1) We would recommend that the SPD states the need for a coordinated approach from the landowners to development on the site.</p> <p>(2) (2) The links between different parts of the site are important to the understanding of the proposed World Heritage Site, and to secure heritage benefits. We would therefore urge that the SPD states the need for an approved phasing strategy for development of the site to be in place prior to the submission of any planning application for the development of any part of the site.</p> <p>(3) (3) As a part of the above, we would expect to see a clear Section 106/ implementation strategy in place. This is in order to ensure the successful development of the entire site with the parts of the site of greatest value contributing, or enabling, the development of less viable parts, to ensure the implementation of a high quality public realm across the site, and to maximise heritage benefits. The SPD could usefully outline general principles or headings in order to guide the formulation of this strategy.</p> <p>(4) (4) It may be useful to state that the LPA will use the English Heritage document 'Seeing History in the View' when assessing any applications for tall building development. Any application should have sufficient information to enable this assessment to be carried out.</p> <p>The following points are requests for correction of typos and slight changes to wording:</p> <ul style="list-style-type: none"> • Item 1.30 (p11) needs updating - i.e. "has applied" • Item 1.31, should, I believe include the statement of OUV, rather than the summary bullet points. If bullets are chosen, we need the new ones, from 	<p>A number of amendments have been made – The SPD does emphasise the need for a coordinated approach from the landowners to development on the site, however, this has been expanded further in the vision.</p> <p>Detail on the phasing strategy has also been included in the Delivery and Implementation section of the SPD.</p> <p>With regard to the S106 the SPD makes reference to Medway's adopted SPD on Development Contributions and further recommendations have been made relating to a S106 Strategy Document. As the land use is not known it is difficult to provide an outline of general principles or headings of a S106. This will be subject to the resolution of detail design.</p> <p>Reference has now been made to English Heritage's document 'Seeing History in the View' within the SPD.</p> <p>The typographical errors and slight changes in wording have been made.</p> <p>The contributions to the Great Lines Heritage Park will be resolved at the detail design stage.</p>

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	<p>the new brochure (those under 1.31 have been superseded). The SPD should point to the Management Plan, as always containing the full and up to date statement.</p> <ul style="list-style-type: none"> Item 2.10 should read "Defences" not "setting". <p>The steering group supports the SPD being taken forward sooner rather than later in light of the uncertainty of landownership on the site following the demise of SEEDA. It is seen that this is a positive move towards protecting the proposed World Heritage Site from disjointed development.</p> <p>You will be aware that all domestic developments greater than ten units within Medway are required to contribute to the upkeep and maintenance of the Great Lines Heritage Park. While the Developer Contributions guide does not provide specific guidance for non-domestic contributions, there are precedent examples which suggest contributions are appropriate. I would welcome the chance to discuss an appropriate contribution with you.</p>	
<p>Klaire Lander DHA Planning</p>	<p>In response to the consultation on the above document, the following representation is submitted on behalf of our client, Kent Police.</p> <p>To ensure that Kent Police can continue to provide a good level of Policing service, there are a number of key issues which should be addressed in the Development Framework document. These key planning and policing issues are summarised below.</p> <p>Designing Out Crime</p> <p>It is noted that paragraph 1.12 of the consultation document refers to the need to create an accessible, safe and sustainable environment and that section 2.76 acknowledges the importance of security provision in new development and that advice should be sought from the Kent Police Architectural Liaison Officer prior to the detailed planning stage.</p> <p>These references within the document are supported, since it is imperative that crime related issues are properly addressed in the provision of new development and that any new development adopts Secured by Design measures. Designing out crime can ensure the creation of safe and sustainable communities with a reduced risk of crime and fear of crime. The importance of reducing crime and creating safe communities is supported by Planning Policy Statement 1.</p> <p>Kent Police requests that all new development should adopt Secured by Design (SBD) Award principles for buildings and external areas. It is also suggested that details of how a development will address community safety and crime prevention should be included within any submitted Design and Access Statements.</p> <p>Population numbers, demographics, mix of tenures, tenant placement policies</p> <p>The document's requirement for new development to provide an appropriate mix of housing, tenure types and occupancy is supported. This will ensure the crime profiles of neighbourhoods and settlements are not adversely affected, which in turn would have an effect on the existing quality of life.</p> <p>Transport infrastructure and access to services</p> <p>It is important for Kent Police, as well as the other emergency services, that adequate infrastructure is in place to ensure that they can respond quickly to incidents and have good accessibility to custody suites to ensure maximum productive time on frontline duties. It is acknowledged that the consultation document recognises the importance of transportation and access as key issues. Kent Police supports a stronger emphasis on the need to reduce traffic generation as well as the suggested Travel Plan.</p> <p>Flooding</p> <p>Kent Police supports the document's acknowledgement that any development would need to ensure that flood risk is mitigated in line with advice within PPS25 and from the Environment Agency. If not addressed when identifying new areas of development, flooding can represent a risk to the Police Service in terms of manpower and resource pressure in responding to flooding incidents. The risk of flooding should therefore be reduced, avoiding inappropriate development in areas at highest risk of tidal flooding and to prevent and manage flood risks.</p> <p>Identifying the Need for Police Infrastructure</p> <p>It is noted that the document refers to the need for developments to make contributions in line with the Medway Developer Contributions SPD.</p> <p>Kent Police require contributions towards infrastructure provision as a key public service. Development tends to place new demands on local infrastructure and services. It should not be an unreasonable burden on existing infrastructure, and it is therefore essential that development should not take place until the infrastructure needed to support it is available.</p> <p>Planning permission will only be granted for developments where the necessary infrastructure, services, facilities and amenities to support them are in place or will be provided when needed. It is expected that contributions would reflect the need for new policing infrastructure to mitigate the impact of the new development.</p>	<p>Support is welcomed with regard designing out crime.</p> <p>Mix of housing/tenure types is supported.</p> <p>Kent police supports a stronger emphasis to reduce traffic generation as well as the suggested travel plan.</p> <p>The response supports the flood mitigation measures.</p> <p>Reference is made to development contributions to Kent Police by way of S106. The SPD has been updated to include a recommendation on a s106 strategy document being prepared prior to any planning approvals – Kent Police would be consulted as part of this document.</p>

