

# Medway Local Development Framework

## Schedule of Letter Responses to the Issues and Options Report 2009

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
<b>File name</b>	<b>Overall</b>				
1.		Cemex Operations Ltd	Cemex Operations Ltd	<p><a href="http://medway-consult.limehouse.co.uk/file/1043616">http://medway-consult.limehouse.co.uk/file/1043616</a></p> <p>The CEMEX site at Halling (former cement works) benefits from an outline planning permission for a mixed-use scheme of 550 dwellings, 3000sqm of employment floor space and associated open space.</p> <p>In relation to the list of regeneration sites on page 25, the table ought to be amended to include identified regeneration sites of significant size 'outside' of the Kent Thames Gateway Area. The 'former Cement Works Site' at Halling should be listed as one of those regeneration sites for circa 700 units. It is the major established regeneration opportunity in the area of Medway outside of the Kent Thames Gateway.</p> <p><u>Q.15</u></p> <p>The LPA should have a flexible approach on issues such as housing numbers, density, mix of units, mix of uses and the extent of site boundaries is key to ensuring that sites are actually delivered. This flexible approach should be applied to all sites that are acceptable for development in principle, and not solely urban regeneration sites.</p> <p><u>Q.68</u></p> <p>All strategic projects of this nature should be identified within the Core Strategy. A number of projects are already listed (para. 4.217) and a further area within CEMEX's ownership should also be considered. This being the existing lake and lake edge underneath and to the south of existing powerlines. This is the major component of an area proposed to enhance wildlife conservation in the permitted Outline scheme. It is also considered that a further significant area of land in between the railway line and the river edge that is previously used industrial land could be delivered as a wildlife/public resource.</p>	<p>Noted. The table in the Issues and Options document has not been carried forward into the Core Strategy. Instead, all relevant sites are included in the Strategic Land Availability Assessment, which informs the strategy.</p> <p>The degree of flexibility taken to the development of individual sites will be measured against the policies set out in the Core Strategy when proposals are considered.</p> <p>These sites will be identified in a subsequent development management/site allocations development plan document.</p>
2.			Brian Kingsley Smith	<p><a href="http://medway-consult.limehouse.co.uk/file/996573">http://medway-consult.limehouse.co.uk/file/996573</a></p> <p>The Consultation is unsound and will result in the Core Strategy being rejected because there is no earlier stage at which it can be independently assessed. We urge the Council to replace the Consultation document with one which is sound.</p> <p>The necessary evidence base does not exist and therefore neither the Council nor consultees can identify the fundamental challenges facing Medway</p> <p>Issues ignored by the Consultation include: transport problems, 'the impact of the Lower Thames Crossing, the impact of commuting, options for a wide range of sites to provide employment appropriate to the existing residents in addition to attraction of new high quality jobs and reduction of commuting, the future of Chatham as a regional shopping centre concentrating development at the regeneration sites which are admitted to be dependent on further public funding, failure to acknowledge the local issues of poverty and deprivation .</p> <p>Medway has therefore at last come to the inevitable collapse in its previous policies. The consultation fails to address the fundamental social, economic and infrastructure issues.</p> <p>The consultation is fatally infected by the absurd belief that "the existing strategy" has succeeded and that no alternative should be considered.</p> <p><u>Q.15</u> is fundamental to the consultation but is brief and inadequately prefaced</p> <p><u>Q88-Q96</u> wrongly predicate not only that development at Chattenden is appropriate but that it is exclusive of others.</p>	<p>The basis for this comment is not understood. The Issues &amp; Options report is not a core strategy.</p> <p>The evidence base is constantly being updated and is considered to be comprehensive.</p> <p>Generally, these issues have been addressed in the Core Strategy although there are no proposals currently for a Lower Thames Crossing.</p> <p>Noted but not accepted.</p> <p>Noted.</p> <p>View noted.</p> <p>The development of Lodge Hill/Chattenden is the only strategic option that meets the requirements of PPS3 to give priority to the development of</p>

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				<p>The Issues and Options report is an unsatisfactory basis for consulting to enable the Council to determine the content of its Core Strategy. If the Core Strategy follows the direction set out thus far, it is likely to be found unsound. In view of the way in which the previous Core Strategy had to be withdrawn, faced with a certainty of being found unsound, it would be a blow to the future of Medway if this new Core Strategy were to be rejected. Medway's problems, especially those relating to the economy and jobs, transport, and social deprivation, require planning solutions that are realistic and practical, and soon. The Council's failure to provide such solutions so far must cast serious doubts on the ability of its existing planning strategy to deliver and therefore makes it essential that there should be an objective and thorough testing of those matters and of sensible alternatives not constrained by irrational criteria. The Issues and Options paper does not meet those requirements and needs to be reconsidered as these comments indicate.</p>	<p>housing on previously developed land, whilst taking into account the need to consider the opportunity for development on surplus public sector land.</p> <p>Views noted.</p>
3.		RACC	Harry Deakin	<p><a href="http://medway-consult.limehouse.co.uk/file/932110">http://medway-consult.limehouse.co.uk/file/932110</a></p> <p>The South East Plan contains a specific policy for protecting and supporting small airports. The RSS reflects the protection and support previously given by the Kent and Medway Structure Plan and Medway Council's own policies. Issues and Options contains no such reference. The Airport has a master plan which has been provided to Medway Council - RACC objects to this omission which requires correction in the Core Strategy.</p> <p>Reference should be made to Rochester Airport rather than just 'Rochester airfield'. The Council and its consultants have failed to engage with RAplc (and also RACC) as stakeholders concerned with one of Medway's major assets.</p> <p>Medway is intended to play a key role in the region and especially in Thames Gateway, but the Issues and Questions under this heading ignore RA. RA needs to be considered more broadly in report in context of regenerating the economy, new large sites for business and industry etc.</p> <p>Para. 4.55 has a short reference to RA which makes no effort to describe the airport's role or its potential. It is true that current use is mainly recreational, but business flying is an important element, which would increase significantly if improved facilities and an all-weather runway are provided. What is meant by "amateur" pilot training?</p> <p>Para 4.56 - gives equal prominence to a local microlight facility detracting from RA's importance.</p> <p>It is clear that with Transport, as with the Economic Strategy, the consultants concerned were not adequately briefed about the airport and had no consultation with RAplc or RACC.</p> <p>The issue of Medway's Economy needs to receive adequate and realistic treatment as the single biggest issue for Medway. RA is able to play a part in reviving the town's economy.</p> <p>The identification of the airport area as a key element in all the options to provide additional business and industry sites makes it necessary to ensure that the airport's own operational area and airspace remains adequate. That is not yet clear from the Issues and Options report, nor from the ERS report on the Economic Strategy.</p> <p>Para.4.60, which records the importance of BAe Systems, needs supplementing to point out that BAe's presence is helped by having the airport adjoining its site.</p> <p>Choices made from the issues and options impinge on RA's ability to operate the airport successfully and safely. RACC has serious doubts about the way the spatial choices have been approached. The current strategy, is untested so there is no basis of objective and clear assessment against which the alternatives put forward can be compared. The report states that there is no obvious need to identify an alternative strategy (but several are examined nevertheless). That conclusion rests upon the view in the report that the Current Strategy has been operating for some years, endorsed by a sequence of plans at regional and Kent levels, and provides capacity for the development intended.</p> <p>The Current Strategy's main features are a focus on regenerating urban sites plus the Chattenden-Lodge Hill site. The report acknowledges however that there are problems, slow or no delivery of development being a major one. Another, acknowledged by the ERS study for the Economic Strategy, is that the focus on using brownfield urban land for housing has made sites for industry and business scarce and expensive. With such core questions unanswered it would seem unsatisfactory to simply take the Current Strategy as a "given".</p>	<p>The South East Plan has now been revoked. The Core Strategy does not propose any alternative uses for Rochester Airport.</p> <p>Noted but this is the purpose of the Issues and Options stage.</p> <p>Noted and addressed in the draft core strategy.</p> <p>Noted.</p> <p>View noted.</p> <p>Noted but it is not clear which consultants are being referred to.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Views noted.</p> <p>A sufficient surplus of both housing and employment land has been identified in the Strategic Land Availability Assessment to offset the potential slow delivery on sites.</p>

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				<p>All the alternative options are made subject to testing against criteria heavily influenced by that fact, rather than being compared on a like-for like basis.</p> <p>The heavy bias of the report in favour of the Current Strategy has implications for the airport. Traffic generation in the centre is likely to exacerbate congestion problems. The concentration on urban brownfield sites for housing creates pressures for higher densities and consequent cramming of development. RApC and RACC are already suffering the consequences in a development proposed close to the airport where high density has produced a proposal for residential building which may not prejudice the airport's protected airspace but if permitted would introduce sensitive uses to an area affected by both road and aircraft noise at levels unacceptable under Government policy, and a potential threat to the airport's future.</p> <p>RACC therefore makes objection to the Issues and Options report in the above respects. It hopes however that the Council will use the opportunity of this consultation to engage in discussions with RACC and RApC, remedying a failure to do so in the run up to the report, and which could produce better understanding and the possibility of resolving matters so as to avoid the need to pursue difficult and time-consuming issues at an Examination into the Core Strategy in due course.</p>	<p>View noted.</p> <p>Noted.</p> <p>Noted and the Council is committed to continuous engagement.</p>
	<b>Preface</b>				
4.	Question 1	Broomhill Gospel Hall Trust	Broomhill Gospel Hall Trust	<p>See attached comment (pdf file) from John Devine on behalf of the Broomhill Gospel Hall Trust <a href="http://medway-consult.limehouse.co.uk/file/947883">http://medway-consult.limehouse.co.uk/file/947883</a></p> <p>The Trust regard the provision of places of worship as a matter of infrastructure, which is not taken account of in the consultation document.</p> <p>Having identified, some 50 such places on a map in the 'State of Medway Report', and we believe there are more, we are surprised that there is no vision or section dealing with this important aspect of human life.</p> <p>The statements of the Sustainable Community Strategy do not deal with the subject of worship and therefore do not guide the proposed core strategy nor its sustainability appraisal. Thus there is a lack in these documents, which should be repaired.</p> <p>The LDF should consider the following:</p> <p>The role of the voluntary sector in general and faith communities in particular in supporting the quality-of-life in the district, tackling social exclusion and inequalities including crime and fear of crime.</p> <p>The need to promote truly sustainable communities and to encourage diversity and equality in planning. We draw attention to "Diversity and Equality in Planning" 2005 ODPM as noted in PPS1.</p> <p>The need to ensure provision for the voluntary sector including faith communities and their need for space to operate, and specifically to ensure the recognition of places of worship as part of the infrastructure for sustainable communities throughout including its growth areas.</p> <p>To provide for the people as a whole in both urban and rural locations and to make a positive contribution to improved social capital.</p> <p>We submit that the social dimension to spatial planning is particularly important at the current time of recession allied with unemployment and deprivation.</p> <p>We suggest that the new local development framework should promote vigorously a more inclusive society recognizing shared values and issues but not forgetting the distinct needs of different groups.</p> <p>We note that it is not the policy of the council to develop East Rainham. However, we have generally moved towards the east and feel that development should be first considered in this area, which scores well as an attractive family area.</p> <p>We have noticed that Medway and Swale now have authority to combine actions to take account of cross border actualities with Dartford and Gravesham in a multi area agreement. We believe that this will improve the provision of infrastructure.</p>	<p>The provision of places of worship will, if necessary, be considered in a subsequent development management/site allocations development plan document.</p> <p>View noted.</p> <p>This is addressed in the draft core strategy.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted but also needs to be assessed against other factors as well.</p> <p>Noted.</p>
5.	Question 1	Bourne Leisure Ltd	Bourne Leisure Ltd	<p>See attached comment (pdf file) from Nathaniel Lichfield &amp; Partners on behalf of Bourne Leisure Ltd. <a href="http://medway-consult.limehouse.co.uk/file/947817">http://medway-consult.limehouse.co.uk/file/947817</a></p> <p>Questions 1,2 and 3</p>	

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				<p><b>5. NLP</b> Core Strategy Issues and Options Report, July 2009 On behalf of our client, Bourne Leisure Ltd., we set out below details of our client's operations and their key observations on the emerging Medway Core Strategy. Our client's detailed comments on the above consultation document are set out in the attached response to the questionnaire and associated Appendices, which expand on national and regional policies for tourism and leisure generally (Appendix 1) and the economic benefits of tourism (Appendix 2). Typical enhancements carried out by Bourne Leisure on its holiday parks are shown on Appendix 3.</p>	Noted
				<p><u>Background</u> By way of background, Bourne Leisure is the UK's leading operator of holiday centres, with more than 50 holiday sites in the UK, in the form of (i) holiday parks; (ii) family entertainment resorts; and (iii) hotels and holiday resorts. These are managed by a number of subsidiary companies which include Haven, Butlins and Warner. Within Medway, Bourne Leisure owns the Allhallows Holiday Park, which comprises a mix of static caravans and holiday chalets, which provide a valuable tourism resource. Holidaymakers at Allhallows Holiday Park stay for a total of 116,000 bed nights per year; together with caravan owners at the park, this figure increase to some 400,000 bed nights per year. This very high number of staying guests is obviously already making very significant contributions to the economy, supporting both direct and indirect employment in the Borough and further afield and likewise supporting companies that are suppliers to Bourne Leisure.</p>	Noted
				<p>For Bourne Leisure's operation to attract customers and to respond to changing market conditions, the Company needs to invest regularly in order to improve the product to meet increasing customer expectations. In 2007, the Company invested some £91 million on improving facilities and accommodation generally on its sites. In 2008, Bourne Leisure spent £103.7 million on its sites. Bourne Leisure is currently seeking to implement improvements to the Allhallows Holiday Park.</p>	Noted
				<p>In some cases, improvements necessitate the expansion of sites, to facilitate the provision of new facilities and to meet higher amenity standards, whilst taking into account the specific environmental constraints imposed by a site's location. It may also be necessary to extend the site to improve the quality of the accommodation and/ or to increase the range of facilities provided in order to extend the season.</p>	Noted
				<p>As many of Bourne Leisure's sites are located in rural and /or coastal areas, incorporating or adjacent to environmentally and ecologically sensitive sites., Bourne Leisure has significant experience of operating within and adjacent to sensitive environmental locations and takes the need for their protection and enhancement fully into account in day to day operations and when drawing up development proposals for its sites. It is vitally important that emerging development planning policies allow fully for these changes to take place, with economic benefits being properly balanced with environmental issues in the drafting of policies.</p>	Noted
				<p><u>The Medway Core strategy Issues and Options Report, July 2009</u> As set out in the attached response to the Questionnaire and the accompanying appendices, Bourne Leisure considers that specific recognition should be given to the importance of tourism to the Borough and the need to enhance the tourism role of Medway. In particular, the Company considers that policy support should be given to the enhancement of existing tourism facilities and accommodation in order to ensure Medway remains an important tourism destination.</p>	These points are addressed in the tourism policy of the core strategy.
				<p>As background to the Issues and Options Report, we note that The State of Medway Report: Retail, Leisure and Culture, August 2009 recognises the importance of tourism to Medway and the fact that" tourism employs over 5,000 local people and is worth in the region of £250 million annually to the local economy". Moreover, point 1 of paragraph 8.1 also note that: <i>"National and international forecasters project continued growth in the tourism economy. Medway has the potential for significant further growth in its local tourist economy.."</i></p>	Noted.
				<p>These attributes should be fully recognised in the Core Strategy, which should also, in its Vision, refer to the Council's objective of developing Medway as " a city of culture, tourism, learning and technology" (paragraph 3 of the State of Medway Report: Retail, Leisure and Culture, August 2009).</p>	The role of tourism is recognised in the Vision for Medway in the core strategy.
				<p>The Core Strategy Issues and Options report (paragraph 4.205) then recognises that the tourism potential of the Borough is constrained by insufficient accommodation. At present, Medway is seen as a day visit destination, with 84% of visitors being day visitors (page 41 of the State of Medway Report). It will clearly be important to encourage more staying visitors, and to provide for a range of high quality visitor accommodation, including holiday parks, if there is to be significant further growth in its local tourist economy.</p>	This is addressed in the tourism policy.
				<p>The focus of our comments on the Medway Core Strategy Issues and Options Report is, therefore, in respect of:</p> <ul style="list-style-type: none"> <li>• Recognising the importance of tourism to the future prosperity of Medway;</li> <li>• Encouraging development which improves the quality of the tourism experience and which will result in attracting more staying visitors and/ or extending the tourist season; and</li> </ul> <p>Enabling improvements in the quality of visitor accommodation to support the Council's objective to develop Medway as a city of culture, tourism, learning and technology, particularly in relation to enhancing existing holiday parks.</p>	These are addressed in the tourism policy.
				<p>On this last objective, policies within the Medway Core Strategy should specifically promote and support the development and enhancement of existing holiday parks, where this results in improvements to the layout, standards and overall appearance of a park. Bourne Leisure considers that the policy approach within the local development framework should be a balanced one, which seeks to balance environmental and economic and social considerations. Moreover, major operators should be encouraged to prepare and agree master plans for their sites/ landholdings, particularly where this would result in long term benefits to the landowner, Council, local residents and local economy.</p>	Whilst not specifically referring to existing holiday parks, the application of the tourism policy, which includes promotion and enhancement, will apply equally to them as to other aspects of tourism.

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			We trust that the above comments will be of assistance in preparing the Core Strategy and other LDDs. Please do not hesitate to contact me or my colleague Frances Young, should you require any clarification of the points made. We would also be grateful if you could keep us informed of progress on the development of the local development framework, in terms of any forthcoming consultations on emerging LDDs.	Noted.
			Response to Questionnaire by Bourne Leisure Ltd.	
			<u>General</u> In regard to Questions 1, 2 and 3, which ask whether the right issues have been identified and what else should be included in the Core Strategy, Bourne Leisure considers that specific recognition should be given to the importance of tourism to the Borough and the need to enhance its tourism role.	Noted.
			Core Strategy policies should support the development of tourism per se, and tackle the issues relating to tourist economy growth inter alia by supporting the development of new tourism accommodation and facilities and the enhancement of existing provision.	Noted.
			In addition, the Vision and strategic objectives of the Core Strategy should specifically refer to the enhanced role of Medway as an important tourism destination, where improvements to the quality of tourist-related facilities and accommodation will be encouraged in order to extend the tourist season and attract additional tourism-related expenditure.	The vision specifically refers to tourism and in the strategic objectives, tourism is encompassed by the aim to substantially improve the performance of the local economy.
			A more detailed response on tourism issues is set out below in relation to leisure, culture and tourism, and in the accompanying appendices.	Noted.
			<u>Housing</u> In relation to the questions posed in regard to housing (Questions 15 to 21), Bourne Leisure considers that it will be important for the provision of high quality permanent residential accommodation to be supported throughout the Borough and for opportunities for affordable housing to be identified. The Council should identify appropriate housing sites in consultation with key landowners.	Noted.
			<u>Transport</u> <b>Q22. Have the correct transport issues been addressed? If not, which further issues should be considered?</b>  Bourne Leisure notes that paragraphs 4.43-4.56 of the consultation document highlight the key transport issues in the Borough. Whilst Bourne Leisure supports the promotion of public transport use, walking and cycling, it should be noted that in regard to tourism uses, there is often no feasible alternative option available other than the private car for reaching more remote areas. In regard to tourism uses, unlike "regular" trips, for example to work, where alternative modes of transport generally do exist, a leisure trip is relatively unusual and infrequent. Moreover, research suggests that leisure trips often result in higher car occupancy (a family day out).	Noted.
			Bourne Leisure therefore considers that a reference should be made within the Core Strategy to the need for transport policies to promote non-car modes of transport where possible, but recognise the reality of car based access, particularly in terms of tourism-related transport.	Noted.
			<u>Leisure, Culture and Tourism</u> Bourne Leisure wishes to comment on a number of tourism issues, which are not reflected in questions 64 & 65, (which specifically refer to hotel development and the marketing of major tourist attractions), namely the need to recognise the importance of tourism to the Borough; the economic of tourism; and the need to enhance the accommodation base of the Borough. In addition, additional information is provided at the attached Appendices, in terms of relevant national, regional and local planning policy (Appendix 1); the economic benefits of tourism (Appendix 2); and examples of enhancements carried out by Bourne Leisure on its holiday parks (Appendix 3).	These are addressed in the tourism policy.
			<u>The Importance of Tourism</u> Bourne Leisure considers that the importance of tourism to the Borough should be fully recognised throughout the Core Strategy.	Noted.
			Whilst Bourne Leisure supports paragraph 4.204 of the issues and Options Report which recognises the "many and varied tourist assets" within Medway, the company considers that the section on issues and choices (page 61) which deals specifically with tourism should fully identify and recognise the potential to further develop tourism within Medway, including the scope to enhance existing tourist accommodation. This would reflect Section 8 of the State of Medway Report: Retail, Leisure and Culture, August 2009.	Noted.
			Paragraph 8.1 of the State of Medway Report: "Retail, Leisure and Culture, August 2009 recognises that tourism is important to Medway. Indeed, point 1 of paragraph 8.1 notes that "tourism employs over 5,000 local people and is worth in the region of £250 million annually to the local economy". Moreover, tourism is seen as contribution to the well-being of local residents. Point 1 of paragraph 8.1 also states:  "National and international forecasters project continued growth in the tourism economy. Medway has the potential for significant further growth in its local tourist economy.."	Noted.
			These attributes should be fully recognised in the Core Strategy, which should also, in its Vision, refer to the Council's objective of developing Medway as "a city of culture, tourism, learning and technology" (paragraph 3 of the State of Medway Report: Retail, Leisure and Culture, August 2009).	Noted.
			Moreover, it is noted that the notes of the LDF Leisure, Culture and Tourism Stakeholder Workshop (23 March 2009) refer to the fact that "Council's recent Economic Study stated that tourism should be given more importance" (page 3).	Noted.

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			Recognition of the importance of tourism would accord with national and regional guidance, as detailed at Appendix 1.	Noted.
			<u>Economic Benefits of Tourism</u> The report "The Economic Impact of Tourism on Medway 2006", by Tourism South East identifies at paragraph 1.1 that in 2006 there were 1.934.401 staying visitor nights and that in total £191, 544, 615 was spent by all visitors on their trip. The report also identifies that tourism activity generated over £215 million expenditure, of which £204 million directly benefited local businesses (paragraph 1.3). Moreover, spending by these businesses on local supplies and spending by employers in the local area is estimated to have generated a further £61 million. Overall, tourism expenditure supported 8% of local employment.	Noted.
			On the basis of these calculations, 116,000 staying visitor nights at Allhallows Holiday Park would equate to 6% of total staying visitors and contribute some £12.25 million to the local economy.	Noted.
			In addition, as recognised at point 10 of paragraph 8.1, "the 2012 Olympics present Medway with significant boost in terms of attracting the tourism and cultural investment is requires and will be a further catalyst to develop Medway as a genuine city break tourism destination".	Noted.
			Specific policies within the Core Strategy should recognise the economic benefits of tourism and support proposals for tourism development/ enhancement which help to support further tourism investment.	Noted.
			Additional information on the economic benefits of tourism is set out at Appendix 2.	Noted.
			<u>Tourism Accommodation</u> Paragraph 4.205 of the Medway Core Strategy Issues and Options consultation document states that "realising the considerable tourism potential (of Medway) is hampered by four main factors", which include a shortage of hotel bedrooms. No reference is made to other forms of tourism accommodation in the consultation document.	Noted
			Paragraph 4.206 then states, " notwithstanding these difficulties potential is still considerable and the already substantial economic benefits to the area as a whole could be greatly increased".	Noted.
			Bourne Leisure notes that the State of Medway Report: Retail, Leisure and Culture, August 2009 refers to the current performance of hotels as being not particularly strong (paragraphs 7.21 to 7.25), although we note that other sectors of tourism accommodation, including holiday parks, are not specifically referred to in the report.	Noted.
			In view of the fact that existing hotel accommodation is not performing well and that Medway is currently seen as a day visit destination (page 41 of the State of Medway Report), with 87% of visitors being day visitors, but that the potential to develop it further as a tourism destination is recognised, there is a clear need to support a range of high quality accommodation, including holiday parks. This should be clearly recognised in the Core Strategy and supported through appropriately worded policies.	Whilst not specifically referring to existing holiday parks, the application of the tourism policy, which includes promotion and enhancement, will apply equally to them as to other aspects of tourism.
			In regard to paragraph 4.212 of the consultation document, which suggests that development of the tourism sector is linked to the need for town centre regeneration, the Company considers that reference should also be made to the need to provide a range of high quality visitor accommodation, including caravan and holiday parks, throughout the area.	Compared with tourist facilities in the urban areas, the expansion of holiday parks in the rural area is more likely to come into conflict with environmental protection policies. The tourism policy supports sustainable tourism development and to maintain and where possible, enhance Medway's natural and built environment. If holiday park development can meet these requirements, it will be supported.
			In conclusion, Bourne Leisure considers that the Core Strategy should contain a general policy which encourages the enhancement of Medway as a tourism destination and supports proposals which improve the quality of existing tourist facilities and accommodation; and encourages new facilities and accommodation, particularly where this helps to extend the season and attracts higher spending guests.	These points are addressed in the tourism policy.
			In addition, and specifically in relation to holiday parks, the Core Strategy should incorporate a policy which states:  Proposals to retain and enhance existing holiday parks, including their expansion, will be supported where this results in improved accommodation and facilities, improvements to the layout and appearance of the site and its setting and helps to extend the visitor season.	A specific policy on holiday parks is not considered to be necessary.
			This would be in accord with paragraph 14.31 of the South East Plan (see Appendix 1) which recognises the increased demand for improvements to many existing holiday and caravan parks and suggests that local planning authorities should consider applications to upgrade such sites favourably.	The South East Plan was revoked on 6 July 2010. However, the principle of improvement to existing tourist accommodation and facilities is recognised in the tourism policy.
			<u>Climate Change</u> Q87. Would you like to propose any additional strategies that should be considered in relation to climate change effects in Medway.	

