



# Medway Local Plan 2041

## Regulation 18

July 2024

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## Versions

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## Abbreviations

AQMA	Air Quality Management Area
AONB	Area of Outstanding Natural Beauty (National Landscape designation)
BNG	Biodiversity Net Gain
BREEAM	Building Research Establishment Environmental Assessment Methodology
CCUS	Carbon Capture, Utilisation and Storage
CHP	Combined Heat and Power
C&I	Commercial and Industrial Waste
CIL	Community Infrastructure Levy
CDEW	Construction, Demolition and Excavation Waste
EfW	Energy from Waste
GTAA	Gypsy and Traveller Accommodation Assessment
HAZ	Heritage Action Zone
HMO	House in Multiple Occupation
IDP	Infrastructure Delivery Plan
IL	Infrastructure Levy
IDB	Internal Drainage Board
KDNL	Kent Downs National Landscape
LLFA	Lead Local Flood Authorities
LNG	Liquefied Natural Gas
LAA	Local Aggregates Assessment
LACW	Local Authority Collected Waste
LCWIP	Local Cycling and Walking Infrastructure Plan
LDO	Local Development Order
LHNA	Local Housing Needs Assessment
LLW	Low-Level Radioactive Waste
LTC	Lower Thames Crossing
MRF	Materials Recycling Facility
MHDS	Medway Housing Design Standards
Mtpa	Million Tonnes Per Annum
MA	Mineral Assessment
MPA	Mineral Planning Authority
MCA	Minerals Consultation Area

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MSA	Minerals Safeguarding Area
MWMS	Municipal Waste Management Strategy
NPPW	National Planning Policy for Waste
NPPG	National Planning Practice Guidance
PPTS	Planning Policy for Traveller Sites
RDF	Refuse Derived Fuel
RWS	Resources and Waste Strategy for England
SSSI	Site of Special Scientific Interest
SEWPAG	South East Waste Planning Advisory Group
SAC	Special Area of Conservation
SPA	Special Protection Area
SAMMS	Strategic Access Management and Monitoring Strategy
SFRA	Strategic Flood Risk Assessment
SRN	Strategic Road Network
STA	Strategic Transport Assessment
SPD	Supplementary Planning Document
SuDs	Sustainable Drainage Systems
Tpa	Tonnes per annum
VLLW	Very Low-Level Radioactive Waste
WNA	Waste Needs Assessment
WPA	Waste Planning Authority
WwTW	Wastewater Treatment Works
WRMP	Water Resources Management Plan

## Executive Summary

Medway Council is publishing this detailed consultation document for gathering comments to feed into finalising the Draft Local Plan for publication in early 2025. This is a formal stage of consultation ('Regulation 18') in the preparation of a Local Plan.

This consultation document builds on the responses to the consultation 'Setting the Direction for Medway 2040' in Autumn 2023, in defining the vision and strategic objectives for the new Local Plan. We are now providing more information on proposed policies and options for a development strategy - the potential sites and broad locations that could form allocations for development in the new Local Plan covering the period up to 2041.

This document sets out a refreshed vision and strategic objectives for the plan, reflecting comments made in the last consultation and wider policy updates. The Local Plan will help to deliver on the wider One Medway Council Plan aims for the environment, health, decent housing, economic prosperity, caring for our communities and demonstrating pride in Medway.

The document is structured into chapters that consider the strategic direction of the new plan, including potential growth locations, and the policy areas that will manage development in line with the plan's objectives for sustainable growth.

This consultation document has been informed by an interim Sustainability Appraisal and Habitats Regulation Assessment, and a wide evidence base. The Council is publishing a number of reports that form part of the evidence base along with this consultation document.

A key aspect of this consultation is the consideration of spatial growth options and an indicative spatial strategy for where development could take place over the plan period. Medway has a high level of housing needs (1,658 homes a year, using the government's standard method), and complex sensitive areas and constraints, such as the natural and historic environment and infrastructure capacity. The Council is seeking a strategy to deliver sustainable development, that meets our communities' needs for homes, jobs and services, that can also protect our valued environment and improve services in line with population growth. This consultation considers how the plan could meet housing needs of around 28,000 new homes over the plan period. This scale of growth will involve significant change across Medway.

Chapter 3 sets out three broad options for growth:

- SGO1 – Urban Focus – this seeks to maximise development and density in urban centres and waterfront sites, with some limited growth adjoining existing towns and villages;
- SGO2 – Dispersed Growth – this provides for less urban regeneration and considers development across broader suburban and rural areas; and
- SGO3 – Blended Strategy – this promotes a 'brownfield first' approach supporting urban regeneration, complemented by greenfield sites in suburban and rural locations to provide for wider housing choice.

The Council has identified option SGO3 as its preferred indicative approach at this stage, and has set out more details of what this strategy could look like, in a draft policies map.

The proposed policy approaches are categorised as strategic, thematic or development management. They are set out in broad chapters by theme.

Chapter 4 – Natural Environment – provides an overview of the plan in mitigating and adapting to climate change, and policies to conserve and enhance biodiversity, landscape, natural resources and strengthening green infrastructure.

Chapter 5 – Built Environment – outlines policies to conserve and enhance the historic environment and securing quality and sustainable design in new development.

Chapter 6 – Housing – sets out policies for providing for a range of homes, including affordable housing and specialist accommodation for different groups of residents, such as Gypsy and Travellers and students.

Chapter 7 – Economic Development – outlines the approach to manage land for employment uses to meet the needs of businesses over the plan period, including specific sectors, such as tourism.

Chapter 8 – Retail and Town Centres – provides policies to strengthen existing town and village centres as a focus for communities and businesses, and support a vibrant retail and commercial leisure offer across Medway.

Chapter 9 – Transport – outlines our vision and policies for sustainable transport as an intrinsic component of the spatial strategy.

Chapter 10 – Health, Communities and Infrastructure – outlines our policies to support healthier communities, and providing for services as part of sustainable development.

Chapter 11 – Minerals Supply – policies outline how the Council as a minerals planning authority supports the sufficient supply of minerals to support the economy, with regard to the natural environment.

Chapter 12 – Waste Management – policies outline how the Council as a waste planning authority provides for the sustainable management of waste.

Chapter 13 – Energy – policies support our transition to net zero carbon by 2050.

The Council is consulting on this document and supporting materials from 15 July to 8 September 2024. All written comments will be recorded and published and considered in the next iteration of work on the plan. Further details, including how to submit your comments, are available on our website at:

[www.medway.gov.uk/localplan](http://www.medway.gov.uk/localplan).

## 1. Overview

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### 1.1 Introduction

1.1.1 Medway Council is preparing a new Local Plan to manage the area's growth up to 2041. The Local Plan will provide a framework for where and how new development can take place. The plan will help to deliver on the Council's ambitions for the local and global environment, supporting people and boosting jobs and investment in Medway. It is closely linked to the One Medway Council Plan 2024, that sets out our vision, ambitions and priorities. Our vision is for Medway to be a place that people are proud of; and to be recognised as a great place to live, work, learn and visit, where all people thrive.

1.1.2 The Council consulted on the direction for the new Local Plan in Autumn 2023. Around 400 people responded to the consultation, covering a range of interests. This included local residents, businesses and potential developers, neighbouring councils, government bodies and organisations and groups promoting specific issues and areas.

1.1.3 The comments show how people care about Medway now and its future. Some concerns were raised about the condition of our town centres, the cost of housing, poor transport, strains on the environment and services, and the health and wellbeing of residents. However, there is no consensus on how the new Local Plan should address the issues and opportunities in Medway.

1.1.4 Local people often made comments about the impact of development on infrastructure, such as health and transport, and the natural environment. Their views sought to limit development on greenfield sites, invest in infrastructure first and provide for a mix of housing that meet local needs, and respect the identity of the historic towns and villages that make up Medway.

1.1.5 Others, particularly developers and organisations, considered that there are opportunities to address Medway's needs and boost investment in services, jobs and homes, through new development. There were specific representations made in relation to the future land uses around Chatham Docks.

1.1.6 This further consultation provides people with the opportunity to comment on the details of the emerging Local Plan. We set out draft policies and identify potential sites and locations for where development could take place over the plan period to 2041.

1.1.7 The document is designed to reflect the scope of the new Local Plan. It sets out the proposed vision and strategic objectives for the plan, a range of policy areas, including the environment, economy, transport, housing, services and retail. It also sets out a proposed Policies Map that reflects the indicative preferred development strategy.

1.1.8 We are consulting on options before we finalise the plan for publication in early 2025. This document contains details of proposed policies. We invite people to make comments on where different policy approaches or wording

may be needed. We will take account of these comments in preparing the plan content.

- 1.1.9 The Local Plan has an important purpose in identifying a strategy for how an area should develop over time – where new development should take place, and which areas need protection. We have considered options across Medway for potential development sites. We have worked with independent consultants to carry out an interim Sustainability Appraisal on potential development sites. This looks at the potential impacts of sites on the environment, economy and communities. Through our work on the Sustainability Appraisal, we have identified a number of options for how Medway could grow up to 2041. Three broad Spatial Growth Options (SGOs) are set out in this document for consultation. We have identified the Council's preferred indicative option and have provided more detail on the potential development sites in a draft Policies Map. We have produced this map to give people the chance to provide detailed comments on potential development sites. This responds to comments made to us in earlier consultations.
- 1.1.10 We welcome comments on this consultation document, to hear views on locations for growth and change, and areas to conserve and enhance; and the policies we need to have in place to secure good quality development in Medway.

## 1.2 Medway area

- 1.2.1 The Local Plan will set out the direction for Medway's growth over coming years. It will be a Plan for people who live, work, or study in Medway and visitors. It will be a Plan for Medway as its own place. A complex place, which encompasses distinct towns and villages, with their own strong identity and history. A place of contrasts, from remote marshes and mudflats to busy urban streets. A place of noted heritage, but also looking to the future, with innovation and enterprise, and universities and colleges equipping students with skills for the changing world of work.
- 1.2.2 People will be at the centre of the Plan. The Council wants Medway to be a healthy place to live, with clean air, high-quality, well-designed housing, greenspaces for people to enjoy, places for people to mix, and job opportunities to support a good quality of life. Currently there are marked differences in health and wellbeing across communities in Medway. The Plan needs to look at how we plan for the use of land to help people to live healthier and longer lives, and provide safe, connected and sustainable places.
- 1.2.3 The Plan will consider the diverse communities who make up Medway. Policies for housing, employment, transport, services and community facilities, retail and design need to take account of the needs of different sectors of the community. This will be reflected in the types of housing planned and infrastructure required, such as schools and parks.
- 1.2.4 The Plan must address big issues for Medway – the environment, high quality energy efficient homes that are affordable and within the reach of residents, health and wellbeing, boosting the economy and tackling

deprivation. There are many areas where we need to improve on the current position. The Local Plan is one of the approaches that the Council can take to help address inequalities, poor environmental standards and reduce pressures on services. The plan will be about ambitions that can be achieved for a confident future Medway.

- 1.2.5 Climate change is a global emergency but needs to be addressed at all levels. Medway as a coastal area is particularly vulnerable to rising sea levels, and changes in temperature and precipitation have impacts for landscape, food production, nature and people. The new Local Plan will help to secure a more resilient future for Medway.
- 1.2.6 Medway sits at the mouth of its great river on the north Kent estuarine coast, bordered by the Thames to the north and the Kent Downs to the south. The five historic towns linked by the A2 form a complex urban conurbation, which retains the distinct identities of the individual towns. The urban area is surrounded by a network of villages on the Hoo Peninsula and the Medway Valley, alongside marshes and mudflats, wooded hills, productive farmland and strategic energy and minerals operations built up around the wharves. Much of the countryside and estuary is of international importance for its environmental qualities, including designated Special Protection Areas (SPAs), Sites of Special Scientific Interest (SSSI), and the Kent Downs National Landscape (KDNL). Land to the west of Medway forms part of the London Metropolitan Green Belt.
- 1.2.7 The River Medway is a key asset, providing a strong sense of place and identity. However, the river bisects the area and movement is constrained by four crossings. The severance caused by the river, established commuting flow patterns and travel behaviour, the legacy of post-war development designed for the car, and the existing public transport offer make for a challenging environment in which to accommodate Medway's development needs. Medway's location in north Kent gives rise to additional opportunities and challenges associated with wider growth, such as the proposed Lower Thames Crossing (LTC).
- 1.2.8 The Local Plan will be about much more than identifying sites for new housing, but this will be a key part of the Plan and generally attracts the greatest levels of interest at consultation. There are huge pressures on housing. Decent homes are unaffordable for many people. Unfortunately, some of the accommodation locally is sub-standard and there are challenges in securing decent standards with some conversions, particularly where they are undertaken under permitted development. The supply of new housing is central to the new Local Plan, but it is about more than housing numbers. The Plan will seek to improve the choice and mix of homes, drive up quality, and meet the needs of different sectors of the community. Housing-led growth can support wider investment in services and businesses and contribute to shaping the character of new and existing communities.
- 1.2.9 The Plan can help Medway to capitalise on its strategic advantages for businesses, with transport links, proximity to London, the cluster of universities and colleges, and a diverse portfolio of employment land from the strategic landholdings at Grain and Kingsnorth, to re-purposing vacant retail units on the High Streets. There are opportunities to redress the flow of

commuters from Medway to jobs in London and attract more businesses to set up locally. This is central to Medway's economic strategy, but is challenged by current trends, particularly with cost of living pressures where people are being attracted to move to Medway for its choice of housing, but retain jobs in London.

- 1.2.10 The Plan will consider how Medway's infrastructure, such as schools, transport networks, health facilities, parks and community facilities, need to be upgraded in line with a growing and changing population.

### **1.3 Policies Map**

- 1.3.1 The Policies Map comprises five maps at the appropriate scale for the urban core, north west, north east, south west and south east areas of Medway.
- 1.3.2 The Policies Map shows sites and areas relating to the:
  - preferred indicative site allocations;
  - natural environment;
  - built environment;
  - retail and town centres;
  - transport;
  - waste management; and
  - minerals.
- 1.3.3 An electronic version of the Policies Map can be viewed in any Portable Document Format reader, however Adobe Acrobat is recommended to enable switching on/off of sites and areas in the legend.

## 2. Vision and Strategic Objectives

### 2.1 Vision

2.1.1 The Local Plan is closely aligned to the One Medway Council Plan, 2024 that sets an ambitious and caring vision for our communities, economy and environment.

#### Vision for Medway in 2041

The plan's vision is to strengthen Medway's position in the economy and culture of the region, connected to its surrounding coast and countryside, and its rich heritage; with a thriving economy, where residents enjoy a good quality of life and there is a clear strategy for addressing climate change and strengthening natural assets. Growth has been shaped by understanding the area's important historic environment, respecting identity and strengthening distinctiveness.

By 2041, Medway will have achieved a significant reduction in carbon emissions (well on its pathway to net zero by 2050) aided by developments which have adopted high sustainable buildings standards (not just in construction but re-use and refurbishment too) and are achieving ambitious net zero carbon targets.

Alongside this, adaptation is an essential component of all development and Medway is well prepared for its long-term future adaptation needs. Medway is delivering against a strong local energy plan and communities are harnessing the results of their direct involvement in decision making on community owned, local energy infrastructure.

Medway has conserved and enhanced its intrinsic cultural and natural heritage and landscapes alongside high quality development to strengthen the area's distinctive character. Medway has achieved sustainable growth, development that has responded positively to tackling climate change, providing for healthier and more sustainable choices of homes, transport and workplaces, and reducing and mitigating the risks of flooding, overheating, drought and soil erosion. Natural assets will play an important role in carbon sequestration and adaptation and bring associated benefits of enhanced biodiversity, good air quality and improved public health. The countryside, coast and the urban open spaces are valued and benefit as joined up environmental assets in a resilient green and blue infrastructure network across land and water. Important wildlife and heritage assets are protected and enhanced, contributing to the Local Nature Recovery Strategy.

Medway is defined by its river and estuaries. The urban waterfront is animated and accessible. Continuous riverside paths provide attractive and healthy connections, a draw for visitors and residents. The rural character of the Medway Valley and the Medway and Thames estuaries are valued landscapes and habitats are in good condition. There are new opportunities for river transport.

All sectors and ages of the community can find decent places to live. The quality of new development has enhanced Medway's profile and driven up environmental standards in construction. Property owners have felt sufficiently supported to retrofit older properties to make them more energy efficient and less vulnerable to the impacts of climate change such as overheating. Custom and self-build housing has provided new living opportunities for residents. Investment in new services

and infrastructure, such as transport, schools, healthcare and open spaces, has supported housebuilding to provide a good quality of life for residents, including the retrofitting of accessible greenspaces to existing settlements.

Improved travel choices and infrastructure have reduced the use of the car across Medway, with people benefitting from better provision for pedestrians and cyclists, and a greater public transport offer. This has transformed how people move through the central urban areas, improved air quality and strengthened the connections with wider neighbourhoods and villages.

Medway is a healthy place in which to live and work. People can move around more easily, with good walking and cycling links and clean air. All sectors of the community can enjoy the outdoors, with spaces designed for play, leisure, access and rest. People have a choice of affordable and healthy food and can grow their own. Public spaces are inclusive, designed with care and imagination for all to share. People can meet most of their daily needs in their local area, such as schools, grocery shopping and places to socialise and exercise, reducing the need to travel, and benefitting from the co-location of services. Medway has responded to the needs of its growing and changing communities, as an inclusive and caring place, where people feel safe and are supported in their health and well-being. Communities are connected, and there is a good range of facilities and services to facilitate interaction and social activities, supporting a vibrant and diverse voluntary sector. There is clear progress in tackling inequalities and improving health and well-being. The ambitions of Child Friendly Medway are being delivered and children and young people have benefitted from better starts in their lives.