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	<p>I trust that the above representation will be taken into account and please do not hesitate to contact me should you have any queries.</p> <p>Yours sincerely</p>	
<p>Peter Kendall English Heritage</p>	<p>I am writing to provide our response to the public consultation.</p> <p>English Heritage welcomes this SPD and as we have been closely involved in its production we do not have any outstanding major concerns and would be pleased to see it adopted by Medway Council. We welcome the flexible approach that encourages a true mixed-use development with less concentration on residential accommodation in flats. Due to the present uncertainty created by economic circumstances and the potential future of SEEDA as part owner we think it vital that clarity be provided about the desired future of this major site. We think that the document is compatible with the guidance of PPS 5 that was issued during the course of the project and that it provides an appropriate framework for consideration of the historic environment, now and in the future. If the proposed World Heritage Site status is to be secured it is essential that we demonstrate how major change at the northern end of the historic dockyard can be achieved without unacceptable harm to the Outstanding Universal Value of the site. We think the SPD will be significantly helpful for this purpose despite the great amount of detail that will need to be worked through before we can agree to a master plan, let alone individual planning applications.</p> <p>On matters of detail we have the following comments.</p> <p>1.11 Use of the term “distinctive” in the vision statement to describe the future character of the site could, despite the following words that refer to a contextual approach, be interpreted to justify a design solution that is more challenging than we might be comfortable with. Would a term such as “complementary” be better?</p> <p>1.24 The site lies north of the 17th century dockyard not south as stated.</p> <p>1.29 The CA designation recognises the complex holistic character of the dockyard that is embodied by both structures and spaces and the linkages between these. It is the collective significance of this that needs to be recognised.</p> <p>1.41 The final sentence might read better as - The statement confirms that the absence of designation does not indicate lower significance and that some assets may need to be considered under the same policies as for designated archaeological heritage assets.</p> <p>1.71 This could be reworded as - buried archaeological remains should be anticipated in most parts of the site but with a lower potential in the reclaimed land of the riverside. Much of the buried archaeology is of undoubted national significance and the advice at PPS 5 para HE9.6 applies.</p> <p>2.11 PPS 5 has a specific policy (HE10) about the setting of heritage assets. English Heritage has issued for consultation guidance on this subject and you should reference this as the approach to implementation of PPS 5 with regard to setting that should be followed. This could sit alongside the SPD on building heights which is a related consideration.</p> <p>On page 22, in the blue box the first bullet point could be protection and enhancement of the significance of the heritage assets.</p> <p>In order to deliver the approach envisaged by PPS 5 an archaeological mitigation strategy will be needed to support each planning application. This will need to balance the appropriateness of safeguarding through preservation in situ with the alternative of excavation. Developers need to know that this is a requirement and will influence both design and construction solutions. The detail is best worked out for each character zone in relation to the type of archaeological remains that they are likely to contain and the impact upon these but there should be an overarching strategy to inform decisions and ensure that archaeological elements of the project are reasonable across the full extent of the site. PPS 5 policy HE12 provides more advice about recording of heritage assets.</p> <p>Riverside</p> <p>This is the zone where issues of setting and building height will require most further discussion and analysis to demonstrate the full consequences of solutions as they come forward. There is not an in principle objection by English Heritage to appropriate development in this zone. We understand that residential development here is seen as providing most value from which to fund the least profitable parts of a solution for the entire site. We do not however rule out other uses, particularly if these could be located within structures of a larger footprint that might reflect the nature of the historic covered slips.</p> <p>You could provide more clarity by explaining that the line of the 18th century river frontage marks a boundary highly relevant to buried archaeological potential. West of the line potential can confidently be predicted as lower than for the land to the east that was part of the dry land of the dockyard with much related activity. Preservation in situ and or intensive archaeological investigation is highly likely to be required east of the line of the former frontage in addition to the approach proposed for the river wall itself. Large buildings with a greater span between foundation elements might be most compatible with preservation of archaeological remains in situ.</p>	<p>The SPD has been updated in line with English Heritage’s comments and the recommended edits have been included in the final SPD. Further comments on delivery and implementation have been included.</p>

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	<p>We will provide clarity as soon as we are able for the COI application on the boat slip. Even if not individually designated this is clearly a heritage asset under PPS 5 and part of the CA as a designated asset. It thus already has a degree of protection under PPS 5. With or without specific designation of the slip, we will consider how best to protect the significance of the structure but also the implications that its retention might have for achieving the desired outcome across the whole site.</p> <p>Pembroke Rise</p> <p>There are remains of the Brunel sawmill complex that are not designated but which are significant i.e. in a similar category to the boat slip. For example the retaining wall to the stacking yard. Such features need to be preserved and respected by a design solution. The flexibility as to how the sawmill building itself might be used in future needs to be preserved, e.g. including the ability to access it with large vehicles.</p> <p>Page 36 – the blue box text in relation to archaeology should read ...various archaeological reports that have been produced for the site i.e. not structures.</p> <p>As discussed at the presentation to the WHS steering committee we think that the delivery and implementation strategy is of primary importance. We anticipate that further work on viability will clarify whether all of the gains required from the site, including historic environment benefits, are a reasonable expectation from an amount and type of development that complies with this SPD. If it is not we will need to assist in prioritising those that are essential and not just highly desirable. An agreed master plan is required for the entire site but it is not likely to be taken forward by a single developer even in a phased way. We expect an unbreakable means to ensure that the zones of the site that can most profitably be developed will assist in achieving solutions for the more difficult zones and the provision of essential infrastructure such as parking for the dockyard. It seems probable that S106 agreements are likely to be part of any planning permissions and this would be one way to ensure that an acceptable outcome is secured for the entire site in a timescale that does not become too extended.</p>	