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				Bourne Leisure considers that it will be important for the specific characteristics and vulnerability of particular uses to be taken into account when considering the effects of climate change, for example, certain tourism uses need to be, or to remain located adjacent to water. In addition, it will be important for consideration to be given to whether the residual risks of flooding to people and property are acceptable and can be satisfactorily managed; and whether the development makes a positive contribution to reducing or managing flood risk. In particular, the Company considers that in regard to the consolidation and expansion of existing tourism accommodation and holiday park sites within flood risk areas, that only the extent of the new development site within or adjacent to the existing holiday park, and not the whole site, should have to be assessed sequentially.	Noted.
				Appendix 1: Leisure, Culture and Tourism National Planning Policy The inclusion of specific policies within the Medway Core Strategy to support tourism generally and to enhance tourist accommodation in particular, would be in accord with national planning guidance.	Noted.
				The CLG Good Practice Guide on Planning for Tourism (May, 2006) emphasises the crucial importance of tourism to the economic, social and environmental well-being of the whole country (paragraph 1.1) and recognises that tourism can act as a focus for regeneration; provide a catalyst for growth in an area; provide opportunities for retraining for the resident workforce; and help to maintain and expand underused sports and recreation facilities.	Noted.
				Paragraph 19 of Annex A of the DCLG Good Practice Guide on Planning for Tourism (May 2006) acknowledges that holiday, touring caravan and chalet parks accommodate some 22% of all holiday bed nights nationally.	Noted.
				In addition, paragraph 34 of PPS7: Sustainable Development in rural areas (2004) states that local planning authorities should recognise that:  <i>“tourism and leisure activities are vital to many rural economies. As well as sustaining many rural businesses, these industries are a significant source of employment and help to support the prosperity of county towns and villages...”</i>	Noted.
				moreover, paragraph 39 of PPS7 notes that in considering development proposals for static holiday and touring caravan parks and holiday chalet developments, planning authorities should:  ...Where appropriate (e.g. in popular holiday areas) set out policies in LDDs on the provision of new holiday and touring caravan sites and chalet developments, and on the expansion and improvement of existing sites and developments (e.g. to improve layouts and provide better landscaping);...	This can appropriately be addressed in a subsequent development management and site allocations document. The principles of new site provision and existing site improvements are established in the core strategy.
				However, a key issue identified in the House of Commons Report on Tourism was that “raising the quality of accommodation is essential to improving the industry” (paragraph 110 of the House of Commons Culture Media and Sports Committee report on tourism, June 2008).	Noted.
				Regional Planning Guidance  In terms of regional guidance, the South East RSS (May 2009) recognises that:  “ South East England comprises the largest tourism market in the UK, outside Greater London” (paragraph 14.1).	The South East Plan was revoked on 6 July 2010. However, where appropriate, the core strategy can carry forward proposals which are particularly appropriate to Medway, provided that they can be supported by Medway’s own evidence base.
				and the South East is: “ a unique visitor destination with significant untapped potential for further tourism related growth” (paragraph 14.2).	The South East Plan was revoked on 6 July 2010.
				Paragraph 14.5 of the South east Plan then states: “at the local level it is important to establish a comprehensive, long-term vision for the role of tourism and related activities within a locality. This vision needs to be significantly explicit and embedded in the ...local development framework in order to signal investment and decision”.	The South East Plan was revoked on 6 July 2010.
				Bourne Leisure would emphasise the need to incorporate this approach into the Medway Core Strategy, and considers that Core Strategy policies should reflect the clear opportunities available to develop the tourism potential in Medway. Moreover, tourism policies should reflect Policy TSR2: Rural Tourism of the South East Plan, which encourages local planning authorities to support proposals which seek to develop tourism opportunities associated with all types of rural development initiatives, and paragraph 14.17, which notes that: “tourism, recreation and leisure activity in rural areas can bring significant economic, social and environmental benefits...”	This approach has been incorporated into the core strategy.
				Specifically in relation to tourist accommodation, Core Strategy policies should accord with Policy TSR5, which states that:	The South East Plan was revoked on 6 July 2010.
				“(i) In formulating planning policies and making decisions local planning authorities should: “...facilitate the upgrading and enhancement of existing un-serviced accommodation including extensions where this will not harm landscape quality or identified environmental assets...”;and	The South East Plan was revoked on 6 July 2010.
				paragraph 14.26, which recognises the increasingly demanding and sophisticated nature of the visitor accommodation sector and states that: “ local development framework policies for visitor accommodation should be based upon a thorough understanding of the needs and characteristics of the many different accommodation subsectors.	The South East Plan was revoked on 6 July 2010.

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				Bourne Leisure then draws attention to paragraph 4.5.27 of the South East Plan, which states that: Policies should be built on a ongoing dialogue between local authority planners and representatives of the accommodation industry..”	The South East Plan was revoked on 6 July 2010.
				Any detailed tourism policies should also reflect paragraph 14.30 of the South East Plan, which states that: “Unserviced accommodation (e.g. camping and caravan sites, holiday parks, self catering units, farmhouses and youth hostels) is a popular and vital component of the leisure accommodation offer in the region and provides a particularly valuable role I supporting longer stay/ higher value rural tourism accommodation”; and	The South East Plan was revoked on 6 July 2010.
				paragraph 14:31 of the SE plan which states: “As visitor expectations change, it is likely that there will be increased demand for improvements to many existing holiday and caravan parks throughout the region, notably in coastal areas. Significant expansion of existing sites may be required to facilitate the provision of new facilities and meet higher amenity standards. Applications to upgrade facilities should be considered favourably by local authorities where there is evidence of existing or untapped demand, subject to environmental policies set out elsewhere in this Plan”.	The South East Plan was revoked on 6 July 2010.
				Local Planning Policy Paragraph 4.5.25 of the adopted Medway local plan (2003) recognises the valuable contribution that new tourist attractions and facilities can make to the local economy and identifies a need for additional facilities: paragraph 4.5.32 states that: “there is a need for additional facilities to take advantage of Medway’s strategic location between London and Europe..”	Noted.
				Existing Policy ED15: Self-Catering Accommodation states: “Proposals for new facilities will be permitted provided it can be demonstrated that: (i) the scale of development would not adversely affect local amenity, nature conservation interest or be an intrusive element in the surrounding landscape; (ii) the local highway network is capable of supporting the scale of development proposed; and (iii) the facilities associated with the development are of a design and scale in keeping with the locality”.	This can appropriately be addressed in a subsequent development management and site allocations document. The principles of new site provision and existing site improvements are established in the core strategy.
				Bourne Leisure considers that this support for the enhancement of existing holiday park accommodation should be continued in the Core Strategy. Moreover, a recent Medway Council committee report (June 2009) in relation to Allhallows Holiday Park recognised the benefits that holiday parks could bring. It stated: “Holiday parks are the largest provider of rural tourism bed spaces. Tourism can bring many broader benefits that will contribute to the economic and social well being of local communities as well as to individuals. The revenue generated by tourism can help to support and enhance local services and facilities such as shops and pubs, particularly rural areas. It can also underpin the quality of the local environment and facilitate further enjoyment of it by residents and visitors.”	This can appropriately be addressed in a subsequent development management and site allocations document. The principles of new site provision and existing site improvements are established in the core strategy.
				Appendix 2: The Economic Benefits of Tourism The benefits of tourism are also recognised by Visit Britain, which has estimated that the value of the tourism industry to the UK economy in 2006 was £85.6 billion a year (reported in the Report of the House of Commons Culture, Media and Sport Committee on Tourism, June 2008). Moreover, it is anticipated that over the next few years there will be increasing demand for holidays within the UK, influenced by such factors as the higher cost of flying, a tighter economy and people looking for “value for money” holidays.	Noted.
				The economic benefits of tourism are also fully recognised in the DCMS strategy “Winning: A Tourism Strategy for 2012 and beyond”, July 2007, which sets out the strategies for realising the potential tourism benefits of the Games and cites a £2.1 billion boost in tourism revenues as a result of the 2012 Games (page 6, Executive Summary). It also stresses that; “it is vital that we use the challenge of the 2012 Games to improve the quality of our tourist “facilities” (page 12, Executive Summary) and emphasises the exceptional opportunity to greatly improve the quality of the UK’s accommodation and visitor attractions (page 56 of the Strategy).	Noted.
				Bourne Leisure considers that the supporting text to tourism policies in the Medway Core Strategy should fully recognise the economic benefits of tourism.	Noted.
6.		SEEDA	Ian Mawer	<a href="http://medway-consult.limehouse.co.uk/file/993301">http://medway-consult.limehouse.co.uk/file/993301</a>  The Regional Economic Strategy (RES) identifies Medway as forming part of the Thames Gateway Kent Diamond for Investment and growth where the concentrations of people, employment, transport and leisure give the potential to be an economic catalyst for the region as a whole, SEEDA recognises the valuable role that the Core Strategy will play in ensuring that Medway is able to realise its economic potential through sustainable prosperity.	Noted.
				Section 3 of the report considers conformity with national and regional Policy. SEEDA considers that as part of the broader regional strategy, the headline targets of the RES could usefully be referred to in the Core Strategy.	The South East Plan was revoked on July 2010 and the core strategy will no longer refer to it.
				Overall, we consider that the document is asking appropriate questions to guide the development of the Core Strategy. However, some aspects of the Core Strategy are very locationally specific, and may be better addressed in subsequent DPD’s such as Area Action Plans and Site Allocations DPD’s.	Noted.
				Question 10 – Promoting Higher education 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 (NVQ4 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 a HE/FE cluster	Noted.



	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				would complement RES Target 6 'to maximise the number of people ready for employment at all skill 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 (paragraph 4.6.1). 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.	Noted.
				Question 15 – Urban regeneration 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.
				Questions 18, 19 & 20 – Housing 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 29 – five strategic priorities 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).	Noted.
				The approach to identify appropriate employment sites seems sensible, and will of course need to be fully evidenced through the ELR and SHLAA.	Noted.
	Question 1			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 efficient employment land is provided through redevelopment of brownfield land and refurbishment of existing stock, to provide new and flexible employment space'.	Noted.
	<b>4. Issues and Choices</b>				
7.		Land Securities Group Plc	Land Securities Group Plc	<a href="http://medway-consult.limehouse.co.uk/file/993797">http://medway-consult.limehouse.co.uk/file/993797</a> 1. These representations are made by CB Richard Ellis on behalf of Land Securities Group Plc. Land Securities Group Plc has been selected as the Land Sale Delivery Partner responsible for the development and sale of approximately 320 hectares of Ministry of Defence land at Lodge Hill. In accordance with the requirements of PPS12, Medway Council has engaged at an early stage in the Core Strategy process with Land Securities, as one of a number of key stakeholders within the Borough. This engagement has been welcomed by Land Securities, who supports the principle of the Council's emerging spatial strategy.	Noted
				2. These representations are made in order to seek to inform the Council's approach on its spatial options, with particular reference to Lodge Hill, and to seek to ensure that any issues are considered at an early stage in the Plan-making process (as encouraged in PPS12).	Noted
				3. CB Richard Ellis, on behalf of Land Securities Group Plc, has also submitted representations in respect of the Sustainability Appraisal. These representations (to the Core Strategy Issues and Options report) are not repeated in the representations made to the Sustainability Appraisal; we trust that the Council will amend the Sustainability Appraisal as appropriate and relevant, to reflect any changes made to the Core Strategy. Executive Summary and Introduction	Noted
				4. Reference is made in the third paragraph on page 4 and paragraph 1.10 (Introduction) 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.	Noted
				Section 3: Conformity with National and Regional Policies 5. 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 the core strategy affordable housing policy is now based upon the recommendations in the Medway Strategic Housing Market Assessment, 2010.
				Section 4: Issues and Choices 6. A number of 'main findings' are set out within this section of the report. Paragraph 4.5 refers to the nature of the housing market, with reference to the Housing Market Assessment (2005) produced by DTZ. We presume that these findings will be updated with those of the emerging Strategic Housing Market Assessment (SHMA), which we understand is nearing completion. This will ensure that these	Noted

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				particular findings are based on evidence which is as up-to-date as practical (PPS12, paragraph 4.37).	
				7. 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.	Evidence supporting both statements is contained in the State of Medway Housing Report, November, 2009
				Section 4: Questions 13 and 14 8. Question 13 relates to whether we agree with the forecasts for population change as described in the Issues and Options report. 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.	The Council is confident with its own population projections and considers the use of a single projection clarifies the process of plan making
				9. Question 14 relates to whether there are any other demographic factors that should be taken into account. 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 Medway Strategic Housing Market Assessment 2010, has been used to inform the housing chapter.
				Section 4: Issues and Choices – Housing 10. PPS3 sets out, amongst other things, the approach to delivering a flexible supply of land for housing. Paragraph 54 of PPS3 states that LPAs should draw on information from the SHLAA or other relevant evidence, and should <i>'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:</i> <ul style="list-style-type: none"> <li>• <i>Be available – the site is available now;</i></li> <li>• <i>Be suitable – the site offers a suitable location for development now and would contribute to the creation of sustainable, mixed communities;</i></li> <li>• <i>Be achievable – there is a reasonable prospect that housing will be delivered on the site within five years'.</i></li> </ul>	Noted.
				11. Paragraph 55 of PPS3 refers, inter alia, to the need for LPAs to identify a further supply of specific, developable sites for years 6-10 and, where possible, for years 11-15, and for LPAs to illustrate the expected rate of housing delivery through a housing trajectory for the Plan period.	Noted
				12. In determining how much land is required, PPS3 states that LPAs should not include sites for which they have granted planning permission unless they can demonstrate, based upon robust evidence, that the sites are developable and are likely to contribute to housing delivery at the point envisaged (PPS3, paragraph 58).	Noted
				13. PPS12 states that Core Strategies should, amongst other things, include strategic objectives and a delivery strategy for achieving those objectives, which should include how much development is intended to happen where, when and by what means it will be delivered (PPS12, paragraph 4.1). Paragraph 4.36 of PPS12 requires Core Strategies to be founded on a robust and credible evidence base; paragraph 4.44 requires them to be effective, which means they must be (inter alia) deliverable. Paragraph 4.45 articulates what is meant by deliverability, and states that <i>'Core Strategies should show how the vision, objectives and strategy for the area will be delivered and by whom, and when'.</i>	Noted
				14. In the interests of the robustness of the emerging Core Strategy, in the context of paragraphs 10-13 above, Medway Council may wish to consider the following comments: The table states that the number of units with planning permission 2009-2026 amount to 7,850 units, based on Volume 2 Section 7 of the AMR (2008). Fundamentally, the Council should only rely upon existing planning permissions, as a component of housing land supply if – as required by PPS3 – it can demonstrate, based upon robust evidence, that the sites are developable and are likely to contribute to housing delivery at the point envisaged. Detailed evidence to meet the requirements of PPS3 and PPS12 is required, as well as a housing trajectory to illustrate when these are expected to be delivered within the Plan period;	The Strategic Land Availability Assessment has confirmed its findings with the owners/developers of the sites within the document.
				With reference to the above point, we are concerned that the Council's definition of existing planning permissions includes resolutions to grant planning permission where they are subject to either a S106 Agreement which have not yet been signed or to referral to the SoS. This is also explained on page 31 of the AMR. Taking a pragmatic approach, we would suggest that the same approach referred to above applies, i.e. detailed evidence to meet the requirements of PPS3 and PPS12 is required, as well as a housing trajectory to illustrate when these are expected to be delivered within the Plan period;	The SLAA contains a housing trajectory based upon the expected delivery of each site.
				Again with reference to the above, and to the specific reference to 7,850 units, having reviewed Volume 2 Section 7 of the AMR (2008) we are not clear how this figure has been derived. Further clarification on this would be helpful;	This figure has now been updated using the 2009, AMR.
				The table refers to capacity for 574 units on allocations not yet started. We consider that the same approach is required to establish the deliverability of these allocations and when in the Plan period they are expected to be delivered. Clarification is also sought on the location and nature of these sites. Detailed evidence to meet the requirements of PPS3 and PPS12 is required, as well as a housing trajectory to illustrate when these are expected to be delivered within the Plan period. This also applies to the second bullet point within Paragraph 4.22;	These sites have been addressed in the Medway Strategic Land Availability Assessment and the owners/developers have been contacted to confirm that they agree with the council's assessment. A housing trajectory has been prepared as part of the assessment.
				For the avoidance of doubt, the capacity of 4,500 units for Lodge Hill referred to in the table is based on current assumptions reflecting	The SLAA and the Core Strategy now

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				market absorption rates and what could be delivered within the Plan period (although as explained in footnote 21 on page 25 of the Issues and Options report, the capacity of the site is in the region of c. 5,000 units). his figure is subject to ongoing testing but nevertheless reflects the minimum site capacity within the Plan period.	assume that, on the advice of Land Securities, 4600 dwellings will be completed by 2026 and a further 400 will be completed thereafter.
				15. Paragraphs 4.23 and 4.35 of the Issues and Options report highlight the uncertainties associated with deliverability, and reinforce the need for detailed evidence to inform the extent to which they should form part of the Council's approach to housing land supply.	These sites have been addressed in the Medway Strategic Land Availability Assessment and the owners/developers have been contacted to confirm that they agree with the council's assessment. A housing trajectory has been prepared as part of the assessment.
				16. Paragraph 4.41 states that there is strong evidence to suggest that more provision needs to be made for larger housing types, including detached properties. This is consistent with the residential market demand evidence being produced on a site-specific basis in respect of Lodge Hill. However, we consider that Medway Council may wish to consider expanding upon this statement to ensure that it is fully explained in the context of other references within the Issues and Options report to housing needs (e.g. Paragraph 4.20).	A breakdown of housing types is contained in the state of Medway Housing report, November 2008.
				Section 4: Question 15 17. Question 15 queries whether the emphasis on urban regeneration should be retained in terms of housing provision, given the difficulties of bringing sites forward in an economic downturn.	Noted.
				18. The principle of focussing development on previously developed land is well enshrined within national planning policy. Section 24 of the Planning and Compulsory Purchase Act 2004 requires Local Development Documents to be in 'general conformity' with the RSS – which in this case is the SEP. The adopted Kent Thames Gateway sub-regional SEP Policy KTG1 relates to the Core Strategy. In terms of policies and programmes, Criterion (i) requires, as a first priority, making full use of previously developed land before Greenfield sites, except where there are clear planning advantages from the development of an urban extension that improves the form, functioning and environment of existing settlements or a new community. Supporting paragraph 19.5 states that the main locational effects of the Core Strategy and related policies will be concentrations of new dwellings, employment and services at major regeneration locations including ' <i>within the Medway urban area at riverside sites, and to the north on Ministry of Defence land at Chattenden</i> '.	The South East Plan was revoked on 6 <sup>th</sup> July 2010. However, paragraph 36 of PPS3 gives priority to development on previously developed land.
				19. We fully support the Council's proposed housing strategy predicated on urban regeneration and previously developed land. However, we consider that it is critical to produce detailed evidence in accordance with the requirements of PPS3 and PPS12 to establish the extent to which they are deliverable within the Plan period, and if they are, when they are expected to be delivered. In terms of the difficulties of bringing sites forward in an economic downturn, the feedback we are beginning to get from PINs and through researching the approach being taken elsewhere, highlights the need to take into account the effects of the recession in terms of short term delivery, which needs to be reflected within the Council's housing trajectory.	The Medway SLAA has identified a surplus of 3000 dwellings over its requirement up to 2026, which could help to offset any slippage in sites coming forward due to the recession.
				Section 4: Question 16 and Paragraph 4.26 20. Paragraph 4.26 relates to internal living space standards, and Question 16 queries whether minimum internal space standards should be introduced with an explicit requirement for higher quality design established. We consider that the Core Strategy should not include explicit minimum internal space standards; given the uncertainty of the market, flexibility on space standards will be critical. The approach to unit sizes should be determined by other factors, not least design quality.	Medway Council is currently preparing a supplementary planning document on internal space standards.
				Section 4: Question 20 21. Question 20 queries whether specific provision should be made for high quality detached housing. We consider that there should be a general requirement within the LDF documents relating to high quality. The approach to the type of housing to be provided should be based on identified need and market demand, and should have regard to a range of site-specific considerations (an urban site might be less suited to family housing by comparison with less central locations). We also consider that the reference should be to 'family' housing rather than to 'detached' housing. The redevelopment of Lodge Hill presents an excellent opportunity to make a significant contribution to the Borough's stock of family housing as part of a balanced and sustainable new settlement, differentiated from the housing type offer in more central, urban locations.	The Government has now deleted the minimum density requirements from PPS3 and this will make it easier for developers to bring forward schemes for detached dwellings on appropriate sites.
				Section 4: Issues and Choices – Transport Section 4: Question 24 22. Question 24 asks how public transport capacity can be increased to tackle the additional demands that will arise from the regeneration of the area, and whether this should include greater priority for buses if linked to substantial service improvements. There are a wide range of public transport solutions which could be provided to increase the capacity of these more sustainable modes, ranging from buses to Ultra Light Rail, Light Rail, cable car systems and railways. However, an increased and improved bus system for Medway will provide a significant reduction in the level of congestion and unlike rail or metro systems, buses do not require considerable infrastructure and therefore can quickly boost the supply of public transport.	Noted. The transport policy supports the improvement of bus services and does not propose any costly new transport infrastructure.
				23. It is anticipated that congestion within Medway will become more acute in the future. We consider that it is therefore very important that the free flow of buses through the existing network is given primary consideration. This can be achieved by creating new road space or giving over existing road space for bus priority measures.	Noted. This is proposed in the transport policy.
				Section 4: Issues and Choices – Economy	