Our high streets and centres have developed new uses and attractions in response to changes in retail, leisure and work patterns. Heritage and culture are celebrated and contribute to the quality of new development and community wellbeing, raising pride in Medway and enriching the lives of residents and visitors. Development has sustained and enhanced Medway's historic environment and improved access to heritage and cultural opportunities. Medway benefits from a network of centres that reflect the distinct character of its different towns, neighbourhoods and villages, and which serve local communities and visitors. Our public spaces embrace culture and are animated and welcoming to all.

Medway is a leading economic player in the region, supporting the growth of its business base and attracting new investment. It has capitalised on its cluster of higher and further education providers to raise skills levels across the workforce. Graduates and the wider workforce can develop their future careers in quality jobs in Medway. There is a broad portfolio of employment sites. Derelict sites at Grain and Kingsnorth on the Hoo Peninsula have been transformed into thriving economic hubs. Medway is known for its innovation and creativity, with businesses adapted to changes in the economy and the environment, and leading in green growth and technology, benefitting from excellent digital connectivity. High Streets are sought after locations for a range of businesses, providing space for start-ups and co-working facilities that reduce people's need to commute. Heritage and culture contribute to the distinct and attractive offer for businesses, community enterprises and voluntary organisations. Medway's farmland produces quality food and drink and is contributing to the management of natural resources. The contribution of Medway's rich environmental heritage and the economic benefit to the area is valued through eco-tourism.

Medway's economic mineral resources may be worked to meet needs and will be safeguarded from unnecessary sterilisation and for use by future generations. Wharves and rail depots continue to be utilised for the importation and distribution of minerals and will be safeguarded for this purpose. A positive legacy will be left by mineral supply development in Medway.

Waste is managed as far up the Waste Hierarchy as possible to achieve a more circular economy. A significant reduction in emissions from waste (including water) is achieved through provision of infrastructure and services which support people to reduce waste and reuse more. The circular economy is embedded into business models and applied to developments.

## 2.2 Strategic objectives

2.2.1 The role of the Local Plan is to plan positively for the development and infrastructure that the area needs, whilst conserving and enhancing the natural, built and historic environment. The Council needs to clearly define what it wants to achieve from the new Plan – what are the issues to address, and what improvements and changes are sought. These are set out as strategic objectives for the Plan. The objectives will feed into the wording of policies and how sites and different locations are assessed for potential development. The objectives are presented around broad themes for the environment, communities, economy, and investment in infrastructure and design that is fit for the future. The Council consulted on these objectives in 2023 and has made updates in response to comments received. The proposed objectives for the Plan are:

### **Prepared for a sustainable and green future**

- To deliver on the Council's commitment to addressing the Climate Emergency, providing resilience to temperature and climate change through seeking adaptations and mitigation measures, including opportunities to promote carbon reduction and support the transition to 'zero carbon', and reduce the risk of flooding; promoting the use of nature-based solutions to climate change; seeking to protect the most vulnerable groups from the impacts of climate change; and supporting major shifts in modes of transport used to reduce carbon impacts.
- To strengthen and develop transport networks providing safe and effective choices for sustainable travel, including improved opportunities for walking and cycling and enhanced public transport services, and management of the highways network, with associated improvements in air quality.
- To conserve and enhance assets of international and national importance for nature and landscape, including the KDNL and biodiversity designations, as part of a wider robust green and blue infrastructure network across land and water that protects and enhances the assets of the natural and historic environments in urban and rural Medway, providing resilience for nature through better connectivity and conditions; informing the design and sustainability of new development; and supporting healthier lifestyles.

- To ensure the effective management of natural resources, including water and soil, and improving air quality, providing for the sustainable supply of minerals and minimising the production of waste, enabling it to be managed as far up the Waste Hierarchy as possible.

### **Supporting people to lead healthy lives and strengthening our communities**

- To provide for homes of varying types to meet demand in Medway and ensure a cohesive sustainable approach. To deliver high quality energy efficient homes that meet the housing needs of Medway's communities, reflecting the requirement for affordable housing and the range of sizes and types the area needs, including provision for specialist housing, such as for people with disabilities, gypsy and traveller accommodation, the elderly including those wanting to down size, students, first homes, and custom and self-build housing; and drive reductions in the carbon impacts of housing in new developments and securing opportunities for retro-fitting older properties.
- To reduce inequalities in health and deliver better outcomes for residents, by promoting opportunities for increasing physical activity and mental wellbeing, providing access to nature locally, through attractive and safe green infrastructure and public realm design for walking, cycling, parks and other recreation facilities, and improving access to healthy food choices; and to reduce social isolation by supporting retention and development of businesses and local services close to where people live, and connected and inclusive environments that are accessible by all groups in society, including people with disabilities, a range of ages, incomes and identities. To support our diverse communities to realise their potential and to be proud to live in Medway.
- To strengthen the role of Medway's urban, neighbourhood and village centres, responding with a positive strategy to changes in retail; supporting independent retail and start-ups, encouraging new business uses into the High Street; securing a range of accessible services and facilities for local communities close to where they live; and realising opportunities for homes and jobs, with the main town and larger village centres providing a focus for new retail and community facilities and cultural activities, within the context of the distinct towns, neighbourhoods and villages that make up Medway.

### **Securing jobs and developing skills for a competitive economy**

- To strengthen Medway's regional economic role through boosting the performance of the local economy by supporting local businesses to grow and innovate; and attracting inward investment and re-locations, through the provision of a portfolio of good quality employment land that meets the needs of businesses; and to secure and extend higher value employment opportunities; and reduce out-commuting.
- Build on existing strengths and expertise, such as engineering, energy and creative industries, and raise the profile of key sectors, including

environmental and land-based industries, to attract and develop the jobs of the future.

- To significantly improve the skills of the local workforce and capitalise upon the benefits to local businesses; and improve graduate retention.
- To gain wide recognition of Medway as a centre for learning and its student base; and realise economic and place-making opportunities associated with the cluster of universities and colleges in Medway.
- To deliver the infrastructure needed for business growth, to provide accessible employment locations, and excellent high speed broadband services.
- To maximise the opportunities to support growth in tourism, cultural and creative industries, providing workspace, venues and facilities, extending the offer to include green tourism, maritime and city breaks, including realising opportunities in the domestic tourism market, further contributing to the diversity of Medway's economy.

### **Boost pride in Medway through quality and resilient development**

- To ensure that development is supported by the timely provision of good quality effective infrastructure, so that the needs of Medway's growing and changing communities are well served.
- To respect the distinct identities, heritage and characteristics of Medway's diverse towns and villages as Medway grows.
- To deliver sustainable development, meeting the needs of Medway's communities, conserving a high quality natural and historic environment, and directing growth to the most suitable locations that can enhance Medway's economic, social and environmental characteristics.
- To secure the ongoing benefits of Medway's regeneration, making the best use of brownfield land, including bringing forward the transformation of the waterfront and town centre sites for high-quality mixed-use development, and a focus for cultural activities.
- To lift the standards of sustainability and quality in all new development; respond positively to the character and variation of local places across Medway; seeking opportunities for greener construction, to provide for more energy efficient buildings which drives down their carbon impact; demonstrate distinctiveness; and improve the accessibility and design of the public realm that will help people to live healthier lives and open up travel choices, reducing car dependency, and improving connectivity for nature.

## 2.3 Spatial development strategy

### Spatial Development Strategy

The Council will support the implementation of a spatial strategy to deliver sustainable development in Medway up to 2041. Subject to the outcomes of this Regulation 18 consultation and further evidence base work that will inform the proposed strategy in the Regulation 19 Pre-Submission Draft Plan, the Council seeks to make provision for Medway's development needs. Development is supported where it demonstrates that it contributes to the conservation and enhancement of the natural and built environment, and the Council's ambitions for sustainable growth, set out in the strategic objectives in the plan.

The spatial development strategy supports the Council's commitment to achieve a net zero carbon Medway and to tackle the negative impacts of climate change through adaptation. These include reducing reliance on cars, reducing the need to travel and providing for sustainable travel choices, and strengthening blue and green infrastructure networks across Medway.

Medway has a high proportion of land designated of national or international importance for wildlife and landscape. These areas have the highest degree of protection from development, and the policies in this plan require their conservation and enhancement. A wider network of green and blue infrastructure across Medway seeks to connect countryside, parks and open spaces, and water bodies, to provide resilience for nature, secure landscape character, support health and wellbeing, and protect environmental resources. This green network informs the spatial strategy, separating urban Medway from the Hoo Peninsula and Kent Downs, and providing strategic green corridors in the urban and suburban areas. The Council will seek opportunities for development to address areas of poor environmental amenity, delivering Biodiversity Net Gain (BNG), improving air quality, and contributing to more attractive places, that are accessible to our communities to enjoy.

The development strategy for Medway prioritises regeneration, making the best use of previously developed land and directing investment to urban waterfront and centre opportunity areas. This promotes Medway's ambitions to lift pride in the area, delivering quality development that respects our heritage, supports health and well-being and a resilient and attractive environment. The urban waterfront regeneration programme from Strood to north Gillingham will link to renewed centres, and places. Development will be required to support improvements to active travel and green infrastructure, such as cycle paths, increasing canopy cover and sustainable urban drainage to deliver on the aims for Medway's communities and environment.

Chatham is an important focus for much of the urban regeneration, with development proposed in the centre of Chatham; and on waterfront sites, and in adjacent areas to the centre, such as Chatham Intra and the station gateway. The strategy is informed by the Chatham Design Code and the Chatham Intra Heritage Action Zone (HAZ) development framework to provide for new homes, workspaces, retail, leisure and community facilities. Chatham will provide the primary centre function for Medway, benefitting from its sustainable transport links and additional investment in cultural and community infrastructure.

Strood also provides for significant new opportunities for redevelopment alongside the riverside and central areas. The completion of Rochester Riverside forms an important component of the wider waterfront regeneration programme.

Redevelopment to the north of Gillingham will consolidate the links between St Mary's Island and Gillingham town centre, and support the further development of the learning cluster of Universities and Colleges, and strengthen the town centre. There are opportunities for further mixed-use urban neighbourhoods with the potential for redevelopment at Medway City Estate.

The spatial strategy provides for a range of development needs. Growth in different parts of the urban, suburban and rural areas will reflect their distinctive character and identity, the potential for a mix of development, and the need for upgrades in infrastructure and services.

Outside of the urban regeneration areas, the Council will support the expansion of identified suburban neighbourhoods and villages, where the principles of sustainable development can be met, and where unacceptable impacts on infrastructure and the environment can be avoided. Large scale growth in these areas will require strategic masterplans to manage and phase the delivery of housing, employment, transport and wider infrastructure, and environmental measures. On such greenfield sites, the Council will require a high standard of design quality and environmental sustainability to contribute to net zero carbon aims, reducing the need to travel and achieving a modal shift from car-based travel. Development will respond positively to the environmental context and realise opportunities to boost biodiversity and resilience.

The function and extent of the metropolitan Green Belt in Medway will be retained, and the Council will ensure that substantial weight is given to the potential for any harm when considering development proposals in the Green Belt.

Development will be required to demonstrate sensitivity to the rich and diverse built and natural heritage of Medway, to provide for quality growth and strengthen the distinctiveness and functions of local towns, neighbourhoods and villages.

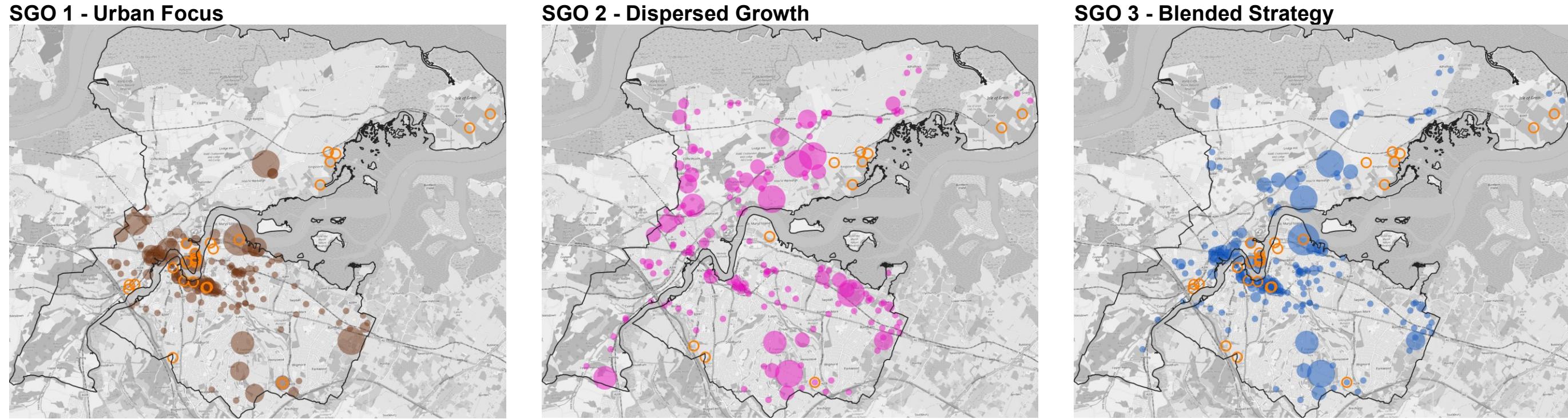
The strategy provides for sustained economic growth, through providing a mixed portfolio of employment sites, supporting business growth and capitalising upon a skilled workforce, benefitting from the local Universities and Colleges. This portfolio includes strategic development sites on the Hoo Peninsula that have unique opportunities to support new and developing sectors, as the economy develops responses to environmental and industrial policies. The Innovation Park Medway provides for technology and other high value industries. Further employment sites will contribute to meeting the needs of businesses in Medway.

The strategy provides for the coordination of infrastructure delivery to support wider growth. Land is safeguarded for the delivery of a passenger rail service connecting the Hoo Peninsula to the North Kent services, and a sustainable travel link connecting Chatham Docks with Gillingham town centre. Development will be required to mitigate the impacts of its growth in line with the Council's policy on infrastructure contributions.

### 3. Spatial Growth Options

#### 3.1 Overview

3.1.1 Three SGOs have been assessed in the Sustainability Appraisal. The SGOs, shown in Figure 1 below, are alternatives to the spatial distribution of growth.



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**Figure 1: Spatial Growth Options**

3.1.2 SGO 1 seeks to maximise development on brownfield sites in urban centres and waterfront sites, benefitting from good transport links and accessible locations. There would be a focus on increasing density in these urban areas. The urban locations alone would not meet the full growth needed in Medway, so there would also be more limited greenfield development adjoining existing larger settlements, including Strood, Rainham, Lordswood and Hoo. There is strong support in national planning policy for the regeneration of previously developed land, and often a preference from the public for the development of brownfield sites. However, such a reliance on the scale and density of development in urban centres and waterfronts raises issues with potential conflict with design guidance, such as the Chatham Design Code, and heritage constraints. This option also includes the proposed redevelopment of existing employment sites at Chatham Docks and areas of Medway City Estate to residential led mixed use growth. There are potential issues with viability on brownfield sites, and the reliance on this development approach would limit the range of housing types to meet the needs of Medway's communities, such as family homes.

3.1.3 SGO 2 considers more limited land being provided through regeneration and excludes sites such as Chatham Docks and some town centre and waterfront opportunity sites that are not actively being promoted by landowners. This option involves a much higher release of land on greenfield and Green Belt sites, including the Hoo Peninsula, North of Rainham, Medway Valley and sites in proximity to sensitive environmental areas, such as Darland and Deangate. It raises issues of sustainability, as there is likely to be higher reliance on car-based transport, a greater loss of good quality farmland, and wider environmental impacts.

3.1.4 SGO 3 blends regeneration and greenfield development, and is the indicative preferred option. There is a 'brownfield first' focus with regeneration in urban centres and waterfront locations, complemented by range of sites in suburban and rural areas. About half of the development would be on brownfield land. It provides for range of housing and types, and density and heights in regeneration sites would reflect design guidance and heritage constraints, rather than focusing on maximising housing numbers to the detriment of the surrounding amenities and quality.

3.1.5 In considering options for sustainable development in Medway, the Council has sought to direct growth to brownfield sites first. This seeks to make use of previously developed land, secure investment in regeneration, and support the evolution of town centres in the context of structural changes in retail. This continues the regeneration agenda that has been integral to Medway's change and growth in recent years, delivering new homes in accessible locations, and supporting economic growth and new services and facilities. The 'brownfield first' approach closely aligns to the wider policy and development environment, such as the Chatham Design Code, Sun Pier to Star Hill HAZ, and Strood Town Centre masterplan and Riverside Supplementary Planning Document (SPD). However, this focus on the potential of urban regeneration cannot deliver the full quantum and mix of development needed to support the needs of Medway's communities and businesses. The options considered for consultation provide varying approaches to the scale of urban regeneration in Medway's growth strategy.

3.1.6 The Council has carried out a wide review of potential development land across the borough. This has been informed by the iterative Land Availability Assessment. The rural and suburban areas are considered to offer potential for development, and there has been strong promotion of sites by the private sector on greenfield sites in these locations. As Medway has a high level of housing need, the Council needs to consider large and strategic scale development allocations in the Local Plan to address the community's needs for homes, jobs and services. This heightens the sensitivity of potential greenfield allocations, as small urban, or village extensions, are not sufficient to provide for development needs. Larger developments will need to provide significant uplifts in services, such as new schools and health centres, and mitigate infrastructure constraints, including transport. Much of the undeveloped land adjacent to existing settlements in suburban and rural areas adjoins farmland of the best and most versatile quality. There are also large areas designated of international and national environmental importance. In considering potential development allocations in suburban and rural areas, the Council acknowledges the need to conserve and enhance the important habitats and landscapes, and to plan at an appropriate scale to support effective infrastructure delivery. In defining options, the Council has considered all potential locations, including land in the Metropolitan Green Belt.