<p>Jennifer Wilson</p> <p>Environment Agency Planning Liaison Technical Specialist</p>	<p>One key question that we have on this document is, how are the government's guiding principles on Sustainable Development going to be applied here?</p> <p>The Sustainability Appraisal (SA), page 13, Section 4.13 highlights a key concern for us:</p> <p><i>"Sustainable Design and Construction: The SPD sets that high standards of sustainable design and construction will be needed, but does not detail what the requirements might be. Our experience is that developers will need further clarification on these matters in order to ensure that the desired outcomes are achieved."</i></p> <p>We support this observation from WSP and have provided further clarification on the environmental standards we expect in the Thames Gateway later in this response.</p> <p><u>Land Contamination.</u></p> <p>There is a background geoenvironmental report in the appendix but the main report only states:</p> <p><i>"Contaminated land is a material consideration under the land use planning process. Given the site's industrial past, there is the potential for the site to be affected by the presence of contamination. Where contamination is present, it is recommended that the land be capped prior to any new development."</i></p> <p>This is too basic as it doesn't reflect that contamination of groundwater and baseflow to the river may be impacted by construction activities, piling and potential drainage and services impact. Piling risk assessments will need to be undertaken as well as ground water monitoring as part of further site/area specific site investigations. This should be acknowledged in the report because heavy contamination in any area could be a show stopper and thereof land contamination needs the same consideration at design stage as flood risk or archaeology, for instance. I would like to see the section above expanded on to address risks to GW and SW as well as harm to human health and future users and that some additional comment is made related to foundation design, perhaps after the flood bit in section 2, I think that is about 2.19."</p> <p><i>Appendix 1, SA Non Technical Summary, Page 5, Bullet 10</i> - Recommends a site wide Remediation Strategy. Considering the Carbon impacts of different options. However, this does not transfer to the Draft Development Framework Section 1.96 - that proposes capping of contaminated land.</p> <p>Draft Framework S3.8 & S3.9 touches on phasing of site. If the development of this area is under a limited number of ownerships and will be undertaken in phases, over a number of years, some thought should be given to assessment of the site from a global or strategic perspective and planning long term sustainable remediation options where appropriate. See attachment for more detail on Global strategies, that have been used successfully on the Olympic site.</p> <p>Land contamination perhaps warrants reference as a key development constraint on page 17 of the Draft Development Framework. Further to the above comments, a detailed investigation should inform site layout.</p> <p><u>Water Efficiency</u></p>	<p>A number of amendments have been made to the SPD and its appendices in light of the comments.</p> <p>Greater weight has been made on the need for high standards in sustainable design and construction.</p> <p>Additional recommendations regarding contamination have been added during the construction stage, including reference to piling risk assessments and a remediation strategy</p> <p>Water efficiency recommendations have also been added due to the site falling within water stressed area.</p> <p>The flood risk management comments have been respond to within the document and the Flood Risk Investigation Appendix.</p> <p>Further recommendations have been added on the principle of retention and refurbishment of buildings and the aspiration to reuse and recycle demolition and construction waste.</p> <p>The objective of linking the proposed open space into the wider green infrastructure has been included within the SPD.</p> <p>Comments noted.</p> <p>The design of the foundations, waste storage and waste collection is a matter for detailed design and has not been addressed within the SPD as the form and use of future development is not defined.</p>

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	<p>Appendix 1, SA - Recommends a water cycle study (WCS) at this Development Framework level. We do not think a WCS would be appropriate at this development level.</p> <p>We would like to see a water efficiency recommendation worked into the Development Brief – expanding on page 23, Drainage and Flooding, S2.19 and delivering on the recommendation by WSP in the SA, page 13, S 4.13. The reason for this recommendation is that the Thames Gateway is a seriously water stressed area where water is a scarce resource. The following text is from our Thames Gateway Environmental Standards document (a copy is in the post to you).</p> <p>New development should meet the following water efficiency standards.</p> <ul style="list-style-type: none"> • Residential development should use of less than 95 litres/head/day of water (in excess of Code for Sustainable Homes Level 4). • Office water use should be no greater than 0.41-2.59 L/M2/day, and 2.59-14.5 L/head/day (based on equivalent of 220 working days per year). • Non-residential development should score maximum points for water in the BREEAM, achieving an excellent rating overall. <p>Measures such as spray taps, water efficient showers and appliances, low flush toilets and outdoor water butts can achieve the water efficiency levels specified above. These add a minimal cost to development of approximately £586 per dwelling and can deliver major cost savings within acceptable payback periods for commercial and multi occupancy premises. Water meters should also be installed by water companies. Increased water efficiency will directly reduce consumer water and energy bills and contribute towards a reduction in greenhouse gas emissions.</p> <p>All developments should aspire to incorporate community water harvesting and reuse systems to achieve greater standards of efficiency. The overall costs and benefits of such systems should be a consideration. These may not be appropriate where low flow rivers rely on surface water run off for flow maintenance. Non-residential developments often offer the greatest opportunities for the use of water efficiency options and should form part of development proposals.</p> <p>Flood Risk Management Draft Development Framework, Page 22 - We are pleased that “drainage and flood management” has been identified as one of 6 key organising principles for the framework.</p> <p>Draft Development Framework, page 23, Section 2.19 - SuDs should follow the management train approach in order to fully maximise the flood risk, water quality and amenity benefits of SuDs.</p> <p>Draft Development Framework, page 32 - Covered Slip Buildings “2.61 This area falls within 1 in 200 year tidal flood extent and this would need to be considered as part of the design of the structures and refurbishment.” We recommend highlighting in this section that Flood Resistance and Resilience measures will need to be designed in.</p> <p>Flood Risk Investigation Appendix 2.1.1 Flood Water Levels This section is confusing it needs to be made clear here that the levels quoted are water levels and not the actual depth of flooding that would be experienced. At this level of assessment it may be useful to compare the flood levels to ground levels to get an approximate appreciation of the depths of flooding that would be experienced on site in both defended and undefended scenarios.