Consultation points	Company / Organisation	Name	Comments	Recommended Response
			Section 4: Paragraph 4.69 24. We broadly agree with the site assessment from paragraph 4.64 to paragraph 4.68, and note that the logical conclusion to be drawn from this is that there are a large number of designated sites but limited market demand at present either for large 'bad neighbour' employment sites on Grain, or for high density offices in the core urban area. Our conclusion has been that economic growth is not constrained by a lack of land, but by a lack of demand in growth sectors.	Planning permission has now been granted for about 450,000 sq m of floor space for B2, B8 and other uses on the Isle of Grain.
			25. In our view, the Economic Development Strategy (EDS) to date hasn't demonstrated that there is a projected lack of land designated for employment uses either on the demand side (projected sectoral growth in Medway) or the supply side (see our comment in relation to Question 14). We have therefore not seen the evidence that a review of mixed use sites is required. We agree that further work is required in terms of the evidence on supply and demand, to enable the Council to quantify the range and type of sites required, and therefore to inform the Council's approach to allocating land and to compare to identified site capacity.	Given that the economic chapter has identified sufficient employment the Council is proceeding with the proposals on its regeneration sites and is not reviewing their mix of uses
			26. Paragraph 4.73 relates specifically to Lodge Hill, and raises the proposition of it becoming a new focus for economic activity that meets more than just the needs of its residents, recognising that this would need to be balanced with other, more established opportunities in the area if the focus is not to be diverted away from the main urban area.	Noted.
			27. Lodge Hill presents an opportunity to gradually establish a vibrant community in which people will want to live and work, from small business enterprise units for one or two person businesses, right up to large offices, which could become viable when the whole development is properly established. Employment uses can be effectively pepper-potted in logical locations and phases throughout the scheme, naturally emerging alongside the character of the place and its inhabitants. The development must be simultaneously self-contained and outward-reaching.	Noted.
			28. Through the redevelopment of Lodge Hill, Land Securities will seek to maximise local economic benefits, minimise travel to work distances by promoting home-working and providing facilities to support home-working, which will become increasingly significant (particularly in rural and semi-rural locations) over the Plan period, linking residents with jobs within the development, and encouraging employers to employ Medway residents.	Noted.
			29. More detailed information will be provided in the Economic study which Land Securities is producing as part of the Evidence Base for Lodge Hill.	Noted.
			Section 4: Question 33 30. Question 33 questions whether the new settlement at Lodge Hill, Chattenden should be identified as an employment location meeting more than purely local needs. In the context of emerging policy, particularly draft PPS4, we believe that the LDF should take a broader approach to Lodge Hill and focus more broadly on its potential economic role as a prosperous community' rather than narrowly as an employment location. In this context it would be inappropriate to apply an 'employment land' or 'employment location' a designation on the site, but instead identify the types of uses which would be appropriate to its role as a mixed use community. These are listed above in relation to our response on paragraph 4.73 of the Issues and Options report.	Noted The Core Strategy recognises Lodge Hill/Chattenden as a community rather than merely an employment location. However, it is still necessary to identify the amount of employment to be provided.
			Section 4: Issues and Choices – Education and Skills Section 4: Questions 37, 39 and 40 31. With reference to the Education and Skills section of the Issues and Options report, we strongly endorse the approach to education and skills which has been pursued so effectively by Medway Council and its partners. We believe that success in this area will be key to Medway's future prosperity and Land Securities is keen to work with Higher and Further Education Institutions to ensure that Lodge Hill can be part of this.	Noted.
			32. In relation to specific questions, we would agree with the proposition in Question 37 that Universities at Medway be further promoted to create a higher education centre of regional or national significance. In relation to Question 39, Land Securities would be happy to work with Mid-Kent College, as its development moves forward, to promote construction opportunities arising from its site.	Noted.
			33. In relation to schools in Question 40, we endorse their role as community hubs and have been impressed with the exemplar schools in Medway that we have visited who are already doing this. This approach was strongly supported by both the community and public service providers in Land Securities' recent consultation exercises at Lodge Hill, and will form a key part of the emerging masterplan for the site.	Noted.
			Section 4: Issues and Choices – Retailing and Town Centres 34. The requirement for a retail capacity study derives from the need for local planning authorities to prepare and maintain up-to-date information on the characteristics of their area to enable the preparation of a sound spatial plan.	A retail study of Medway was completed by consultants in 2009 and underpins the retail policy in the economic chapter
			35. PPS6 highlights the importance of undertaking studies for retail and leisure uses to aid in the establishment of a robust and credible evidence base which underpins the development of planning policy. NLP acknowledge that such assessments should provide broad guidance on the likely levels of capacity and that projections should not be considered as maximum/minimum limits. The NLP study is therefore welcomed and considered up-to-date.	Noted.
			36. However, PPS6 also recognises the importance of ensuring that such assessments are regularly updated i.e. every 5 years to reflect changes in floorspace provision, housing and employment allocations and changes in the economy. We would therefore wish to see regular updates throughout the life of the emerging Plan to ensure that retail and leisure provision are accurately reflected and regard is had to the development of Lodge Hill as a new centre.	Noted.
			38. 37. We consider that the next stage of the Core Strategy should reflect the further work on the Borough-wide retail evidence base	The Lodge Hill policy makes provision for

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				which we understand is to be undertaken to reflect the approach set out in draft PPS4. Although draft PPS4 makes clear that it is the final version of the document which should be taken into account in the LDF process, in our view, many of the principles enshrined in the draft version exist in the current version of PPS6, but have been expanded upon and clarified. Future work should therefore consider the economic and retail role of Lodge Hill as a key component of the Council's preferred spatial option for accommodating its growth requirements set out in the SEP. Paragraph 4.158 relates specifically to retail provision as part of a new settlement at Lodge Hill. The exact scale of retail and associated uses will be informed by the scale and mix of uses proposed for this strategic allocation, recognising the Government's objectives of enhancing consumer choice by making provision for a range of shopping, leisure and local services, which allow genuine choice to meet the needs of the entire community. Furthermore, the Government seeks to promote social inclusion, ensuring that communities have access to a range of main town centre uses, and that deficiencies in provision in areas with poor access to facilities are remedied.	5,200 sq.m. of retail development.
				39. NLP also acknowledge (Medway Retail study 2009, paragraph 16.8) the potential requirement to provide new convenience facilities to serve major new residential development. The retail component within the emerging masterplan for Lodge Hill is small by comparison with the scale of the overall mixed use development, with housing and employment constituting the majority of floorspace. A significant proportion of the proposal will be self supporting whereby expenditure is generated by residents/workers/visitors resulting in minimal impact on existing centres in the immediate vicinity. Furthermore, the retail proposal will provide a sustainable solution, meeting the daily needs of residents without detracting from the vitality and viability of nearby centres and reducing the need to travel.	Noted.
				40. We consider reference in Paragraph 4.158 on phasing to be premature and not appropriate at this stage of the planning process. It is pertinent to note that it is not the role of the planning system to prevent competition. The role of the centre can inform the scale of retail development considered acceptable at Lodge Hill and it would be inappropriate to prejudice the development of a new centre on the premise that it might impact upon lower order rural settlements.	The policy on Lodge Hill includes retail phasing figures based upon information provided by Land Securities. The retail policy seeks to maintain and enhance the vitality and viability of both urban and rural retail centres.
				Section 4: Question 53 41. Question 53 seeks feedback on what retail function the new settlement at Lodge Hill should have, and on whether the retail development should be carefully phased to limit the impact on nearby rural settlements.	Noted.
				42. PPS6 sets out a number of principles, including enhancing consumer choice and delivering more sustainable patterns of development. In promoting centres, PPS6 requires local planning authorities to consider the network of centres and their relationship in the hierarchy. It recognises that local planning authorities should consider a more balanced network of centres. Areas where significant growth is expected are recognized circumstances where such new centres should be promoted. This is reflected further in the SEP (SEP sub-regional Policy KTG5, which relates to the role of the retail centres), which recognises that retail and service centres will be developed in conjunction with the development of major new neighbourhoods. The NLP study informs the Council's retail evidence base; it acknowledges the potential requirement to provide new convenience facilities to serve major new residential development, and recognises that this will contribute to ensuring residents and workers have access to facilities.	The South East Plan was revoked on the 6 <sup>th</sup> July 2010.
				43. We consider that the function of the retail component of Lodge Hill should be of an appropriate scale which is proportionate to the role, needs and demands of a new settlement, and should accommodate the quantum of development that is required to create the critical mass needed to sustain the development. It should also enhance existing retail provision within the Peninsula to extend the benefits beyond the site, to the existing community.	The level of retail provision at Lodge Hill has now been agreed with Land Securities.
				44. On the issue of 'phasing' and 'impact', it is pertinent to note that it is not the role of the planning system to prevent competition. The role of the centre can inform the scale of retail development considered acceptable at Lodge Hill and it would be inappropriate to prejudice the development of a new centre on the premise that it might impact upon lower order rural settlements.	Noted.
				Section 4: Issues and Choices – Community and Social Infrastructure 45. Land Securities has been consulting widely on the potential community and social infrastructure provision at Lodge Hill, which has raised similar issues to those identified in the Issues and Options report. The theme of clustering facilities at a neighbourhood level is clearly a good one both for place-making and in terms of reducing the need to travel. The evolving masterplan for Lodge Hill adopts this approach, seeking to maximise facilities available within walking distance of people's homes. This can also be linked with the use of schools as community hubs.	Noted.
				Section 4: Issues and Choices – Leisure, Culture and Tourism 46. Paragraph 4.205 refers, amongst other things, to there being a shortage of hotel bedrooms particularly catering for the middle and upper segments of the market. The emerging masterplan relating to Lodge Hill has the opportunity to accommodate a middle/upper segment hotel (for which there is current demand in the area) which could have linkages with the existing leisure amenities in close proximity to the site. This could be included within a reasonably early phase of development, since it could contribute to the 'place-making' that is so important to new schemes. Small retail units could be attached to this hub, which should also offer some conference and gym facilities for users from the village and outside, on a membership basis. There is also demand for a 2-3 star commercial hotel, which may be located within the Chattenden Barracks part of the site, where the road frontage is an advantage.	Two hotels have been included in the policy for Lodge Hill.
				Section 4: Question 58 47. Question 58 asks whether further sports hall provision should be made and if so, whether this should be in stand-alone locations, in conjunction with secondary schools or a combination of both. We consider that the location of new sports hall provision should be determined by where there is a deficiency/need. We support the principle of colocating/ sharing these facilities with secondary schools or indeed other community uses to create a community hub, as well as uses which are active throughout the day and evening. This is a key development principle underpinning the evolving masterplan for Lodge Hill.	Noted.

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				Section 4: Question 64 48. Question 64 queries whether, given the dispersed pattern of hotel development, future provision should be restricted to more central sites. PPS6 relates to planning for town centres, and defines hotels as a town centre use. It sets out the approach in terms of the preparation of planning policy, which includes a sequential approach to site selection with the first priority being on central locations. Therefore focussing on more central sites would be consistent with the current version of PPS6.	Noted.
				49. However, draft PPS4 sets out the considerations for site selection and land assembly for town centre uses, based on identified need, appropriateness of scale, the sequential approach, the impact of development and accessibility. It then states that after addressing these considerations <i>'planning authorities should also consider the degree to which other considerations such as any physical regeneration benefits of developing on previously developed sites; employment opportunities; increased investment in an area; social inclusion and other specific local circumstances, may be material to the choice of appropriate locations for development'</i> (Draft PPS4, paragraph EC7.1).	Noted. The tourism policy encourages the development of new hotels in locations that complement regeneration opportunities.
				50. Draft PPS4 states that LPAs, through their LDFs, should in their Core Strategies set out a spatial vision and strategy for the management and growth of the centres in their area over the Plan period. It states that as part of the vision and strategy they should (inter alia): <i>'Define a network and hierarchy of lower order centres (those not identified in the Regional Spatial Strategy) to meet the needs of their catchments and ensure that people's everyday needs are met locally; Make choices about which centres will accommodate any identified growth; addressing deficiencies in the network by promoting centres to function at a higher level in the hierarchy or designating new centres of an appropriate scale in identified areas of deficiency or significant growth such as in identified growth areas and proposed ecotowns...'</i> (our emphasis, Draft PPS4, paragraph EC5.1).	Noted.
				51. Sub-regional Policy KTG5 of the SEP states that a network of retail and service centres will be developed in which, inter alia, LDDs will make provision for local and district facilities in appropriate town centres in conjunction with the development of major new neighbourhoods.	The South East Plan was revoked on the 6 <sup>th</sup> July 2010.
				52. We consider that the Council's approach to hotel provision should reflect the approach set out in draft PPS4, particularly in terms of the flexibility provided for within paragraph EC7.1. We consider that this is essential for hotel development, given that many hotel offers are not suited to central locations.	Noted. The tourism policy encourages the development of new hotels in locations that complement regeneration opportunities.
				53. Lodge Hill is proposed as a new settlement within the Issues and Options report. We understand that further work on the Borough-wide retail evidence base will be prepared which will reflect the approach set out in draft PPS4, and will consider the retail role and impact of Lodge Hill as a key component of the Council's preferred spatial option for accommodating its growth requirements set out in the SEP. This should also inform the identification of an appropriate scale of 'town centre' uses as part of the development. The proposed new settlement at Lodge Hill provides an exciting opportunity to contribute to the provision of hotels in the Borough, particularly in terms of the middle and upper segments of the market which are currently identified in the Issues and Options report as having a shortage of bedrooms. The evolving masterplan currently makes provision for two hotels. We consider that hotel development as part of the evolving masterplan for Lodge Hill is appropriate and would be entirely consistent with the references at paragraph EC7.1 of draft PPS4, referred to above.	Noted.
				Section 4: Issues and Choices – Landscape, Wildlife, Countryside and Open Space 54. Paragraphs 4.222 to 4.225 relate to local landscape designations. Reference is made to the relevant parts of PPS7 in terms of the circumstances in which local landscape designations may be maintained. Paragraph 4.223 sets out the concern that criteria based policy cannot adequately substitute the current designations and as such (in Paragraphs 4.224 and 4.225) the Council sets out a new approach of Integrated Countryside Management. Paragraph 4.230 is also relevant.	
				55. In progressing the Core Strategy, we consider that it will be important for the Council to be consistent with the approach set out in PPS7, specifically: <i>'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'</i> (PPS7, paragraph 25). If the Council pursues the Integrated Countryside Management approach – or indeed any other non-criteria based approach – the justification for this should be clearly identified.	Noted.
				56. We think that in the context of Paragraph 4.214, the Core Strategy should also make reference to the Hoo Peninsula Green Cluster Studies.	Reference has been made in the landscape policy to the Hoo Peninsula Green Clusters Study.
				Section 4: Issues and Choices – Energy 57. Paragraph 4.318 refers, amongst other things, to there being an 'exceptional opportunity' to re-use waste heat through a district heating grid. We consider that this needs to be tempered within the Core Strategy; whilst we acknowledge the significant scale of a <i>potential</i> opportunity, the extent to which it is a <i>real</i> opportunity should be determined based on evidence which shows that it is technically possible, commercially proven and feasible. This also applies to the reference to 'good opportunity' for district heating within Paragraph 4.320.	The Lodge Hill policy requires design solutions to have regard to the potential for a comprehensive heating grid and other measures to minimise the carbon footprint.
				58. Paragraph 4.319 states that an essential first step would be to require new developments to install a heating grid and this is a role for the Core Strategy. We consider that the 'requirement' should be replaced with identification of what criteria/objectives are required to be met (e.g. carbon reduction), and the policy approach should not focus on the technical solution for achieving this. The policy	The promotion of a large scale district heating systems in the Energy Efficiency Policy is dependant on feasibility.

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				approach should provide flexibility to enable technically and commercially feasible solutions to be identified to meet the policy criteria/objectives.	
				Section 4: Questions 77 to 80 59. Question 77 asks whether any future conventional power generating development in Medway should be conditioned to require the ability to provide district heating. If conventional power generation is to include Carbon Capture at the Power Station it is questionable that to include a mandatory requirement to fund a district heating area-wide network is appropriate, without confirmation that such a proposal is an economic proposition to the potential customer base. It should only be provided where it is demonstrated to be technically and commercially feasible compared to other options. We note that any opportunity to exploit waste heat from Kingsnorth would be conditional on, inter alia, commercial viability. Space heating costs for end users need to remain competitive, not least because of the issues associated with fuel poverty.	The policy on conventional energy generation supports the development of additional power generation subject to proposals being addressed for their potential to re-use waste heat. There is therefore no compulsion.
				60. Question 78 asks whether new development, over a minimum size, should be required to install a heating grid, and if so, whether this should be applied universally in Medway or only in areas where connection to a larger grid can be reasonably demonstrated. New developments should not be required to install district heating systems by default if they are over a minimum size. If, for example, Medway had an infrastructure network for waste heat from a Power Station there still remains issues of responsibility for the on-site ownership and maintenance of the infrastructure and pipe work. The owners and operators of the off-site district grid may also need to own the on-site mains to the boundary of properties. As in Southampton, the choice as to whether the Geothermal source of district heating grid is selected as an energy source is left to market conditions and competition between the utilities. Fundamentally, whilst district heating can be an excellent means by which to meet the energy demands of new development efficiently, it must be demonstrated to be feasible, and compared to other low/zero carbon options such as solar water heating and ground source heat pumps.	There is no compulsion in the Core Strategy to install heating grids.
				61. Question 79 asks whether there should be a stronger presumption in favour of the use of renewable technologies, including wind, combined heat and power, solar and photovoltaics. We consider that there should be flexibility in the approach to the type of technology used to achieve the carbon reductions specified. The use of renewables should be considered where conditions are favourable, for example installing wind turbines where wind speeds are sufficiently high. If greater carbon emission reductions can be achieved through the use of low carbon emission technologies such as gas-fired CHP rather than renewables, this should be taken into account. The overriding consideration is ensuring the carbon reduction target is achieved, and not being prescriptive as to the technology utilised to achieve this.	The energy efficiency policy requires 20% of on-site energy loading on certain sites to be delivered from renewable energy.
				62. Question 80 asks whether a 'Merton Rule' should be introduced for Medway, and if so, whether this should be in addition to making provision for district heating and what percentage of on-site renewable energy should be required as a minimum standard. We consider that this has essentially been superseded by the Government proposals to drive the reduction in Co2 through the new standards under the Building Regulations. As referred to above, the means of achieving the end goal should not be prescriptive, more of a performance specification approach. This has the advantage of policy not becoming outdated or inappropriate as changes in the energy markets and technologies improve.	Noted.
				63. Furthermore, implementing a 'Merton Rule' for Medway may be incompatible with a provision for district heating, particularly if it is sourced from a conventional power generating development. In some instances, it may be preferable to forgo a minimum renewable energy requirement for a higher carbon emission reduction from a low carbon source. It should be noted that following the national timetable for the implementation of the national timetable for the Code for Sustainable Homes, there will be minimum carbon emission reductions to be met, and an element of low/zero carbon technology will have to be present in order to achieve this.	Noted.
				Section 4: Issues and Choices – Climate Change Section 4: Questions 81, 82 and 85  64. With respect to Questions 81, 82 and 85, there is published data available which provides guidance on habitat creation, habitat networks and corridors, and creation and protection of urban green spaces. We support the principles set out in these questions, which we consider should be reflected within the Core Strategy as broad criteria, with flexibility to enable the precise means of protection to be determined on a site-specific basis. This approach would avoid a more arbitrary approach based on imposing Borough-wide protection on all relevant land/sites within the Borough. At the appropriate time, we would be happy to discuss this in the context of Lodge Hill in terms of how the considerations set out in these questions can be addressed.	Noted.
				Section 4: Question 84  65. Question 84 asks whether we agree with the principle of earmarking areas now for buffers around our more significant areas of nature conservation importance. We support the principle of buffers, but we consider that these should only be identified in the context of nationally significant landscape designations (such as SSSIs). We consider that the width and nature of the buffer zone should be determined on a site and development specific basis, through consultation with a professional ecologist and Natural England in each case. The relevant policies within the Core Strategy should only set out the generic criteria. Section 4: Issues and Choices – Lodge Hill, Chattenden	There is no provision for buffer zones in the Core Strategy due to the number of important wildlife sites and the difficulties in determining the extent of the zones. Consequently, buffering will be addressed on a site by site basis.
				66. Paragraph 4.446 refers to the defence estate comprising around 400 hectares in total, of which 325 hectares will become the responsibility of Land Securities. We would suggest that references to the site in the Core Strategy should refer to the site area as 'approximate'. In terms of the other references within the paragraph, we consider that the references don't quite reflect Land Securities' current thinking/information; we would be happy to provide the Council with data to feed into the Core Strategy evidence base to clarify the relevant figures, and to enable these to be updated as the Core Strategy progresses.	As Lodge Hill will be a strategic allocation in the Core Strategy, the precise area can be calculated. The document refers to the development site extending to some 256 hectares
				67. Paragraph 4.447 states, inter alia, that the site 'has been assessed as sufficient to accommodate around 5,000 homes and 20-25	The current assessment amounts to 5000

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				hectares of employment land'. We consider that it is critical that the Core Strategy positively acknowledges that this was based on a previous assessment (and not on the current work being undertaken by Land Securities and its consultant team) which was less extensive by comparison with the work now being undertaken and required in response to the revised version of PPS12. The quantum of development that can be accommodated on site is being determined by the site-specific evidence base. We also consider that the reference to 70,000 sq m of employment within the Sustainability Appraisal is arbitrary; the approach to the quantum of employment floorspace should be based on the approach expressed elsewhere within these representations.	dwellings and a minimum of 43,000 sq m. of employment land.
				68. Paragraph 4.448 sets out the reasons why the Council has supported the principle of development at Lodge Hill. We consider that it would be worthwhile placing these reasons within the context of the requirements of sub-regional Policy KTG1 of the SEP, and the need for the Core Strategy to be in general conformity with the RSS. With reference to the last bullet point, we can confirm that based on extensive work completed to date to inform the evolution of the masterplan for Lodge Hill, we do not envisage any constraints to the delivery of development. This is consistent with Paragraph 4.450 of the Issues and Options report.	Noted.
				69. Paragraph 4.454 and 4.460 refer to the need for a realistic and deliverable programme/plan. We can confirm that this will be a key component of the site-specific evidence base	The Lodge Hill chapter includes a development programme
				70. Paragraph 4.455 relates to the SATURN transport model. Access is a potentially significant constraint and both the Council and the Highways Agency will need to be satisfied that appropriate solutions have been fully tested and can be delivered. Use of the Council's high level SATURN transport model, which has been validated with the Highways Agency, will be an important part of this process.	Noted.
				71. Paragraph 4.456 relates to sustainability standards. We consider that the Core Strategy should reflect the Code for Sustainable Homes national timetable more fully, to include that relating to the period up to 2016 (i.e. 2010 onwards – Code Level 3, and 2013 onwards – Code Level 4).	Noted.
				<p>Section 4: Question 88</p> <p>72. Question 88 queries whether the intended development programme for the Lodge Hill development is realistic and achievable, bearing in mind its proposed contribution towards meeting the requirements set out in the SEP. Land Securities and its consultant team has – and continues to – undertake extensive technical and design work to inform the evolution of the masterplan for Lodge Hill, which will inform the Council's evidence base relating to the identification of the site as a strategic allocation within the Core Strategy. The approach to the site-specific evidence base is based on the requirements of PPS12. The site-specific evidence on the development programme is being developed in detail. Land Securities is currently working on the assumption that 4,500 units will be delivered within the Plan period, based on market absorption rates. In terms of the requirements set out under paragraph 54 of PPS3:</p> <ul style="list-style-type: none"> <li>• the site is available; Defence Estates has positively confirmed that the MoD will vacate the site and release it for redevelopment. This is reflected in Paragraph 4.22 of the Issues and Options report;</li> <li>• the site is suitable; it utilises previously developed land. The extensive site-specific evidence base has informed the evolving masterplan for the creation of a balanced, mixed and sustainable new settlement. The identification of the site as a strategic allocation within the Core Strategy is consistent with sub-regional Policy KTG1 which states, inter alia, that full use should be made of previously developed land before greenfield sites, and with the SEP paragraph 19.5 reference to the site as a major regeneration location;</li> <li>• it is achievable; housing will be delivered on the site within five years of the start of the Plan period and beyond, and this will be reflected within the Council's forthcoming housing trajectory. We can provide the Council with data to support this as part of their evidence base for the Core Strategy.</li> </ul>	<p>The housing trajectory in the SLAA and the Core Strategy includes the following rates of development at Lodge Hill, provided by Land Securities:</p> <p>2011-2016 – 1000 Dwellings  2016-2021 – 1800 Dwellings  2021- 2026 – 1800 Dwellings  Post 2026 – 400 Dwellings</p>
				<p>Section 4: Question 89</p> <p>73. Question 89 asks what tests should be used to assess the proposed transport and access solutions for the development. We consider that the transport and access solutions are tested against their ability to address the following issues which are identified in the DfT's Guidance on Transport Assessments:</p> <ul style="list-style-type: none"> <li>• Reducing the need to travel, especially by car – ensure, at the outset, that thought is given to reducing the need to travel; consider the types of uses (or mix of uses) and the scale of development in order to promote multi-purpose or linked trips;</li> <li>• Sustainable accessibility – promote accessibility by all modes of travel, in particular public transport, cycling and walking; assess the likely travel behaviour or travel pattern to and from the proposed site; and develop appropriate measures to influence travel behaviour;</li> <li>• Dealing with residual trips – provide accurate quantitative and qualitative analyses of the predicted impacts of residual trips from the proposed development and ensure that suitable measures are proposed to manage these impacts;</li> <li>• Mitigation measures – ensure as much as possible that the proposed mitigation measures avoid unnecessary physical improvements to highways and promote innovative and sustainable transport solutions.</li> </ul>	Noted.
				<p>Section 4: Question 90</p> <p>74. Question 90 asks what headline sustainability principles should be applied in planning the settlement. We consider that the approach should reflect that set out in PPS1: Delivering Sustainable Developments and Planning Policy Statement: Planning and Climate Change – Supplement to PPS1. We consider that given the anticipated 'life' and phased nature of the redevelopment of Lodge Hill, and the 'life' of the Core Strategy, the emerging policies need to be sufficiently flexible to ensure delivery in the medium and long term, to respond to changing standards and emerging technologies.</p>	Noted.
				Section 4: Question 91	Noted.