3.1.7 In planning to meet the full scale of development needs in Medway over the plan period, there are complex issues to address, in securing a deliverable strategy for sustainable development. A range of mitigations will be required, including investment in transport improvements and wider infrastructure and services; protecting the natural and historic environment, addressing flood risk, and mitigation and adaptation to climate change. Further details will be provided in site allocation policies at the next stage of the Local Plan, informed by further work on the evidence base and site assessments.

## 3.2 Preferred spatial growth option

3.2.1 SGO 3 has been identified as the Council's indicative preferred approach at this stage. The interim SA report has found that this option is likely to offer

the best balance of sustainability considerations by integrating urban regeneration with suburban and rural development, promoting sustainable travel, and addressing the needs of diverse communities. On the whole, this option is likely to ensure a diverse range of housing types and tenures can be provided across Medway and economic needs can be met whilst directing the majority of new development to sustainable locations.

3.2.2 SGO 3 is the basis for the preferred indicative site allocations shown on the Policies Map.

## 4. Natural Environment

### 4.1 Introduction

4.1.1 Medway's environment is at the heart of our new Local Plan. Medway is incredibly rich and diverse in its landscapes, habitats and wildlife. We have areas of international and national importance for nature and landscape. Our duty is to conserve and enhance these important features. The plan also reflects the need to address the impacts of climate change and to promote more sustainable development, that reduces our impacts on the planet. We seek to manage natural assets such as water, air quality and minimise the impacts of pollution.

### 4.2 Planning for climate change

4.2.1 Medway Council declared a climate emergency in April 2019 and is working to implement its Climate Change Action Plan. Planning has a critical role to play in meeting our ambitions to respond effectively to the impacts of climate change, in designing places that cut carbon emissions and build resilient communities. The Council considers that the Local Plan can contribute a range of solutions to the climate crisis. Medway as a coastal area is at risk of flooding, and its communities and nature are also exposed to the impacts of overheating, drought and soil erosion. The Hoo Peninsula is particularly vulnerable to rising sea level rises.<sup>1</sup>

4.2.2 Increasing temperatures are already being experienced, and for longer, as a result of climate change. Consideration will need to be given to the design and balance of development against the need for green infrastructure to mitigate urban heat islands through cooling and shading. Similarly consideration will be required to mitigate the likely increase in impermeable surfaces and subsequent surface water flooding, through appropriate Sustainable Drainage Systems (SuDs) and/or green infrastructure.

4.2.3 The vision and strategic objectives of the Local Plan set out Medway's aims to significantly progress to net zero carbon emissions by 2041. This is a fundamental principle of the Local Plan, and is reflected in a range of policies and the spatial strategy. The Council has considered flood risk in site selection, the opportunities to reduce the need to travel, and providing choice of sustainable transport, and the role of green infrastructure in increasing resilience and supporting the health of communities.

## Policy S1: Planning for Climate Change

Development shall contribute to making demonstrable progress in the achievement of a net zero carbon Medway by 2050.

Development must minimise the impact and mitigate the likely effects of climate change on existing and future communities and the environment and minimise the use of natural resources.

The Council will require new built development to contribute to the mitigation of, and adaptation of climate change through:

### Effective spatial planning and placemaking

- Directing the spatial strategy for growth to locations that provide better access to services, or which are capable of delivering improved services.
- Reducing the need for travel, through co-location of services and an accessible network of centres.
- Designing for walking and cycling, and providing for sustainable transport choice.
- Designing for the wellbeing of people and wildlife, promoting public health and strengthening networks for nature.

### Mitigating the impacts of climate change

- Drive reductions in the carbon impacts of new development, including energy consumption, and the consideration of embodied carbon of materials and processes through low carbon design.
- Maximising resource efficiency and sustainability in construction, and promoting the principles of the circular economy.
- Use of renewable and low carbon technologies in development.
- Provision of decentralised energy and heating.
- Delivery of multi-functional green infrastructure.

### Adaptation to climate change

- Managing water resources, through efficiency measures and sustainable urban drainage measures.
- Provide resilience to the impacts of climate change in the design of development.
- Using multi-functional green infrastructure to enhance biodiversity, manage flood risk, address overheating and promote local food production.
- Ensuring that development does not increase flood risk, including a sequential approach to avoid development in flood risk areas.

**4.2.4** There are a number of drivers for this policy, at international, national and local levels. There are governmental commitments to take action on climate change, which are embedded in legislation.

**4.2.5** Medway experiences many of the broad ranging risks from climate change on its communities and environment. As a low-lying estuarine area, it is particularly vulnerable to the risks of flooding. Communities and wildlife are exposed to the impacts of drought, over-heating and other climate extremes. There are opportunities through the Local Plan to plan positively for

sustainable and resilient growth, particularly where the scale of development provides for a strategic approach, such as heat networks, and nature-based solutions to mitigate the impacts of climate change, such as carbon sequestration.

4.2.6 The Local Plan is part of a wider collaborative approach across Medway to coordinate actions to effectively adapt to and mitigate the impacts of climate change.

*Question 1: The Council could consider setting local standards for development that go beyond national policy/regulations in addressing climate change. What evidence would justify this approach, and what standards would be appropriate?*

### **4.3 Conservation and enhancement of the natural environment**

4.3.1 In providing for high levels of housing need, there are concerns that development could impact negatively on the natural environment. Medway has a rich natural environment, with a high proportion of land in international and national environmental designations. The Council acknowledges that in preparing a spatial strategy and identifying site allocations for development in the new Local Plan, that great care is needed in considering the sensitivity of the natural environment and the potential for direct or indirect impacts arising from development. The evidence base for the Local Plan includes specific considerations of sensitive sites and locations, as well as opportunities to conserve and enhance biodiversity across Medway.

4.3.2 The Kent Nature Partnership Biodiversity Strategy 2020-2045 identifies a number of priority habitats and species that are found in Medway, and sets objectives to maintain, restore and create nature rich environments.<sup>2</sup> Biodiversity Opportunity Areas are a spatial reflection of the Kent Biodiversity Action Plan.<sup>3</sup> They indicate where the delivery of Kent Biodiversity Action Plan targets should be focused to secure the maximum biodiversity benefits. Medway includes land in the North Kent Marshes, and the Medway Gap and North Kent Downs Biodiversity Opportunity Areas. A Local Nature Recovery Strategy is in preparation for Kent and Medway, which will provide an updated basis for policy.

4.3.3 The Council is implementing BNG for new developments, in line with regulations, and the additional guidance produced by Kent County Council for local planning authorities in Kent and Medway.

4.3.4 The NPPF states that planning policies and decisions should contribute to, and enhance, the natural and local environment by minimising impacts on, and providing net gains for biodiversity. The Council welcomes the opportunities for BNG with development. It supports further work on wider environmental net gain to promote sustainable development in Medway.

## Policy S2: Conservation and Enhancement of the Natural Environment

The Council recognises the hierarchy of sites designated for their importance for nature conservation. In addition to the sites of international importance set out in Policy S3, Medway has Sites of Special Scientific Interest, a Marine Conservation Zone, a National Nature Reserve, Local Nature Reserves, irreplaceable habitat, such as ancient woodland and salt marsh, Local Wildlife Sites and roadside nature reserves, which have particular significance for the protection of habitats and species. The Council will promote the conservation, restoration and enhancement of priority habitats and species and seek opportunities to deliver net gains for biodiversity.

Where development has the potential for a likely significant effect on any SPAs, Special Area of Conservation (SAC) or Ramsar site (and any other sites protected under the Habitats Regulations 2017 (as amended)), either alone or in-combination, it would only be permitted if it can demonstrate through a Habitats Regulations Appropriate Assessment that:

- There will be no adverse impact upon the integrity of the designated site, taking into consideration the site's conservation objectives, either alone or in-combination with other plans and projects.
- Adverse impacts on site integrity can be mitigated.

Where the above cannot be met, development would only be considered if it meets requirements set out in the Habitats Regulations 2017 (as amended). The Council will promote the conservation and enhancement of biodiversity in Medway, by recognising the protection given by these designations. Development proposals will be required to demonstrate that significant harm to biodiversity can be avoided; if not, then adequately mitigated; or as a last resort, compensated. Development proposals should seek opportunities to strengthen biodiversity networks and support the conservation objectives of any biodiversity site management plans.

There may be requirements for development to contribute to strategic environmental management programmes to ensure an effective mitigation approach in particularly sensitive locations, such as in close proximity to designated sites. Development should support the conservation, enhancement and restoration of biodiversity and geodiversity across the plan area. Planning decisions will give consideration to the importance of any affected habitats, species and features.

Development proposals must demonstrate their contribution and enhancement of the natural environment and provide a measurable net gain of 10% in biodiversity, in line with the recognised Defra metric. The Council's policy follows national legislation and strategic guidance across Kent and Medway. BNG should be designed to support the delivery of an identified biodiversity network, and provide enhancements for wildlife within the built environment. Where developers can demonstrate that they cannot provide policy compliant BNG on site, the Council will consider offsite delivery to deliver strategic enhancements. This will be in accordance with the Kent and Medway Local Nature Recovery Strategy, or interim or supplementary guidance.

4.3.5 The policy reflects national planning policy and guidance in relation to the hierarchy of designated environmental sites. National planning policy states that planning policies and decisions should contribute to conserve and enhance the natural and local environment. This includes the protection and enhancement of biodiversity or geological value commensurate with their status. Over 30% of Medway's environment is designated as of international or national importance.

4.3.6 The Council's vision for Medway over the plan period places great importance on the natural environment, and the strategic objectives reflect our aims to conserve and strengthen Medway's important wildlife sites, as well as wider nature networks.

4.3.7 The Local Plan is informed by work of the Kent Nature Partnership including the KNP Biodiversity Strategy and Kent State of Nature Report.<sup>4,5</sup> These provide an evidence base on the importance of habitats and species across Kent and Medway, the scale of loss and pressures on biodiversity, and promote strategic objectives to maintain and restore wildlife. The Council works in partnership with Kent County Council and local planning authorities across Kent and Medway on the implementation of BNG to ensure a joined up strategic approach. Kent County Council commissioned a Viability Assessment of BNG in Kent in 2022 that assessed the costs of BNG on development.<sup>6</sup> It found that an uplift from 10% to 15% or 20% BNG would not materially affect viability of development in the majority of instances when delivered onsite or offsite. This has not yet been updated since the implementation of BNG, and the Council considers that further testing may be required with the more detailed information now available.

*Question 2: Do you consider that the Council should seek to go beyond the statutory minimum of a 10% increase in BNG? What evidence can you provide to support your view?*

## 4.4 Sites of international importance for nature conservation

4.4.1 Much of the Thames and Medway estuaries and bordering mudflats and marshes are designated as SPAs and Ramsar sites for their international importance for wintering birds, and also have status as Sites of Special Scientific Interest.

4.4.2 European sites are designated under the Habitats and Birds Directives.<sup>7</sup> These sites form a system of internationally important sites throughout Europe known collectively as the 'Natura 2000 Network'. In line with the Habitats Regulations, UK sites which were part of the Natura 2000 Network before leaving the EU, have become part of the National Site Network.

4.4.3 Planning policy in England and Wales notes that the following sites should also be given the same level of protection as a 'European site' (Habitats Regulations):

- a potential SPA (pSPA);
- a possible / proposed SAC (pSAC);

- listed and proposed Ramsar Sites (Wetland of International Importance); and
- in England, sites identified or required as compensation measures for adverse effects on statutory European sites, pSPA, pSAC and listed or proposed Ramsar sites.

4.4.4 Ramsar sites are wetlands of international importance designated under the Ramsar Convention.

4.4.5 The Council recognises potential conflicts between opening up access to the coast and the needs of wildlife. Research has shown that the internationally important birdlife of the Thames Estuary and Marshes SPA and Ramsar, Medway Estuary and Marshes SPA and Ramsar and the Swale Estuary SPA and Ramsar sites can be damaged by the impact of people visiting the estuary. Dogs exercising off the lead, cycling and water sports are among the activities shown to cause disturbance to birds, and so a potential contributing factor to the decline of birds in the estuary. Medway Council is working at a landscape scale, implementing a Strategic Access Management and Monitoring Strategy (SAMMS). The Council is a leading partner on the North Kent SAMMS Bird Wise Board, that coordinates the delivery of a strategic package of measures to address the potential of damage to the special features of the designated habitats. The collaborative Bird Wise scheme has been developed by environmental groups and local planning authorities to ensure residential developments can come forward without further increasing the disturbance of over wintering wetland bird populations. The strategic approach is funded through a contribution from new developments which would lead to an increase in the population within 6km of the protected areas. This is the defined catchment, which research has found to be the distance within which most visits to the estuarine coast originated. Monitoring is embedded in the SAMMS scheme, so that measures can be adapted to take account of changing conditions. A review of the North Kent Bird Wise management plan is being carried out in 2024.

## Policy S3: North Kent Estuary and Marshes designated sites

The North Kent Estuary and Marshes designated sites include the following:

- Medway Estuary and Marshes SPA;
- Medway Estuary and Marshes Ramsar;
- Thames Estuary and Marshes SPA;
- Thames Estuary and Marshes Ramsar;
- Swale SPA; and
- Swale Ramsar.

New residential development within a 6km Zone of Influence from the North Kent Estuary and Marshes designated sites will need to make a defined tariff contribution to a strategic package of measures agreed by the North Kent SAMMS, 'Bird Wise' Board, or undertake their own Habitats Regulation Assessment with bespoke mitigation which must be agreed with Medway Council and Natural England.

Bird Wise will be reviewed on a regular basis to reflect proposed growth from all LPAs within the Zone of Influence.

New residential development for larger schemes outside of the 6km Zone of Influence may also need to secure appropriate mitigation and avoidance measures to offset any potential adverse effects arising from increased recreational pressure on the above listed designations (either 'alone' or 'in combination' with other relevant plans and proposals). This requirement will be determined in consultation with the Council and Natural England.

All new development which is located within close proximity to the North Kent Estuary and Marshes designated sites (listed above) may also need to provide further mitigation measures to address urbanisation impacts, in addition to contributing to Bird Wise. Such proposals will be considered on a case-by-case basis by Natural England. All mitigation measures will be provided prior to occupation of development and delivered in perpetuity.

- 4.4.6 The policy seeks to avoid damage to the protected features of the Thames, Medway and Swale SPA and Ramsar sites, in line with national policy for these internationally important sites. An interim Habitats Regulations Assessment has been prepared for this consultation on the emerging Medway Local Plan. The Habitats Regulations Assessment has identified a range of threats and pressures on the protected sites that could result in likely significant effects. Damaging effects include habitat loss, degradation and fragmentation; hydrological changes; coastal squeeze; decline in air quality linked to traffic generation; and urbanisation, such as noise, lighting and visual impacts, and disturbance from recreational use.
- 4.4.7 Information on the conservation status of the SSSIs that coincide with the Medway, Thames and Swale Estuary and Marshes SPA/Ramsar sites indicates that a number of units are in unfavourable condition. Disturbance from recreational activity is understood to be a contributing factor to the decline in the condition of the estuaries and marshes. This is also noted in the Kent Biodiversity Strategy 2020-2045, State of Nature in Kent report, 2021, and emerging work on the Kent and Medway Local Nature Recovery Strategy.<sup>8,9</sup> The designated sites are recognised as priority habitats.
- 4.4.8 Research has shown the potential for negative impacts arising from recreational disturbance on the integrity of the SPAs and Ramsar sites within 6km of the designations, and a strategic approach has been developed to implementation and monitoring. Development in close proximity to the SPAs or Ramsar sites has a greater potential for generating disturbance and therefore require enhanced mitigation measures. It is recognised that areas in proximity to the designations have a role as functionally linked land, such as feeding areas for wildlife. Such areas will also need to be considered in assessing potential for damaging impacts resulting from development.
- 4.4.9 A landscape scale strategic approach, as implemented by Bird Wise contributes to strengthening wider ecological networks, and will be reflected in the Kent and Medway Local Nature Recovery Strategy.

**Question 3: Do you agree that the tariff based strategic approach applied to development within 6 km of the designated areas, supporting the delivery of the Bird Wise SAMMS programme represents an effective means of addressing the potential impact of recreational disturbance on the designated SPA and Ramsar habitats of the Thames, Medway and Swale Estuaries and Marshes.**

## 4.5 Landscape protection and enhancement

- 4.5.1 There are a wide range of different landscape types in Medway - coastal marshes, chalk downland, orchards and shelter belts, large-scale arable farmland and extensive tracts of woodland. There are also landscapes that are strongly influenced by the built development.
- 4.5.2 In contrast to the urban landscapes, the rural parts of Medway are noted for expansive marshes, stretches of undeveloped coast around the estuaries of the Medway and Thames, woodland, chalk downland, orchards and shelterbelts, and extensive agricultural land, particularly on the Hoo Peninsula. Capstone and Horsted Valleys bring an accessible rural landscape into the heart of Gillingham and Chatham. The orchards running along the northern bank of the estuary provide an attractive and productive belt separating Rainham from Gillingham. Orchards to the east of Rainham provide a rural character and sympathetic setting for the Conservation Area at Meresborough and a strategic gap between urban Medway and settlements in neighbouring Swale. The Hogmarsh Valley separates urban Medway from the Hoo Peninsula. Blue infrastructure in its many forms is an important feature of Medway. Water has determined the location of Medway's towns, with water the driving force for the location of settlements and industry. Water has shaped, and continues to shape, the heritage and character of the landscape. The wild and open landscape, with its extensive marshes, ditches, fleets and reedbeds inform the character of the Hoo Peninsula.
- 4.5.3 The diverse landscape character underpins Medway's green and blue infrastructure assets. Due to the diverse topography in Medway where valleys and a river characterise much of the area, a number of strategic viewpoints become apparent, including at some of the historic churches in Strood, Gillingham, Rochester and Hoo St Werburgh. There are strong landscape links to the area's heritage, including the industries built up around the rivers of the Thames and Medway, and the military activities, fortifications and defensive structures.
- 4.5.4 The Kent Downs is a National Landscape, and the North Kent marshes have been previously designated as a Special Landscape Area. The 2003 Medway Local Plan designated Areas of Local Landscape Importance. These reflect local amenity and environmental quality, providing an attractive setting to the urban area and surrounding villages. They perform a range of functions, including green buffers and corridors for people and wildlife. The wider landscapes are important in providing local character, retaining links to the historic environment, and defining distinct settlements. Reference to the historic landscape of the East Kent Fruit Belt area lying east of Rainham gave rise to the term 'Garden of England'. The countryside in Medway experiences pressures from the neighbouring urban areas. However, these

landscapes are particularly valued by communities on the doorstep of the countryside, coast and open spaces.