</p> <p>3.3 State of the Flood Defences An FRA could draw on some of the high level findings in the emerging SPD being produced by Scott Wilson. At site-specific FRA level an intrusive structural survey would be required of the wall to determine its actual standard of protection, condition grade and residual life.</p> <p>3.4, 3.5, 3.6, 3.7, 3.8, 3.9 and 3.10</p> <p>We are satisfied with what is proposed.</p> <p>Actual Risk Flood hazard to the site would need to be assessed in any site specific FRA.</p> <p>Residual Risk A site-specific assessment would need to look at the residual risk to any development. This is the risk that remains after FRM management measures e.g. defences are in place. This would need to look at the likelihood of failure of any flood defences and the consequences of this e.g. breach of flood defences and the hazard that would ensue. Flood hazard would need to look at the depth and velocity of flooding.</p> <p>Waste Draft Development Framework, page 36 - Design Principles S2.76 Appearance and Materials: The need to respect the historic context of the Interface Land will affect the material palette, with the choice and application of materials being an important consideration. In our Thames Gateway Environmental Standards we are recommending that developments retain and refurbish rather than rebuild & aim for reuse and recycling of at least 90% of demolition and construction waste.</p>	

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	<p>Large development sites should consider the incorporation of an automated waste collection system within the development. Such systems have the advantage of minimising the area required for waste receptacles, reduces nuisance associated with such areas, such as odour, vermin, antisocial behaviour etc and minimise transport movements and costs associated with waste collection. Such systems can be configured to be compatible with the collection of recyclable materials and can be linked into public realm waste and recyclables collections. They are appropriate to all forms of development, including higher density medium / high rises. Such systems tend to be suitable (on economic grounds) in developments of 1,000 plus units. The system could be extended to include smaller scale fringe development in the surrounding area.</p> <p>Ultimately the waste storage and collection system should be easy and convenient to use to encourage participation by occupiers.</p> <p>Green Infrastructure We note that there is no section dealing with how green infrastructure will be incorporated in to the design of the proposed area.</p> <p>A well planned and managed GI network can and should perform multiple functions and provide multiple benefits and services for communities such as</p> <ul style="list-style-type: none"> • Managing surface water and flood risk • Improving water quality • Helping communities to address and adapt to climate change • Providing opportunities for recreation and improved wellbeing • Enhancing biodiversity • Promoting community interaction <p>We hope you find these comments of use, and look forward to being consulted on any further versions of this document.</p>	
<p>David Hobbs Thames Gateway Project Officer – Environment Agency</p>	<p>We recently responded to the consultation for Interface Development Framework. In our comments we referred to the Thames Gateway Environmental Standards. Please find attached the document, for info it is easier to use if you drop it onto your desktop. I could post you the CD if that is easier.</p> <p>Many thanks</p>	
<p>Flintoft, Guy Barton Wilmore</p>	<p>I note that there is no key to the ownership boundary plan on page 16. Could you please confirm whether I am right in assuming that the Trust, SEEDA and the Council are the three main landowners and that there is one other private owner?</p>	<p>Changes will be made to the ownership plan to ensure clarification.</p> <p>Explanation was sent confirming that the site has two landowners SEEDA, shown in orange, and Chatham Historic Dockyard Trust, shown in blue.</p>
<p>Gapper, Claire Resident</p>	<p>(Response left in written format at consultation exhibition)</p> <p>Height – 10-storey buildings should not be built on river frontage. Parking – adequate parking for new houses and working places must be included in addition to visitor parking. Will the covered slips be able to cope with this? The Dockyard is potentially a WHS and the approach to it should be designed as sensitively as possible.</p>	<p>Comments noted.</p> <p>The Building Heights Assessment identified that up to 10 storeys would be acceptable provided viewing corridors were considered when locating the taller buildings. Further comment has been added relating to the bulk of taller buildings and the height of the buildings closest to Covered Slip number 7.</p> <p>Parking provision will be a matter for detailed design dependant upon the future use and occupancy of the site.</p> <p>We have met and consulted the Chatham World Heritage Steering Group to discuss the proposals and emerging SPD.</p>
<p>Gapper, Richard and Claire Resident</p>	<p>I would like to make the following comments about the outline plans for the Interface Land at Chatham Historic Dockyard.</p> <ol style="list-style-type: none"> 1. The Dockyard is part of a World Heritage Bid and the approach to its visitor entrance ought to reflect the character of the Dockyard itself, highlighting the scheduled ancient monuments and listed buildings that are included on the Interface site. Inappropriate design and density may militate against obtaining or retaining World Heritage status. 2. Siting buildings on the Mast Pond changes its nature and relationship to related buildings like the Saw Mill in an unacceptable fashion. 3. Parking. If the parking in the covered slips is only going to replicate what is currently available over the Mast Pond, where are all the additional residents and work people going to park their cars? Experience shows that adequate parking is never available for new developments, as we know in the Dockyard itself, and leads to endless disputes and untidy parking. What will be the mechanism for regulating parking? 4. While care is being taken over the height of buildings, anything of 10 storeys should not be sited on the river frontage. Tall buildings should only be placed at the rear of the plot that adjoins the river. 	<p>Comments noted.</p> <p>In regard to point 1, we have met and consulted the World Heritage Steering Group to discuss the emerging proposals.</p> <p>Point 2, historically buildings were sited on the Mast Ponds. The SPD provides indicative building plots, not defined footprints.</p> <p>Point 3, this will be a matter for detailed design dependant upon the future use and occupancy of the site.</p> <p>Point 4, location of taller buildings will again be resolved at the detailed design stage and will be dependant upon the retention of the identified viewing corridors further, detail is included within the building height assessment at Appendix 3 of the SPD. Further</p>

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		comment has been added relating to the bulk of taller buildings and the height of the buildings closest to Covered Slip number 7.
Glover, P Resident	(Response left in written format at consultation exhibition) A little early for detailed comments but we understand the land must be used, hopefully in the correct manner. The proposals seem reasonable with one exception, the method of applying "reduced reliance on the private car". This usually means reduced parking leading to uncontrolled parking.	Parking will be resolved at the detailed design stage and will follow guidance set out by Medway. The quantum Parking will be dependent upon future form and use of development.