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				<p>75. Question 91 asks whether we have any preferences as to the economic role that the new settlement could fulfil. Lodge Hill needs to fulfil an economic role which is appropriate to its location, its designation as a mixed-use development and one that is complementary to the Medway Towns. It should:</p> <ul style="list-style-type: none"> <li>• Be a prosperous community, part of a prosperous Medway;</li> <li>• Be a genuinely mixed-use development where there are synergies between uses, and people can live and work;</li> <li>• Provide options and choices for business which complements the wider Medway offer and supports growth sectors;</li> <li>• Provide a unique offer which can help change perceptions of Medway as a business environment;</li> <li>• Provide employment opportunities which maximise employment rates and reduce the need to travel for Lodge Hill residents, and provide jobs for residents of the Hoo Peninsula and Medway.</li> </ul>	
				<p>76. In practical terms this means building on the location's strengths and likely current market demand, focusing on creating a high quality place which can attract residents to live and stay in Medway, start new businesses, and provide an excellent base for home-working and small business start up and growth space.</p>	Noted.
				<p>77. It can also act as a new centre providing a combination of local retail, service and leisure provision together with destination uses such as hotel provision, sport, recreation and outdoor and environmental activities.</p>	Noted.
				<p>78. Building on this in the longer term, it can aim to secure larger scale inward investment possibly through a small campus style office/knowledge quarter linked to R+D and environmental business.</p>	Noted.
				<p>Section 4: Question 92 79. Question 92 asks whether we agree that the new settlement should contribute towards a wider green vision or strategy for the Hoo Peninsula and the Isle of Grain. The Medway Green Grid, Hoo Peninsula Green Cluster Studies and Terry Farrell's Hoo Peninsula vision all acknowledge that the development will be a major catalyst in achieving the goals set out for the Hoo Peninsula. In our view, a new settlement should make a contribution towards a wider green vision/strategy, and the issue will be in terms of how and to what extent should it contribute to these strategies.</p>	Noted.
				<p>Section 4: Question 93 80. Question 93 asks whether we have 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. A key objective in terms of the evolution of the masterplan and delivery strategy for Lodge Hill is the timely delivery of infrastructure and services, recognising that a comprehensive approach would be taken to ensure all services/facilities/infrastructure required to sustain the development would be provided. Evidence to support the delivery strategy is being produced to demonstrate that this can be achieved and that the site can be delivered within the Plan period. The delivery strategy will have appropriate risks assessed and contingencies in place. We can confirm that based on extensive work completed to date to inform the evolution of the masterplan for Lodge Hill, we do not envisage any constraints to the delivery of development.</p>	An infrastructure delivery plan will accompany the Core Strategy to demonstrate when and how all its proposals will be delivered.
				<p>Section 5: Spatial Choices or Options 81. We would suggest some amendments to Paragraph 5.7 to ensure that it accurately reflects the position, as follows (suggested amendments in bold text): <i>'Although many Thames Gateway documents have been issued since then which supersede RPG9a, the original strategy has been reflected within these and therefore continues to be applied. It has been restated and further refined in every development plan document since then – in the case of Medway in two structure plans, one local plan and the new South East Plan. It can be concluded that it remains very relevant, given that it has half of its projected term= still to run in terms of the broader vision'</i>.</p>	Noted
				<p>82. Paragraph 5.10 refers to the housing requirements and housing land supply position, with reference to the housing section of the Issues and Options report. The comments set out in paragraphs 10-14 (inclusive) of these representations apply.</p>	Noted.
				<p>83. Paragraph 5.11 should be amended to clarify that no additional land needs to be identified beyond that which has been identified within the SEP (which has been reflected within the Issues and Options report).</p>	The Core Strategy is not preparing a level of development which is higher than the requirements set out in the former South East Plan.
				<p>84. Paragraph 5.16 states that due to the quantity of development that is already committed within the main urban area, it is not feasible or realistic to have options that do not take this into account. We consider that for the reasons set out in paragraphs 10-14 (inclusive) of these representations, this is only appropriate if reliance on existing planning permissions is justified in accordance with PPS3, and if – based on robust and credible evidence – they are deliverable within the Plan period. Paragraph 5.19 also needs to be considered in the context of deliverability.</p>	Lodge Hill is the only Strategic Option being pursued in the Core Strategy.
				<p>85. In the context of the parameters for assessing the alternative options for accommodating growth, the final bullet point of Paragraph 5.18 states that other than the base option, each option is of a size that could be a substitute for the proposed new settlement at Lodge Hill. We have significant reservations about the validity of this assumption. It would appear to us from a review of the relevant SLAA submissions that the scale (hectares) of the four alternative options for accommodating growth are not sufficient to substitute the scale of development that could be accommodated at Lodge Hill, and to accommodate Medway Council's growth requirements. This also applies to Paragraph 5.23, which states that around 200 hectares of land would be required to make up for the Issues and Options report, for the reasons set out above.</p>	Noted but the assessments carried out demonstrated that each option had sufficient land.
				<p>86. Paragraph 5.22 confirms the Council's support for Option 1: new settlement at Lodge Hill. This is in conformity with the SEP in terms of making full use of previously developed land before greenfield sites, and the explicit reference to the site being a major regeneration</p>	Noted.

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				location.	
				87. We consider that the Council should liaise with Maidstone Borough Council to understand its position in terms of housing land supply (with reference to Paragraphs 5.26 and 5.27). With reference to Paragraph 5.27, for the purposes of clarity, if a development at Capstone Valley was increased in size by virtue of extending further southwards into Maidstone, this would not contribute towards Medway Council's housing requirements.	Maidstone Borough Council has informed Medway that it has no intention of allocating land for development at the Southern End of the Capstone Valley.
				88. We assume that the numerical points set out under Paragraph 5.40 are in no order of preference. However, in the context of the requirement for the Core Strategy to be in general conformity with the RSS, and a number of key principles enshrined within national planning policy, in our view there are a number which should be afforded greater weight. These are 1 (conformity with the SEP); 7 (greenfield or previously developed land); and 9 (impact on regeneration strategy for the urban area). It may also be appropriate for the Council to consider including a criterion relating to deliverability within the Plan period.	Noted.
				Section 5: Spatial Choices or Options: All Options 89. Reference is made throughout the assessments to Local Plan designations as potential constraints, for example rural lanes, ALLIs. We consider that it is important to recognize that the status of these may change through the emerging Core Strategy process, and as a result of the Borough-wide evidence base being prepared.	Noted.
				90. Criterion 3 relates to transport impacts. In our view, in order to compare the sites, transport and services would need to be considered in detail. Transport could be assessed via a PTAL, and the services assessed by compiling the number and accessibility of the sites to the local services.	Noted but PTAL has been developed for use in London and has been found to be inappropriate for use outside the capital.
				Section 5: Spatial Choices or Options: Assessment of Option Number 1 91. Consideration 6 on page 96 relates to accessibility to existing services, the overall assessment for which is 'comparable to other options, subject to quality of transport links'. However, there is no apparent consistency with the Council's assessment of the other four options and as such, it is unclear how Lodge Hill is 'comparable' to them. We consider that it is difficult to make a direct comparison with other options because of the size and unique opportunities of the Lodge Hill site. The consideration seems to be framed on an implicit assumption that only houses will be provided, which will need access to existing services. Of course access will be required by new residents to use services outside the site and the quality of transport links will need to be improved to facilitate this. Of more importance, however, is that the scale and location of Lodge Hill at the heart of the Hoo Peninsula has an unrivalled opportunity to provide, in addition to housing, services which will be used by existing communities as well as the new community. Other Options may not be able to provide these services. The uniqueness of scale and location, and the benefits which follow, mean it is therefore not comparable to other Options in this respect.	Noted.
				92. In terms of transport links, the evolving masterplan seeks to improve links for pedestrians and cyclists to the adjacent settlements of Hoo St Werburgh and the Medway Towns. It also aims to secure high quality frequent bus services to the key local destinations within the Medway towns area. A significant proportion of the residents of Lodge Hill would be within an easy (2km) walking distance of Hoo St Werburgh and therefore the residents of both these settlements would benefit from easy access to the services provided at both Hoo and Lodge Hill. The residents would also be within easy cycling distance (5km) of Frindsbury Strood and Wainscott Areas. The scale of Lodge Hill would also be sufficient to support a wide range of services which would be accessible to the residents of Lodge Hill and adjacent settlements via direct and attractive walking and cycling routes.	When assessing access to services in the SLAA, a walking distance of 800 metres was used as a reasonable measure of sustainability. Consequently, all options were comparable in this regard and all would have had to include services and facilities as part of their overall development.
				Section 5: Questions 96 93. Land Securities fully supports the Council's preferred option for a new settlement at Lodge Hill. The site has long been acknowledged as part of the Borough's strategy for accommodating growth, subject to clarification on the timescales of its availability for redevelopment. This has now been confirmed by Defence Estates and the site is deliverable within the Plan period, with early phases expected to be delivered within the first five years of the Plan.	Noted.
				94. Section 24 of the Planning and Compulsory Purchase Act 2004 requires Local Development Documents to be in 'general conformity' with the RSS – which in this case is the SEP. The adopted Kent Thames Gateway sub-regional SEP Policy KTG1 relates to the Core Strategy. In terms of policies and programmes, Criterion (i) requires, as a first priority, making full use of previously developed land before greenfield sites, except where there are clear planning advantages from the development of an urban extension that improves the form, functioning and environment of existing settlements or a new community. Supporting paragraph 19.5 states that the main locational effects of the Core Strategy and related policies will be concentrations of new dwellings, employment and services at major regeneration locations including 'within the Medway urban area at riverside sites, and to the north on Ministry of Defence land at Chattenden'. The Council's proposed strategy for accommodating their housing requirement, which includes a new settlement at Lodge Hill, conforms with the approach set out in the RSS.	The assessment of options has now been overtaken by the revocation of the South East Plan on 6 July, 2010. If carried out now, the options would be measured against the requirement of paragraph of 36 of PPS3, which gives priority to the development of previously developed land.
				95. The new settlement would utilise previously developed land to create a balanced and sustainable community as a key component of the Council's housing land supply within the Plan period.  MEDWAY LOCAL DEVELOPMENT FRAMEWORK: INITIAL SUSTAINABILITY APPRAISAL (JULY 2009) REPRESENTATIONS MADE BY CB RICHARD ELLIS ON BEHALF OF LAND SECURITIES GROUP PLC	Noted.
				96. These representations are made by CB Richard Ellis on behalf of Land Securities Group Plc. Land Securities Group Plc has been selected as the Land Sale Delivery Partner responsible for the development and sale of approximately 320 hectares of Ministry of Defence land at Lodge Hill.	Noted.

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				97. CB Richard Ellis, on behalf of Land Securities Group Plc, has submitted detailed representations in respect of the Core Strategy Issues and Options report, which also apply to the Sustainability Appraisal; we have not, therefore, repeated these comments and trust that the Council will amend the Sustainability Appraisal as appropriate and relevant, to reflect any changes made to the Core Strategy.	Noted.
				98. Our general comment to the Sustainability Appraisal relates to the need for Medway Council, through the next version of the Sustainability Appraisal which we anticipate will accompany the next stage of public consultation on the Core Strategy, to articulate in a greater level of detail – based on robust and credible evidence – the rigorous assessment of its spatial options for accommodating growth, to ensure that the statutory requirements of the Sustainability Appraisal process are met.	Noted.
8.		Palm Developments	Palm Developments	<p>See attached response from Jennifer Owen &amp; Associates Ltd made on behalf of Palm Developments.  <a href="http://medway-consult.limehouse.co.uk/file/993506">http://medway-consult.limehouse.co.uk/file/993506</a></p> <p><b>a. Planning Policy Statement 10 (PPS10).</b></p> <p>b. The latest advice issued by The Planning Inspectorate (PINS)<sup>1</sup> advises that a waste strategy should indicate waste management developments and facilities which are required; where they are to be located; when they are to be provided; and how they will be delivered. PINS advise that there have been many instances where DPDs have been found unsound because of lack of essential baseline information in relation to current levels of waste being generated in each waste stream, how it is managed and what factors are likely to influence the quantities of waste and types of facilities needed over the plan period not being provided.</p> <p>c. PPS10 requires that waste planning authorities in preparing DPD's to deliver the waste policies set out in the Regional Spatial Strategy (RSS) should be able to demonstrate that capacity equivalent to at least 10 years of the annual rates set out in the RSS could be provided and to allocate sites and areas suitable for new or enhanced waste management facilities to support the apportionment set out in the RSS. In order to be able to do this credible evidence base must be provided.</p> <p>d. PPS10 further requires that in identifying the location of waste management facilities or areas care should be taken so as to avoid stifling innovation in line with the waste hierarchy and also that unrealistic assumptions in relation to the development of particular sites or areas should be avoided.</p> <p>e. PPS10 also advises that in identifying sites and areas a broad range of locations should be achieved and the opportunity to collocate facilities should be taken. In particular sites and areas should be assessed against the following criteria</p> <p>i. Extent to which the allocations support policies in PPS10</p> <p>ii. The physical and environmental constraints on development, including existing and proposed neighbouring land uses including:-</p> <ol style="list-style-type: none"> <li>1. Protection of water resources</li> <li>2. Land instability</li> <li>3. Visual intrusion</li> <li>4. Nature conservation</li> <li>5. Historic environment and built heritage</li> <li>6. Traffic and access</li> <li>7. Air emissions, including dust</li> <li>8. odours</li> <li>9. Vermin and birds</li> <li>10. Noise and vibration</li> <li>11. Litter</li> <li>12. Potential land use conflict</li> </ol> <p>iii. The cumulative effect of previous waste disposal facilities on the local community</p> <p>iv. Capacity of the existing and potential transport infrastructure to support the sustainable movement of waste</p> <p>v. Re use of previously developed land.</p> <p><b>f. Regional Spatial Strategy, South East Plan.</b></p> <p>i. The RSS sets out policies and requirements for the management of waste. Whilst Policy W7 gives capacity requirements on a county by county basis this is only for MSW and Commercial and Industrial (C and I) waste. There is no clearly defined requirement for Medway in respect of CDE wastes. An illustrative additional capacity requirement is provided and this is discussed below together with an analysis of other relevant policies and advice and how the requirements are met or otherwise by the evidence base for the Core Strategy together with the proposed options.</p> <p>ii. Policy W3. "Provision for recovery and processing capacity for London's waste should only be where there is a proven need, with demonstrable benefits to the region, including improving the viability of recovery and reprocessing activity within the region, and in the nearest appropriate location. A net balance in movements of materials for recovery and reprocessing between the region should be in place by 2016." Reprocessing CDE waste in Medway and sending back clean material will help achieve this goal.</p> <p>iii. Para. 10.16. Beyond 2016 export from London to landfill will be for residuals only. Medway will have a requirement to landfill a proportion of London's residual waste throughout the period to be covered by the Core Strategy. This issue is not addressed in the proposed options nor is there any evidence as to how the apportionment of the requirement is to be divided between Kent and Medway.</p> <p>iv. Para. 10.17. sets out how there may be sites suitable for processing London's waste outside London where the facility is the nearest available outside London and accessible by sustainable transport modes. This can make the operation more economic. Net flow requirements can be achieved by returning processed waste to London for re use. For example with contaminated soils the processed soils can be taken back to London. Locations along the River Medway can meet this requirement.</p> <p>v. Para 10.18 refers to Sub Regional self sufficiency and admits that greater control is possible over MSW compared to C and D waste.</p>	<p><b>This representation concerns two specific sites at Trenchmans Wharf and Bores Hole</b></p> <p>Noted</p> <p>Noted</p> <p>This is dealt with in the draft core strategy.</p> <p>Noted but there is currently no evidence of demand for such facilities/capacity in Medway.</p>

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				<p>It is, therefore, necessary to ensure that over capacity is provided in respect of treatment facilities for CDE wastes in order to achieve recycling targets.</p> <p>vi. At para 10.19 cross boundary co-operation is expected between Kent and Medway. The CS Issues and Options Report does not anticipate what this might be and does not report what cross boundary movements there might be between the two areas and how proposed facilities will relate to both areas waste streams.</p> <p>vii. Para 10.29. Reports surplus C and D capacity in Medway of 1.034 million tonnes by 2015. The analysis below at section 5 demonstrates that this figure cannot now be correct on the basis of currently permitted sites and is unlikely to have been correct at the time SEPlan was published.</p> <p>viii. Para 10.45 identifies a need for additional landfill capacity after 2013/4 landfill for residues at Sub Regional level (that is London and Medway). The Issues and Options Report does not properly identify requirement, current capacity or options for dealing with additional requirement for the residuals arising from the CDE waste stream.</p> <p>ix. Para 10.47 advises that landfill can be used to meet national environmental objectives such as habitat reestablishment and biodiversity targets. The CS Issues and Options does not consider how environmental objectives could be achieved through the use of part of the Bores Hole/Trenchmans Wharf site as set out below could be used to fulfill environmental objectives such as enhancement of a SSSI.</p> <p>x. Policy W15 identifies the requirement for sub regional network of contaminated C and D facilities and sites for storage, treatment of remediation of contaminated soils and demolition waste. The CS Issues and Options report makes no mention of how Medway could help deliver this policy objective taking account of its location close to London with sustainable transport links to the capital, it being a Growth Area and its location within the Thames Gateway.</p> <p>xi. Para 10.51. The identified facilities should be designed/located to make best use of rail and water transport. The CS Issues and Options Report does not consider how well the selected waste facility options perform in respect of sustainable transport.</p> <p>xii. Policy W16. Waste DPDs should identify sites with appropriate depot and wharf facilities wherever possible. The CS Issues and Options Report does not do this.</p> <p>xiii. Para 10.56. advises that waste management facilities should not be precluded from being established in AONBs or the Green Belt.</p> <p>4. Issues</p> <p>Process. The Waste Capacity study referred to in para. 28 and documented in the State of Medway Waste report has found to be inaccurate in respect of both the assessment of CDE waste arising together with existing and currently planned capacity.</p> <p>Conformity with National and Regional Policies. The provisions for waste and the options considered in the CS Issues and Options Report do not conform with PPS10 and the RSS as set out in Section 3 above.</p> <p>Sub Regional Context. At para. 4.6 the CS Issues and Options Report fails to identify the important transportation links which Medway has including the River Medway and also its proximity to London. This section has also failed to recognise any role for Medway in the provision of Sub Regional waste facilities or the requirement to take waste from London for landfill.</p> <p>Transport. Medway is well located with respect to London and Thames Gateway. Sites well placed with respect to wharves and rail connections should be investigated. Paras 4.53 and 4.54 set out the importance of the River Medway as a transport corridor and the existence of the wharves along the river but fails to acknowledge that suggestions have been put forward in relation to the use of particular wharves including Trechmans Wharf. Water transport is an economical and highly sustainable transport method for bulky products including waste. This should be acknowledged and formal protection should be given to wharves where there is a good prospect that their commercial use will continue or resume.</p> <p>Landscape, Wildlife, Countryside and Open Space. Designations are not necessarily a hindrance to development. Individual site circumstances should be investigated. The Core strategy must provide flexibility and acknowledge that some protected areas can be enhanced through development particularly where they have be the subject of past development.</p> <p><u>Waste</u></p> <p>The use of 1998 research to estimate arisings for this sector is not acceptable. Newer research is needed as set out at Tables 1 and 2 below.</p> <p>Para 4.269 states that increasingly demolition waste is treated and reused on site. However, this type of waste is often processed only very basically and used for on site landscaping projects, usually bunds, which are merely vehicles for ensuring that no waste leaves the site. This is a missed opportunity as the waste could be recycled to a higher level and make a real contribution to replacing primary building products. A pre requisite to allow this to happen is a network of CDE recycling sites which are well located to the point of waste arising or linked to it by sustainable transport networks.</p> <p>Furthermore with planning permissions for projects with an estimated value of more than £300,000 now being required to demonstrate how the reuse, recycling and recovery of waste arising from the project is maximised higher levels of recycling and use are expected. Many sites will not be able to deliver the requirements on site due to the space required for the recycling and storage together with</p>	<p>View noted.</p> <p>The council is working closely with KCC on these matters</p> <p>View noted.</p> <p>These matters are addressed in the draft core strategy and landfill requirements are reducing as higher proportions of C.D and E are recovered and reused.</p> <p>Noted but needs to be weighed against all other considerations.</p> <p>The policy is now revoked and the issue is covered in the draft core strategy.</p> <p>This would only form one element of an options appraisal.</p> <p>This is a matter for the core strategy or subsequent DPD not an Issues and options report.</p> <p>Noted.</p> <p>View noted.</p> <p>View noted.</p> <p>As there are currently no facilities dealing with London's waste such a reference is not justified in what is essentially a factual description.</p> <p>Water access is only one of many considerations that need to be taken into account in assessing sites and facilities.</p> <p>View noted but a core strategy is required to consider broad locations as opposed to specific sites</p> <p>Noted.</p> <p>Noted.</p>

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				<p>amenity constraints due to nearby residential and employment areas.</p> <p>Many of the sites proposed for redevelopment in Medway are actually on the rivers or close to it. Therefore, a riverside site for recycling CDE waste should be a priority for the Core Strategy.</p> <p>Para. 4.277 states that chalk pits are no longer considered suitable for landfill "for environmental reasons". No explanation is given for this assertion and it is the case that with appropriate engineering chalk pits can be used for landfill. The EA Ground advice contained within document LDF1 paras 17-22 and Groundwater Protection Policy Section 3.2 only prevents landfill deposits below the water table.</p> <p>Para 4.290 recognises that Kingsnorth is too remote to serve the waste market of Medway.</p> <p>The questions set out at the end of this section are inadequate to deal with the issues which will need to be included within the Core Strategy. It is essential that the issues are clearly divided into the waste streams and it is also made clear what new capacity is required in Medway for each stream. It should also be made clear that questions of location are constrained by National and Regional policy.</p> <p>Question 73. For CDE and wastes a cluster for handling, treatment and disposal of residuals should be provided at Bores Hole/Trechmans Wharf as set out below at section 6.</p> <p>Question 74. Provision for landfill of CDE residual waste should be made at Bores Hole. Land raising and creation of a new void by excavating London Clay are unacceptable or not deliverable for the reasons set out at Section 6 below.</p> <p>Question 75. A network of recycling facilities should be provided in order to provide economies in relation to transport and also allow competition between operators.</p> <p><b>Section 5. Spatial Choices</b></p> <p>The CS Issues and Options Report has failed to accurately justify quantities of material arising in Medway and also failed to assess the current capacity realistically. Set out below is an analysis of both these issues and an assessment of new capacity which is required and which will need to be provided for in the emerging Core Strategy.</p> <p>b. Requirement. The Council's calculations on arisings for C and D waste appear to be around 300,000 tpa. This contrasts with that for Kent where Excavation waste is also included in the calculations and 2,678,000tpa is currently assessed as being the arisings in Kent for CDE wastes. Forecast growth predicts that in Kent this will rise to 3,445,000 in 2026. There are currently 1.4 mill people living in Kent and 250,000 people live in Medway. The Medway population is 18% of the Kent population. Using the same ratio gives an estimated CDE arising of some 482,040 tpa rising to 515,178 tpa in 2026 for Medway.</p> <p>c. Medway is a Growth area and also part of the Thames Gateway. The population is scheduled to grow from 250,000 to 300,000 during the plan period of the Core Strategy. Growth across the entire County of Kent is more constrained with only part being identified for Growth area status. The predictions for CDE waste arisings made above could, therefore, be an underestimate and should be treated as the lower end of the spectrum.</p> <p>d. In order to ensure that this capacity is brought forward and to allow for competition between sites capacity increase of 20% should be made. This means that Medway should be seeking to plan for treatment capacity currently of <b>578,500</b> tpa rising to <b>618,200</b> tpa in 2026.</p> <p>e. With regard to landfill Policy W6 of the RSS requires that C and D waste recycling in 2008 was 48% and this is expected to rise to 65% in 2025. Landfill is the only reasonable alternative for CDE waste which is not recycled. This means that landfill capacity of 52% of the annual arisings should now be provided and this should reduce to 35% in 2026. Using the figures at para. d. above (again a 20% over capacity should be planned to allow for competition and sites not coming forward) the CDE residual landfill capacity which should now be available in Medway is <b>300,080</b> tpa and this should fall to <b>216,370</b> tpa in 2026.</p> <p>f. Set out below is a comparison between the capacity requirement and the currently available or planned capacity for both recycling and landfill of residuals of CDE waste in Medway and the estimated requirement.</p> <p>See attached comment for table. <a href="http://medway-consult.limehouse.co.uk/file/993506">http://medway-consult.limehouse.co.uk/file/993506</a></p> <p>g. Further landfill capacity will also be required in Kent and Medway in order to take a proportion of London's waste in accordance with Policy W3. This will need to be agreed with Kent County Council as the apportionment figure in SE Plan Policy W3 is combined for both Kent and Medway.</p>	<p>Noted but there is currently no evidence of demand for such a facility.</p> <p>Noted but the costs of preparing such sites are increasing rapidly. As a result they are generally discounted by the industry. Noted.</p> <p>The Issues and Options report contains more questions than are usual in such a document and the consultation encouraged any other relevant issues to be raised</p> <p>View noted.</p> <p>View noted.</p> <p>Noted.</p> <p>View noted.</p> <p>It is not considered that such a direct correlation between population and C,D and E can reasonably be made.</p> <p>View noted.</p> <p>View noted.</p> <p>View noted.</p> <p>With the revocation of the South East Plan this is no longer a requirement.</p>