- 4.5.5 The Council has commissioned an updated Medway Landscape Character Assessment to provide guidance on conserving and strengthening the quality and distinctiveness of Medway's diverse landscapes.<sup>10</sup> It will inform the preparation of the new Local Plan, and in decision making on development proposals.
- 4.5.6 Landscape considerations are intrinsic to designing and delivering good quality place making and supporting resilience to climate change.

## Policy S4: Landscape protection and enhancement

The Council seeks to conserve and enhance Medway's landscape character and local distinctiveness. It recognises the diversity and importance of Medway's landscapes, that include the KDNL, the expanses of the North Kent Marshes, and the value of wider landscapes. The Council attaches great importance to the distinctiveness and quality of landscape in defining Medway's character, the intrinsic character and beauty of the countryside, containing urban sprawl and retaining the separation of settlements.

Development is directed towards areas of lower landscape sensitivity, with the objective of restoring lost landscape distinctiveness and establishing quality in newly designed landscapes.

Development proposals should demonstrate how they respect and respond to the character, key sensitivities, and qualities of the relevant landscape character areas, as detailed in the Medway Landscape Character Assessment and other appropriate design guidance, to ensure that distinctive character is maintained through protection, conservation, restoration and enhancement. This involves consideration of key characteristics and visual attributes including:

- Landform, topography and natural hydrological patterns.
- Land use pattern and composition. Nature of field boundaries.
- Pattern, distribution and nature of settlements, roads and footpaths.
- Vernacular building materials.
- Extent, location and composition of woodland and tree cover.
- Characteristic and important views.
- Distribution, type and composition of wildlife habitats.
- Time depth - the presence and pattern of historic landscape features.
- Distribution and type of designations (landscape, historic and wildlife).
- Aesthetic and perceptual factors (including darkness and tranquillity).

Development will be permitted in and alongside the undeveloped coast, only if:

- A coastal location is essential and no suitable alternative site exists along the developed coast.
- The scenic, heritage or scientific value and character of the undeveloped coast is maintained and, where appropriate, and consistent with Policy S3, public access to the coast is improved.

Development proposals will be required to demonstrate that they respond to the principles in the Council's policy guidance and contribute to enhancing and

connecting features of local landscapes. Proposals which seek to address landscape enhancement and green infrastructure at a strategic scale will be welcomed where they represent sustainable development.

4.5.7 The NPPF recognises that policies should contribute to and enhance the natural and local environment by recognising the intrinsic character and beauty of the countryside and the wider benefits from natural capital. The European Landscape Convention recognises that every landscape forms the setting of the lives of local people and the quality of those landscapes can affect everyone's lives.

4.5.8 Medway lies within three National Character Areas:

- NCA 81 – Greater Thames Estuary
- NCA 113 – North Kent Plain
- NCA 119 – North Downs

4.5.9 The Marine Management Organisation has produced a national seascape character map. The coastal edge and seascape to the north of Medway form part of MCA 18: Thames and Medway Estuaries.

4.5.10 These national level assessments define key characteristics and distinctiveness and identify pressures.

4.5.11 The Medway Landscape Character Assessment identifies eight landscape character types outside of the urban area:

- Coastal marshes
- River valleys and marshes
- Chalk scarp and scarp foot
- Dry chalk valleys and Downs
- Fruit belt
- Mixed chalk and clay farmland
- Clay farmland
- Wooded hills and ridges

4.5.12 These are further categorised into Landscape Character Areas. The report describes key characteristics and influences; evaluates key sensitivities and values; identifies issues and changes; and provides guidance at a landscape character area. This assessment clearly demonstrates the importance of landscapes across Medway and the need to carefully manage development to conserve and enhance landscape distinctiveness and quality and resilience to climate change.

4.5.13 The draft Medway Green and Blue Infrastructure Framework identifies strategic landscape corridors that perform a range of functions.<sup>11</sup> These inform the development strategy, nature recovery networks, and provide for the enhancement of natural capital at a landscape scale.

4.5.14 Medway's landscape is subject to a number of pressures and threats. These include negative impacts of urbanisation and development pressures resulting in fragmentation, changes in land management practices and land uses, and visitor pressures. Loss of inter-tidal areas and salt marsh impact on the distinctive landscape character and biodiversity of the marshes. Through climate change, sea level rise is likely to result in significant loss of

coastal habitats. The Council seeks to provide appropriate policy to secure and strengthen landscape distinctiveness. Landscape has an important role in planning for the mitigation and adaptation to climate change, supporting health and well-being and providing for sustainable development and quality in place making in Medway.

4.5.15 Policy has a role of providing strong forward-looking action to enhance, restore or create landscapes. The undeveloped coast contributes significantly to the landscape character of Medway, and policy should maintain its character and provide for improved public access where appropriate. The sensitivity of the coastal habitats is recognised in Policy S3.

*Question 4: Do you consider that Medway Council should identify landscapes of local value as an additional designation in the new Local Plan. What should be the criteria for designation? Are there areas that you would identify as justifying a local valued landscape designation – where and why?*

## 4.6 Securing strong green and blue infrastructure

4.6.1 The large urban conurbation made up of the distinct Medway towns is surrounded and interspersed by countryside and water. The parks, paths, open spaces, trees and plants across urban Medway are important to residents for relaxation, health, socialising, and contribute to the quality of towns and suburbs. These can be the most direct way for people to engage with their local environment and can contribute to tackling social isolation, inactivity and wider health issues. Together these urban and rural assets make up Medway's green and blue infrastructure network that provides a number of landscape services, and multiple benefits for nature and people.

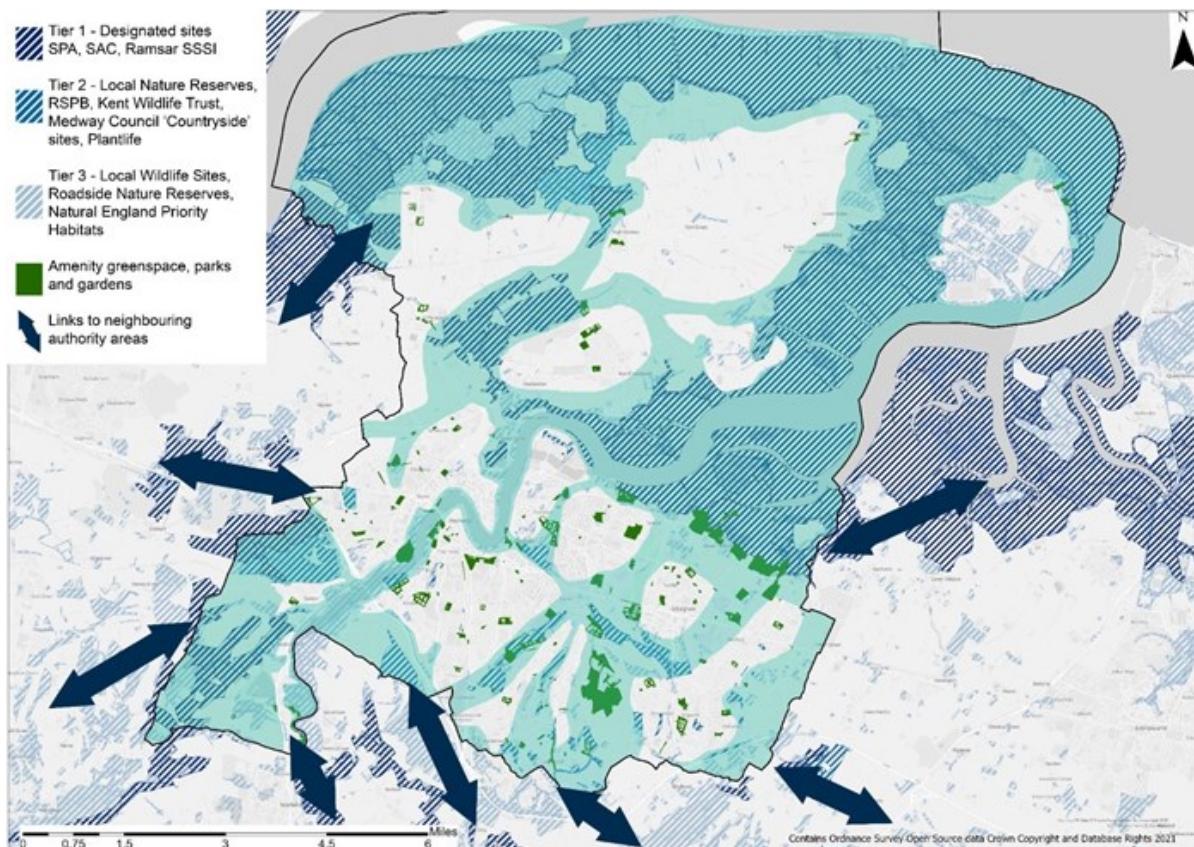
4.6.2 A key feature of green infrastructure is that networks are strategically planned and that spaces and places are connected. Each component part of green infrastructure has the potential to deliver wider benefits (functions), including recreation, biodiversity, health, climate change mitigation and adaptation and water quality (termed 'multi-functionality'). When planned, designed and managed as a network, these benefits are maximised. Green infrastructure is intrinsic to good development and quality place making.

4.6.3 Green spaces and countryside help in regulating the resilience of the environment at a local and global scale. The Council will work at a landscape scale to conserve biodiversity and secure the wider benefits of a coordinated approach to planning for the protection and enhancement of Medway's natural and local environment. Green infrastructure planning informs the direction and objectives in the new Local Plan. This accords with the ambitions and approaches in planning for the natural environment set out in the Government's 25 Year Environment Plan.<sup>12</sup> This has been further developed through Natural England's Green Infrastructure Framework, which sets out principles and standards to strength natural networks.<sup>13</sup>

4.6.4 The Council has prepared a Medway Green and Blue Infrastructure Framework, which has assessed the varied components of the area's assets, considered the priorities for different areas and delivering on the

ambitions. It sets out strategic priorities for wildlife, people, climate change adaptation and mitigation, landscape and heritage.

4.6.5 Green and blue infrastructure networks cross local authority boundaries and this framework considers biodiversity, strategic access routes, watercourses and other green and blue infrastructure across neighbouring authority boundaries. The Green and Blue Infrastructure Framework has identified strategic ecological networks, set out as the Green and Blue Corridors in Figure 2.



**Figure 2: Green and Blue Corridors**

4.6.6 This work will be further developed in the Kent and Medway Local Nature Recovery Strategy.

## Policy S5: Securing Strong Green and Blue Infrastructure

The Council will conserve and enhance the network of green and blue infrastructure across rural and urban Medway. The highest protection will be given to securing the ecological and landscape interests of sites designated of international importance as a SPA, Ramsar site and/or SAC, or candidate sites, and National Landscapes. A high level of protection from damaging impacts of development will be given to Sites of Special Scientific Interest and Ancient Woodland.

The Council will consider the need to protect the special features of Regionally Important Geological Sites, Local Wildlife Sites and Local Nature Reserves.

Wider components of the green infrastructure network will be protected and enhanced in line with the analysis and strategy set out in the Medway Green and Blue Infrastructure Framework and the Kent and Medway Local Nature Recovery Strategy.

The Council supports the Green Infrastructure Principles set out in Natural England's Green Infrastructure Framework. New development must provide for multifunctional, varied, connected and accessible green infrastructure that reflects local character and supports the successful integration of development into the landscape, and contributes to improved connectivity and public access, biodiversity, landscape conservation, design, management of heritage features, recreation, positively benefits health and wellbeing, and seeks opportunities to strengthen the resilience of the natural environment. Major new development proposals will be expected to submit a Green Infrastructure Plan as part of a Design and Access Statement setting out how will meet policy/objectives/GI principles.

The Council will expect development proposals to demonstrate that they are designed to be resilient to, and can adapt to, the future impacts of climate change, in strengthening ecological networks. Opportunities to retrofit this to existing urban areas should be maximised.

Opportunities will be sought to promote and enhance the public rights of way network, including national trails, long distance paths and the wider footpath network, bridleways and cycle routes, in particular to address existing gaps in connectivity and extend appropriate access along the riverside, and other cross border links.

- 4.6.7 The NPPF directs plans to take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure. Further guidance is provided in Planning Practice Guidance for the Natural Environment.
- 4.6.8 A strong and attractive green infrastructure network is at the centre of the Council's vision and strategic objectives for the Medway Local Plan. It underpins our ambitions for caring for nature, thriving and healthy communities, beautiful places and economic well-being. This policy links to work on the Kent and Medway Local Nature Recovery Strategy, and is informed by the Kent Biodiversity Strategy. There are further links to the Medway Health and Wellbeing Strategy.
- 4.6.9 The draft Medway Green and Blue Infrastructure Framework demonstrates the multi-functional benefits that the local environment provides to Medway's residents and wildlife. It also highlights the pressures on the natural environment, health inequalities and deprivation in local communities, and opportunities to strengthen natural capital networks.
- 4.6.10 Natural England has produced a Green Infrastructure Framework. This follows from a commitment in the Government's 25 Year Environment Plan. The framework sets out 15 strategic principles and headline standards for:
  - Green infrastructure strategy standard
  - Accessible greenspace standards, including quality standards
  - Urban nature recovery standard
  - Urban greening factor standard

- Urban tree canopy cover standard

4.6.11 The framework supports the greening of towns and cities and connections with the surrounding landscape as part of the Nature Recovery Network. Green infrastructure measures can help with climate change adaptation such as urban cooling, wildlife corridors, and ecological networks to increase resilience.

4.6.12 Key components of green infrastructure planning will include strategic green infrastructure zones in areas facing development to provide for sustainable development and provide robust landscape features to enhance planned growth. Planning at this strategic scale provides an opportunity to deliver these multi-functional green infrastructure zones. This work will be further developed through the Kent and Medway Local Nature Recovery Strategy.

4.6.13 The benefits for Medway go much further than the wildlife, with the significant health, wellbeing and life expectancy benefits that can be realised through easily accessible, high quality semi-natural greenspace provision, and the potential for economic benefits from green tourism.

*Question 5: Do you agree that the Council should promote Natural England's Green Infrastructure Framework standards in the Medway Local Plan policy?*

*Question 6: Has the draft Medway Green and Blue Infrastructure Framework identified the correct key issues and assets, and provide effective guidance for strengthening Medway's green infrastructure?*

## 4.7 Kent Downs Area of Outstanding Natural Beauty National Landscape

4.7.1 The Kent Downs form an important component of Medway's natural assets. The Downs to the west and south of Medway are part of an Area of Outstanding Natural Beauty (AONB) National Landscape designation that runs across the county from Downe to Dover. This is an exceptional landscape, and the area is afforded the highest status of protection in relation to landscape and scenic beauty. The Council has a duty to seek to further the purpose of the AONB, namely to conserve and enhance natural beauty. Medway Council is a member of the Kent Downs Joint Advisory Committee that coordinates actions to conserve and enhance the natural beauty of the National Landscape, including the preparation of a joint management plan. The Council has adopted the Kent Downs AONB management plan, 2021-2026, in line with statutory requirements, with the purpose of securing and strengthening the distinctive qualities and features of the AONB, within the context of development and wider changes across Kent and Medway. The AONB Management Plan provides the vision, aims and principles that formulate the Council's policy for the management of the Kent Downs NL and for carrying out the Council's functions in relation to it.

4.7.2 Land in the Kent Downs NL AONB in Medway sits to the west and east of the river valley and extends to the south of the urban area. It falls within three character areas, as defined and assessed by the Kent Downs Landscape Character Assessment used in preparing the current

Management Plan. These are the West Kent Downs, Medway Valley and Mid Kent Downs landscape character areas and this supporting evidence for the Kent Downs management plan provides guidance specific to each area. It is a strongly historic landscape, and the peaceful rural feel and relative tranquillity contrasts with the nearby urban areas and busy roads. The area is characterised by extensive blocks of woodland, much of it ancient, and the coherent backdrop of scarp woodlands and fields of the Medway Valley. The woodlands form mosaic habitat with unimproved grassland. Medway's only SAC falls within the ancient woodland near Upper Halling, as a part of the wider North Downs Woodland SAC. There are long views from the south. It provides an important rural buffer between the urban areas of Medway and Maidstone and Malling to the south. There are rich layers of history, and the area includes pre-historical sites and is marked by its industrial past. The M2 and Channel Tunnel Rail Link rail bridges sit high at the northern end of the valley. The open views and dominant landform of the area make it a highly sensitive landscape, stressing the importance of its setting. Its sensitivity is increased by its role in the setting of the Medway Valley; its function as a strategic gap between large settlements and a landscape buffer to large urban areas and infrastructure; the inherent value of its cultural and biodiversity sites, and its remarkable survival as a peaceful, rural landscape despite its proximity to settlements, industry and transport infrastructure. Land in the connecting countryside close to the KDNL, in areas such as the Capstone Valley, reflect features of the designated landscape.