Helen Finlayson Resident	<p>I have a strong interest in the regeneration of Medway and the proposed bid for World Heritage status which is an important element of Medway's regeneration. I have just been given a leaflet advertising a period of public consultation on a draft supplementary planning document for the Interface Land Chatham. I have the following comments:</p> <p><u>Consultation</u></p> <p>The leaflet itself gives very little useful information. The diagram with yellow areas is I assume the proposed masterplan but it is too small to read and understand.</p> <ul style="list-style-type: none"> • The Council's main web address is used but there is no indication as to where on the Council's website the documents can be viewed. • The documents are only available at one Council building during normal hours. The documents cannot therefore be viewed at weekends or during the evening which makes it difficult for those working outside the Medway towns to view the documents. • The exhibition is only being held on two days. • The consultation period is only 4 weeks and it is being held in the school holidays. <p>In the last few years or so the Council has consulted on a wide range of masterplans for Chatham town centre. On each occasion there has been a wide programme aimed at letting as many residents and stakeholders as possible know of the consultation. The period of consultation has generally run for six weeks and throughout this period a mixture of staffed and non-staffed exhibitions were held at different times to make it easier for the public to visit. Documents were also made available at a number of Council offices and libraries. There was also wide publicity by way of adverts in the local press.</p> <p>My understanding is that previous consultation exercises have been so far wide ranging so as to comply with The Council's adopted Statement of Community Involvement. I've managed to find this document on the Council's website and it quite clearly states that:</p> <p>' Medway Council's standard for community involvement is to seek participation from as wide a section of the community as possible that work, live and use the Medway area and to use the results of that participation in a positive way to shape the future for Medway.'</p> <p>In my view the consultation being undertaken on the Interface masterplan does not comply with the objectives of the Statement of Community Involvement. In comparison to other recent consultation events undertaken by the Council e.g. on the Best St/High St masterplan, the consultation being undertaken appears minimal and tokenistic.</p> <p><u>The masterplan</u></p> <p>The document identifies a number of key objectives:</p> <ul style="list-style-type: none"> • promoting a development appropriate to the scale and character of the historic environment and which enhances the environment and the setting of its buildings, most of which are Scheduled Ancient Monuments(SAMS). • establishing a development that reconnects the formerly integrated elements of the original Naval Base and Dockyard whilst preserving the Historic Dockyard's secure boundary. • maintaining and enhancing existing vehicular and pedestrian routes with the addition of a riverside walk to the north side of Covered Slip 7, Existing parking numbers to be retained. • creation of an appropriate sense of arrival at the Historic Dockyard • creating a mix of uses likely to enhance and sustain the emerging Chatham Maritime /Historic Dockyard destination. <p>Pages 7-21 of the document set out the context and background and are somewhat dull. A number of diagrams are used which are too small to read and understand. Similarly the text is plagued by architectural speak which does not make the document particularly accessible to the general public e.g. 'The Development Framework is a three dimensional proposal affecting physical, social and economic development'.</p> <p>Pages 22-37 sets out the key organising principles and the masterplan proposals in more detail. The organising principles are defined as principles that when applied will contribute towards achieving the SPD vision and are listed as:</p> <ul style="list-style-type: none"> • enhancing of the heritage features 	<p>The World Heritage Steering Group has been consulted in the development of this SPD.</p> <p>The consultation has been undertaken in line with the Council's guidance for producing SPD's, in agreement with Medway officers. The agreed consultation approach can be found within chapter 2 of this Statement of Community Consultation report, this sets out how the consultation was publicised.</p> <p>With regard to the reference of 'masterplan' this document is a development framework and spatial masterplan (rather than detailed design masterplan). It sets out development principles and indicative plots for the Interface Land. The form of the development will be a matter for detailed design and is not addressed within the SPD. The sketches and development blocks are illustrative only – we have further clarified this in the document.</p> <p>The context and background of the Interface Land and its surrounding context needs to be understood for a site of this significance.</p> <p>The amount and type of land use is indicative to allow for future flexibility in land use, massing and building heights are also indicative.</p> <p>A design solution is not set out within the Development Framework; however a number of constraints to development are identified within pages 7-21. These are what future development proposals should be tested against, alongside the character zone Frameworks.</p> <p>Further comment has been added to the SPD relating to the bulk and massing of future development and the height of buildings adjacent to Covered Slip number 7. Also further text added relating to land uses.</p>

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	<ul style="list-style-type: none"> • protection of the strategic and local views • block scale, massing and height parameters • permeable movement and parking requirements • public realm treatment • drainage and flooding management. <p>These principles are in addition to earlier criteria listed on page 7 of the document in order to bring forward the vision i.e.</p> <ul style="list-style-type: none"> • provide high quality built form and public realm • introduce innovative sustainable design solutions • preserve and/or enhance the special historic character and appearance of the heritage assets both within and outside the site • reinstate cohesion within the surrounding area • introduce a range of complimentary and compatible land uses and • create a distinct identity but respect its setting <p>To bring forward and achieve the SPD vision the document has listed 12 matters against which the masterplan proposals can be judged. In my view when judged against its own extensively listed criteria the masterplan proposals are poor.</p> <p>I believe this view is supported by the images on page 24 and 25 of the document illustrating the proposed view from the river towards the site. The slip buildings are Grade 1 listed buildings and Scheduled Ancient Monuments. The masterplan itself on page 17 states 'the volume, scale of the historic Slip buildings should be acknowledged and any new proposed development respect their industrial heritage and setting in the context of the River Medway.' The images show tall flatted blocks dominating and overwhelming the historic slip buildings. The proposed 30m-separation zone is not evident and I would suggest meaningless. The proposal fails to meet the masterplan guidance which states on page 24 that 'proposed development must respect the scale of the Covered slips as the dominant feature within current views'.</p> <p>The quantum and nature of the development proposed is also of concern. The masterplan divides the site into 5 areas and a staggering 97,000m2 of development is proposed a significant element of which would be flatted residential accommodation. The quantity and type of development is not appropriate for this important riverside site at the heart of a proposed World Heritage site.</p> <p>The document also states that 'all future planning applications will be tested against the development framework and that failure to comply with the SPD or demonstrate that the design solution is equal or superior to the Development Framework is likely to result in a refusal of planning permission'. All fine words unfortunately the masterplan document does not have a coherent and acceptable design solution against which future applications can be assessed.</p> <p>The current masterplan document in my opinion is totally unacceptable and I strongly urge the whole approach to regenerating this important site is re-considered.</p> <p>Regards</p> <p>Helen</p>	