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				<p>h. These calculations show that Medway Council have severely underestimated CDE arisings and that there is a significant current under provision in Medway and this is set to get worse. Table 3 above shows the extent of the capacity deficit and the quantum of materials for which new capacity is required.</p> <p><b>Section 6. Evaluation of the Options</b></p> <p>a. The CS Issues and Options report goes into some depth in assessing the identified options for housing. In relation to waste the analysis is weak partly as a result of lack of evidence and partly because the waste streams are not treated separately at the assessment stage. This will need to be addressed if the Core Strategy is to be found sound.</p> <p>The analysis set out in Section 5 above has clearly identified a need for new CDE capacity of over 500,000 tpa to be in place by 2026. In reality due to the significant reliance of current capacity at Strood where only temporary planning permissions of 2/3 years exist and the whole area allocated in the Medway Plan is now the subject of a planning application for redevelopment there is an urgent need for this capacity to be accommodated in total. Similarly there is a current shortfall in capacity for the landfill of CDE residuals of some 300,000 tpa which needs to be met.</p> <p>c. The CS Issues and Options Report is not adequate in respect of how these matters are defined or proposed options put forward. The Sustainability Appraisal gives more information but this is still inadequate and in any event needs to be cross referenced into CS Issues and Options Report. Of critical importance to the analysis undertaken in the SA and the CS Issues and Options Report is the failure to consider transport of the waste both in terms of sustainability (travelling shortest distance and use of sustainable modes such as rail and the river) and the impact of cost in moving waste and whether sites will be undeliverable as a result of this factor.</p> <p>d. A further problem is the fact that the options considered in both the SA and the CS Issues and Options Report do not differentiate between the various waste streams. Finally, the options considered also do not equate to the realities of how waste is required to be handled in that options in relation to treatment and disposal are considered as alternatives whereas in practice treatment is never 100% and therefore will always require landfill capacity for residuals. Also there is no point in considering an option which is 100 % landfill as both the Landfill Directive and the RSS have diversion targets which must be met.</p> <p>e. Set out below are the Options considered in the SA and the reasons why they should be rejected. This is followed by an Option generated by the analysis undertaken in this report in respect of CDE waste and considered to be capable of meeting National and Regional Policy requirements including the need for communities to take responsibility for their own waste (the proximity principle) and for the provision of a network of sites in order to allow the development of a an efficient market for recycling CDE waste to produce high quality products.</p> <p>f. The options outlined in the SA for waste are identified at para. 3.17 as being based on "...as much treatment as possible". No figures either for arisings or treatment rates are given. This is a weakness which is fatal to the analysis as without this information it is not possible to say whether the capacity required can be met within the options identified. The problem is particularly acute as the types of waste to be handled at each site are also not identified. A further assumption made is that all Environment Agency requirements are assumed as capable of being met by the options being met. This is not the case for the landraising option as set out below.</p> <p>i. Option 2A: Treatment/processing hub in/or around Kingsnorth. This proposal is too distant from the main areas of arising of CDE waste in Medway and access for London waste would be by road only. It could prove a useful location for the treatment of waste arising from the proposals to develop a strategic housing site at Chattenden. There are no residual disposal proposals associated with this option. This is a one site option and does not provide for the development of an efficient market either for dealing with CDE waste or the recycled products.</p> <p>ii. Option 2B: Viridor's Medway City Estate site. Site reserved for MSW waste which produces higher processing values so no incentive to take CDE waste. This is a one site option and does not provide for the development of an efficient market either for dealing with CDE waste or the recycled products.</p> <p>iii. Option 2C: Chatham Port. Water access is limited by time taken in negotiating locks. Sites within the area are likely to have higher alternative site values than that associated with CDE recycling. Also landowners unlikely to allow waste processing here as it is likely to devalue adjoining sites. It is possible to have temporary CDE recycling but this would then not be in a building so amenity problems could arise. There is no disposal of residuals proposals associated with this option. This is a one site option and does not provide for the development of an efficient market either for dealing with CDE waste or the recycled products.</p> <p>Option 2D: Halling Coal Yard. It is understood that this site is now the subject of a planning permission for housing development so is not, therefore, available. This is a one site option and does not provide for the development of an efficient market either for dealing with CDE waste or the recycled products.</p> <p>v. Option 2E: Void creation. This option should not be considered as it is not viable without the identification of a market for the clay.</p>	<p>It is not accepted that this is the case for the reason given above.</p> <p>View noted.</p> <p>The issue of new/permanent capacity is addressed in the draft core strategy.</p> <p>View noted.</p> <p>It is not considered that the scale of analysis inferred is appropriate for a core strategy issues and options report. This needs to be read alongside all other material, including the Waste State of Medway report.</p> <p>The SA is, inevitably a high level assessment covering many more subjects than just waste. The level of detail and analysis apparently being sought is more appropriate to an EIA associated with a site specific planning application. Kingsnorth has potential for water access and is readily accessible to the main urban area</p> <p>This is cited as an example. As the draft core strategy explains there is potential for a cluster of facilities in this location</p> <p>View noted.</p> <p>The site is not included in any proposal for residential development and would be unsuitable for such a use for a number of reasons.</p> <p>View noted.</p> <p>View noted.</p>

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				<p>vi. Option 2F: Land Raising. This is identified as a sustainable waste management solution which it clearly is not. If no recycling is proposed then the solution does not meet the requirements of either landfill directive or the RSS. Even if this option is combined with a treatment option it will not be possible to achieve the necessary permit for the disposal method as it is not possible to control pollution pathways in respect of surface water and ground water. This can be achieved with the landfill option for residuals by lining the void. It can only be achieved with land raising if walls are engineered around the site. This would not be economically viable for CDE waste residuals. There are also likely to be problems relating to noise and air quality which are much easier to control in a void.</p> <p>g. Set out below is an Option for dealing with the estimated CDE waste arising by recycling and the disposal of residuals which is both sustainable and viable</p> <p>i. A series of riverside CDE recycling sites should be identified including one at Trechmans Wharf totaling 500,000 tpa from Medway and a further 100,000 tpa from London the latter to be specifically brought by barge and processed at Trechmans. Some of these facilities will be temporary. The Trechmans Wharf facility should be given priority and brought forward as quickly as possible as it will deliver the Bores Hole landfill for the deposit of residuals from the recycling operations of the network of facilities.</p> <p>ii. A facility at Kingsnorth/ Chattenden to handle 100,000 tpa in order to service the Chattenden residential Option proposals. Landfill of residuals would need to be off site.</p> <p>iii. Landfill of residuals to be at Bores Hole.</p> <p>h. TRECHMANS WHARF/BORES HOLE</p> <p>i. It is proposed that this facility would process 200,000 tpa made of 100,000 tpa from the London market. The principle means of access would be via the wharf but road access from the A299 will also be provided and the potential to use a rail sidings nearby would be investigated.</p> <p>ii. Material would be offloaded on the wharf and transported to a recycling yard which would be located in a largely cleared area of the land behind the wharf. Trees currently growing along the edge of the wharf would be largely unaffected as the material would be moved by conveyor. Similarly recycled products would be moved back to the wharf by conveyor for removal from the site.</p> <p>iii. Residual waste from the processing and also that arising from other recycling sites located in Medway and brought to the wharf for disposal would be moved into Bores Hole by conveyor through the tunnel under the A228.</p> <p>iv. Bores Hole is a former chalk quarry. The Quarry is situated above the water table. Views into the eastern end of the quarry where it is proposed infilling will take place are very limited. It is proposed that chalk will be excavated from the bottom of the quarry and engineered to form a base and line the sides of the excavated hole in order to comply with the Landfill Directive in respect of ground water protection.</p> <p>v. Nature conservation. Bore Hole is designated as a SSSI. An assessment of the designated has been undertaken (see Appendix A Bioscan report). The conclusions of this report are that the value of the eastern section of the quarry in nature conservation terms is low and that the remainder of the designated would benefit from enhancement funded by the development of the waste facility.</p> <p>vi. Regionally Important Geological Site. Bores Holes is identified as a RIGS but it is not protected as a SSSI for geology. As it is only proposed to landfill part of the site it is likely that the geological interest can be protected.</p> <p>vii. North Downs AONB and North Downs Special Landscape Area. Bores Hole but not Trechmans Wharf is part of the North Downs AONB and SLA. It is not proposed that the filling will be visible from outside the site.</p> <p>viii. Metropolitan Green Belt. Bores Hole but not Trechmans Wharf is part of the Metropolitan Green Belt. Para.10.56 of the RSS makes it quite clear that waste facilities should not be precluded from either the Green Belt or areas designated as AONB. In this case the unique opportunities to co locate recycling and landfill of residuals serviced by a wharf strongly mitigate against policies precluding development in the Green Belt and AONB.</p> <p>ix. Tree Preservation Order. The trees along Trechmans Wharf are protected by TPO. It is anticipated that the majority of trees can be retained as it is proposed that the recycling facility will be located in a clearing on previously developed land and accessed by conveyor. Where trees are removed these will be replaced.</p> <p>i. Set out below is an assessment of the proposals for Trechmans Wharf/Bores Hole against the criteria identified in PPS10, see Section 3 above.</p> <p>i. extent to which the allocations support policies in PPS10. The proposals are well located in relation to arisings, look to see waste dealt with in the community within which it was created, push waste up the waste hierarchy by maximising recycling and meet the criteria set</p>	<p>This is a site specific proposal that would be more appropriately considered in relation to a subsequent site allocations DPD than the core strategy. Planning permission for such a use was also refused in 2005. The draft core strategy identifies sufficient capacity to meet Medway's forecast requirements in other locations.</p>

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				<p>out below.</p> <p>ii.</p> <p>iii. the physical and environmental constraints on development, including existing and proposed neighbouring land uses including:-</p> <ol style="list-style-type: none"> <li>1. Protection of water resources. The site is above the water table and can be engineered using on site materials to meet water protection requirements.</li> <li>2. land instability. No land instability issues have been identified or are expected.</li> <li>3. visual intrusion. The Trechmans Wharf proposals will be masked by existing woodland and the Bores Hole proposals will not be seen outside the quarry. Activity on the wharf will be visible. This is considered not to be detrimental as it is normal for a riverside location.</li> <li>4. nature conservation. Overall it is expected that there will be an improvement in the SSSI through the delivery of a management strategy for that part of the SSSI identified as being of appropriate value.</li> <li>5. historic environment and built heritage. No issues have been identified which would conflict with this requirement.</li> <li>6. traffic and access. Access will generally be from the river. HGV access will be via the A228, into Bore Hole.</li> <li>7. air emissions, including dust. It is expected that the recycling will be within a controlled environment. The Bores Hole site is naturally protected by the height of the quarry walls. Measures can be taken within the quarry to ensure that no air quality issues arise.</li> <li>8. odours. None expected as the waste is CDE.</li> <li>9. vermin and birds. None expected as the waste is CDE</li> <li>10. noise and vibration. Expected to be controlled within acceptable levels.</li> <li>11. litter. None expected as the waste is CDE</li> <li>12. potential land use conflict. None expected as sufficient land within control to prevent problems arising. <ol style="list-style-type: none"> <li>i. iv. the cumulative effect of previous waste disposal facilities on the local community. There are no other waste disposal facilities in the area.</li> <li>ii. v. capacity of the existing and potential transport infrastructure to support the sustainable movement of waste. The principal method of transport will be via the river. Motor vehicle access will be directly onto the A288.</li> <li>iii. vi. Re use of previously developed land. Both sites are PDL. Bores Hole does not have a restoration requirement.</li> </ol> </li> </ol>	
9.		Kent Downs AONB Unit	Stella Bandu	<p>See attached comment from Kent Downs AONB Unit <a href="http://medway-consult.limehouse.co.uk/file/952591">http://medway-consult.limehouse.co.uk/file/952591</a></p> <p>We would expect the Medway Core Strategy to contain specific policy seeking the conservation and enhancement of the AONB.</p> <p><b>Integrated Countryside Management</b> Paragraph 4.224 raises a new approach termed Integrated Countryside and given the strategic role of the Kent Downs AONB, we would want to see it incorporated as a key element of the Core Strategy.</p> <p><b>Sustainable Construction and Renewable Energy</b> Regarding provision of renewable energy we request that the Kent Downs AONB position statement on the matter be used to guide policy formulation.</p> <p>Any approach needs to consider the need to reduce the amount of energy used in the first place as well as looking at the opportunity to utilise “green energy” sources.</p> <p><b>Transport (PROW network and cycle routes)</b></p> <p>We would like to see the creation of strategic new cycle (or multi user) routes along the Medway River being included as part of any transport strategy for the area.</p>	<p>Policies on natural assets, landscape and countryside and open space all seek to conserve and enhance the countryside, with particular emphasis given to the Kent Downs AONB.</p> <p>Noted.</p> <p>This has been taken into account in the foundation of the renewable energy policy.</p> <p>The transport policy makes provision for the extension of walking and cycling networks and a riverside cycleway is</p>



	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				<p><b>Capstone Urban Extension</b></p> <p>We agree with the Council's decision not to support this option.</p> <p><b>Annual Monitoring Report</b></p> <p>It is a duty of the Kent Downs partnership (including Medway Council) to monitor the condition of the AONB - the condition monitoring of the Kent Downs AONB should be incorporated in the LDF monitoring process.</p>	<p>promoted in the River Medway policy.</p> <p>Noted.</p> <p>Noted.</p>
10.		dha planning	Klaire Lander	<p>See attached comment on behalf of Kent Police.  <a href="http://medway-consult.limehouse.co.uk/file/951398">http://medway-consult.limehouse.co.uk/file/951398</a></p> <p><b>Identifying the need for Police Infrastructure</b></p> <p>Kent Police must react to population growth by expanding and investing in order to hold crime at existing levels when population growth occurs. Unless Kent Police is able to obtain appropriate infrastructure contributions as a service it cannot guarantee that it can maintain the same level of policing as growth takes place.</p> <p>SEP policy CC7 and PPS12 state importance of infrastructure needs and costs.</p> <p><u>Q.3</u> – It is essential that the infrastructure needs of Kent Police and emergency services should be included in the Core Strategy to ensure that sufficient developer contributions can be obtained to prevent increasing levels of crime and to maintain sustainable communities.</p> <p>Kent Police would like to see a specific policy within the Core Strategy on planning obligations such as – 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><b>Designing out crime</b></p> <p>PPS1 and Para 7.22 in SEP require design to address health and safety concerns including how good design can reduce the opportunity for crime and disorder and the fear of crime.</p> <p><b>Population numbers, demographics, tenure mix</b></p> <p>Core strategy should seek for new development to provide an appropriate mix of housing, tenure type and occupancy to ensure 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><b>Town centre regeneration and intensification</b></p> <p>Any increased density and amount of development and issues such as promoting the 24 hr economy will impact on the Police's existing resources. The CS should include a policy to encourage a safer evening and night time economy, strengthening town centres and reducing criminality. Such a policy could read as –</p> <p>The Council wants to promote a range of uses in town centres which result in a balanced and safe evening/night time economy.....The quantity, type and location of A3, A4,A5 and other evening or late night uses will be controlled, having regard to other spatial planning documents and policies, together with the aims and objectives of the Community Strategy and also the Community Safety Strategy produced by the Crime and Disorder Partnership.</p> <p>Where the new A3, A4 and A5 uses are permitted, financial contributions will be sought for related town centre improvements including additional CCTV, improved lighting, improved signage for CCTV and Alcohol free zones and any necessary additional infrastructure identified by the relevant agencies. In relation to those areas where concentrations of drinking establishments, night clubs or other evening or late night uses have caused existing anti-social problems, there will be a presumption against further consents for such uses.</p> <p><b>Transport and access to services</b></p> <p>Adequate infrastructure needs to be in place to ensure that emergency services can respond quickly to incidents.</p> <p><u>Q.22</u> – Kent Police would support a stronger emphasis on the need to reduce traffic congestion throughout Medway.</p>	<p>Noted.</p> <p>The South East Plan was revoked on the 6<sup>th</sup> July 2010.  Medway Council does not seek contributions from developers to fund policing and has no plans to do so.</p> <p>An infrastructure delivery plan will accompany the submission of the Core Strategy.</p> <p>Noted.</p> <p>The housing policy seeks an appropriate mix of housing and tenure.</p> <p>These issues will be addressed in a subsequent development management/site allocations development plan document.</p> <p>An infrastructure delivery plan will accompany the submission of the Core Strategy.  The transport policy seeks to reduce</p>

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				Flooding – can represent a risk to the Police Service in terms of manpower and resource pressure in responding to flooding incidents – policies to reduce the risk of flooding should be included in the CS.  .....calculating contributions towards police services .....based upon population growth rather than housing growth.	congestion. The development and flood risk policy seeks to minimise the risk from flooding.
	<b>Sub-Regional Context</b>				
	<b>Population</b>				
	<b>Housing</b>				
11.		South East England Partnership Board	Tom Kingston	<p>See attached comment <a href="http://medway-consult.limehouse.co.uk/file/992618">http://medway-consult.limehouse.co.uk/file/992618</a></p> <p>We consider it important for your Core Strategy to set out the housing requirement in the South East Plan and show a clear distribution between areas within and outside of the Kent Thames Gateway sub-region to provide clarity for the purposes of delivering regional planning objectives. South East Plan Policy H1 sets a target of 16,300 dwelling completions for Medway between 2006 and 2026; Policy KTG4 specifies that 15,700 of these should be within the Kent Thames Gateway sub-region.</p> <p>We would like to see the Core Strategy make a commitment to contributing to the regional density target of 40 dwellings per hectare (as set out in policy H5 of the South East Plan) and examine how higher densities might be achieved at the local level.</p> <p>The Delivery Strategy will need to identify what infrastructure is required to support the overall strategy, when it is required, and how it will be delivered. We would welcome reference to the definition of infrastructure as set out within the South East Plan (in the box beneath paragraph 5.22) and to Policy CC8: Green Infrastructure (with the box beneath paragraph 5.27). This will help to ensure that development and infrastructure are provided in a coordinated manner as encouraged by Policy CC7 of the South East Plan. We would support a policy in the Core Strategy on developer contributions/ planning obligations.</p> <p>The Core Strategy could usefully refer to the definition of Smart Growth given in Policy RE5 of the South East Plan and set out what achieving Smart Growth in the district requires in terms of the six key principles: employment; enterprise; innovation and creativity; skills; competition; and investment in infrastructure, including transport and physical development.</p> <p>We would advise that the Core Strategy includes a combination of policy measures to address the sustainable use of natural resources including support for sustainable construction (South East Plan Policy CC4), waste minimisation and reuse (South East Plan Policy W1) and water efficiency (South East Plan Policy NRM1).</p> <p><u>Q.21</u> - 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.</p>	<p>The South East Plan was revoked on the 6<sup>th</sup> July 2010. The housing policy addressed the proposed distribution of housing in Medway. The requirement of 16,300 dwellings has been retained. The government has now deleted its minimum density target from PPS3. The Core Strategy consequently does not include a density target. The infrastructure delivery plan will include a definition of infrastructure and the implementation chapter of the Core Strategy includes reference to the Councils Developer Contributions guide.</p> <p>Although the economic policy does not refer to smart growth, it does support its six key principles.</p> <p>The sustainability issues are addressed in the Core Strategy.</p> <p>The Core Strategy has concluded that there is no need to safeguard chalk reserves given adequate supplies in Tonbridge and Malling to serve the proposed cement manufacturing plant at Holborough.</p>
	<b>Transport</b>				
12.				<p>See attached pdf file for comments <a href="http://medway-consult.limehouse.co.uk/file/931925">http://medway-consult.limehouse.co.uk/file/931925</a></p> <p>G L Hearn are instructed by ArcelorMittal Kent Wire Ltd to respond to the consultation in respect of the Issues and Options Report. Although these representations are submitted on behalf of one of the occupiers of Chatham Docks, their purpose is to demonstrate that the Docks as a whole represent a valuable local and regional resource with the potential to play an increasingly influential role in the Medway economy.</p> <p><b>Question 26.</b></p> <p>The representations are concerned specifically with question 26: "Should formal protection be given to local wharves and Chatham Docks over the long term?" They are submitted in the context, as recognised within Strategic Priority 4 – Employment Space that: "Reallocations of employment land for residential use and the dearth of good quality sites in the Borough means that Medway's potential</p>	<p>The River Medway policy states that wharves and port capacity at Chatham Docks and Thamesport will continue to be safeguarded for the transhipment of freight, including waste and aggregates and other materials.</p> <p>The transport and movement policy states that existing wharf and port capacity will be safeguarded in order to meet national</p>

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				<p>to generate significant new employment opportunities could be severely constrained unless the amount of available employment land can be increased." The clear implication is that existing sites with the potential to provide employment opportunities should be retained for that purpose. This should apply to an even greater extent to those sites which possess particular qualities or characteristics which set them apart from other existing employment land. In making these comments we note that Chatham Port is identified as a site within the portfolio of employment sites at Appendix 7, and that it has the potential to provide significant additional floorspace. It is one of the larger sites within the tier below the Isle of Grain and Kingsnorth. We strongly believe that formal protection should be given to Chatham Docks and to other port facilities in Medway. The Medway Towns have a long history as a military and commercial port which has, over the years, contributed substantially to the local economy. The Docks represent a resource which, in combination with other economic initiatives, can help to drive and sustain long term regeneration. A port facility is by definition unique and irreplaceable. Once it has been lost it cannot readily be reinstated to its former use. For that reason alone the Docks are worthy of specific protection through planning policy but there are additional factors specific to Chatham Docks which reinforce the case for their retention as a functioning port. ArcelorMittal currently occupies a site of some 12 acres within the Docks. The company directly employs a total of 50 staff in a range of disciplines including; management, manufacturing and port operations. In addition to these direct employees the company also actively supports countless local people from the sandwich lady who calls every morning through to local engineering suppliers. The company not only manufactures reinforcing steel for use in major construction projects such as Heathrow Terminal 5 and the Olympic project to name two high profile contracts, but also handles and stores for onward transmission products such as road salt, sugar, timber, construction aggregates, glass for recycling and biomass used at Kingsnorth power station, and many other types of products. Employees are recruited predominantly from within the Medway Towns and remuneration is significantly above the norm for the area as a whole. The Docks are therefore a significant contributor to the local economy. At present, ArcelorMittal handles some 250,000 tonnes of cargo per year, but there is scope for this to increase significantly to at least 500,000 tonnes within the next two years and up to 1 million tonnes within the next five years. An increase in job opportunities would be an inevitable consequence. In order to achieve these volumes investment will be required that the business is willing to provide. However in order to effect this investment greater certainty over the future of the Docks is necessary. The operational characteristics of ports vary widely, of course. They range from the largest deep water ports such as Southampton, Felixstowe and Harwich to the smaller, more specialist facilities able to handle smaller vessels. Chatham Docks falls within this latter "niche" market and performs an important complementary function. It is important to the UK maritime economy that a range of facilities able to handle the full range of vessel types and sizes is maintained. In the interest of promoting more sustainable forms of transport it has become a feature of government policy to seek to bring about a shift from road to rail transport including reducing the amount of heavy goods vehicle traffic. Chatham Docks is particularly well placed in this respect since it benefits from a link to the national railway network. It was by this means that steel was transported from the Docks to the Heathrow construction site and scope clearly exists to expand the use of this valuable regional facility. Notwithstanding the opportunities for freight transport by rail, the Docks are also well connected to the regional and national highway network which is important because, inevitably, a substantial volume of goods will continue to be transported by road. To summarise, we believe that the long term interests of Medway will be best served by the retention, and enhancement, of resources with the potential to contribute towards economic regeneration. Chatham Docks comprise a facility with unique qualities, and its loss would detract significantly from the variety of available employment land. As such, we consider that it should be afforded strong policy protection through the emerging Local Development Framework.</p>	and regional capacity requirements and to encourage the local transportation of goods.
	<b>Economy</b>				
13.		Henderson Global Investors	Henderson Global Investors	<p>Attached comment from Indigo Planning Ltd on behalf of Henderson Global Investors, who manage Gillingham Business Park on behalf of the head leasehold property fund.  <a href="http://medway-consult.limehouse.co.uk/file/954343">http://medway-consult.limehouse.co.uk/file/954343</a></p> <p>Gillingham Business Park is an important established employment location in Medway and is acknowledged as such in adopted Local Plan policy. The park is currently identified for a mix of employment uses comprising B1, B2 and/or B8, and this is in accordance with the current range of uses at the park and our client's aspirations for the property. The park was constructed in phases over the period 1978 to the present day, and it is acknowledged that there is a potential need for re-investment in a number of the park's older phases. However, it is important that this is considered in the context of market demand. We note that the Council's Economic Strategy recommends a utilisation audit of GBP to establish whether/the extent to which there are vacant/under-used sites and premises that could be made available. We understand that a similar audit was carried out in relation to Medway City Estate, and that this resulted in a strategy for the park in terms of future potential development. Our client is willing to work with the Council on this and is open to the possibility of intensified development at the park to meet local employment needs at this location. However, it is important that the Council is realistic in terms of its aspirations for the park and that emerging policy reflects the importance of being able to respond to market demand for employment floorspace in Gillingham.</p> <p>I trust that this will be taken into consideration in progressing this key policy document.</p>	The economic policy promotes reinvestment strategies for existing established employment areas but does not attempt to estimate the likely additional employment floor space which could be forthcoming.
14.	Question 29	Costco Wholesale UK Ltd	Costco Wholesale UK Ltd	<p>See attached comments (pdf file) for Q29, 30, 32 &amp; 33 submitted by RPS Group on behalf of Costco Wholesale UK Ltd (Costco)  <a href="http://medway-consult.limehouse.co.uk/file/946830">http://medway-consult.limehouse.co.uk/file/946830</a></p> <p>Q.29 - Costco supports Strategic Policy 2. This option recognises the importance of up skilling the workforce to improve the quality of jobs and meet employers' skills needs.</p>	The economic policy supports the up-skilling of the workforce.