4.7.3 The area experiences pressures from development and infrastructure in the wider area and the proximity of urban areas. The Maidstone Local Plan Review 2024 has a strategic allocation adjoining Medway's border at Lidsing for mixed use development including 2000 homes. The Downs have been subject to some anti-social behaviour, including illegal access, and poor land management regimes. The Valley of Visions partnership set up by the Kent Downs team invested in a programme to celebrate and enhance the landscape, which has had legacy benefits, such as tackling illegal use of off-road vehicles. Climate change also presents pressures for habitats and species in the Kent Downs, in common with the wider environment.

4.7.4 There are strategic landscape and wider green infrastructure functions of the designation across local authority boundaries, and benefits of a landscape scale approach. The importance and potential of the designated area and its setting to strengthen natural capital and to mitigate and adapt to climate change are recognised in the Kent Downs AONB management plan and emerging work on the Kent and Medway Local Nature Recovery Strategy.

## Policy S6: Kent Downs Area of Outstanding Natural Beauty National Landscape

AONBs are nationally designated landscapes and as such have the highest status of landscape protection. Medway includes land in the Kent Downs National Landscape. This will be conserved and enhanced in accordance with its landscape significance.

Development in the National Landscape, and within its setting, must demonstrate that it meets the aims of the Kent Downs AONB National Landscape Management Plan and associated supporting relevant policy guidance. The design scale, setting and materials should be appropriate to the National Landscape. Major development within the National Landscape will only be permitted in exceptional circumstances and where it can be demonstrated that it is in the public interest.

Other development within the National Landscape and its setting, both in views to and from the designated landscape, will be permitted provided that:

- a. the location, form, scale, materials and design would conserve and enhance the character of the landscape;
- b. the development would conserve and enhance the special qualities, distinctive character and tranquillity of the National Landscape and avoids adverse impacts, unless these can be satisfactorily mitigated; and
- c. the development furthers the delivery of the Kent Downs AONB National Landscape Management Plan and having regard to any associated guidance.

Actions to conserve and enhance the AONB shall be informed by landscape assessment, having considered any relevant landscape character appraisals and shall focus upon:

- a. damaged landscapes and features relating to the proposals, especially those supporting AONB designation, including the scarp slope dramatic landform and views, dry valleys, woodlands, biodiversity-rich habitats, farmed landscapes, pastoral scenery, villages, historic and cultural heritage, geology and natural resources;
- b. locally distinctive patterns and species composition of natural features such as trees, hedgerows, woodland, field boundaries, watercourses and waterbodies;
- c. the locally distinctive character of buildings, settlements and their landscape settings, including the transition between man-made and natural landscapes at the urban fringe;
- d. visually sensitive skylines, geological and topographical features;
- e. landscapes of cultural, historic and heritage value;
- f. important views and visual amenity; and
- g. relative tranquillity and remoteness and the need to avoid intrusion from light pollution, noise, and motion.

Opportunities to restore and enhance the special characteristics and natural capital of the Kent Downs NL, particularly at a landscape scale will be encouraged.

- 4.7.5 The purpose of the AONB National Landscape designation is primarily to conserve and enhance natural beauty. This is recognised in national policy and guidance, and the status of AONBs as National Landscapes, alongside National Parks, has been strengthened through the new duty for public bodies to seek to further the purpose of the designation.
- 4.7.6 The Kent Downs AONB National Landscape is a material consideration in plan making and decision making. The Council will give a high priority to the Kent Downs AONB National Landscape Management Plan vision, aims, principles and actions in its planning policies, development management

decisions and planning enforcement cases, and in carrying out other relevant functions.

4.7.7 The importance of the setting of a designated AONB is recognised in national planning policy and guidance, especially where long views are identified as important, such as in the National Landscape to the south of Medway. The Capstone Valley, in particular, shares similar characteristics to the landscape of the Kent Downs and contributes to its setting. It is a 'gateway' to the AONB and provides a key function as a transition zone between the AONB and built-up areas of Medway. The area is identified as a strategic component of green infrastructure in Medway, with the potential for strengthening cross border green networks.

4.7.8 Working strategically at a landscape scale offers opportunities to strengthen nature recovery networks and wider green infrastructure and provide mitigation and resilience to climate change through landscape scale restoration, conservation and enhancement. This is the approach taken through the Making Space for Nature partnership in developing the Local Nature Recovery Strategy. The Kent Downs management plan notes the impacts of climate change on the designated landscape and the potential for the area to contribute to nature-based solutions, such as through a strategic approach to woodland and tree cover expansion.

## 4.8 Flood and water management

4.8.1 There are a number of flood risk management authorities who have responsibilities for managing flood risk throughout Medway:

- The Environment Agency has a strategic overview of all sources of flooding and coastal erosion, as defined in the Flood and Water Management Act 2010. The approach is set out in a National Flood and Coastal Erosion Risk Management Strategy. The Environment Agency is also responsible for flood and coastal erosion risk management activities on main rivers and the coast, regulating reservoir safety, working in partnership with other risk management authorities, and providing flood forecasts and warnings. It must also look for opportunities to maintain and improve the environment for people and wildlife while carrying out all of its duties. Its functions include bringing forward flood defence schemes to manage flood risk, working with partners and local communities to respond to local priorities.
- Lead Local Flood Authorities (LLFA) have a lead role in managing the risk of flooding from surface water, groundwater, and ordinary (smaller) watercourses. Medway Council, as a Unitary Authority, is considered a LLFA under the Flood and Water Management Act 2010 and also has a flood risk role as a Highways Authority. In addition, Medway Council is also a Coastal Protection Authority under the Coastal Protection Act 1949, leading on coastal erosion risk management activities in their area.
- Internal Drainage Boards (IDBs) are independent public bodies that manage water levels in low lying areas where there is a special need for drainage. They work in partnership with other authorities to actively manage and reduce the risk of flooding. There are two IDBs within the

Medway administrative area; the Lower Medway IDB, and the North Kent Marshes IDB.

- Water and Sewerage Companies (Southern Water and Southeast Water) manage the risk of flooding to water supply and sewerage facilities and flood risks resulting from failure of infrastructure.

### **Flood risk in Medway**

4.8.2 The Medway Towns are at risk of flooding from a number of sources, including tidal and surface water flooding, as well as flooding from groundwater, streams and ditches. A national assessment of surface water flood risk indicates that Medway is one of 116 communities throughout England which is considered to be at significant risk of surface water flooding.<sup>14</sup>

4.8.3 Tidal flood risk infrastructure currently provides a varying level of protection to the areas of ecological importance across the low-lying land in the north of Medway, and the strategically important towns situated along the tidal River Medway. The Environment Agency produced both the Thames Estuary Plan (TE2100) and Medway Estuary and Swale Strategy (2019) which sets out the short, medium and long-term vision for managing flood risk over the next 100 years.<sup>15,16</sup> The implementation of these strategies is being led by the Environment Agency through two capital delivery programmes for both the Thames Estuary and the Medway and Swale Estuaries. Medway Council and other neighbouring local authorities are key partners in these capital programmes, which ensure flood infrastructure improvements are realised to reduce flood risk and support sustainable growth.

4.8.4 To manage flood risk Medway Council will:

- allocate land to safeguard it for flood risk management infrastructure;
- identify site policies for change of use and reduce the causes and impacts of flooding; and
- determine the acceptability of flood risk in relation to emergency planning capability.

### **Links to flood risk strategies and assessments**

4.8.5 There are a number of national and local strategies, assessments and plans which need to be taken account of throughout the planning cycle including the following:

- Medway Strategic Flood Risk Assessment (SFRA)
- Local Flood Risk Management Strategy
- Preliminary Flood Risk Assessment
- Surface Water Management Plans
- Shoreline Management Plans
- Medway Estuary and Swale Strategy
- Thames Estuary 2100 Plan
- Thames River Basin District Flood Risk Management Plan

4.8.6 The Council will ensure the aims and recommendations of these plans are considered when developing detailed policies for specific river frontages, to ensure that development proposals contribute towards the objectives and measures included.

## Climate change

4.8.7 Current UK projections for future climate change indicate that there will be more frequent short duration high intensity rainfall and more frequent periods of long duration rainfall. Climate change is also expected to bring hotter, drier summers alongside wetter winters but not necessarily in tandem. Climate change allowances show that around 1 metre of sea level rise is possible by 2100. This is expected to increase flood risk due to more frequent and severe coastal flooding events in the future. Flood zones are expected to increase for all sources of flooding so that some areas will move from Flood Zone 1 to Flood Zone 2 and 3 over the next 100 years.<sup>17</sup>

4.8.8 Summer droughts are also therefore likely to be more frequent alongside an increased risk of flooding. This combined with increased demand from development requires a proactive approach to the management of these risks via the planning system.

## Water supply

4.8.9 Medway is an area of serious water stress as identified by the Environment Agency.<sup>18</sup> Southern Water and Southeast Water are the statutory water suppliers throughout Medway with Southern Water supplying water to most of the authority and Southeast Water supplying Halling.<sup>19</sup> There is a shared interest in the protection of groundwater supplies and water quality. Both water companies have developed Water Resources Management Plans (WRMPs) which set out how it is proposed to ensure there is a secure and reliable supply of water under a range of future scenarios. WRMPs are linked to Drought Plans which detail the steps that would be taken to ensure that supplies can be maintained whilst minimising the impacts to rivers and the environment during drought events.

4.8.10 In order to minimise the use of mains water, water supplies and resources need to be protected and conserved in a sustainable manner.

## Wastewater

4.8.11 There is an established network of sewerage facilities throughout Medway. The majority of Wastewater Treatment Works (WwTW) have capacity to accept wastewater from the proposed growth without the need for improvements to existing facilities. However, it is important to recognise that if significant spare capacity is not maintained at WwTWs due to the need to maintain efficiency, upgrades may be required to serve growth. Existing water infrastructure will need to become more resilient to climate change. A significant increase in flood risk, storm overflow events and other climate change impacts is likely to seriously impact the efficiency of existing potable and wastewater infrastructure.

4.8.12 Southern Water is the primary provider for wastewater disposal within Medway and are currently developing Drainage and Wastewater Management Plans across their catchments, including Medway. Drainage and Wastewater Management Plans are long-term plans that will provide an opportunity to improve water quality and drainage systems and will address pollution and flooding for the benefit of communities and the environment. These long-term plans take into account projected growth over the Local Plan period.

4.8.13 Policies relating to the additional waste management capacity and wastewater treatment are presented in the Waste Management section of this document.

### **Water quality and groundwater protection**

4.8.14 Surface and groundwater water quality is vitally important for water supply, general amenity, recreation, fisheries and nature conservation supporting domestic, industrial and agricultural uses. In Medway there are several groundwater sources that are predominantly in the urban area and Medway Valley. These are highlighted via the Environment Agency Ground Water Source Protection Zones that aim to protect the water quality of groundwater sources.<sup>20</sup>

4.8.15 Development proposals should reference the Environment Agency's Groundwater Protection guidance documents to ensure that any impact of development on groundwater quality in the area is managed appropriately.<sup>21</sup>

4.8.16 The EU Water Framework Directive has been retained in UK law following the UK's exit from Europe and establishes a framework for the protection of inland surface waters, estuaries, coastal waters and groundwater which is delivered via River Basin Management Plans.

### **Sustainable drainage**

4.8.17 SuDs comprise a suite of water management techniques that replicate natural drainage processes, for example via the use of permeable paving, swales and attenuation ponds. SuDs provide an opportunity to achieve multi planning benefits and contribute towards several planning policies including reduced flood risk, improved water quality, increased biodiversity via contribution to open space and landscaping and reduced use of potable water supplies.

4.8.18 SuDs measures are of particular importance also for new developments within areas where there may be sewer capacity limitations. Increased take up of SuDs will improve resilience of Medway over the Local Plan period and beyond and contribute towards climate adaptation.

## **Policy DM1: Flood and Water Management**

The Council seeks to reduce flood risk, promote water efficiency measures, and protect and enhance water quality through the following mechanisms:

### **Flood Risk Management**

Medway Council will manage flood risk by requiring applicants/developers to apply the Sequential Test and, where necessary, the Exception Test as part of the application:

- Submit site-specific flood risk assessments in particular locations, including those at risk from sources other than river and sea flooding:
  - Requiring that development is safe throughout its lifetime without increasing flood risk elsewhere and, where possible, have a positive impact on flood risk.

- Development that would harm the effectiveness of existing flood defences or prejudice their maintenance or management will not be permitted unless it can be suitably mitigated.
- Where development passes the sequential and exception tests, finished floor levels should be raised above the design flood level and include the Environment Agency's recommended additional freeboard requirements.
- Investigate measures to control the risk of flooding affecting the site.
- Implement further management measures to deal with any residual risk remaining after avoidance, control and mitigation have been utilised.
- Flood Hazard should be appraised against the proposed development layout to ensure that users and occupants of the site can achieve safe access and egress.
- Using site layout to locate the most vulnerable aspects of development in areas of lowest flood risk.
- Where flood risk management infrastructure is required to address flood risk, all development should:
  - Liaise with the flood risk management authorities to identify and deliver flood risk management schemes to manage flood risk to existing communities and future development sites. This specifically would include the Environment Agency's Medway Estuary and Swale and the Thames Estuary 2100 programmes.
  - Identify how this infrastructure will be operated, funded and maintained for the lifetime of the development.
  - Ensure there is space for future maintenance or new flood risk management infrastructure.
  - Consider the consequences of flood risk management infrastructure failing or its design standard being exceeded.
  - Identify the legal requirement under the Habitats Regulations (2019) to provide compensatory habitat associated with sea level rise and the process known as coastal squeeze. The Environment Agency's Medway Estuary and Swale programme is delivering habitat compensation schemes to provide intertidal compensatory habitat. This is required as flood defence improvements and sea level rise are expected to cause losses to existing designated SPAs and Ramsar sites within the Medway Estuary and Swale area.
  - Contribute towards the Environment Agency's flood risk management programme to support:
    - The delivery of flood risk management schemes which will provide indirect benefits such ensuring the strategic infrastructure which supports development including road, rail, utilities, employment areas and other essential services.
    - Habitat creation / compensation works required to offset the impact of flood defence improvements and sea level rise squeezing out existing designated intertidal habitat. This is required under the Conservation of Habitats and Species Regulations (2019).

Medway Council will identify an appropriate mechanism such as planning obligations / S106 agreements, or other approaches to support flood risk works under the MEAS and TE2100 programmes.

## Adaptation to Climate Change

Development must be designed to be resilient to, and adapt to the future impacts of, climate change through the inclusion of adaptation measures. These measures could include:

- Incorporating water efficiency measures, such as the use of grey water and rainwater recycling, and low water use sanitary equipment.
- Minimising vulnerability to flood risk by locating development in areas of low flood risk (making an allowance for climate change) and including mitigation measures including SuDs (in accordance with SuDs policy above).
- Optimising the use of multi-functional green infrastructure, including tree planting for urban cooling, local flood risk management and shading.
- Seeking opportunities to make space for water and develop new blue infrastructure to accommodate climate change.
- Appraising and mitigating the risks of climate change on flooding in site specific flood risk assessments.

## Water supply

- Development within Groundwater Source Protection Zones and Principal Aquifers will only be permitted provided that it has no adverse impact on the quality of the groundwater resource, and it does not put at risk the ability to maintain a public water supply.

## Wastewater

- Development proposals must ensure that adequate wastewater infrastructure is available in tandem with the development, which are also resilient to the impacts of climate change. Proposals where appropriate must comply with Policy T40.

## Water quality and groundwater protection

- All new development should have regard to the actions and objectives of appropriate River Basin Management Plans (in Medway, this is the Thames River Basin District) in striving to protect and improve the quality of water bodies in and adjacent to the district. Developers shall undertake thorough risk assessments of the impact of proposals on surface and groundwater systems and incorporate appropriate mitigation measures where necessary.

## Sustainable Urban Drainage

- Development should utilise SuDs and replicate Greenfield runoff rates and volumes.
- Surface water runoff must be managed as close to source as possible and be guided by relevant national (and/or) local standards and guidance.
- All major or non-major (identified within a Sensitive Drainage Area by level 1 SFRA) development will require a Surface Water Management Strategy (SWMS) with an accompanying SuDs proforma to be produced to show how SuDs will be included to manage surface water runoff from the site.
- Arrangements must be put in place for the long-term management and maintenance of SuDs.

- Drainage should be designed and implemented in ways that deliver other policy objectives of this plan, including water use efficiency, water quality, biodiversity, amenity and recreation and Green Infrastructure.

4.8.19 National Planning Policy expects Local Plans to account for water management via the consideration of flood risk, coastal change, climate change, water quality, water supply and wastewater; this section will focus on the management of those aspects. The policies proposed should be considered alongside the wider, linked policies contained within the Natural Environment section of this document. Water supply is further referenced in the Infrastructure section in the context of utility provision.