<p>Hunt, Tony</p> <p>Resident</p>	<p>When the existing pair of tower buildings were proposed I raised objections because in my view tall buildings are de-humanising and unattractive. If regard is had to towns an cities that are regarded as attractive and comfortable to live in, such as Chester, York, Oxford, Cambridge, or even our own Rochester, tall buildings tend to be confined to those of a landmark character: cathedrals, castles etc. The existing tall buildings in Chatham are largely eyesores of little aesthetic appeal that I had hoped might disappear at some stage.</p> <p>I gained the impression when the 60-odd metre twin towers were constructed, that while excessive, they would be exceptional, and comforted myself with the thought that standing alone they might be regarded as landmark buildings. Now it appears that further tall buildings are to be regarded as 'acceptable'. The figure of 45 metres is mentioned. From reading the report on the effects of building heights from different viewpoints, I have to say that it seems to me that no higher than 25 metres could be regarded as in any way 'acceptable', and this only in view of the desire to enable developers to make an attractive profit; 15 metres would be considerably more desirable.</p> <p>Aside from anything else, tall buildings will detract from the presently striking nature of the historic buildings in the dockyard, which appear to currently lie within a maximum height of 27 metres.</p>	<p>Comments noted.</p> <p>45 metres was one of the heights used within the Building Heights Assessment as it related to the height of the adjacent bell tower. This assessment identified that up to 10 storeys would be acceptable. This is likely to be less than the upper 45m height that was analysed.</p> <p>To protect the historic buildings a 30-metre buffer has been proposed, along with the principle that buildings should step up in height away from such features. Further comment has been added in relation to building heights within the riverside area.</p>
<p>Hutchfield, Richard</p> <p>Hutchfield Furniture</p>	<p>I have read aforesaid and associated documents, with interest.</p> <p>I appreciate that your work on these documents is, by-and-large, specific to the site, however, for the purpose of inclusion in Medway's Local Development Framework, other matters need to be taken in to account, especially if sustainability of development of the Interface Land is to be achieved. Most importantly, your block plan, (Sec1: 27), in which areas are presently annotated " Proposed Building Plot" needs proposed use, e.g. residential, light industrial, retail, mixed use.</p> <p>In and effecting the Medway area, there are presently, to my knowledge, five major residential developments, in various states of progress, Wouldham, Cemex Halling, Land Securities Chattenden, St Mary' Island and Chatham Maritime. When complete, these developments will facilitate an increase in population in the Medway</p>	<p>Comments noted.</p> <p>The SPD has promoted flexibility by not specifying land uses but instead development plots. However, open space has been located within the south mast pond area.</p> <p>The Building Heights Assessment completed identified that the Riverside Zone was the most suitable area for taller buildings; the land use designation within this zone is again flexible at this</p>

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	<p>area of approximately 10%. The Chattenden development and City Loft's prior proposals for Interface Land were criticised for not being sustainable, primarily because they proposed high density residential, but insufficient employment.</p> <p>Considering the above, and that Chatham Dockyard was the biggest employer in Medway, and, according to a leading economist "...we can't survive by cutting each others hair", Referring to Sec1: 18, we need to propose Riverside as high quality light industrial with leisure access; North & South Mast Ponds as open area; Brunel Way and Pembroke Rise as residential, with some small amount of staple retail.</p> <p>I vehemently disagree with your designation of Riverside as an area suitable for higher rise development. Slip 7 is dominant in Medway's scene, and should remain so. Maximum height of any new development adjacent should be 14.5 meters, and the building plots arranged radially from the Mast Pond, such that views into and out from the Interface Land, across the riverscape, are maximised. And...No flat roofs</p>	<p>stage. A 30-metre buffer is provided around the slip buildings and buildings would sympathetically rise in height as they step away from this structure. Further comment has been added in relation to building heights within the riverside area.</p> <p>Flat roofs are a matter for detail design, which this SPD is not resolving at this stage. No reference is made to flat roofs in the SPD text.</p>
<p>Hutchfield, Richard</p> <p>Hutchfield Furniture</p>	<p>I have just been to the exhibition in the Dockyard Church.</p> <p>I was horrified, that all but Brunel Way has been, initially at least, designated residential.</p> <p>In my previous letter on this matter, I mentioned the quantity of large residential developments planned and in progress, in and adjacent to Medway. I had forgotten some.....</p> <p>Wouldham; Chattenden; Temple Marsh; Gillingham Reach; Frindsbury; St Mary's Island; Cemex Halling; Chatham Maritime.</p> <p>I implore you to go to Medway, Gravesend, Swale and Tonbridge Planning Departments, and ask for information on aforementioned, (<i>and any others I might have missed</i>). I believe you will be shocked at how many new residences have been built recently in and around Medway, and how many are already approved, and nearing construction.</p> <p>Armed with the information gleaned from this, I ask that you go to SEEDA and Chatham Historic Dockyard Trust, and ask if they can justify building more residences in preference to places for employment.</p> <p>Chatham Dockyard was a centre of manufacturing excellence in its heyday. The opportunity we have here with the Interface Land could be used to emulate this, and avoid the ignominy of becoming a dormitory.</p>	<p>Comments noted (see responses above).</p> <p>The SPD has promoted flexibility by not specifying land uses. Further comment has been added to the SPD relating to flexibility and land uses.</p> <p>Further comment has been added on Land uses.</p>
<p>John Sharkey</p> <p>John Sharkey & Company on behalf of University for the Creative Arts (UCA)</p>	<p>We are currently acting on behalf of the University for the Creative Arts (UCA) on a number of property and town planning matters, including emerging planning policy documents.</p> <p>Together with UCA, we have had the opportunity of looking at the above Supplementary Planning Document (SPD), and this letter contains UCA's views: -</p> <ol style="list-style-type: none"> 1. Paragraph 1.5: Page 5. "Various key stakeholders were involved during the preparation of this SPD." UCA is an acknowledged key stakeholder in Medway, but it was not consulted during the preparation of this SPD. 2. Policy Context: Paragraphs 1.37 to 1.67: Pages 12 to 16. Please see comments beside number 3 below. 3. Development Framework: Paragraphs 2.27 to 2.61: Pages 24 to 32: - <ol style="list-style-type: none"> a. Within these pages, the draft SPD sets out the following proposed uses for the five identified areas within the Interface Land: - <ol style="list-style-type: none"> i. Riverside: Residential led mixed use development ii. North and South mast Ponds: Mixed use development iii. Brunel Way: Commercial iv. Pembroke Rise: Primarily residential v. Covered slips: Car/coach parking b. UCA is extremely surprised and disappointed that there is no reference to Higher and Further Education (HFE) use anywhere in the SPD. UCA is naturally concerned that the Council is seeking to withdraw from previous statements/commitments. c. UCA feels that the SPD should allow for HFE development, within the broader context of a mix of uses across the whole of the Interface Land, and the following comments should be noted: - <ol style="list-style-type: none"> i. So far as national planning policy is concerned, bearing in mind that development for commercial/employment purposes features highly in the SPD, PPS 4 ("Planning for Sustainable Economic Growth") is particularly useful as paragraph 4 states that "..... economic development includes development within the B Use Classes, public and community uses (our emphasis) and main town centre uses." Given that many local planning authorities (LPAs) regard education as falling within community uses, HFE is included within the definition of economic development. In case someone should express a different view, it is instructive to consider another part of paragraph 4, which states that "The policies also apply to other development which achieves at least one of the following objectives ..." one of which is "provides employment opportunities", and HFE demonstrably does that. ii. At a regional level, the Regional Spatial Strategy (RSS) for the south east of England (the South East Plan) is relevant: - <ul style="list-style-type: none"> • Policy S4, a copy of which is attached to this letter, states that LPAs "should work with the higher and further education sectors to ensure that these Sectors' needs are addressed in LDFs". Moreover, the supporting text to the Policy contains some material highly relevant to this exercise: - 	<p>Amendments have been made to provide further details on the inclusion of Higher and Further Education uses within the Interface Land. These were previously included under the flexibility of use, however specific comment has now been added.