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				<p>Costco supports Strategic Priority 4 and a review of all mixed use land allocations to assess whether the extent to which there ought to be a re-balancing of residential and employment uses, away from the former and towards the latter.</p> <p>We note that there is currently an inadequate supply of employment land (Para 13.1 Employment &amp; Economy Review 2009) and employment cannot be created in Medway without the allocation of the necessary space which is currently insufficient. It is considered in allocating employment land that a definition of appropriate uses should be included within the Medway Core Strategy that recognises sui generis uses – <u>Q.30 Q.32 &amp; 33</u> - It is essential that the Medway Core Strategy supports a wide range of employment uses including sui-generis warehouse clubs. As explained, these have an important employment generality and support function.</p>	<p>The Council is continuing to implement the existing proposals for its regeneration sites and has not attempted to re-balance their uses.</p> <p>The economic policy chapter makes provision for an adequate supply of employment land. Warehouse clubs will be considered through the development management system. Retail policies seek to concentrate retail development in the town centres.</p>
	<b>Retailing &amp; Town Centres</b>				
15.		DTZ	Hempstead Valley Shopping Centre	<p>See attached pdf file <a href="http://medway-consult.limehouse.co.uk/file/948361">http://medway-consult.limehouse.co.uk/file/948361</a></p> <p><b>15. DTZ</b></p> <p><b>Medway Council- Medway Council Core Strategy Issues and Options Consultation, July 2009</b></p> <p>We write on behalf of our clients, British Steel Pension Fund Ltd and British Airways Pension Trustees Ltd (The Trustees) joint owners of Hempstead Valley Centre (the Centre), in response to Medway Council's current consultation on the Core Strategy Issues and Options Report (July 2009).</p>	Noted.
				<p><u>Hempstead Valley</u> Hempstead Valley Centre was originally opened in 1978. Last year the Centre celebrated its 30<sup>th</sup> birthday and it is popular and well managed retail and community centre with over 50 shops including Sainsbury's, Marks and Spencer's and a BHS Department Store, financial services, travel agents, restaurants and high street retailers including Argos, Boots and WH smith. As the Issues and Options report acknowledges, the Centre is an important part of Medway's retail offer and "counteracts at least some potential leakage to other areas" (para. 4.155).</p>	Noted.
				The Centre is therefore an important retail centre, service provider, local employer and community resource for Medway. This is reflected in its designation as District Centre in the Local Plan and Urban Service Centre in the Structure Plan.	Noted.
				The Trustees are now looking to the next 30 years and have been considering a range of investment options for the Centre in order to maintain its retail role, enhance its mix of uses and to improve public realm and transport facilities. The Trustees have been in discussion with Medway Council's members and officers on the future of the Centre. It is therefore vital that emerging policies for the Centre are flexible and enable it to maintain and enhance its role within the local community and for Medway generally.	Noted.
				As long standing and committed owners, the Trustees will play the key role in the future delivery of policies and proposals for the Centre. The Trustees therefore welcome the opportunity to participate in the future planning for the Centre through the LDF and wish to register their interest in fully engaging in the Core Strategy process.	Noted.
				<p><u>Retailing and town centres</u> This representation specifically relates to the "Retailing and Town Centres" section of the Issues and Options report and within that to Question 50 which asks: 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?</p>	Noted
				We agree with the Council's analysis set out at para. 4.129 and 4.130 that recent retail investment in Medway has been concentrated in out of centre retail warehouse parks and stand-alone foodstores, and as such there has been considerable "leakage" in terms of spending, particularly on comparison goods.	Noted.
				As a designated district centre within the retail hierarchy, Hempstead Valley has played and needs to continue to play a significant role in preventing further leakage from the Medway catchment area.	Noted.
				Hempstead Valley Centre covers approximately 9.5ha and is surrounded by residential development, therefore making it easily accessible by foot and bicycle for local residents. It is also well connected with the local road network being in close proximity to the A278, A229, A230 and A2, with the M2 (Junction 4) also located just 1.3km to the south. The Centre provides approximately 2,200 car parking spaces, including disabled and cycle/ motorcycle parking, and includes a bus terminal within the site offering access by public transport. Gillingham or Rainham train station is 10 minutes away by car.	Noted.
				<p>A strengths and weakness analysis is set out in tabular form at page 49 of the Issues and Options Report. Whilst we would concur with a number of the points, we would wish to see the following reflected in the strengths and weakness analysis going forward:</p> <ul style="list-style-type: none"> <li>The Centre has a good range of national multiples in the comparison sector. However it needs to be noted that many units are</li> </ul>	<p>The strengths and weaknesses are taken from the Nathaniel Lichfield Retail Needs Study, 2009.</p> <p>Noted.</p>

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				<p>now small by modern standards and the Centre is facing increased competition from sub-regional and out of centre locations;</p> <ul style="list-style-type: none"> <li>The Centre provides a major convenience food offering for the Medway catchment by virtue of the Sainsbury's and M&amp;S store.</li> <li>The Centre also provides other service related and community use functions (as noted above) which taken with the food offer underline the Centre's district centre role;</li> <li>We note improvements to public transport facilities and pedestrian/ cycle linkages can be made (as in many town and district centres), but we do not accept that Hempstead Valley acts like a "free standing" retail destination or that it poorly linked to surrounding areas;</li> </ul>	<p>Noted.</p> <p>Noted.</p> <p>The Nathaniel Lichfield Study compared the function of Hempstead Valley with that of a district centre defined in PPS6 (now in PPS4). This included local public facilities such as a library and a range of non- retail services and found some deficiencies at Hempstead Valley. The study states that although pedestrian crossings and subways are provided, they do not appear to be well used and Hempstead Valley Drive and Sharsted Way, which encircle the shopping centre, are busy with traffic and present a barrier to unconstrained pedestrian movement.</p>
				<ul style="list-style-type: none"> <li>We do not concur that a lack of vacant units "prevents new retailers from locating at the centre"- rather this is indicative of a well managed centre and the need for larger comparison shop units to maintain existing and attract new retailers.</li> </ul>	Noted.
				<p><u>The future role of Hempstead Valley Centre</u> According to the Council's Retail and Leisure Study (2009) prepared by Nathaniel Lichfield &amp; Partners, Medway is currently experiencing considerable leakage in terms of retail spending, particularly comparison goods, to centres outside of Medway.</p>	Noted.
				<p>To ensure Medway maintains and claws backs some of this retail expenditure there is a need to strengthen the Borough's retail offer, the cornerstone of which will be the improvement of Medway's centres particularly Chatham, which is identified in Policy TC1 of the South East Plan as a Primary Regional Centre and 'Centre for Significant Change'. We note and support the Issues and Options report proposal that Chatham will be the main focus of regeneration and improvements to Medway's retail offer.</p>	Noted.
				<p>Question 44 asks whether new retail development of 30,000 sq m (gross) should be a priority for Chatham. Whilst we support the need to improve Chatham's retail offer, we also consider that given current and foreseeable market conditions, the Council needs to identify the likely viability and deliverability of such a major proposal within a reasonable timeframe.</p>	Noted.
				<p>We therefore welcome the report's recognition that defined District Centres, including Hempstead Valley, complement Chatham by "providing for bulk convenience shopping and a range of comparison shopping facilities and other services"(4.132). It is therefore equally important that these centre's are maintained and strengthened as they will also play a key role in clawing back lost retail expenditure.</p>	Noted.
				<p>As such the Council needs to ensure that future planning policy supports and encourages District Centres to maintain their competitive position and continue to be successful in their own right, as this will allow them to positively contribute to the achievement of the Council's objectives for retail within the Borough.</p>	The retail and town centre policy in the core strategy seeks to maintain and enhance the viability and vitality of its network of retail centres and makes provision for additional retail development of an appropriate scale at the district centres, including Hempstead Valley.
				<p>As one of the five District Centre's in Medway, Hempstead Valley plays a key role in the Borough's network of centres. Despite relatively healthy levels of trading over the past decade the Centre is now 30 years old and in need of further enhancements to ensure its ongoing success. Central to these enhancements will be an improved retail offer that will help safeguard the Centre's future competitiveness, together with other secondary uses further diversifying the Centre's role.</p>	Noted.
				<p>In planning for the future enhancement and regeneration of Hempstead Valley, the Trustees consider a phased approach to investment is required that responds to the Centre's short term and medium-longer term needs, and puts in place policies and proposals that support the sustainable future of Hempstead Valley as a vital and viable district centre within the Borough.</p>	Noted.
				<p>The Trustees have identified that there is an urgent need to reconfigure and extend the southern retail street which currently contains the BhS store. This mall consists of many small units that increasingly do not meet modern retail requirements and where occupational levels are under pressure. Unless action is taken as soon as possible to offer more appropriately sized and configured units, it is the Trustees view that vitality and viability of the centre will be significantly impacted upon. It is thus the Trustees intention to submit a planning application for these "short term" proposals in the near future in order that the centre continues to perform its role in the retail hierarchy. The Trustees are continuing to work on detailed proposals, but as discussed with Council officers the proposals could include the following:</p>	Noted.
				<p><u>The short term</u></p> <ul style="list-style-type: none"> <li>New public transport facilities improving pedestrian convenience and interchange</li> <li>Improved new public realm and linkage across the site</li> <li>New landmark southern entrance</li> <li>New and expanded community facilities</li> </ul>	Noted.

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				<ul style="list-style-type: none"> <li>Improved servicing and access arrangements</li> <li>Re-developed and reconfigured southern retail offer to provide new, additional, better shaped and modern retail units in semi open shopping street.</li> </ul>	
				<p>Medium-long term</p> <ul style="list-style-type: none"> <li>Focus on northern retail offer</li> <li>Accommodation to meet Sainsbury's growing need for a more efficient store to meet increased competition from out of centre stores</li> <li>Identification of opportunities for other uses, such as residential and hotel and additional leisure uses</li> </ul>	No provision has been made in the Strategic Land Availability Assessment or in the core strategy for residential development within the Hempstead Valley site.
				<p>Question 50</p> <p>As noted above we do not accept that Hempstead Valley acts like a "free-standing" centre or that it is not a "typical" district centre, given as set out above its wider convenience food and service offer.</p>	Noted.
				The Trustees as long term and committed owners are passionate to see the Centre develop over the next 30 years in a manner which is economically, socially and environmentally sustainable. In this context the Trustees are keen to continue to explore diversifying the Centre's offer with additional non-retail uses, service functions, public transport facilities and additional linkage to neighbouring areas.	Noted.
				As recognised in Question 50 this will involve re-investment in the Centre's retail offer to retail its competitiveness. The Trustees wish to bring about change in a manner and timing which maximises the contribution the Centre can make in preventing further leakage from the catchment area.	Noted.
				The Trustees are also conscious that given their ownership, investment and funding position they are capable of delivering the "short term" proposals within the next 2-3 years, subject to planning. The Trustees evolving strategy is therefore to see a phased development at the Centre with initial investment focused on the southern retail street and medium to longer term investment focused on the northern mall.	Noted.
				In this regard we would urge the Council to maintain a flexible approach that recognises in its evolving LDF policies that re-investment is required in the short and medium as well as the longer term at the Centre. For this reason it remains the Trustees objective to work with the Council through the LDF process and to bring forward proposals in the context of an overall and indicative masterplan as to how Hempstead Valley will develop over the next 30 years.	The retail and town centre policy provides for flexibility in the range of development which will be supported in Medway's network of retail centres.
16.	Question 44 & 46	Ropemaker Properties Limited	Ropemaker Properties Limited	See attached comment from Turley Associates Ltd. on behalf of Ropemaker Properties Limited <a href="http://medway-consult.limehouse.co.uk/file/954006">http://medway-consult.limehouse.co.uk/file/954006</a>	
				<p>Q.46 Our client supports the development of a Central Area Plan for Strood which seeks to capitalise on its public transport links and plan to better 'knit' the centre together.</p> <p>We also support the recognition that Strood has a below average proportion of restaurants (Class A3) and takeaways (Class A5) and as such these uses should be promoted with a Central Area Plan for the town.</p>	A masterplan has been prepared for Strood town centre and has been taken into account in the preparation of the policy for Strood.
				Q. 44 Our client would also support major new retail development in Chatham but on the basis that this does not preclude or prejudice development in centres such as Strood where a number of potential development sites have been identified in the town centre by the Medway Council Retail Needs Study (March 2009). Our client supports these proposed enhancements of the town centre which would complement Strood Retail Park and improve the retail offer and attractiveness of the town.	Noted.
				.....to highlight the potential of the retail park to provide small retail units for high street fashion and potentially restaurants as cafes, as well as improved linkages with the high street. We look forward to engaging with the central area preparation process.	Noted.
	<b>Leisure, Culture &amp; Tourism</b>				
17.		Sport England	John Feetam	<p>See attached comment from Sport England <a href="http://medway-consult.limehouse.co.uk/file/952520">http://medway-consult.limehouse.co.uk/file/952520</a></p> <p><b>Developing spatial planning approaches</b></p> <ul style="list-style-type: none"> <li>Maximise contributions to spatial planning initiatives such as greenspace networks or better use of the urban fringe and the wider countryside?</li> <li>Develop policies which respond to the expressed needs and demands of marginal or controversial sports, with due regard to resource protection and wider sustainability issues?</li> <li>Explore opportunities for sport and recreation to make a contribution to unprogrammed development proposals?</li> </ul> <p>The above checklist is part of Sport England's extensive guidance on ensuring appropriate attention is paid to sport within Local Development Frameworks. This guidance can be found on our website at: <a href="http://www.sportengland.org">www.sportengland.org</a> &gt; Facilities and Planning &gt; Developing Policies for Sport</p>	Noted.
				<p><b>Planning Policies for Sport and Active Recreation</b></p> <p>To assist in the development of planning policies for sport, within the Core Strategy and other relevant DPD's, I would like to draw your attention to Sport England's 'Planning for Sport and Active Recreation: Objectives and Opportunities' document. This document presents Sport England's planning policy objectives across a wide range of areas including the protection and promotion of provision, providing for sport through new development, sport in the countryside and urban fringe and the management of sports facilities. I would</p>	Noted.

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				particularly refer you to Planning Policy Objectives 1, 2, 7 and 8. The document can be viewed and downloaded via the above link.	
				<p><b>Developing and Using the Evidence Base</b>  It is vital that along with the vision and spatial objectives of the Core Strategy, policies relating to sport are supported by a robust evidence base. PPS12 states that <i>'the Core Strategy should be supported by evidence of what physical, social and green infrastructure is needed to enable the amount of development proposed for the area, taking account of its type and distribution'</i> (Para 4.8). The development of an evidence base for sport is required to assist the sound development of the Core Strategy and its ability to meet the tests of soundness set out in PPS12. The 'Justified' test is of particular relevance</p>	The core strategy draws upon the Medway Countryside, Wildlife and Open Space Strategy, 2008-2016 and the Sports Development Strategy, 2009-2016 as part of its evidence base.
				With regards to sport this evidence tends to be included within a wider PPG17 compliant assessment of open space, sport and recreation provision. As you will be aware PPG17 states <i>'that to ensure effective planning for open space, sport and recreation it is essential that the needs of local communities are known. Local authorities should undertake robust assessments of the existing and future needs of their communities for open space, sport and recreational facilities'</i> (Para. 1). These assessments should cover both indoor and outdoor sports facilities.	Medway's open space was assessed as part of the Countryside, Wildlife and Open Space Strategy preparation. An up to date PPG17 assessment is currently underway, together with a household survey.
				It is Sport England's opinion that a PPG17 assessment should be supported by associated strategies for such provision which go beyond an assessment and the setting of standards. The strategies should develop the assessment work to provide recommendations and priorities for improving provision in line with the wider objectives for the area, as set out in relevant plans and strategies e.g. Community and Council Plan. The development of such strategies will in turn provide clear infrastructure requirements and priority projects relating to the needs of existing residents, the amount of development proposed for the area and catering for a desired increase in participation. These requirements can be fed into the development of the Core Strategy and other relevant DPD's. This approach is supported by Policy S5 of the South East Plan.	Noted.
				<p>The following checklist should be of assistance in ensuring the Core Strategy is supported by a robust evidence base for sport.</p> <p><i>The Evidence Base</i></p> <ul style="list-style-type: none"> <li>• Has the range of information gathered by Sport England, and updated by local authorities, in relation to facility planning (Active Places Power and Active People), been drawn upon?</li> <li>• Has the information available through PPG17 audits and needs assessments of open space and sport and recreation facilities been used?</li> <li>• Has the evidence base and any resulting local standards of provision built in projected increases in the participation rates in sporting activities as a result on policy objectives, LAA targets and related initiatives in the area e.g. sports governing body initiatives?</li> <li>• Has use been made of parallel data gathering and analysis exercises undertaken as part of initiatives such as green infrastructure planning and playing pitch strategies which could provide opportunities for joint working?</li> <li>• Has there been a consideration of the quality and accessibility of provision as part of the preparation of Local Area Agreements?</li> <li>• Have cross-boundary issues, particularly relating to facility provision been addressed?</li> <li>• Has information from other local authority strategies, including sport and recreation strategies, play strategies and community strategies been considered?</li> </ul>	See the Sports Development Strategy, 2009-2016
				<p><b>The Evidence Base in Medway</b>  Sport England is aware of work undertaken to date by your authority to develop an evidence base for sporting provision. It is Sport England's understanding that the key documents are the 'Medway Wildlife, Countryside and Open Spaces Strategy 2008-16' and the 'Sport and Recreation Strategy 2009-2016'. Sport England does hold concerns these documents and their ability to support the development of the Core Strategy. The concerns primarily focus on the nature of the demand assessment carried out for indoor sports facilities in the Sport and Recreation Strategy, and the apparent out of date information on playing pitch provision contained in the Wildlife, Countryside and Open Space Strategy. It is noted that this strategy recognises the issue and indicates that the playing pitch study requires a review.</p>	Further work has been undertaken to update and supplement these studies.
				Based on the information contained in the above documents it is Sport England's opinion that a sufficiently robust and sound evidence base, in line with the guidance in PPS12, PPG17 and Policy S5 of the South East Plan, is not yet in place to support the development of the Core Strategy. If the evidence base was in place then this would greatly assist in providing detailed answers to the questions raised on page 62 of the Issues and Options Report. The development of the Core Strategy could then focus on specific spatial options to address the identified deficiencies and barriers to participation in order to assist in meeting the desires of the Community and Council Plans along with the targets in the Local Area Agreement.	See above.
				Sport England would welcome further discussions with your authority to ensure that we are fully aware of the work that is currently in place and its status. We would also be pleased to offer assistance in developing this evidence base further.	Noted.
				<p><b>Issues and Options Report – Sport and Leisure</b>  Further to the above comments Sport England is concerned with the statements in paragraphs 4.194 and 4.197 of the Issues and Options Report alluding to Sport England standards for sports halls and playing pitches. Sport England does not have any such standards. We provide a number of tools and guidance to assist local authorities to develop locally derived standards of provision as advocated by PPG17. The statements in these paragraphs regarding Sport England standards are therefore incorrect.</p>	Noted. This has been corrected in the core strategy. A set of localised standards will be prepared, drawing upon information gained from the new PPG17 assessment and the household survey.
				In line with comments above we welcome the principle of the Core Strategy highlighting and addressing specific identified deficiencies in sporting provision. However, we would expect such statements to clearly reference the evidence base on which the issues are	Noted.

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				founded and for that evidence to be robust and up to date. For example, we would hold concerns if the statements made regarding playing pitch provision are based on the results of the 2002/03 playing pitch study which is now up to 7 years old.	
				<b>Co-location and Sustainable Community Sports Facilities</b> It is noted that the report mentions the principle of co-location and community hubs, for example on school sites (Q40). Further to these points below are two areas of guidance which may be of interest.	Noted.
				<b>Win Win Scenario</b> This guidance supports the principle of developing community hubs on education sites through delivering opportunities for both community sport and arts. <a href="http://www.sportengland.org">www.sportengland.org</a> > Support and Advice > Building Schools and Sport	Noted.
				<b>Sustainable Community Sports Hub Toolkit</b> This toolkit and initiative promotes the development of high quality, demand led sports facilities with secure long term financial sustainability through the principle of co-location. The approach seeks to work with all relevant sectors and funding streams to overcome pressures on local authority resources, expenditure and subsidies. Through strategic planning and the co-location of services, including a mixture of public and private provision, the approach seeks to create a dowry through commercial and other rental opportunities. the establishment of the dowry seeks to generate sufficient income streams to reduce operating subsidies to enable the development of ring fenced funds for lifecycle costs. <a href="http://www.sportengland.org">www.sportengland.org</a> > Facilities and Planning > Planning Tools and Guidance	Noted.
				<b>Urban Design and Masterplanning</b> Sport England has produced a guide to assist with designing developments which encourage participation in sport and physical activity. Linked to a number of the above comments this guide, called 'Active Design', could help your authority ensure that high quality design is achieved in new developments and in turn assist the implementation of any related forthcoming strategic objectives and policies in the Core Strategy. Taking widely accepted principles of good design (character, continuity, quality, legibility etc) as a starting point, the guidance uses three objectives to frame advice on positive design: improving accessibility; enhancing amenity; and increasing awareness. Using the three design objectives, the guidance explores in detail their application to three activity settings: everyday activity destinations (shops, homes, schools workplaces); informal activity and recreation (play areas, parks & gardens); and formal sports and leisure activities (sports pitches, swimming pools etc) Active Design poses a number of questions for consideration by planners and urban designers. The following table gives a flavour of these questions.	Noted.
				<b>Theme Example questions</b> Accessibility (21 questions) <ul style="list-style-type: none"> <li>• Are everyday activity destinations accessible to all travel modes?</li> <li>• Does the design enable the most direct and safe active travel route between everyday activity destinations?</li> <li>• Are everyday activity destinations co-located to offer the opportunity for linked trips?</li> <li>• Are active travel routes to everyday activity destinations prioritised?</li> <li>• Does the design and layout of everyday activity destinations help to prioritise pedestrian, cycle and public transport access?</li> </ul>	Noted.
				Amenity (12 questions) <ul style="list-style-type: none"> <li>• Are flexible and durable high-quality public spaces proposed?</li> <li>• Does the quality, design and layout of open spaces enhance the setting of development?</li> <li>• Does the design of informal sport and recreation facilities create a high quality environment?</li> </ul>	Noted.
				Awareness (13 questions) <ul style="list-style-type: none"> <li>• Are everyday activity destinations co-located with sports and leisure facilities in a manner that promotes awareness?</li> <li>• Are informal sport and recreation facilities located in prominent positions?</li> <li>• Is appropriate high quality provision made for all age groups within the community?</li> <li>• Are formal sports and leisure facilities located in prominent positions playing a positive role as landmarks and attractions?</li> </ul>	Noted.
				The full guidance is available at: <a href="http://www.sportengland.org/activedesign">www.sportengland.org/activedesign</a> Sport England would be particularly interested to work with Medway Council to apply the principles of Active Design to the master planning of any new large scale developments proposed through the Core Strategy e.g. Lodge Hill, Chattenden.	Noted.
	<b>Minerals</b>				
18.		Lafarge Aggregates Ltd.		Attached comment submitted by Heaton Planning Ltd on behalf of Lafarge Aggregates Ltd. <a href="http://medway-consult.limehouse.co.uk/file/952322">http://medway-consult.limehouse.co.uk/file/952322</a> The National and regional guidelines for aggregates provision in England, 2005 – 2020 were published in June 2009. These confirm that the regional requirement for the South East is 12.18 mtpa. Paragraph 4.234 discusses the preference for the regional agency to reduce this figure further. We do not believe a separate approach for the South East to reduce the guideline figure is appropriate. We recommend that Medway should follow the apportionment approach that has previously been undertaken and is used throughout the rest of England.  Whichever method is taken to identifying the future apportionment within Medway, it is clear within the Core Strategy document that additional reserves will need to be secured towards the end of the plan period, paragraph 4.237. The Core Strategy, paragraph 4.245, identifies potential extensions to the Kingsnorth site and these are supported by Lafarge.	Since the abolition of the South East Plan the targets set out in Policy M3 no longer are in force. However, Medway will continue to have the responsibility to plan for a steady and adequate supply of aggregate minerals to foster economic growth. To that end work done to evidence the sub-regional apportionment set out in the "Proposed Changes" to the revision of Policy M3, published on 19 <sup>th</sup>