4.8.20 'Flood risk' is defined in National Planning Practice Guidance (NPPG): Flood and Coastal Change as "a combination of the probability and the potential consequences of flooding from any source, now or in the future. Sources – including from rivers and the sea, direct from rainfall on the ground surface, rising groundwater, overwhelmed sewers and drainage systems, reservoirs, canals and lakes and other artificial sources."<sup>22</sup>

4.8.21 For areas at risk of river and sea flooding, this is principally land within Flood Zones 2 and 3 or where a SFRA shows it will be at risk of flooding in the future.<sup>23</sup>

4.8.22 National planning policy seeks to minimise increased vulnerability to flood risk through the promotion of sites away from areas of higher flood risk via a Sequential Test, which aims to steer new development to areas with the lowest probability of flooding.<sup>24</sup> Where this is not possible then the Exception Test should be applied, which is a method to demonstrate flood risk to people and property will be managed satisfactorily while allowing necessary development to go ahead in situations where suitable sites at lower risk of flooding are not available.<sup>25</sup>

4.8.23 A SFRA has been produced which considers the risk of flooding from all sources to provide evidence for a Sequential and Exception Test and provides guidance for the completion of site-specific Flood Risk Assessments.<sup>26</sup>

4.8.24 To minimise the risk created to people and property from new development and the impacts of climate change, national planning policy instructs local planning authorities to direct development towards areas at the lowest risk of flooding. The SFRA will be updated and will inform site allocations going forward in the plan-making process. Proposals for development in areas at risk of flooding will be refused if other suitable sites are reasonably available in areas at lower risk. Sequential and exception tests (where required) must be passed in line with the National Planning Policy Framework (NPPF) and Guidance.

4.8.25 Land uses considered to be the most vulnerable from flooding must be located in areas of lowest flood risk first unless there are demonstrable overriding reasons to prefer a different location. The National Planning Policy Guidance will be referred to when assessing the vulnerability of a land use to flood risk.

- 4.8.26 Comments received requested site-specific flood risk assessments to support planning applications, this will be considered at the relevant stage of plan-making.
- 4.8.27 The Council will require sufficient and appropriate funding to support flood risk works under the MEAS and TE2100 programmes.
- 4.8.28 SuDS should be provided on all new development unless it can be demonstrated that such measures are inappropriate and suitable alternative drainage mechanisms are proposed. Drainage systems higher in the SuDS hierarchy, as defined by NPPG, will be favoured.

## 4.9 Contaminated land

- 4.9.1 Development cannot take place where land is potentially contaminated without proper assessment and remediation. The Council seeks to encourage development supportive of people leading healthy lives. Land contamination is a key consideration in planning as it causes harm to the environment and ecology, has the potential to adversely affect human health, and unless dealt with appropriately, can restrict the re-use of otherwise suitable brownfield sites.
- 4.9.2 Medway has a number of brownfield sites that were previously in industrial and/or military use, particularly in waterfront locations. These previously developed sites provide opportunities for regeneration, making the best use of land, boosting the supply of housing and contributing to the area's economic success. However, the Council recognises that some of these sites may be subject to contamination from previous uses.

### Policy DM2: Contaminated Land

All contaminated land will be remediated prior to development and/or during construction to an appropriate level to its proposed use. Investigations and assessments of all sites situated on, or in close proximity, to potentially contaminated land will be required in conjunction with relevant development proposals. This will identify potential risks to human health and the environment and where relevant, inform remedial measures and future monitoring to mitigate and monitor the risk. All investigations should be carried out in accordance with established procedural guidelines. Where a site is affected by contamination or land stability issues, responsibility for securing a safe development will rest with the developer and/or landowner.

- 4.9.3 This policy approach is consistent with national planning policy which seeks to avoid unacceptable risks from ground pollution.<sup>27</sup> The policy ensures that all potentially contaminated land is assessed and mitigated appropriately before use.
- 4.9.4 This policy supports development on brownfield land providing it can be remediated appropriately, allowing high quality development to take place in sustainable locations.

## 4.10 Air quality

4.10.1 Clean air is an important factor in human, environmental and ecological health. Medway has areas of good air quality, which should be maintained, and areas with recognised poor air quality, which the Council seeks to improve. Areas of poor air quality are managed and designated by Air Quality Management Areas (AQMAs) to bring pollutant levels below national objectives. The Local Plan's strategic objectives aim to support people to lead healthy lives, and to prepare Medway for a sustainable and green future and managing air quality contributes towards these. The Local Plan recognises that air quality is an important consideration when making decisions with regards to future developments, transport, and pollution control issues.

4.10.2 Large, potentially polluting developments which generate a significant amount of vehicle movements have the potential to significantly affect air quality and air pollution impact assessments and mitigation measures, in accordance with local air quality guidance must be completed.

4.10.3 The impact of any proposals on ambient air quality will also be important where the development could in itself result in the designation of Air Quality Management Areas or conflict any Air Quality Action Plans declared by the Council. In appropriate circumstances, air quality impact studies through air dispersions modelling and appropriate modelling will be made legally binding through the use of planning conditions or planning obligations (S.106 agreements).

4.10.4 The use of renewable and alternative energy sources; and integrated transport strategies, will all help to improve air quality and also contributing to reducing CO<sub>2</sub> emissions. However, biomass burning can pose challenges to air quality. A shift towards more biomass burning in urban areas of Medway could have significant impacts on air quality and public health if only the potential climate change benefits are considered. There could be conflict with policies relating to energy, and therefore very careful consideration of the air quality impacts relating to proposed development of biomass burning will be required.

### Policy DM3: Air Quality

The Council seeks to reduce exposure to areas of poor air quality, maintain areas of good air quality, and where possible improve air quality through restricting development or requiring acceptable and effective mitigation measures. It also seeks to protect designated habitats from the impacts of air quality on ecology.

Proposed developments which have the potential to negatively impact on air quality will be expected to be accompanied by air pollution impact assessments and mitigation measures, in accordance with local air quality guidance.

All proposals should take account of the Medway Council Air Quality Planning Guidance that sets out a screening checklist for major size development and proposed development within, or close to an AQMA. Depending on the scale of development, the Council may require the submission of an Air Quality Assessment and/or an Emissions Mitigation Assessment.

The guidance also advocates mitigation measures for all development and all development will be expected to maximise opportunities to improve local air quality through appropriate design. This includes installation of electric charging points and the introduction of low Nitrous Oxide (NO<sub>2</sub>) boilers. Where mitigation is not integrated into a scheme, the Council will require this through a planning condition(s). If on-site mitigation is not possible, then the Council may seek a contribution to wider air quality mitigation measures through a planning obligation, but this approach will not be acceptable where there remains an adverse impact upon sensitive neighbouring uses.

Proposals must be consistent with Policy S2 through the consideration of air quality to conserve the natural environment.

Development with the potential for impacts resulting from air quality, such as from traffic, industrial emissions, on the ecology of designated sites will be required to demonstrate avoidance or appropriate mitigation.

- 4.10.5 The NPPF states that planning policies must prevent new development from being adversely affected by air pollution and take into account the presence of Air Quality Management Areas which Local Authorities have a duty to declare if particular pollutant levels exceed national objectives.<sup>28,29</sup> Medway has four AQMAs currently (Central Medway; Pier Road Gillingham; High Street, Rainham; and Four Elms, near Chattenden), all for exceedances of the annual mean nitrogen dioxide objective. These AQMAs highlight the need for careful and considerate management of air quality as a result of new development. There may be circumstances where it is impossible to avoid small increases in pollution, and such increases may be considered acceptable when balanced against the benefits that would result from development.
- 4.10.6 The Medway Air Quality Action Plan 2015 was adopted in December 2015, and the Four Elms Air Quality Action Plan in 2022. The Medway Air Quality Planning Guidance, 2021 has been prepared to set out the measures which will be taken to help reduce emissions which occur as a result of development proposals.<sup>30</sup> It provides advice for the design and layout of schemes and potential mitigation measures. The guidance applies across the whole borough to improve air quality and avoid worsening air quality in existing AQMAs or resulting in the designation of further AQMAs. It will be reviewed and updated in light of any specific future national and local policy changes, throughout the plan period.
- 4.10.7 It should be noted that other policies within the Local Plan will guide the location of development to reduce the need for private transport and encourage the use of decentralised, renewable energy and green infrastructure to reduce both emissions and their impact still further.
- 4.10.8 The management of air pollution is a cross border issue, and Medway will engage with neighbouring Local Authorities and seek a joint approach where necessary and/or requested.

## 4.11 Noise and light pollution

4.11.1 Development has the potential to raise noise and light pollution to unacceptable levels, which can have significant adverse effects on health, quality of life, the natural environment and ecology. They also impact on areas of tranquillity. The Council has considered tranquillity through its Landscape Character Assessment. The Council recognises the contribution of tranquillity to conserving the qualities of the Kent Downs NL.

4.11.2 In addition, light pollution can be wasted energy, and the reduction of this aligns with the Council's ambitions to address climate change.

### Noise

4.11.3 Noise can come from a variety of sources, including road, rail and air traffic, industrial processes and recreational activities and some development, for example residential development, can be particularly sensitive.

4.11.4 When considering the impact of noise, development proposals must ensure that appropriate mitigation, consistent with national and/or local policy is incorporated into designs.

### Light

4.11.5 Under the Clean Neighbourhoods and Environment Act 2005 Local Authorities have the power to classify artificial light emitted from defined premises as a statutory nuisance. Good practice advises appropriate lighting design in all development to limit these problems.<sup>31</sup> Different forms of light pollution are identified as:

- Sky Glow - the brightening of the night sky
- Light Glare - the uncomfortable brightness of a light source when viewed against a dark background
- Light Spillage - the spillage of light beyond the boundary area
- Light Intrusion – the intrusion of light into another property or sensitive area<sup>32</sup>

4.11.6 The Council refers to the Institution of Lighting Professionals Guidance Notes for the Reduction of Obtrusive Light.<sup>33</sup> Councils are advised to distinguish between the broad areas that merit different levels of light control which have been identified in Table 1. External lighting must be limited to accord with Institution of Lighting Professionals lighting guidance for this zone.

**Table 1: Levels of Light Control**

Zone	Where does this apply in Medway
E0	Not applicable
E1	KDNL, SSSI's,
E2	Countryside and villages
E3	Suburban Areas
E4	Urban Areas

4.11.7 In certain areas such as prisons and airfields, high levels of light are required for safety and security reasons. These are exempt from the statutory

nuisance regime for artificial light, so it is important for lighting design for these premises to be considered right at the outset. Proposals will still require mitigation to reduce impacts on human health, environmental, and ecological concerns.

## Policy DM4: Noise and Light Pollution

Development which generates noise and light pollution, likely to cause significant adverse impacts to health and quality of life, or significant adverse impacts to the natural environment and ecology, will only be acceptable where it can be demonstrated that adequate mitigation has been incorporated into the scheme.

It must be demonstrated that:

- There are no adverse impacts to sites of nature conservation and/or protected habitats and other vulnerable species.
- There is no adverse impact on residential amenity and the character of the surroundings.
- Where appropriate, technology and efficiency, such as motion sensors and LED lights, have been incorporated into design to reduce levels of noise and light.

A Landscape and Visual Impact Assessment will be required for proposed developments within the Kent Downs NL, North Kent Marshes or an SSSI.

Planned development, either through an extant planning permission or allocated in the Local Plan, must be considered.

Proposals must be consistent with Policy S2 through the mitigation of noise and light pollution to conserve the natural environment.

### Noise

Where noise levels are known to be high, development proposals which are noise sensitive will need to demonstrate adequate mitigation to support a good quality of life and health for all.

### Light

Proposed development that includes external lighting, or requires external lighting in connection with its operation, will be acceptable provided they demonstrate that it has been designed to minimise light glare, light trespass, light spillage and sky glow and is lit to the minimum amount necessary to achieve its purpose.

Major developments with specific lighting requirements or for those that are in or adjacent to sensitive locations will require a lighting strategy. Impact on protected species and habitats will be a key consideration to ensure there is no detrimental impact or unacceptable harm.

External lighting must comply with the Institution of Lighting Professionals standards.

4.11.8 National policy contains specific requirements to limit the impact of light and noise pollution.<sup>34</sup> The national Planning Practice Guidance (Noise) provides additional advice and links to additional relevant documents, guides and

standards to support developers on providing appropriate mitigation and assistance when considering noise pollution.<sup>35</sup>

4.11.9 Medway has a number of nationally and internationally important environmental and ecological sites and development in or affecting these areas must not cause them unacceptable harm. These have been categorised into the highest appropriate environmental zone for light pollution with a corresponding restrictive guidance to protect them. It is critical to the ongoing health of these assets that noise and light pollution is considered at the earliest stage of development.

4.11.10 Both noise and light pollution can also cause human health concerns. Therefore, even the lowest category of environmental zone in Table 1 has guidelines to ensure appropriate external lighting mitigation is incorporated into development proposals.

4.11.11 The Kent Downs NL's Landscape Character Assessment highlights the impact that noise has on the distinctive characteristic of the area, which will be protected through policies S4 and S6.

## 4.12 Green Belt

4.12.1 The Metropolitan Green Belt aims to stop the outward growth of Greater London into the surrounding countryside, towns and settlements. National policy states its fundamental aim as being to prevent urban sprawl by keeping land permanently open.

4.12.2 The Metropolitan Green Belt terminates in the west of Medway, with 4.98% of the Council's land area designated as green belt. Larger areas of contiguous green belt are located within the neighbouring boroughs of Tonbridge and Malling, and Gravesham. Although green belt is a small part of Medway's land area, it performs a significant role in that it serves to retain the strategic gap between the urban areas of Gravesend and Strood and prevents coalescence of Strood and Higham, Snodland and Halling. The Council attaches great importance to the function provided by the green belt along its western boundary with neighbouring boroughs.

4.12.3 The Council carried out a Green Belt review in 2018 to assess if land is meeting the purposes established in national policy, and to test whether exceptional circumstances justify a revision to green belt boundaries in Medway.<sup>36</sup> The review recommended largely maintaining the existing green belt designations, subject to some minor boundary amendments to reflect local features and address anomalies to provide a better defined boundary. The Council will further review this designation in advance of finalising the content of the new Local Plan.

4.12.4 The Council's position is to adhere to a policy of development being restricted in the Green Belt, in line with national policy, to ensure that the land remains permanently open.

## Policy S7: Green Belt

The Council recognises the important function of Green Belt at a local and strategic scale, in managing the urban sprawl and coalescence of settlements and maintaining the openness and permanence of the countryside.

Development proposals will be permitted only where they are in accordance with national planning policy for the Green Belt and can demonstrate that it would not undermine the functioning of the Green Belt.<sup>37</sup>

The Council will seek opportunities to enhance land for beneficial uses in the Green Belt to strengthen its function.

- 4.12.5 National policy as set by the NPPF attaches great importance to the Green Belt and its five key purposes, and although once established there is no requirement to review or change Green Belt boundaries, that boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the plan-making process.<sup>38</sup>
- 4.12.6 The Metropolitan Green Belt has served to preserve open countryside between the edge of Greater London and surrounding areas. At a local level, it has helped to separate the urban areas of Strood and Gravesend, and preserve a band of open countryside, interspersed by smaller rural settlements. This policy will help to retain this important separation and prevent coalescence, which was an evident concern in a number of comments received from previous consultations on the emerging Local Plan.
- 4.12.7 The Medway Green Belt Review assessed whether green belt land within its administrative area, meets the fundamental aim of national policy, which is to keep land permanently open, and fulfils the above five green belt purposes.
- 4.12.8 The review found that existing green belt boundaries should be maintained largely as they stand, with minor amendments to take account of boundary anomalies. The Local Plan Policies Map shows Medway's Green Belt designation.
- 4.12.9 The neighbouring boroughs of Gravesham, and Tonbridge and Malling, have both undertaken Green Belt Reviews as part of their Local Plan processes.<sup>39,40</sup> Green Belt adjacent to the Medway boundary forms part of their respective assessments. It is noted that there is a narrow gap between the urban areas of Gravesham and Medway, Snodland and Halling. Medway residents have raised concerns about potential development in neighbouring authorities eroding the Green Belt and impacting on Medway. The Council will continue to discuss Green Belt issues with neighbouring LPAs as part of the preparation of our respective Local Plans.
- 4.12.10 Medway's Green Belt provides a well-established buffer between settlements, making a significant contribution to the aims and purposes of the Green Belt as set out by the NPPF.

**Question 7: Do you consider the Green Belt boundary should be revised in line with the recommendations in the 2018 Green Belt Assessment?**

*Question 8: Do you consider that exceptional circumstances exist to justify review of the Green Belt boundary?*

## 5. Built Environment

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### 5.1 Introduction

- 5.1.1 The Council's vision is for Medway to be a location of quality development and correspondingly high-quality environments. This is key to fostering happier, healthier residents who are proud of their homes, towns and communities where they live. The Council will also seek to create a destination of choice to support businesses and employment creation.
- 5.1.2 New development should respect the area's heritage, reflecting distinctiveness across Medway, and conserving and enhancing valued aspects of the historic environment. Given the quality and diversity of Medway's heritage and the scale of development needed over the plan period, careful attention will be given to managing the historic environment and planning for high quality design.

### 5.2 High quality design

- 5.2.1 New development should provide high quality homes, employment and other activities in support of sustainable development for the long term. High quality design and attractive environments are key components of good planning; encouraging investment and economic development in an area, supporting wellbeing and social inclusion while helping to reinforce civic pride and community cohesion, along with providing and protecting an enduring built environment which people are proud of. Good design is therefore essential in achieving sustainable development and the objectives of this Plan.
- 5.2.2 Local Authorities are encouraged to prepare design codes to deliver quality and attractive environments. Medway Council has recently adopted a Chatham Design Code and the Star Hill to Sun Pier Development Framework. These two guidance documents set out detailed considerations without being overly prescriptive recognising the special characteristics of these localities and what they can offer in creating vibrancy and quality environments. Adherence to this guidance is vital for delivering quality environments in a holistic way rather than piecemeal developments that do not take account of visioning for the wider area.
- 5.2.3 The attractiveness of the Medway area (its public realm, appearance and offer) is fundamental in supporting and nurturing a stronger local economy. The Council will also seek to achieve its aims for Medway as a Dementia Friendly Community through consideration of accessible design principles in the public realm and new developments.
- 5.2.4 The scale and mix of growth proposed in the new Local Plan offers great opportunities to shape Medway's future success through excellent design that invests in infrastructure, streets, landscape, architecture and public realm and other community assets as place making, benefitting established places and creating attractive new development. The regeneration areas provide the basis for new and revitalised urban quarters and continuing the

regeneration and revitalisation of our urban waterfront areas. Strategic allocations and sites in suburban and rural Medway will be required to realise the plan's ambitions for quality, attractive, sustainable development that respects the character of the surrounding landscapes and distinct identities of our communities.