</p> <p>Further comment has also been added on land use.</p> <p>A meeting was held with the UCA in January 2010 to discuss emerging proposals for the Interface Land.</p>

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	<ul style="list-style-type: none"> ➢ “The Higher and Further Education sectors in the region are critical to the South East's productive capacity and are powerful drivers of technological change and to local and regional economic development.” ➢ “Moreover the Higher and Further Education providers are..... An important economic entity in their own right..... A direct support to the development of industry and the regional economy..... A cultural and recreational resource ...” ➢ “A framework for an effective and efficient higher education offer would need to recognise the importance of ancillary services for higher education establishments; including student accommodation (our emphasis), sports facilities...” • The South East Plan also has policies relating to the different sub-regions, and one of those sub-regions is the Kent Thames Gateway which includes Medway. The following extracts are taken from the relevant part of the South East Plan: - <ul style="list-style-type: none"> ➢ Policy KTG1 sets out the Core Strategy for the sub-region, and states that “Local and central government, and all parties concerned with service provision and infrastructure, will co-ordinate their policies and programmes to raise the standards of education and skills in the workforce, including support for higher and further education, and achieve economic development and inward investment at an accelerated pace” ➢ Policy KTG2 deals with Economic Growth and Employment, and contains the following “The roles of the main economic locations will be promoted and developed as follows Medway will further develop the functions of a city centre within Thames Gateway, providing higher education, retail and other services” • While UCA appreciates that the new coalition government has revoked RSSs, it is understood that a major house-builder (Cala Homes) is seeking a judicial review of that decision which it believes to be unlawful: Cala Homes’ concern centres on development proposals of theirs in the area covered by the South East Plan. In any event, the South East Plan is a document that has been published, and was subject to thorough independent examination: UCA would therefore be extremely surprised if any reasonable LPA in the region disagreed with Policy S4 even if the RSSs are eventually abolished by legislation. iii. At a local level: - <ul style="list-style-type: none"> • One of the saved policies in the Local Plan is Policy CF7 which deals with “Further, Higher and Adult Education: <i>Further, Higher and Adult Education facilities will be permitted on appropriate sites in Chatham town centre or other town centres which are accessible by a variety of means, including public transport, cycling and walking. Expansion of the existing campuses at Chatham Maritime and World Naval Base, Chatham will be permitted.</i>” • The Issues and Options version of the emerging Core Strategy has a particularly relevant reference in paragraph 4.121: - “With its new university charter UCA is looking to develop a major new campus but this need not necessarily be in Medway. Given the established links, stock of student accommodation and a new focus on the local development of cultural and creative industries, losing the university to another area would be a major blow. On the other hand a number of potential sites have been identified, with a particularly interesting candidate being what is known as the 'Interface Land' between Dickens World and the Historic Dockyard.” • Indeed, the Sustainability Appraisal (SA) for this SPD has two references which also support the inclusion of HFE uses within a mix of uses on the whole of the Interface Land: - <ul style="list-style-type: none"> ➢ One of the recommendations on page 11 is “It is recommended that consideration be given to providing shared space for community and education uses within the development. The services that are likely to be needed on site and the required footplate should also be specified;” ➢ One of the SA Objectives is “ Raise educational achievements through developing opportunities to acquire skills, to develop and maintain workforce” • Medway Council have produced two other relevant planning documents: - <ul style="list-style-type: none"> ➢ The Medway Regeneration Framework 2006 – 2016 includes in its Vision “A major university complex with 15,000 students”. Moreover, two of the four sectors which are expected to drive the creation of high value-added employment are: - <ul style="list-style-type: none"> ○ “Creative industries (Particularly in convergence with other industrial disciplines)” ○ “Higher Education sector activity on research, convergence, and integration with the business community and international development.” ➢ The Medway Waterfront Renaissance Strategy 2004 has an important reference to higher education viz. “Foster the role of the Universities at Medway, Kent Institute of Art and Design and colleges as important drivers for economic 	

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	<p>change.” [UCA incorporates the institution that used to be known as the Kent Institute of Art and Design.]</p> <p>iv. UCA has had a number of discussions with the Council on its plans for a new Kent campus and, while no final decision has been made, Medway is one of the locations that is under serious consideration. Throughout those discussions, the Council has consistently referred to the Interface Land as a site suitable for the location of the new Kent campus. Indeed, as can be seen from the above the Council even referred to that possibility in its most important LDF document viz. the emerging Core Strategy.</p> <p>d. Paragraph 1.89: Page 19. UCA fully agrees that affordable student housing should be considered when dealing with residential accommodation.</p> <p>e. Paragraph 1.90: Page 19: -</p> <p>i. UCA does not agree that the draft SPD makes “the most efficient and effective use of land and buildings” – please see comments under (c) above.</p> <p>ii. While UCA agrees that the draft SPD should take a flexible approach to uses, it cannot understand why the document does not allow the possibility of an HFE use within the context of a mix of uses across the whole of the Interface Land.</p> <p>f. Sub-heading “uses”: Page 36. UCA fully agrees with the text here: - “Suitable levels of a compatible mix of uses will be encouraged within the Interface Land to create a high-density, sustainable development. At this stage a flexibility in the future use of buildings is encouraged to ensure potential occupiers are not constrained through planning policy and use classes.” HFE is a use that is compatible with many of the other uses set out in the draft SPD. This makes it even harder for UCA to understand why the document does not allow the possibility of an HFE use within the context of a mix of uses across the whole of the Interface Land, particularly bearing in mind that throughout UCA’s discussions with the Council on the new Kent campus, the Council has consistently referred to the Interface Land as a site suitable for the location of the new Kent campus.</p> <p>UCA is naturally disappointed that, having had discussions with the parties involved, including the Council, and bearing in mind that the Council indicated in its emerging Core Strategy that the Interface Land is suitable for the new Kent campus, the possibility of education use on the Interface Land has now been discounted without any discussion with UCA.</p> <p>If the SPD is adopted without making reference to education use, and assuming that UCA selects Medway as the location for the new Kent campus, UCA wonders what sites in Medway the Council feels would be suitable for the new Kent campus?</p> <p>In the normal way, please contact us if any aspect is not clear.</p> <p>We are sending this letter to you by email as well as post, in order that you receive it before the deadline of 5.00 pm on Tuesday 14 September. For good order, we are also sending it to Medway Council.</p>	