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				<p>In terms of this support for extensions, we would be happy to have discussions with you over the possible extension areas and we can potentially assist with geological information and information concerning deliverability.</p> <p>The Core Strategy, at paragraph 4.247, raises concern that due to the existing site not yet fully implemented the reserves may not be economically viable. We can confirm that this is not the case. The existing site at Kingsnorth is economically viable and operations are scheduled to begin in the next couple of years. The Council should therefore consider this site as being deliverable within the plan period</p> <p>Q.69 further extensions to the Kingsnorth site that can assist in facilitating nearby regeneration sites and the Lodge Hill settlement are welcomed.</p>	<p>March 2010 can be used to inform the Medway Core Strategy aggregate minerals supply planning.</p>
19.	Question 71	Lafarge Cement UK PLC		<p>See attached pdf file  <a href="http://medway-consult.limehouse.co.uk/file/947953">http://medway-consult.limehouse.co.uk/file/947953</a>  Q.71 -  Lafarge considers there is a strong case for safeguarding chalk reserves in the vicinity of the Medway Works project.</p> <p>MSP1 par 13 - Mineral Safeguarding Areas in order that proven resources are not needlessly sterilised by non-mineral development ..... 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>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>MPS 1 does make clear the safeguarding of economic minerals from other development that would sterilise them, as set out in Paragraph 13, though the reserves have to be 'proven' in nature; not simply assumed due to their proximity or that they are continuous to permitted reserves. Lafarge Cement UK have apparently not assessed the Chalk in the suggested 500 Metre margin around the existent planning consent. These deposits are, or have to be considered, as unproven at this stage.</p> <p>Safeguarding is directly related to the establishment and maintenance of a landbank of permitted reserves to ensure the long term economic planning of the cement manufacturing industry. MPG10 states in paragraphs 58 and 59:</p> <p><b>58. Mineral planning authorities should normally aim to maintain cement plant with a stock of permitted reserves of at least 15 years. Where significant new investment (such as a new kiln) is agreed with the mineral planning authority, the plant should be provided with a stock of permitted reserves to provide for at least 25 years. New plant on a greenfield site should be provided with a stock of permitted reserves lasting more than 25 years.</b></p> <p><b>59 Development plans should normally allocate sufficient land for mineral extraction for cement manufacture to provide for the maintenance of landbanks.</b> The Medway Works have substantial reserves well beyond 25 years, the required amount for a new investment site. Safeguarding additional reserves at this time is not required to maintain a sufficient land bank through the plan period.</p> <p>In addition the area in Medway that would be covered by the 500 meter margin is open countryside that is within the</p>

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
					Metropolitan Green Belt and in part within the designated North Downs Area of Outstanding Natural Beauty. The potential for major new development that might sterilize unproven chalk reserves is contrary to established policy and highly unlikely within the plan period.
20.	Question 71	Omya UK Ltd	Omya UK Ltd	See attached pdf <a href="http://medway-consult.limehouse.co.uk/file/947957">http://medway-consult.limehouse.co.uk/file/947957</a> <b>Q.71</b> Omya considers there is a strong case for safeguarding chalk reserves in the vicinity of Cliffe. 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.”  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.	MPS 1 makes clear the safeguarding of economic minerals from other development that would sterilise them, as set out in Paragraph 13, though the reserves have to be ‘proven’ in nature. Without evidence as to the nature of the materials such that they are of proven economic importance, a question is raised that the subsequent lack of safeguarding by the mineral planning authority is not in conflict with MPS1.
	<b>Energy</b>				
21.			Leslie Morris	Attached comment from National Grid <a href="http://medway-consult.limehouse.co.uk/file/954332">http://medway-consult.limehouse.co.uk/file/954332</a> We therefore wish to be involved in the preparation, alteration and review of Development Plan Documents (DPDs) which may affect our assets including policies and plans relating to the following issues: Any policies relating to overhead transmission lines, underground cables or gas pipeline installations. Site specific allocations/land use policies affecting sites crossed by overhead lines, underground cables or gas transmission pipelines. Land use policies/development proposed adjacent to existing high voltage electricity substation sites and gas above ground installations. Any policies relating to the diverting or undergrounding of overhead transmission lines. Other policies relating to infrastructure or utility provision. Policies relating to development in the countryside. Landscape policies. Waste and mineral plans.  In addition, we also want to be consulted by developers and local authorities on planning applications, which may affect our assets and are happy to provide pre-application advice. Our aim in this is to ensure that the safe and secure transportation of electricity and gas is not compromised.  Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure.	National Grid is included on the LDF consultation database and will be consulted at all stages of plan preparation.
	<b>Climate change</b>				
	<b>Lodge Hill, Chattenden</b>				
22.		Medway Magna Ltd	Medway Magna Ltd	See attached Medway Magna Ltd comment <a href="http://medway-consult.limehouse.co.uk/file/952622">http://medway-consult.limehouse.co.uk/file/952622</a> <b>Economic Development Strategy and Employment Land Study.</b> 3.2 This runs only to 2011 and this timeframe is inappropriate to this necessary and important component of the evidence base, in that it should be testing the position, if not up to 2026, at least to 2016.  3.3 One of the principal failings of the previous attempt at a Core Strategy was the complete lack of connection between the aspiration to create 50,000 jobs, subsequently reduced to 40,000, by 2021, (Medway Economic Development Statement and Action Plan) and employment land supply. The latest iteration of the Employment Development Strategy and Employment Land Study fails yet again to make the connection between employment aspirations and land supply.  3.4 The Economic Development Strategy at paragraphs 8.6 to 8.9 concluded that land and Kingsnorth and Grain “are not locations that will attract employers looking for a high quality operating environment”. Yet at paragraph 4.65 of the Issues and Options consultation, it is stated that both sites are potentially suitable locations for environmental technology etc. Grain and Kingsnorth are in the wrong place to	The Medway Economic Development Strategy was reviewed in 2009 and now covers the period up to 2026.  Medway Council is no longer pursuing a target of 40,000 to 50,000 jobs in the core strategy. It has now adopted a range of estimates from 9,400 to 21,500 jobs.  Planning permission has now been granted for over 460,000 sq.m. of B1c, B2 and B8 employment uses at the Isle of

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				serve Medway, with most of its population south of the river and where good quality employment land allocations are needed.	Grain and the site at Kingsnorth is currently being prepared for development. Consequently, Medway Council is including both sites in its employment land supply. This approach has been confirmed by the recent Employment Land Consolidation Study.
				3.5 Question 35 asks whether land at Kingsnorth and Grain should be actively promoted as locations for environmental technology and related activities. These two sites distort the council's perception of employment land availability. Medway Magna agree with those who produced the Economic Development Strategy (para 8.9), that they ought to be excluded from any calculations of forecast of take up of employment land, as they are irrelevant to most employment uses.	See above.
				3.6 The Issues and Options paper fails to mention the need for high quality employment land; a necessary requirement in Medway, as identified by the Economic Development Strategy at paragraph 8.33.	The economic policy emphasises high value activity and higher skilled employment activities, the provision of employment floorspace to provide a range and choice of sites in terms of quality, type and size, the creation of a high quality environment at Lodge Hill for the development of employment and continuing opportunities at Rochester Airfield to develop a technology and knowledge based cluster.
				3.7 It is clear from the Issues and Options Paper that the council are still not addressing the fundamental shortcomings of Medway's economic characteristics. Nor does the economic evidence base for the Core Strategy address the correct period. If the Core Strategy emerges using this information base, it will be unsound.	An extensive range of evidence has been produced since the Issues and Options report was published and the proposed policy approach reflects this.
				<b>Green Grid Strategy</b> 3.8 Medway Magna Ltd recognise this as an aspiration and would say that development on the sites proposed would achieve the objectives of the interlinkages in the Green Grid Strategy to a greater extent than the chosen option at Chattenden, which is completely divorced from the Towns.	The aim of the green grid is to ensure that adequate open space is provided in association with new development and that it be linked into a wider grid. The green grid strategy can therefore be pursued irrespective of where development takes place.
				<b>Infrastructure Plan</b> 3.9 This is stated that it will be part of the evidence base for the Core Strategy and is as yet, incomplete. This begs the question of how the council can then discount all potential growth options bar Chattenden because the amount and timing of infrastructure delivery is fundamental to growth options.	An infrastructure plan cannot be completed until the development strategy has been developed. It is therefore unsurprising that it was incomplete when the Issues and Options report was published. The full plan will accompany the submission of the core strategy.
				<b>SATURN Transport Model</b> 3.10 This has yet to be completed. It is also understood that Mott McDonald have carried out a Transportation Assessment of the Towns. Medway Magna have not had sight of this document and at the time of writing this response, it is not clear whether it is in the public domain.	A report referring to the initial conclusions from running the SATURN model is referred to in the Issues and Options report. Developers can arrange runs of the model by the consultants at cost.
				3.11 Question 22 asks whether the correct transport issues have been addressed. It is not just the capacity of public transport in the Towns that is an issue but its convenience, particularly in respect of journey times.	Noted.
				3.12 At the local level and for topographical reasons, the Medway highway network radiates out from Chatham town centre, mainly along the A2. About 51% of Medway's population resides east of the river and south of the A2. All traffic and 100% of public transport between these areas has to use the A2 through Chatham	Both public transport and other traffic is dispersed over a network of roads and it is incorrect to claim that it all has to use the A2 through Chatham.
				3.13 It is clear from the Issues and Options paper that this situation is not effectively addressed. The current position is unsustainable (long public transport journey times, especially between Walderslade and Hempstead) and unattractive to many potential users.	Opinion noted.
				3.14 Medway council has no plans to change what is an unsustainable situation, which fundamentally makes current public transport provision unattractive. Medway Magna, as part of a planned urban extension, proposes the provision of the Medway Towns Southern Relief Road (MTSRR). This road featured as a strategic requirement in the previous Structure Plan but has for unsubstantiated reasons been abandoned by both Medway and Maidstone Councils.	This road proposal was abandoned by KCC in 1997 as it could not score highly enough to have any prospect of attracting funding, it would have had severe implications for parts of the existing network and it had serious environmental

Consultation points	Company / Organisation	Name	Comments	Recommended Response
				impacts.
			3.15 With the completion of MTSRR (proposed by Medway Magna), the town centre will be relieved of substantial volumes of traffic, which currently has no alternative route. In addition to shorter and more efficient car journey's, there would for the first time, be public transport from Lordswood, Warrenwood, Walderslade, Wayfield, Weedswood and Horsted direct to Rainham Mark, Parkwood, Miers Court, Wigmore and Hemstead. Such public transport provision would be much more sustainable than at present. Peak hour bus travel between Lordswood and Rainham can take up to 90 minutes. Medway council's proposed solution to retain a narrow lane, with passing places for buses and restrictions on other vehicles, as the sole connector between major communities in Medway is symptomatic of the failure to provide facilities necessary for the largest urban area in the Thames Gateway.	Opinion noted. No evidence has been produced by Medway Magna to substantiate its traffic movement assumptions, nor the efficacy of a relief road as suggested.
			3.16 The evidence base needs updating in this respect and the Medway Magna option for development assessing in this context; see below.	Noted.
			<b>Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessment.</b> 3.17 The housing evidence relied upon by the Core Strategy will be fundamental to it and will need to demonstrate how the Strategy will meet the housing requirements of the Regional Plan and indeed exceed them as the provision figures therein are minima. The Medway Towns are a growth hub and will need to maximise housing provision.	The South East Plan was revoked on 6 July, 2010. The Medway SLAA now demonstrates a surplus housing supply of over 3,000 dwellings over the requirement up to 2026.
			3.18 A major failing in the Medway Towns is the lack of progress on regeneration. Part five of the Issues and Options paper suggest the existing strategy should form the basis for the future. Even at this stage, an objective assessment of the, as yet, incomplete evidence base would reveal little if any progress on housing provision associated with regeneration.	While the sentiment expressed is noted it is at odds with the fact that housing completions in Medway have exceeded all records over the last two years and than the area is substantially performing both other growth areas and the rest of Kent.
			3.19 Medway Magna Ltd will, closer to the examination of the Core Strategy, look at the likelihood of the council's housing trajectory, which will presumably be updated at that time, reflecting what is likely in practice. The council and the Inspector will be reminded that even since the mid 1980's, for example, many alternative housing proposals have always been disregarded because of the prospects of an "early win" at Rochester Riverside.	Noted and see above.
			3.20 The Inspector examining the Local Plan in 2002, was told that "smoke would come out of the first chimneys at Riverside" in 2006, whereas no dwellings have yet been completed. The Housing Market Assessment, identified a need for what has been described as "up market" housing in Medway.	Noted.
			3.21 There is a real problem in Medway in respect of housing mix. Too much reliance on riverside sites produces too many flats - a type of accommodation of which there is now a surplus and not always suited to families, which in turn restricts the provision of affordable housing.	There are, currently, fewer flats in Medway than virtually any other area and Lodge Hill will feature a high proportion of family housing..
			3.22 It is disturbing to see, particularly in the light of an incomplete evidence base in respect of transportation and housing trajectory, the statement in paragraph 4.35 of the Issues and Options paper. This concludes that "there is no obvious need to identify additional sites beyond the existing urban boundaries, other than at Lodge Hill, Chattenden..."	This conclusion has been reinforced by the results of the Medway SLAA. See above.
			3.23 While the same paragraph recognises that identified sites will need to come forward in a timely manner, there is no debate on the consequences if they do not and what potential other options will need to be considered. The questions relating to housing include only one "macro" question relating to regeneration. At the peak of the housing boom, there were difficulties in bringing forward Rochester Riverside, where the number of dwellings was increased from 400 to 2,000 for reasons of viability and still required very large sums of public funding.	The Medway SLAA now demonstrates a surplus housing supply of over 3,000 dwellings over the requirement up to 2026.
			3.24 There needs to be a suite of questions that examine whether the predisposition to Lodge Hill, Chatterden, for example, really does confer the benefits claimed. The evidence base needs to establish the levels of infrastructure required for what is described as a strategic location and whether it can be delivered on time and on budget.	There is a substantial evidence base relating to Chattenden and the comparative ease with which it can be delivered. The Issues and Options report included many more questions than usual and invited respondees to make any additional points they considered relevant.
			3.25 Medway Magna are of the view that for the Core Strategy to be found sound, it will need an evidence base that clearly justifies the council's current approach in respect of the following broad headings: i. The relationship between employment land provision and job creation. ii. Housing provision in terms of timing, mix and location. iii. The transportation problems that exist in the Medway Towns and how these are to be resolved; and iv. The justification for Lodge Hill, Chattenden and the reasons why this strategic option is the best in the light of the matters identified above.	Noted.
			<b>4: Chattenden, Lodge Hill and the Assessment of Options</b> 4.1 Reference has already been made to the need for an evidence base that enables the conclusion to be drawn in the Core Strategy that Lodge Hill, Chattenden, is the most sustainable option for major growth up to 2026 and beyond in the Medway Towns. Medway Magna Ltd are of the opinion that because the landscape has subsumed much of what might be termed previously developed land, the	The masterplan submitted by Land Securities shows how the Lodge Hill site can accommodate the level of growth proposed. The high proportion of

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				scale of the redevelopment of such land has been over estimated.	previously developed land has also been documented.
				4.2 The Core Strategy will need to demonstrate that a stand alone settlement at Chattenden, that currently has poor accessibility, is a better option than a planned urban extension/s to the Medway Towns. Is 20 to 25 hectares of employment land proposed to principally serve the employment needs of the occupiers of the 5,000 dwellings?	Accessibility is being addressed in the planning of Lodge Hill but it is well related to the principle road network. Employment provision is planned that seeks to balance provision with the eventual resident workforce.
				4.3 The assertion in paragraph 4.448, fourth bullet point, that by concentrating development at one location, there is an opportunity to fashion a development of real note and one with a full range of local services. It is stated that this would be difficult to achieve on urban extension sites where, it is claimed, development would impact more significantly on existing communities.	Noted.
				4.4 In most cases, sustainable urban extensions will be preferable to stand alone new settlements, so the Core Strategy will need to robustly set out why Chattenden has advantages over the other options set out. Other options, it has to be said, that have been assessed on an incomplete evidence base and assertions in the absence of knowledge to the contrary, on such matters as transportation.	Lodge Hill is the only previously developed land option and consequently most closely meets one of the national policy requirements for the selection of sites for housing development. It is noted that Medway Magna has submitted no detailed evidence to justify its proposal for the Capstone Valley, contrary to PPS12.
				4.5 For example, under the summary assessments, options 2 to 5, are claimed to have a high negative impact, when considered against the need to integrate with existing urban form. One of the primary objectives when planning sustainable urban extensions is to ensure that they do integrate and indeed complement and/or improve existing urban form.	Opinion noted.
				4.6 The Medway Magna proposal - Option 3 is also regarded as having a high negative impact when assessed on its perceived transport impacts. Medway Magna have consistently said that the development would include what was previously a Strategic and Local Plan requirement, i.e. the Medway Towns Southern Relief Road, (MTSRR). It would also connect the North Danes Way to the MTSRR, thereby improving access to J3 and J4 of the M2.	The route of the southern relief road mainly lies outside the administrative boundary of Medway and is not supported either by Maidstone Borough Council or Kent County Council as Highways Authority. Nor do these comments address impacts on the existing road network, for example Sharsted Way, Luton Road and M2 junctions 3 and 4.
				4.7 The assessments of the options is wholly subjective and indicates an obvious predisposition to Chattenden, irrespective of the merits of other options. Options that have not been properly tested because of an inadequate evidence base.	Opinion noted and the respondent is reminded that PPS12 places the onus on development promoters to provide robust evidence to justify their proposals. No such evidence has been submitted in support of the Medway Magna proposals for the Capstone Valley.
				4.8 The proposal at Medway Magna would therefore have opportunities for substantial improvements to transport provision. Provision of the MTSRR would enable a radical revision of the transport network in the Medway Towns, providing high levels of integration by all modes between the areas of Walderslade, Hempstead and the Town Centre and reduce traffic attempting to use the M2 for purposes for which it is not intended. Most trips between Walderslade and Hempstead have of necessity to go through the Town Centre and due to the distance involved and the lack of alternatives, many of these trips have to be undertaken by car.	See previous comments on the MTSRR.
				4.9 A Southern Peripheral Road would reduce the number of vehicles traversing the Centre, provide the opportunity for upgraded and much more efficient direct transport connections by all modes, which should reduce the overall level of emissions. The MTSRR would also enable ready access to the improved junction 3 of the M2 Motorway, maximising the use of infrastructure investment and also bring about development led improvements to junction 4 of the M2.	See previous comments on the MTSRR.
				4.10 In the light of these potential advantages, the Core Strategy will need to robustly demonstrate that development at Chattenden would: <ul style="list-style-type: none"> <li>i. Be readily accessible to the local and national transportation network.</li> <li>ii. Result in reduced carbon emissions when compared with sustainable urban extensions.</li> <li>iii. Enable radical improvements to be made to public transport within the Medway Towns, with particular emphasis on reduced journey times.</li> <li>iv. Enable an early start to the delivery of market and affordable housing.</li> <li>v. Provide high quality employment land which will need high quality access to the national highway network.</li> <li>vi. Be accessible to a range of services, and</li> <li>vii. Integrate with existing urban centres</li> <li>viii. Guarantee delivery in a climate where public funding is in doubt.</li> </ul>	Noted.

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				4.11 The evidence base as currently formulated, demonstrates none of the above. There are also other important considerations which need to be addressed by the Core Strategy. The principal ones are: i. The regeneration of Chatham Town Centre. ii. The need to reduce out-commuting from the Towns. iii. Improving the image of the Medway Towns as a place to do business. iv. The level of public funding likely to be available to maintain regeneration momentum. Consideration of an approach that balances the merits of brown and greenfield development that will deliver, must be explored.	All these matters have been considered and are reflected in the draft core strategy.
				4.12 There is nothing in the Issues and Options Report that at present suggests how the Core Strategy will bring about objectives i to iii above.	Noted.
	<b>5. Spatial Choices or Options</b>				
23.		Government Office for the South East (GOSE)	Marie O'Sullivan	Your authority undertook a Planning Advisory Service visit in March 2009 and we understand that you decided to take up all the subsequent support packages offered. In addition, a PINS Front loading visit was held in June 2009 and a joint PINS frontloading visit for the Kent Thames Gateway was undertaken in October 2009. We strongly advise you to take into account the support and advice provided by these support packages, in preparing the next version of your core strategy.	Noted and all the advice received has been closely followed.
				PPS12 (paragraph 4.13) states that the time horizon of the core strategy should be at least 15 years from the date of adoption. As the expected adoption date of the core strategy is October 2011, what is your proposed approach to this issue?	The plan period for the core strategy will extend from its adoption in 2012 to 2028.
				PPS12 (paragraphs 1.2 and 1.6) states that the Sustainable Community Strategy sets out the strategic vision for a place, and provides the vehicle for considering and deciding how to address difficult cross cutting issues. Spatial planning objectives for local areas should be aligned not only with national and regional plans, but also with the shared local priorities set out in sustainable Community Strategies, where these are consistent with national and regional policy.	The sustainable community strategy has been fully taken into account in the core strategy.
				In view of the above, we suggest that you take this into account in preparing the core strategy. We are aware of Medway's Community Plan covering the years 2007-2010, however, we understand that a revised Community Strategy is being prepared. We assume you will be reflecting this in the emerging core strategy, subject to the guidance set out in PPS12.	A revised community strategy was adopted in 2010 and this extends to 2026.
				Whilst this may not be a reason for finding the document unsound, we suggest that you think about the length of the document you are preparing. One way that you may wish to consider addressing this is by including information in topic papers? The 2004 Regulations as amended do allow for accompanying documents to be produced [2008 Amendment Regulations, 30 (1) (g)].	The length of the document reflects the need to include a range of strategic policies appropriate to a large unitary authority. The Council has prepared fourteen State of Medway reports (ie. topic reports), as well as a range of other evidence documents. Further topic papers will be prepared at the submission stage.
				The PINS publication "Examining Development Plan Documents: Learning from Experience" (Sept 2009) endorses the above. It states that all DPDs should be concise and focussed and convey the essential messages in a clear and engaging way (page 5).	Noted.
				We note the helpful use of footnotes within the core strategy and suggest that you continue with this approach, as advised in the PINS advice "Examining Development Plan Documents: Learning from Experience (September 2009) paragraph 34.	Noted. It is intended that the submission core strategy will be accompanied by a comprehensive evidence 'map'.
				In addition, if you are drawing together more than one piece of the evidence base, you may need to consider producing a topic paper setting out your conclusions.	Noted.
				Reference is made to a separate AAP for Lodge Hill. This position will need to be updated in the next version of the core strategy, in view of the December 2009 LDS.	The AAP has been replaced with a strategic allocation for Lodge Hill/Chattenden.
				By allocating Lodge Hill as a strategic site in the core strategy, you will need to have the evidence base in place to justify your proposals. We understand that you are working in partnership with Land Securities, which is to be welcomed.	Noted.
				Finally, the South East Plan (May 2009) sets out the policy context for Lodge Hill (paragraph 19.5) which is not solely housing, but employment and other services.	The South East Plan was revoked on 6 July, 2010. However, the Lodge Hill proposals continue to be based on the concept of the development of a sustainable community.
				You make reference to the inclusion of a "vision section" and "strategic objectives" section in the document.	Agreed.
				PPS12 (paragraphs 4.1, 4.2) provides advice on setting out the vision for an area. Your core strategy should set out how the area and the places within it should develop. It should be informed by an analysis of the characteristics of the area and its constituent parts, and the key issues and challenges facing them. The vision should be in general conformity with the RSS and closely relate to the Sustainable Community Strategy.	Noted.
				PPS12 (paragraph 4.3) states that the strategic objectives form the link between the high level vision and the detailed strategy. They should expand the vision into key specific issues for the area which need to be addressed, and how that will be achieved within the timescale of the core strategy.	Noted.