- 5.2.5 Whilst the style of buildings and their adaptability are important considerations, setting is crucial, as is the fabric and landscapes to which buildings contribute. The creation of high quality, innovative and context sensitive design developments that are well integrated with their surroundings is a key aim of this Local Plan.
- 5.2.6 Medway has a distinct local character that is derived from its rich historic environment, fabric and landscapes among other attributes. This local character creates a unique sense of place that new development should strive to reveal, protect, enhance and make relevant. In considering the design of new development, regard should be given to heritage assets, their settings, the wider historic environment and appropriate use of local vernacular materials & motifs.
- 5.2.7 The natural environment and well-designed open spaces together with a high-quality public realm and pedestrian-focussed streets and spaces play an integral role in creating a successful place. The role of the existing topography and other natural assets, landscape, and features worthy of retention within the site should be fully considered from the outset of the design process with professional experts brought on board within design teams to inform work early in the design and pre-application dialogue process.

## Policy T1: Promoting High Quality Design

Development in Medway will be of high-quality design that makes a positive contribution and responds appropriately to the character and appearance of its surroundings.

Proposals will be considered favourably, with particular regard to the following:

- High quality place making, distinctiveness and character is delivered through the scale and form of development that responds positively and respectfully to its surrounding context and sensitively reflects key characteristics and interpretations of Medway.
- The proposal demonstrates, through compliance with relevant design guides and codes, how it relates to and/or reinforces local distinctiveness and character through the use of appropriate morphologies, streetscapes, public realm and landscapes. This should include the consideration of high-quality materials, local vernacular materials where appropriate; building, public realm and landscape detailing.
- In responding appropriately to the character of the area, the proposal interprets respectfully the prevailing pattern of plot size, appropriate plot layout relating to position within proposed fabric / edge conditions, building siting, roofscapes, mass, bulk and height, and views into and out from the site.
- It must be compliant with the building heights / views policy, Landscape and Visual Impact Assessment / Townscape and Visual impact assessments

methodologies and best practice for neutral analysis of the impacted context as a baseline for understanding the site in this regard.

- Where relevant proposals achieve a transition from urban to rural that reinforces distinctiveness and respects appropriate scale at edges, field patterns and existing landscape features where possible while providing for green / blue infrastructure integration, separation to avoid coalescence where possible, distribution of higher density fabrics towards centres / inner edges and connecting Public Rights of Ways as appropriate to give full access to the countryside.
- New or regenerated fabric and landscape is sought particularly where in alignment with high level priorities of Medway Council including the declared climate emergency, BNG, tree canopy cover, tree lined streets, social cohesion, child friendly environments, health and wellbeing.
- The proposal works with the topography of the site and the inventive incorporation / use / interpretation of existing natural features.
- The proposal makes efficient use of land and is guided by a clear set of design principles that fully embrace the National Model Design Code / National Design Guide ten characteristics of well-designed places in an interdisciplinary manner demonstrated through innovative developmental / conceptual work as a route towards solutions.
- There is good connectivity and permeability that supports active travel and provides a clear user hierarchy for pedestrians, cycles, public transport before cars, ensuring streets and spaces within new developments are not overly car dominated particularly in residential developments.
- There is demonstration of provision and/or access to essential services and facilities sufficient to support existing and new growth.
- There is high quality landscaping, public art and areas of public realm that make use of / or retain features considered relevant / important by the Council, including the integration of art & play where possible, integration of SUDs with landscape areas and demonstrating clear linkages / contribution toward green infrastructure assets and networks.
- Proposals include measures to mitigate and adapt to climate change.
- It protects existing trees where possible and establishes new trees and other landscape features such as hedges that collectively help create an attractive, welcoming, and healthy place to live, work and visit and contribute toward ecosystem benefits in support of climate change and sustainability.
- It protects and where possible enhances the historic environment and heritage assets.
- The proposal respects the amenity of neighbouring uses through consideration of light levels, overshadowing, overlooking, loss of privacy, visual intrusion, appropriately designed car parking and ensuring minimal impact so that development does not result in or is exposed to excessive noise, vibration, fumes or light pollution.
- The proposal creates a safe environment including but not limited to during the operational phase of the development but also ensures full remediation of brownfield sites to appropriate standards for re-use.
- There is the establishment of healthy communities and well-balanced neighbourhoods that encourage social interaction and inclusive environments that create a sense of belonging.

- The inclusion, design and thoughtful use of shared spaces in housing developments may be used to create an environment which is supportive of social connection and encourage more incidental encounters.
- Supporting healthier and more active lifestyles by designing health and wellbeing into place and producing designs and layouts for accessible and adaptable homes (ensuring homes are suitable for lifetime living).
- The scheme provides for discreet provision of utilities including lighting, electricity and water systems but which have easy access for maintenance purposes.
- All development demonstrates sustainability criteria, such as at least meeting a Building Research Establishment Environmental Assessment Methodology (BREEAM) standard of 'Very Good' for both energy efficiency and water efficiency, Biodiversity 2020, Building with Nature Standards which define "what good looks like" covering the themes of wellbeing, water and wildlife and other references.

The Council would expect compliance with the principles of nationally recognised standards and Building Regulations (M4), so far as practicable, across all proposed new developments.

5.2.8 The NPPF places great emphasis on place making, beauty and quality design. This is reinforced by the aims and ambition of Medway Council. National planning policy requires good design as a key aspect of sustainable development. It directs local planning authorities to develop robust and comprehensive policies that set out the quality of development that will be expected for the area.

5.2.9 Additional design guidance such as site-specific development briefs, masterplans, Building Height / View Policies, supplementary planning documents, National Model Design Codes, National Design Guide, Conservation Area Appraisals, Conservation Area Design Guides, and the Kent Downs AONB Management Plan and supporting guidance should be consulted as part of the design process where appropriate.

5.2.10 Recent times have highlighted the need to create healthy places where people can spend considerable time living and working within their home but also enjoy surrounding streets and open spaces for the benefit of their own physical and mental health.

5.2.11 Much of Medway has a very built-up character in contrast to the rural Hoo Peninsula and Medway Valley, with varied character in between. A generic policy approach will not suffice as it will need to factor in the local context and dynamics. A sensitive approach is needed in creating sustainable and desirable communities and homes that respond to residents' needs.

5.2.12 Medway's built-up areas have limited green spaces, particularly in some locations, which are desirable for creating healthy and desirable places to live and work. Proposals will need to ensure these aspects are carefully factored in, in addressing Medway's needs.

## 5.3 Housing design

5.3.1 Achieving adequate residential standards remains a key planning objective for the Council, especially given the scale of growth envisaged for Medway. It is important that new development is designed to ensure long-term social and economic sustainability, continuing the quest for lifetime homes and to reduce future obsolescence in the face of changing economic, demographic and social trends.

5.3.2 The Impact Statement carried out with regard to the introduction of the Medway Housing Design Standards (MHDS) in 2011 provided evidence of the need for external space standards reflective of Medway's local context.

5.3.3 The Council will continue to expect that the internal floor areas of dwellings submitted for planning permission are adequate, and will use the Nationally Described Space Standard as guidance on this matter, supporting existing policy relating to amenity.

5.3.4 Following consultation, the MHDS, sets out similar requirements to the National Standards. This work included an extensive 'impact assessment' that demonstrated that the MHDS was not unduly onerous and that it would not have an undue impact on the quantum of development that could be achieved in Medway.

5.3.5 In addition the MHDS has specific standards on the following topics, which developers should continue to adhere to:

- shared outdoor amenity space;
- shared access and circulation;
- cycle storage, refuse and recycling;
- management – landscape / public realm Landscape Management Plans (LMP) are crucial to sustaining residential placemaking over time;
- visual privacy and private outdoor space; and
- environmental comfort.

5.3.6 Housing choice, flexibility and attractiveness are key considerations for people wishing to live in the area. The creation of functional spaces and the adaptability of a home will provide a better opportunity to secure long term occupation, i.e. lifelong homes. In a changing environment with greater emphasis on climate change and supporting people to be able to carry out their day-to-day activities, the adaptability of a dwelling is also important.

5.3.7 Special consideration will be needed in areas of historic value such as the area between Star Hill to Sun Pier. Guidance in the Star Hill to Sun Pier Development Framework will be a material consideration and offers an overarching framework to guide development in this sensitive and complex area. Further design guidance for the centre of Chatham is provided in the Chatham Design Code.

### Policy DM5: Housing Design

New housing developments must provide good living conditions for future occupants with high quality, robust, adaptable housing, inclusive and functional

spaces that respond to changing resident needs throughout their lives and support the undertaking of necessary day to day activities.

All new accommodation must, in addition to the general design policy above (T1):

- As a minimum meet the relevant nationally described internal space standard for each individual unit.
- As a minimum meet the MHDS for external spaces including shared outdoor amenity space, shared access and circulation, cycle storage, refuse and recycling, management, visual privacy and private outdoor space, environmental comfort.
- Incorporate dementia friendly standards where required.
- As a minimum requirement, the provision of sufficient natural light must be met to meet healthy living standards:
  - Limited single aspect homes will be considered favourably, i.e. no more than 5% north facing single aspect homes within any one development will be considered.
  - No ground floor single aspect north facing homes will be considered at all.
  - British Standards methodologies to establish the validity of solutions must be used.
- Provide a convenient and efficient layout, including sufficient circulation space and avoiding awkward or impractically shaped rooms, unless there is justification for doing so on the basis of significant design quality gain.
- Demonstrate sufficient space for storage and clothes drying.
- Demonstrate how developments have been designed to respond to the importance of trees within streets and developments as set out in national planning policy.
- Are informed by a contextual analysis (including a clear and particular attitude to the place) of key character traits that contribute to local distinctiveness. Well-defined character areas which individually and collectively create a strong sense of place and as a whole presents development that is clearly differentiated from other places across Medway.
- Encourage the use of natural features such as green walls/roofs/hedges/roof top gardens etc to enhance sustainability and BNG and contribute to the health and wellbeing of residents.
- Demonstrate how measures for recycling and refuse storage have been built into the overall design and fabrics of proposed accommodation to maximise recycling but without detrimental impact to the street scene/character of an area.
- Design for flexible living, successful places are robust and support 'long-life and loose-fit' neighbourhoods that are flexible and adaptable to rapidly changing circumstances. The physical and social infrastructure provision required to create sustainable communities have been considered.

5.3.8 The NPPF emphasises the importance of good design and achieving well designed places to create high quality, beautiful and sustainable buildings. This recognises that the quality of housing that has been delivered through the planning process over the last 50 years has not generally been of the highest or sufficient quality both externally and internally and has not created

the special places that most people aspire to live in. There is also the need to create homes that are future proof and will both meet sustainability challenges but are also adaptable to the changing needs of the occupiers.

5.3.9 Through the introduction of the Nationally Described Space Standard (2015) which lays down minimum internal floor areas for dwellings, the Government has established that residential amenity and adequate space within homes is a planning concern.<sup>41</sup> It is important that space standards in homes are sufficient for people's needs.

5.3.10 Mental health is also a big priority. Ensuring that people have the minimum requirements for a healthier life are fundamental and this includes simple requirements such as access to sufficient daylight, access to greenery, space for storage and drying clothes. The quality of the home and the surrounding external space is vital in ensuring places are healthier for people both for their mental and physical health.

5.3.11 Ensuring self-sufficiency and introducing sustainability considerations also assist in creating a better environment, which in turn supports healthy minds and independent individuals that can be economically active.

## **5.4 Sustainable design and construction**

5.4.1 Sustainability is at the heart of planning and with the impacts of climate change being more widely recognised, the approach to development needs to be carefully considered at all stages. Planning can make a fundamental difference in influencing development from the infancy of a plan built-in with principles of sustainability and due regard to climate change and its contributing factors. Consideration of these factors in the built environment occurs during the design process. Wherever possible, new developments should incorporate mitigating measures as part of their design, construction and occupation resulting in minimal impact on the environment.

5.4.2 The environment is incapable of keeping up with the current consumption patterns of natural resources, which has an impact from large scale business and economies to local High Street businesses and down to each individual person. Actions to introduce the circular economy uses (making better use of recycled materials or locally sourced materials) will contribute to the collective aim of sustainability and resource maintenance/preservation.

5.4.3 New homes currently must meet a national Building Regulations standard for water efficiency of 125 litres/person/day. New residential development in Medway must meet the buildings regulations.

5.4.4 The BREEAM provides a nationally recognised standard for the sustainable design of non-residential development. Where relevant (not all non-residential schemes will be able to meet the BREEAM targets) non-residential development should meet a 'Very Good' BREEAM standard in terms of both energy efficiency and water efficiency.

5.4.5 Should the BREEAM standards be replaced, or any other national standards increased, the equivalent standards of the replacement scheme should be used. The voluntary use of sustainability assessment tools for residential development will also be encouraged.

5.4.6 Buildings are significant contributors to carbon emissions, so it is essential to ensure that all developments are contributing to reducing the impact of climate change and to meeting carbon net zero emissions. Maintaining, repairing, reusing and adapting existing buildings to enable their continued use is one of the most effective ways to reduce carbon emissions and unnecessary waste. The whole life cycle of a building should be considered. When preparing proposals that incorporate heritage assets, applicants are expected to consider the latest Historic England (or successor body) advice such as that contained in the Climate Change and Historic Building Adaptation Historic England Advice Note.<sup>42</sup>

5.4.7 Medway Council's guidance through the Chatham Design Code and Star Hill to Sun Pier Development Framework will also inform development proposals in those specific areas where relevant.

## Policy DM6: Sustainable Design and Construction

All new forms of development, residential, commercial or other, should aim for high standards of sustainable design and construction.

Proposals for development must as a minimum:

- Set out, where relevant how proposals adhere to Building for a Healthy Life.
- Include with the planning application, details of how the proposals will address matters of sustainability both through the construction phase and once completed via submission of a construction management plan and design considerations.
- This should include design principles founded on locally sourced and/or recycled materials.
- Any submission must include details of how it seeks to address energy efficiency to meet building regulations and meet the higher national water efficiency standard of 110 litres/person/day for residential development where possible.
- Any submission must include details of how the proposal is seeking to address the climate emergency with an aim to achieve or aspire to net zero carbon with due regard to Medway's current Climate Action Plan and Corporate Strategy. The whole life cycle of a building should be considered.
- Where relevant any submission must demonstrate how it will meet a very good BREEAM standard for water and energy for non-residential development proposals.
- All residential proposals shall detail how they are seeking to facilitate working from home within the design including access to high-speed broadband/internet.

5.4.8 NPPF has achieving sustainable development as a central theme running throughout and places an emphasis on place making, sustainable design and sustainability. There are specific sections on achieving well designed places, promoting sustainable transport and meeting the challenge of climate change. There is an increased emphasis on thinking locally and managing

local impacts. The Policy also supports the One Medway Council Plan and Climate Change Action Plan.

## 5.5 Shopfront design and security

- 5.5.1 Medway has many historic buildings that are now in retail or commercial use. Often shopfronts have been inserted into the building to facilitate a retail or commercial use or were included as part of its original design.
- 5.5.2 The design of shopfronts has evolved over time, but the basics of their form has remained the same. Across Medway there are good surviving examples of shopfronts displaying various architectural styles and from different periods.
- 5.5.3 Shopfronts have an important role in enhancing the vibrancy and vitality of a place and add to the overall street scene. They also can contribute to the significance and character of heritage assets.
- 5.5.4 There is a presumption for the retention of historic shopfronts where they exist.
- 5.5.5 Development proposals for a new shopfront should ensure that they sensitively integrate into the building and the street scene through the use of high-quality materials, an appropriate design, and respecting the proportions of the building.
- 5.5.6 For any proposals for shopfronts, regard should be given to relevant adopted Design Guidance.
- 5.5.7 Standard corporate designs for signage and advertising may need to be adapted in order to respect the character and appearance of the area, particularly on historic buildings or in Conservation Areas.
- 5.5.8 For works impacting heritage assets, policy S8: Historic Environment and DM9: Heritage Assets will also apply.

### Policy DM7: Shopfront Design and Security

Proposals which would result in the loss of shop fronts of traditional design or materials, and which contribute to the character and appearance of an area, will not be permitted.

Proposals for new commercial or retail frontages should:

- Respect the character, scale, and appearance of the building.
- Incorporate fascias and any additional features which are in proportion to the elevations of the existing building and which avoid obscuring any existing architectural details.
- Complement the positive or historic character of the surrounding area.
- Ensure that any security grilles or shutters demonstrated to be necessary, are designed to be an integral feature of the frontage and maintain a shop window display.

Where illumination is required, it should be restrained, unobtrusively sited, and in context with the building and the wider area.

5.5.9 Insensitively designed shopfronts can detract from the street scene and adversely impact the local distinctiveness and character of an area. This can arise through such elements as inappropriate materials, poorly sized signage (often too large), lighting, security measures (such as roller shutters) poorly replicated historic details, or where the shopfront does not conform to the proportions of the building.

5.5.10 To help provide clarity on shopfront design, signage, and security, a range of design guidance notes have been published by the Council:

- Guide to Good Practice in Shopfront Design.
- Shopfront Advertising Guide.
- Shopfront Security.<sup>43,44,45</sup>

5.5.11 External roller shutters will rarely be considered acceptable due to their detrimental impact on the street scene. There may be exceptional circumstances for their use however and justification would need to be clearly set out in a development proposal and their design integrated into the building, as described in the adopted Shopfront Security Design Guidance.