<p>Josh Nelson Natural England</p>	<p>Thank you for consulting Natural England on the above SPD consultation draft.</p> <p>Natural England welcomes the importance attached to respecting the surrounding cultural heritage, which is of particular importance to the local landscape character.</p> <p>Southern Mast Pond We would support the provision of public open space in the southern mast pond and would encourage water to play a feature of the design. We would recommend that the planting - including that of any water feature(s) - should be of native species or species providing known nectar, pollen or fruiting body resources for native wildlife.</p> <p>Living roofs Natural England would encourage the use of green (or brown) living roofing as part of the development brought forward through the planning and delivery processes, where these can be designed sympathetically with the heritage setting.</p> <p>As well as providing tangible improvements to the living environment, living roofs can also provide important sustainability benefits by assisting climate change mitigation and adaption through, for instance, urban cooling and sustainable drainage.</p> <p>Living roofs can also provide a vital urban biodiversity resource and there is increasing evidence of these benefits and increasing technical knowledge on how to design them into new development. Natural England would encourage living roofs that build in biodiversity enhancements as a core component of the design (including an emphasis on a diverse range of native locally occurring species rather than a low biodiversity value monoculture led planting scheme).</p> <p>Paragraph 1.62 - Ecology</p>	<p>Comments noted and support is welcomed having regard to the South Mast Pond solutions and ecology recommendations.</p> <p>Living roofs is a matter for detailed design and therefore not considered at this stage.</p>

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	<p>Natural England welcomes the recognition of the need to confirm the presence of any protected species on the development site. This should be carried out – and any appropriate mitigation secured – prior to the grant of any relevant planning permission.</p> <p>As you are hopefully aware, Natural England has recently issued a consultation draft of our updated protected species standing advice. From 1 November 2010, Natural England in London and the Southeast Region will be withdrawing from offering case specific advice to Local Planning Authorities where a development may impact upon a protected species and the Council will need to refer to the guidance contained within our standing advice. The draft advice can be found at: http://www.naturalengland.org.uk/regions/south_east/ourwork/standingadvice/protectedspecies/standingadviceconsultation/default.aspx.</p>	
<p>Parker, Viv Resident</p>	<p>The riverside area should have a maximum height of 6 storeys and the covered slips area a maximum height of 5 storeys so as not to overpower adjacent buildings and dominate the skyline. The use of the Covered Slip as a multi-storey car park is an inappropriate use for such a historic building and detracts from its previous use. Brunel Way maximum height should be 3 storeys – the existing Ramada is too high and ugly and attracts attention for its sheer height and ugliness. The river frontage must not be tower blocks as suggested on the plans but of lower height with pitched roofs to complement the surroundings. Use of brick cladding not UPVC, steel or wooden cladding to enhance visual appearance – wood will weather too quickly.</p> <p>Can the old river wall be marked out in paving? Ground floors of the blocks should be given over to parking to mitigate the risk of flooding and reduce parking demand on the covered slipway multi-storey car park.</p>	<p>Comments noted.</p> <p>The Building Heights Assessment identified that up to 10 storeys would be acceptable within the Riverside Zone provided that the following were considered when locating the taller buildings.</p> <ul style="list-style-type: none"> • viewing corridors; • a 30 metre buffer around the slip buildings; and • buildings should step up in height away from the slip buildings <p>Further comment has been added in relation to building heights adjacent to Covered Slip number 7.</p> <p>The design of the buildings and landscape treatment will be resolved at the detail design stage.</p> <p>The parking provision within the Interface Land will be a matter for detailed design the use of slips 5 and 6 for parking is indicative at this stage.</p>
<p>Scott, B Leigh on Sea</p>	<p>This is a church and place of worship. The display should be exhibited in another building (there are plenty of them here)!! Try using language of a more simple nature!</p>	
<p>Williams, Peter and Margherita Residents</p>	<p>We would like to make a number of points:</p> <ol style="list-style-type: none"> 1 a previous planning proposal by City Lofts tried to squeeze in far too many properties. It is important that the local infrastructure e.g. hospital, schools and roads can cope with the extra numbers. 2 we have lived in the area for 25 years and in the dockyard for 8. We have seen big planning oversights in that time e.g. no pedestrian or cycle route through the revolutionary Medway Tunnel connecting two urban areas, Chatham and Wainscott/ Upnor. 3 we suggest pedestrian and cycle access to the interface land be easy and well designed, including through the dockyard wall. Traffic in the Medway Towns is bad and ever increasing and reduces quality of life. Ways of reducing it need to be found e.g. car sharing for school runs, public transport etc A major development such as this should liaise with local schools and transport agencies. 4 the modern houses in the dockyard are dull and uninspiring, especially for instance the view of College Road from the west side of the Medway which looks like a long yellow brick wall. Please can we have some visually exciting architecture with highly energy efficient houses, perhaps with water collection for gardens and designed also to encourage wildlife such as nesting House Martins, Swifts etc. A colony of House Martins deserted the eighteenth century wooden building on the north side of the mast pond a few years ago when large cables were thoughtlessly laid under the eaves. In Amsterdam all new buildings have to have entrance slits under the eaves to allow Swifts, whose numbers are declining, to nest. 5 it should be noted that hitherto much wildlife is regularly found in the dockyard, including Dabchicks (Little Grebes) which overwinter on the Mast Pond. We have regularly seen or heard Common and Lesser Whitethroat, Willow Warblers, Chiffchaff, Blackcaps in the scrub near the Police House, and occasionally Nightingales. Little Owls and Sparrowhawks are sometimes seen, also Black Redstart in winter. Some wild spaces should be left. Local planning guidelines recommend proper green spaces. Tern platforms on the Mast Pond should be considered. An environmental assessment e.g. by Kent Wildlife Trust should be invited. 6 light pollution needs to be minimised, also to save energy. The current Dockside car park lighting is excessive. 7 this could be a great development in a unique environment but needs to be sensitive to the above issues, and could be an example for others to follow. <p>We look forward to your response to our suggestions.</p>	<p>We agree with the points raised and believe in principles these have already been discussed within the draft SPD and Transport Assessment. These points will need to be addressed at the detail design stage as part of any planning application/s for the Interface Land.</p> <p>Wildlife surveys are recommended in the SPD.</p>
<p>Wyett, Dave</p>	<p>(Response left in written format at consultation exhibition)</p>	

Consultee	Comment	Response/Action
Resident	Interested in public open spaces	