Consultation points	Company / Organisation	Name	Comments	Recommended Response
			PPS12 (paragraphs 4.1, 4.4, 4.5) also sets out advice on the delivery strategy. This should set out how much development is intended to happen where, when and by what means it will be delivered. It needs to show how the objectives will be delivered, whether through the actions taken by the council or by other bodies. There also needs to be co-ordination of actions and the core strategy needs to demonstrate that the agencies/partners necessary for its delivery have been involved in its preparation. There should also be a realistic prospect of delivery within the plan period. You are strongly advised to take account of the above advice set out in PPS12. We would generally expect to see the vision, strategic objectives and delivery strategy set out at the beginning of the core strategy.	Noted.
			PPS12 (paragraph 4.14) states that the need for frequent updating can be reduced by taking long-term views and providing some flexibility. PPS12 continues (paragraph 4.46) by stating that a strategy is unlikely to be effective if it cannot deal with changing circumstances and should set out how it can handle contingencies. Examples of this would be addressing in core strategies the South East Plan partial reviews on Gypsies and travellers' accommodation and on the primary aggregates apportionment.	Noted.
			Reference is made to a series of meetings which you have had with key agencies. We strongly suggest that you have an audit trail of any discussions held and agreed actions.	Noted.
			Paragraph 3.3 sets out the most significant PPSs and PPGs relevant for the area. However, in doing so, you need to be aware of other national policy that is also relevant for your area.	Noted.
			Paragraph 3.9 refers to no apportionment between Kent County Council and Medway on waste issues, and the need for agreement. In this situation, you are advised to have written agreement between yourselves and Kent County Council as to the figures used in your respective core strategies. This is to ensure that the Inspector is content that the South East Plan figures overall will be met.	Noted.
			You make reference to the Minerals apportionment in the South East Plan and the Partial Review. You will be aware of the stage reached in the South East Plan Minerals Partial Review – The Panel report was published in November 2009. Work is underway on the next stage.	Noted.
			The South East Plan sets out the requirements for the Kent Thames Gateway. In producing the core strategy, it is suggested that you make clear how any requirements set by the Kent Thames Gateway are to be met and how any requirements for the rest of Medway are to be met.	Noted.
			The South East Plan sets out requirements for the Kent Thames Gateway LPAs which are to be brought forward as a sub-regional area. As you progress towards examination, you may find it useful to have written confirmation or a joint statement by the Kent Thames Gateway LPAs on the approach each authority is taking, which can be put before the Inspector.	Noted.
			Reference is made to few significant cross border issues. Even so, you are advised to fully consider the advice in PPS12 (paragraph 4.45) which states that a core strategy should be coherent with the core strategies prepared by neighbouring authorities, where cross boundary issues are relevant.	Noted.
			As stated above, you may find it useful if a topic paper is prepared jointly by the Kent Thames Gateway LPAs.	Noted..
			Reference is made to infrastructure such as ports, additional university provision, etc. In terms of setting out the place shaping for the area, we strongly suggest, if you have not already done so, engaging with these bodies so that you can factor in their long term proposals (PPS12, paragraph 4.8).	Noted.
			Paragraph 4.12 states that your authority is unsure whether to address the implications of the Thames Estuary 2100 consultation plan now or at a future review. As this is a consultation plan, do you expect the position to become clearer over time?	This is dependent upon the decision of the Environment Agency.
			You may find it useful to refer to PPS12 (4.45) which refers to deliverability of the core strategy. It states that the core strategy should ensure that there are not regulatory or national policy barriers to the delivery of the strategy, such as threats to protected wildlife sites and landscapes or sites of historic or cultural importance. In addition, there may be cross boundary issues to consider, for example you make reference to sites in Essex. Flexibility in approach (PPS12, paragraph 4.46) is also a consideration.	Noted.
			The table in paragraph 4.21 includes sites that you intend to carry over from the adopted local plan saved policies. You will be aware that these sites will fall within broad locations and that you will need to take into consideration Sustainability Appraisal of the plan.	Noted.
			Paragraph 2.8 states that the SHLAA was being prepared in house. You will need to consider this piece of the evidence base once completed, and its impacts on the statistics and sites in the table in paragraph 4.21.	Noted.
			Finally, it is suggested that it would be useful in the next stage of document preparation to set out the separate housing allocations for the area within the Kent Thames Gateway Sub-region (15,700) which is part of a growth area; and the area outside (600), and how you intend to address the individual housing allocations.	This has been addressed in the housing chapter.
			You may wish to consider including a very simple table that highlights in 5 year blocks the number of units that are to be delivered as per paragraphs 54 & 55 of PPS3.	This has been addressed in the housing chapter.
			In addition, a housing trajectory should be prepared to accompany the core strategy (PPS3, paragraph 55). PPS3 (paragraph 62) also refers to the provision of a housing implementation strategy.	Noted.
			You are also advised to take account of the advice on the efficient use of land and density levels set out in PPS3 (paragraph 47).	Noted.
			Finally, you will be aware of the need to make provision for gypsies and travellers (PPS3, paragraph 21).	Noted.
			PPS3 (paragraph 22) states that based upon the evidence of the Strategic Housing Market Assessment and other local evidence, local planning authorities should set out in LDDs the likely proportion of households that require market or affordable housing, the profile of household types requiring market housing and the size and type of affordable housing required.	Noted.
			PPS3 (paragraph 29) goes on to say that local planning authorities should set a plan wide target for the amount of affordable housing to be provided and reflect an assessment of the viability of land. Authorities should set separate targets for social rented and intermediate housing, and set out the range of circumstances in which affordable housing will be required. Finally, the approach to developer	Noted.

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				contributions should be set out.	
				Local planning authorities may also wish to take account of the contribution of low cost market housing as part of the overall housing mix (paragraph 29).	The core strategy contains a policy on developer contributions. This is also the subject of an adopted supplementary planning document.
				You are advised to take the above points into consideration as you progress the core strategy document.	Noted
				In working up your transport proposals for the core strategy, we assume that you will be taking into consideration the local transport plan covering Medway.	Confirmed..
				Reference is made to further work being in hand to define what quantum and type of employment floorspace should be provided over the period to 2026.	Now completed.
				You are strongly advised to complete this work as it is likely to have a significant impact on place shaping within Medway. You will also need to have regard to the South East Plan in formulating your employment policies.	See above.
				In addressing the Medway retail centres, you are advised to have regard to the South East Plan. Chatham is designated as a primary regional centre and a centre for significant change.	Although the South East Plan has been revoked, the core strategy continues to recognise Chatham as a centre for significant change.
				Please see comments above on the delivery strategy (page 3). We assume you will be assessing each retail area and allocating a floorspace figure (if appropriate) to be delivered at retail centres over the plan period (PPS12, paragraph 4.1).	Noted
				Para 4.158 You refer to retail at Lodge Hill. We suggest you consider establishing what level of retail provision you would expect to see at this location. Is it intended to be "local needs" shopping?	The level of retail development proposed for Lodge Hill has been addressed in the Lodge Hill policy.
				Paragraph 4.179 In terms of engaging with stakeholders in the preparation of the core strategy (see PPS12 paragraph 4.1) have you consulted with the police, fire service, etc on your proposals for Medway, for example, the housing allocation which will cover the period up to 2026? In engaging with the above, you may wish to consider the option of shared facilities.	Yes.
				<b>Minerals</b> You have acknowledged the Minerals partial review of the South East Plan and are advised to take account of this as you progress your core strategy. You will be aware of the need for contingencies in such cases where there is not maximum certainty and establishing what triggers may be used to address the issue (PPS12, paragraph 4.46).	Noted.
				It is stated with the document that there is no case for safeguarding reserves of chalk or clay (paragraphs 4.253, 4.257, 4.261). This approach does not appear to reflect the guidance set out in the South East Plan (paragraph 10.74). This states that minerals planning authorities should ensure that provision is made for sufficient supplies of aggregates, clay, chalk, silica sand and gypsum to be extracted and processed to meet regional, and where appropriate national needs	No provision is proposed as there are no longer any operational plants in the area or proposals for any new ones.
				In addition, SEP Policy M4 refers specifically to requirements in Kent. It states that minerals planning authorities should plan for a permitted reserve of chalk for cement manufacture, sufficient to last for at least 25 years at current production rates, which should be maintained throughout the plan period in Kent and Medway. However, the proposed approach in the core strategy is not to address chalk reserves.	The reserves at Home Farm in Holbourn just over the administrative boundary are in excess of 25 years. As of 2010 construction of the plant has not been scheduled.
				In addition, Policy M4 states that permitted reserve of silica sand should be maintained throughout the plan period in Surrey and Kent.	There is no silica sand in Medway.
				Reference is made to the option of safeguarding operational wharves (paragraph 4.249). However, SEP Policy M5 sets out that minerals planning authorities should assess the need for wharf facilities and identify strategic sites for safeguarding. Policy M5 also advises the safeguarding of existing minerals sites, proposed sites and areas of search, which your authority are also advised to take account of in preparing the core strategy.	Noted.
				Finally, we suggest that as a waste and minerals authority along with Kent County Council, have you established any joint working arrangements, which would assist with document preparation (PPS12, paragraph 4.16)?	Medway Council and Kent County Council have established lines of communication in order to progress the collection of evidence sufficient to plan each area's mineral and waste planning but neither authority considers there is a need for joint plans.
				You have included a considerable amount of background information on waste issues within the document. As you progress the core strategy, we presume that policies for inclusion within the document will be set out, taking into account the advice set out in national policy guidance and regional planning guidance. At this stage, the government office has the following comments to make:	Noted.
				You set out (paragraphs 4.282 & 4.283) considerations in terms of dealing with waste. It is suggested that you consider SEP Policy W17.	Point is noted, though the South East Plan has now been abolished.
				We suggest that elements of the waste section is updated, for example the table in paragraph 4.266 does not appear to include the statistics set out in SEP Policy W7	Point is noted, though the South East Plan has now been abolished. The evidence base will continue to evolve through time to inform the Core Strategy as appropriate.



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				Paragraph 4.283 refers to continuing the provision for landfill. In doing so, this should reflect the SEP Policy W13 which states that documents should make provision for "declining" landfill capacity and SEP Policy W5 sets out targets for diversion from landfill.	Point is noted, though the South East Plan has now been abolished.
				We suggest that as a waste authority along with Kent County Council, that you consider joint working arrangements, which would assist with document preparation (PPS12, paragraph 4.16). This would also accord with SEP Policy W4 which refers to sub-regional self sufficiency and collaborative working. In addition, Policy W3 provides a joint figure for Kent & Medway. We assume that your authority is in discussion with Kent County Council on the division of any "Kent wide" figures. In addition, we suggest that you have written confirmation of any agreement on the division of figures with Kent County Council or any other waste planning authorities.	See above comment in relation to minerals.
				Finally, we suggest that you consider the advice in the PINS document "Examining Development Plan documents: Learning from Experience" (Sept 2009) on waste planning. It states that waste plans should indicate what waste management developments and facilities are required, where they are to be located, when provided and how they will be delivered.	Noted.
				<b>Energy</b> We suggest that you consider the advice set out in the supplement to PPS1 "Planning and Climate Change" (paragraph 31). This states that when proposing any local requirements for sustainable buildings, authorities must be able to demonstrate the local circumstances that warrant and allow this. In addition, paragraph 20 refers to considering identifying suitable areas for renewable and low-carbon energy sources and supporting infrastructure.	Noted.
				<b>Paragraph 4.458</b> As you progress the core strategy, you will need to set out the amount and type of floorspace expected to come forward during the plan period at the Lodge Hill site.	This has been addressed in the Lodge Hill chapter.
				<b>Options</b> You have listed out the options and made reference to separate SA documents. We suggest that you consider the advice in the PINS document "Examining Development Plan documents: Learning from Experience" (Sept 2009) paragraph 40. This refers to the importance of the role of SA in choosing the option and the need for this to be clearly articulated. The SA should inform the content of the core strategy. It concludes stating that thought should be given at the outset as to what sort of sustainability appraisal is needed.	Noted and the SA has and continues to inform development of the core strategy.
				A submitted core strategy must be accompanied by a map to show how the existing adopted proposals map will be changed, as a consequence of the adoption of the core strategy where changes are proposed (See Examining Development Plan documents: Learning from Experience" Sept 2009, paragraphs 52 to 57). You will need to factor in this work and consider how you will approach it.	Noted.
				PPS12 (paragraph 4.1) advises that locations for strategic development should be indicated on a key diagram. Where core strategies allocate strategic sites, they must include a submission proposals map (PPS12, paragraph 4.7).	Noted.
				We suggest that you take into account the advice set out in PPS12 (paragraph 4.47) which states that the delivery strategy should contain clear targets or measurable outcomes to assist the monitoring process. At present, the approach to monitoring is not clear. Once you have established the place shaping aspects of the document, i.e. quantum figures for varying uses at different locations across Medway, this should feed into the monitoring framework.	Noted.
				<b>Development Management Policies</b> If your authority are considering including development management policies within the core strategy, you should consider the advice in PPS12 (paragraph 4.32). If the intention of the local planning authority is to apply national guidance, it does not need to reiterate it in DPDs. There may be local reasons for having greater detail than national or regional policy, such as local circumstances which suggest that a local interpretation is appropriate. Local Planning Authorities may include local policies in their DPDs if they have sound evidence that is justified by local circumstances.	Noted.
				You are advised to include an appendix within the core strategy setting out the saved local plan policies which the core strategy seeks to replace.	Noted.
	<b>Evaluation of the Options</b>				
24.		Kent County Council	Richard Feasey	<b>Initial Archaeological Appraisal of 5 Strategic Sites</b> The following brief assessment has been undertaken primarily from readily available resources held by the Kent County Council Historic Environment Record. It is not a detailed appraisal but merely provides a broad initial view on the sensitivity of the archaeological, historic building and historic landscape resource and the way in which this should be approached for some of the options. The sensitivity of particular sites may change following more detailed appraisal and in light of new information. The process of assessment will be reviewed and refined as the Local Development Framework evolves.	The archaeological appraisal is welcomed and will be included in the Council's evidence base.
				A crude 5 point scale has been used to rank the options with regard to the historic environment. This is:  <b>Scale</b> 1 Development of this site (or part of) should be avoided 2 Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible. 3 Significant archaeology could be dealt with through suitable conditions on a planning approval. 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.	

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				5 No known archaeological potential on the site or part of it.	
				Note that for each described site several 'Scales' may be noted reflecting the varying potential across the site. For consideration of the site as a whole the lowest numerical 'Scale', i.e. that with the highest archaeological sensitivity, should be used.	
				<b>The following sites have identified specific archaeological issues.</b> <b>New Settlement at Lodge Hill, Chattenden (Scale 2)</b> The archaeological and heritage interest in the site relates to both the pre-military and military use of the site.	A full heritage assessment has been completed and agreed with English Heritage.
			For the pre-military use of the site the area is considered to have a good but localised potential for remains dating from the later prehistoric to post-medieval periods.		
			The site has been subject to extensive post-1870 military use associated with Lodge Hill Camp, Lodge Hill Depot and Chattenden Barracks which is of archaeological and heritage interest.		
			Detailed heritage assessments are required to ensure retention of important archaeological remains, historically significant buildings and structures and to ensure that suitable mitigation is implemented prior to redevelopment.		
				<b>Expanded Hoo (Scale 2/3)</b> Hoo lies in an area of considerable archaeological potential and archaeological remains from the later prehistoric to post-medieval times have been recorded across this part of the Hoo Peninsula.	Noted and the Council has been cooperating with English Heritage on its research project.
			The current settlement pattern is part of the distinctive landscape of the Hoo Peninsula which is currently the subject of an English Heritage research project.		
			The Hoo Peninsula is located in a strategic position at the mouth of the Thames and Medway and there are a number of important military remains in the area including a well preserved WWII stop-line.		
			The precise nature and location of development would determine how historic environment issues should be dealt with. A combination of detailed heritage assessments and programmes of archaeological mitigation would be required to ensure retention and/or recording of important archaeological remains and historically significant buildings and structures.		
				<b>Capstone Urban Extension (Scale 3)</b> Archaeological interest is related to Prehistoric, Roman and medieval remains which have previously been recorded in the Capstone Valley.	Noted.
			A WWII heavy anti-aircraft battery is known at Gibraltar Farm. Upstanding remains of a hutted military camp survive at the site and buried remains of the battery may survive.		
			The precise nature and location of development would determine how historic environment issues should be dealt with. A combination of detailed heritage assessments and programmes of archaeological mitigation would be required to ensure retention and/or recording of important archaeological remains and historically significant buildings and structures.		
				<b>East of Rainham Urban Expansion (Scale 3)</b> The principal focus of known archaeology in the area East of Rainham is focused on the line of the A2 which follows the route of Roman Watling Street between Rochester and Canterbury. There are also a number of post-medieval farmsteads which could potentially have earlier medieval origins.	Noted.
			The East of Rainham Urban Expansion area is a large site in an area of limited systematic archaeological investigation. Archaeological programme of works would be suitable and can be covered by condition		
				<b>North of Rainham Urban Expansion (Scale 2/3)</b> Lies in a topographically favourable position on the banks of the River Medway. There is a good potential for prehistoric and later settlement and occupation on the higher dry-land areas, whilst in the lower lying former marshland there may be remains associated with marshland exploitation – track-ways, evidence for fishing, salt-working and other activities.	Noted.
			There is evidence for significant archaeological remains in the form of Palaeolithic and Neolithic occupation close to Bloors Lane Community Woodland and to the east of Manor Court and Little London Farm.		
			The North of Rainham Urban Expansion area is a large site and the precise nature and location of development would determine how historic environment issues should be dealt with. A combination of detailed heritage assessments and programmes of archaeological mitigation would be required to ensure retention and/or recording of important archaeological remains and historically significant buildings and structures.		
25.		Highways Agency	Howard Moore	See attached comments. <a href="http://medway-consult.limehouse.co.uk/file/951315">http://medway-consult.limehouse.co.uk/file/951315</a>	
				Although the IOR does not discuss the prospect of employment growth at Chattenden the HA have been informed that approximately 3,000 jobs have been included for Chattenden in the Medway Model. This figure should be confirmed and, if accurate, used when undertaking transport assessments for Chattenden.	Noted.
				Due to its non-urban location Option 1 could potentially generate a considerable volume of vehicular traffic that is likely to impact upon the A2 and M2 (particularly Junction 1). The IOR proposes that the Medway Transport Model is used to assess the impact of the Chattenden development. The HA would wish to review the assumptions used and corresponding outputs from this assessment process.	This is being done.
				Chattenden is remote from the main urban conurbation and therefore may not lend itself to integration with, and the extension of, existing urban public transport services.	Opportunities for high quality bus connections have been identified and are expected to be a condition of any planning permission.

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				When undertaking an impact assessment of Chattenden the HA requests that junction assessments are undertaken of all SRN junctions and links which suffer a material impact.	Noted.
				Whilst Option 2 involves the expansion of a number of villages at the western end of the Hoo Peninsula, the other three options are located on the edge of urban areas and therefore could make better use of existing facilities than the two rural options. This may help to limit the number of vehicular trips generated.	Noted.
				Options 4 and 5 are located within reasonable walking or cycling distance of railway stations within Medway that provide services to London in approximately an hour (or less in some cases due to anticipated high speed rail services). This may encourage commuters to undertake longer distance trips without utilising the strategic road network. Options 1, 2 and 3 are located at less convenient distances from the nearest rail station.	Noted but the urban extension options, particularly that for the Capstone Valley would have direct implications for M2 junctions 3 and/or 4 and no doubt the Agency will wish to take note of this..
				In order to maintain consistency and provide the necessary level of assessment the impact of the options considered should be undertaken using the Medway Transport Model.	Noted..
				The Isle of Grain is also identified as a potential area for employment growth. The IOR contains no information regarding the quantum of development (or type of employment) planned for this area.	Assumptions were provided for the SATURN model. The Isle of Grain now has planning permission for over 450,000 sq m. of B2, B8 and other uses.
				The IOR discusses the transport impacts, particularly on the highway network that may arise following housing and employment growth without any associated transport infrastructure or public transport improvements.	Noted and this was to provide a consistent baseline..
				The full impact of the five spatial options on the strategic road network cannot be determined without more detailed information regarding the type, quantum and phasing of development planned at each site.	Noted.
				Due to a lack of information provided regarding the quantum of housing and employment development, the Highways Agency are not certain as to the most appropriate alternatives to Option 1 at Chattenden. However, it is recommended that Options 4 and 5 are considered as alternatives due to their location on the urban fringe, their reasonable distance from railway stations and the access that both locations provide to existing, or an extension of existing, services and infrastructure.	Noted but the Issues and Options report makes clear that these are unlikely to be progressed for the reasons given, transport being only one of many factors considered.
				A review should be undertaken regarding the 'self-sufficiency' of the non-urban options and ability of these sites to minimise external trips.	This is being done for the Lodge Hill option, which is being progressed in the Core Strategy.
				The outputs from the modelling of the options under consideration should be presented to the Highways Agency for review.	Noted.
26.	Question 95	Member of Parliament	MP Paul Clark	See attached comment <a href="http://medway-consult.limehouse.co.uk/file/991780">http://medway-consult.limehouse.co.uk/file/991780</a>	
				As Member of Parliament for Gillingham and Rainham, I wish to indicate my objection to 'Option 3: Capstone Urban Extension' (p. 93, Issues and Options Report, July 2009); 'Option 4: East of Rainham Urban Extension' and 'Option 5: North of Rainham Urban Extension'.	Noted.
				I have totally opposed any development within the Capstone Valley.	Noted.
				The proposals are unnecessary to meet the anticipated housing projections.	Noted.
				When assessing those already delivered, those sites with planning permission and regeneration sites available, the total availability in Medway is 19,355 – 3,000 in excess of that identified in the South East Plan.	Noted. The South East Plan was revoked on 6 July 2010.
				The sites identified, with the exception of Lodge Hill, do not require an extension of the urban boundaries. Even the Lodge Hill development will be principally on previously developed land	Noted.
				The Medway Magna proposals cover areas which are sites of Nature Conservation Interest, Community Woodlands (BNE44) and an important buffer between the built up areas of Hempstead and Lordswood. This proposal is unnecessary, unwarranted and must be opposed at all costs.	The Capstone Valley option is not being pursued.
				The same arguments hold for the proposals in 'Option 4: East of Rainham Urban Extension' (p.93) and 'Option 5: North of Rainham Urban Extension' (p.93). Unfortunately, many of these proposals are not new. Landowners and consortia have tried time and again to weaken the restrictions on these areas in Lower Rainham. As a Gillingham Borough Councillor in the 1980s I opposed such attempts and I oppose them now thirty years on. The areas targeted are recognised as Conservation Areas (BNE12), as Special Landscape Areas and even as a Tidal Flood Area (CF13).	Noted.
				The sites identified within the Medway Core Strategy document follow the Government's policies of using "brownfield sites first". Medway is able to provide more than sufficient sites over the 20 year period without encroaching on those green, open and important sites identified in Options 3, 4 and 5.	Agreed
				I fear that many of those behind these attempted raids on the open spaces of Medway and have long tried to weaken the resolve of elected members, have no thought for the proper balance required within an area between homes, jobs, space and conservation – their sole motive is profit with little thought to the communities they leave behind. So Option 1 should be supported and Options 3,4, and 5 opposed at all costs.	Noted.
27.	Question 96	Barratt Strategic		See attached pdf file for comments. <a href="http://medway-consult.limehouse.co.uk/file/947809">http://medway-consult.limehouse.co.uk/file/947809</a>	

	Consultation points	Company / Organisation	Name	Comments	Recommended Response
				<p>Q.96 - Barratt Strategic do not accept the proposition that a new settlement at Lodge Hill Chattenden accommodating some 4500 units is the best option available to the Council in delivering its housing land supply targets... the practicalities of delivering the scale of development proposed (4500 dwellings plus ancillary facilities) are in our opinion such that to rely on Chattenden alone, would be foolhardy to say the least, and could lead to serious questions being raised about the credibility of the housing land supply strategy being advocated in the Core Strategy. Chattenden represents 28% of the councils housing land supply requirement over the plan period. Despite the fact we are 3 years into the plan period (2006-2026) the site still does not benefit from planning permission. Indeed there is not even an application before the council yet.</p>	<p>The strategic Land Availability Assessment has identified a surplus of 3,000 dwellings to come forward before 2026, without including any windfalls. A further 1113 have been identified for the post 2026 period. Consequently, there is a built in contingency, to make up for any shortfall in delivery, without the need to identify further greenfield sites. Detailed planning of the site is progressing.</p>
				<p>Barratt Strategic do not feel Chattenden can deliver 4500 units over the plan period. The scale of delivery is not realistic. 3000 units is in Barratt Strategic opinion the maximum this site can deliver over the plan period.</p>	<p>Land Securities, the agents for the release and development of Lodge Hill have assured the Council of the delivery of 4,600 dwellings by 2026</p>
				<p>Barratt Strategic feels that the level of development likely to come forward from extant planning permissions/ the town centre/waterfront regeneration sites will be less than anticipated. Barratt Strategic feels the council need a contingency and that an extended Hoo is the most suitable location for this. To this end they also support the identification of 1500 units at an extended Hoo (to include sites at/around Hoo, St Werburgh, and the nearby villages of High Halstow and Cliffe Woods).</p>	<p>See above in relation to surplus provision. There is therefore considered to be no case for considering the option proposed.</p>