## 5.6 Advertisements

5.6.1 Advertisements and signs need to be visible to attract attention or convey information. If they are insensitively designed in relation to their context or position, they can appear overly dominant and incongruous, adversely impacting the street scene.

5.6.2 Applications for advertisements and signage should be designed with reference to the impact on amenity and public safety, within the context of the character of an area, taking account of any historic, architectural, or other features of relevance.

5.6.3 Applications for illuminated advertisements and signage should demonstrate that the use of lighting is restrained, unobtrusively sited, and in context with the building and the wider area.

5.6.4 Advertisements and signage on heritage assets should be kept to a minimum to help preserve or enhance the character and significance of the asset. Policies S8: Historic Environment and DM9: Heritage Assets will also apply.

### Policy DM8: Advertisements

Proposals for the display of advertisements and fascia signs will be permitted unless:

- their scale, size, design, materials, or illumination would be detrimental to the character and appearance of the land or buildings on which they are to be displayed or of the surrounding area; or
- they result in visual clutter or are excessive in size or number; or
- their siting on a building extends above ground floor fascia level and fails to respect architectural features or the original divisions of the property; or
- the sign constitutes a road safety hazard which would be likely to distract, confuse or obstruct the vision of road users.

For heritage assets advertisements will not be permitted if their design, materials, size, colour, or siting adversely impacts the significance of the heritage asset or its setting.

- 5.6.5 The policy has been drafted to prevent signage from adversely impacting the street scene, particularly in conservation areas or other areas with sensitivities.
- 5.6.6 The display of advertisements is subject to a separate consent process within the planning system. This is principally set out in the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (as amended). There are three categories of advertisement consent set out in the Regulations:
  - Those permitted without requiring either deemed or express consent from the local planning authority;
  - Those that have deemed consent; and
  - Those that require the express consent of the local planning authority.
- 5.6.7 Policy DM8 will only apply to those applications requiring consent.

## 5.7 Historic environment

- 5.7.1 The historic environment is an irreplaceable resource that lies at the heart of the character of Medway, contributing to its local distinctiveness and helping to articulate the unique sense of place. It also contributes positively to wider Council objectives, such as tourism, education, leisure, regeneration, economic development, planning and urban design, sustainability, and health and wellbeing. The creation of a clear and positive strategy for the historic environment will help support the Council's commitment for the continued conservation and enhancement, and enjoyment of Medway's rich heritage.
- 5.7.2 To appropriately integrate heritage into planning policy and decision making, policies relating to the historic environment should be read in conjunction with other policies within the Local Plan, such as those relating to heritage assets, design, landscape, trees, and transport, along with any relevant SPDs and published Guidance.

### Policy S8: Historic Environment

To ensure the continued contribution that the historic environment brings to Medway, the Council remains committed to the conservation, enhancement and enjoyment of the historic environment; including the heritage assets and their distinctiveness and characteristics. This will be achieved through:

- Delivering on the heritage objectives set out in the Medway Heritage Strategy and national planning policy guidance.
- Encouraging development that maintains and enhances the significance of designated and non-designated heritage assets and their settings.
- Ensuring that all new development positively contributes to local distinctiveness and character.

- Encouraging development that makes sensitive reuse of heritage assets consistent with their conservation, particularly where they are vacant or redundant, and especially if they are considered to be 'at risk' on national and local registers.
- Working positively with stakeholders and other partners on heritage initiatives, including bids for funding.
- Promoting the enjoyment, access and interpretation of heritage assets that deliver wider community educational, health and well-being benefits.

5.7.3 The NPPF requires a positive strategy for the conservation and enjoyment of the historic environment which this policy provides.<sup>46</sup>

5.7.4 To help deliver the Council's commitment to the historic environment, the Medway Heritage Strategy has been produced in support of the Medway Local Plan. The Heritage Strategy builds upon the findings of Medway's Heritage Asset Review (published in 2017), culminating in the establishment of a set of strategic objectives:

- Objective 1: Conserve and enhance Medway's heritage assets.
- Objective 2: Work with Medway's heritage assets to help deliver sustainable development.
- Objective 3: Increase the understanding and community involvement with Medway's heritage assets.

5.7.5 Collectively the objectives of the Heritage Strategy provide a framework for how Medway Council intends to conserve, enhance and enjoy the historic environment both in the immediate and long-term future.

5.7.6 Further advice and additional resources for Medway's historic environment can be sought by contacting Medway Council's Planning Service.

## 5.8 Heritage assets

5.8.1 The conservation and enhancement of the historic environment is of great importance as it plays a substantial role in place-making, as well as making a positive contribution to local character and distinctiveness.

5.8.2 Medway currently benefits from over 600 Listed Buildings, many of which concentrated around the Historic Dockyard Chatham, Brompton, and Rochester. Whilst being of heritage value in their own right, Listed Buildings also contribute to the delivery of a range of social, environmental and economic benefits, as well as adding to the character of the area.

5.8.3 Historic parks and gardens make a considerable contribution to the character, history, and setting of an area. They can also play an important role to biodiversity and the environment too.

5.8.4 Medway currently has 3 Registered Parks and Gardens (that are wholly or partly in Medway) included on the National Heritage List for England, whilst many others are considered to be of local heritage importance and therefore Non-Designated Heritage Assets.

- 5.8.5 There are many heritage assets in Medway that currently do not meet the criteria to be nationally designated; however, they often display local heritage significance that requires consideration in planning decision making.
- 5.8.6 Local Heritage Lists play an essential role in building and reinforcing a sense of local character and distinctiveness, as well as providing the means for creating a record of non-designated heritage assets and enabling entries on the list to be better taken into account in planning decision making.
- 5.8.7 Medway Council does not currently have a Local Heritage List but has the ambition to establish one in partnership with the local community, and in-line with Historic England's guidance on Local Heritage Listing.
- 5.8.8 Currently Non-Designated Heritage Assets are identified by the Council through area-based Planning work such as Conservation Area Appraisals and Design Codes, and also through the Planning and Development Management processes.

## Policy DM9: Heritage Assets

Development that impacts a heritage asset, or its setting, should achieve a high quality of design which will conserve or enhance the asset's significance and setting.<sup>47</sup>

Where development impacts upon a heritage asset, or its setting, a Heritage Statement proportionate to the significance of the asset must be submitted as part of the application. For historic Parks and Gardens this must include consideration of the landscape architecture, the setting of the historic buildings within or associated to it, along with its visual amenity and wider setting. Where applicable, an Archaeological Assessment and/or Management Plan may also be required.

Development that causes the loss or substantial harm to the significance of a heritage asset will only be permitted where it can be demonstrated that substantial public benefits will result that outweigh the harm or loss.

The demolition or other loss of a heritage asset will not be permitted unless it can be demonstrated that there are exceptional and overriding reasons; and that all possible methods of preserving the asset have been exhausted. In the exceptional circumstances where the loss of a heritage asset can be fully and robustly justified, the developer must make information about the heritage asset and its significance available to the Council, along with making it possible for any materials and features to be salvaged.

Should permission be granted for demolition or loss of a heritage asset, all or in part, works will not be permitted to commence until it is proven that replacement development will proceed.

Development proposals shall demonstrate:

- Having met legislative requirements for Designated heritage assets
- Adherence to advice set out in government historic environment policy and guidance, including Historic England Conservation Principles, Historic England Good Practice Advice Notes and Historic England Advice Notes.

- Compliance with any relevant published Council resources that address the historic environment, such as Conservation Area Appraisals, SPDs, and Design Codes.
- Submission of an assessment of how the proposal relates to the local distinctiveness and character of the area.
- In the case of historic parks and gardens, improvements for public access.

Proposals will be supported where a heritage asset is brought back into use consistent with its conservation requirements and ambitions.

To help ensure the delivery of high-quality development and to be able to fully assess the impact of a development, proposals should be submitted as full applications when they are within, or would affect, a Conservation Area.

5.8.9 The NPPF provides a range of guidance for delivering sustainable development and the historic environment with specific regard to 'heritage assets' as both designated assets, and any non-designated assets identified by the Local Planning Authority.<sup>48,49</sup>

5.8.10 Medway benefits from some of the region's most celebrated heritage assets, many of which are recognised through inclusion on the National Heritage List for England, such as Scheduled Ancient Monuments, Listed Buildings and Registered Parks and Gardens. Furthermore, there are a range of non-designated heritage assets including buildings and structures of local importance, historic landscapes, parks and gardens, development patterns, valued views and vistas, and archaeological sites.

5.8.11 A number of designated heritage assets in Medway are identified on the annual Historic England Heritage at Risk Register to be 'at risk' through neglect, decay or other threats. Medway Council intends to supplement Historic England's register with its own that will cover a broader range of heritage assets than those currently included. Heritage assets considered 'at risk' on both national and local registers will be monitored by the Council, who will seek to bring them back into sensitive and sustainable use and/or into a good state of repair.

5.8.12 The Medway Heritage Asset Review published in 2017 identifies a range of themes that are considered key factors contributing to the local character and distinctiveness. The Medway Heritage Asset Review provides a starting point for an overview of Medway's historic environment, however there are a range of other published resources that should be consulted as part of development proposals.

5.8.13 The Planning (Listed Buildings and Conservation Areas) Act 1990 provides specific protection for buildings and areas of special architectural or historic interest.

## 5.9 Star Hill to Sun Pier

5.9.1 Medway Council was awarded funding for revitalising the lower High Street which extends from Star Hill in Rochester through to Sun Pier in Chatham and is known to locals as 'Chatham Intra'. This area has a vast amount of

historic and conservational interest and has the potential to provide a unique offer to Medway and has been awarded a HAZ designation.

5.9.2 Medway Council will seek to-re-establish this area as a social, cultural and retail destination, which will support small to medium sized businesses and social enterprises. The HAZ area is an ideal location for embracing the creative sector – a key economic driver.

5.9.3 Medway Council has prepared and adopted the Star Hill to Sun Pier Development Framework (SPD) to provide considered guidance for future development in the designated area to achieve a balance between preserving and enhancing the historic character of the area. It considers the River Medway; the High Street and adjoining areas; movement and transport; and sustainability amongst other more detailed considerations. The SPD will be a material consideration for development proposals that fall between Star Hill and Sun Pier.

### Policy S9: Star Hill to Sun Pier

The Star Hill to Sun Pier Development Framework includes the Star Hill to Sun Pier Conservation Area and is designated as a HAZ. The Star Hill to Sun Pier Development Framework aims at re-establishing the area as a social, cultural and dynamic destination whilst preserving and enhancing the special historic interest and character of the neighbourhood.

Planning applications will be supported where compliant with the Supplementary Planning document adopted in 2024.

5.9.4 This area has long been an area of interest and potential, and the subject of research and planning guidance work. It is a key opportunity area in which to deliver the Council's ambitions, celebrating the area's heritage and delivering on the cultural strategy. With the HAZ funding award, the Council has worked with local communities and wider stakeholders to gather evidence and knowledge to inform a new development framework to guide future proposals.

## 5.10 Conservation areas

5.10.1 The Conservation Areas in Medway exist to protect and manage features of special historic and architectural interest that are desirable to preserve and enhance. Conservation Areas are particularly sensitive to change, with their character and distinctiveness easily damaged by new development and other changes, such as minor alterations to buildings, signs and traffic. Medway currently has 24 Conservation Areas, for each of which the Council intends to produce a Conservation Area Appraisal to examine the key features that contribute to their special historic or architectural interest.

5.10.2 The special historic and architectural interest of a Conservation Area is not limited to the buildings contained within. Other features such as the setting, open spaces, trees, street furniture, roads and footpaths, areas between and

around buildings, and views to, from and within a Conservation Area are also often as important as the buildings and areas themselves.

## Policy DM10: Conservation Areas

Development within a Conservation Area will only be permitted where it contributes positively to the conservation or enhancement of the character, appearance and distinctiveness of the area.

Any proposals for development within a Conservation Area must demonstrate that they:

- Respond positively and sensitively to the Conservation Area Appraisal (where they have been prepared) and reveal its significance.
- Have due regard to the setting of the Conservation Area.
- Respect the historical and architectural interest of the area.
- Use materials and details that are appropriate and sympathetic to the locality and existing buildings.
- Retain historical and architectural features of the area.
- Remove features that detract from the character of the area.

5.10.3 The NPPF sets out what is to be taken into account when determining applications which includes positive contributions to the area and revealing its significance.<sup>50</sup>

5.10.4 In addition, the Council has prepared a number of Conservation Area Appraisals which assess the impact on the Conservation Area's special interest, character and appearance and are a material consideration in decisions affecting the area.

*Question 9: Should this policy be broadened out to areas adjacent or near to Conservation Areas rather than only within? If so, please explain why.*

## 5.11 Scheduled monuments and archaeological sites

5.11.1 There are currently 80 Scheduled Monuments in Medway, as well as numerous important archaeological sites and areas of known archaeological potential.

5.11.2 Scheduled Monuments are afforded a high level of protection through the Ancient Monuments and Archaeological Areas Act 1979.

5.11.3 There is a presumption against development proposals that would adversely impact a Scheduled Monument or its setting.

5.11.4 Some archaeological sites in Medway are not currently designated as Scheduled Monuments but may be of comparable significance and therefore should be treated as such.

5.11.5 The potential for archaeological remains will need to be taken into consideration in development proposals. On sites where there is potential for archaeological remains, we would encourage applicants to consult both the

local planning authority and the County Archaeologist at Kent County Council at an early stage, preferably as part of a pre-application.

5.11.6 Applicants will need to demonstrate that archaeology has been adequately assessed as part of a development proposal, and a detailed written archaeological assessment may be required to be submitted with an application for development.

## Policy DM11: Scheduled Monuments and Archaeological Sites

Development that adversely affects Scheduled Monuments and/or their setting, and other important archaeological sites will not be permitted.

Where development impacts or has the potential to impact heritage assets with archaeological interest, a desk-based assessment, or where appropriate, a field evaluation may be required.

Where development is permitted that affects a heritage asset with archaeological interest, there will be a preference for the preservation in-situ of the archaeology. In instances where the preservation in-situ is not possible or justified, the developer may be required to make provision for the archaeological excavation and recording to be undertaken by an approved archaeological body and in accordance with a specification and programme of work to be submitted to and approved by the Council.

5.11.7 Legislation (as noted above) recognises the importance of and provides protection to Scheduled Monuments. National planning policy supports this approach, with substantial harm to scheduled monuments being wholly exceptional, and any harm to heritage assets needing to be justified in the planning application.

5.11.8 This approach provides for the potential of archaeological remains to be acknowledged and investigated and also gives the appropriate level of protection for Scheduled Monuments and heritage assets with archaeological interest on sites in Medway.

## 6. Housing

### 6.1 Introduction

6.1.1 Medway experiences many of the same housing issues seen across the country, with rising costs of housing placing significant pressures on people. House prices have risen by over 23% in the last five years. Many people cannot afford to gain access to the 'housing ladder' and also face issues of availability and rising costs in the private rented sector. There has been a marked increase in homelessness requests in the last three years and greater use of Temporary Accommodation to support people. Increasing cost of rents in the private sector are exacerbating the problem. We also have areas of poor housing, where standards are low, and do not provide for a safe and healthy home. Poor quality housing impacts on people's health, such as worsening respiratory illnesses in damp homes. Some of these poor-quality homes have been provided through conversions under Permitted Development Rights, where they do not have to meet the normal requirements of a planning application for housing.

6.1.2 A primary purpose of the new Local Plan is to meet the needs of Medway's communities for housing. The Council is using the government's Standard Method for calculating Local Housing Need. As of March 2024, this is defined as 1,658 homes a year. We are using this as a basis to identify the land needed for housing over the plan period, to understand the scale of growth anticipated in Medway. The Strategic Growth Options set out in section 3 of this document seek to meet that scale of housing growth in Medway by 2041. The Council continues to update its evidence base and assessment work to inform the final content of the Local Plan. The next stage of the Local Plan (the Pre-Submission Draft Plan) will include specific policy on the scale, distribution, mix, and phasing of housing. The policies presented here for consultation provide an indication of the preferred approach and the current evidence base.

### 6.2 Housing mix

6.2.1 Accommodation standards and affordability impact on the quality of life of Medway's residents including their health and wellbeing. As Medway's population grows and changes, we need to ensure that we plan for the right mix of housing, reflecting the size of households and the demographics of our communities. Provision must be made to encourage socially mixed, sustainable communities with a sufficient choice and mix in the size, type and location of housing. The wide range of different households includes single households, families with children and older people. Our evidence base for the Local Plan includes a Local Housing Needs Assessment (2021) (LHNA) that considers the make-up of Medway's communities, projected forward over the plan period.<sup>51</sup> The Council will update this evidence before finalising the plan to accurately reflect needs in our planning policies for housing.

6.2.2 A key strategic objective of this Local Plan is to provide for the range of housing needs of Medway's communities. The needs of specific groups are reflected in our proposed policies. This is in line with national planning policy. The proposed policies below reflect our current thinking and evidence base, and we welcome comments through this consultation.

## Policy T2: Housing Mix

The Council seeks to ensure that a sufficient range of sustainable housing options are provided to adequately meet the needs of a growing and changing population.

Residential development will only be permitted if it encourages a sustainable mix of housing that includes an appropriate range of house types and size to address local requirements, as evidenced through the Medway LHNA, or updated reports.

The mix must be appropriate to the size, location and characteristics of the site as well as to the established character and density of the neighbourhood.

Accommodation requirement as detailed in the latest Local Housing Need Assessment will be used to help inform which house sizes and mix should be delivered in key locations in urban and rural areas to meet the objectively assessed needs of Medway as detailed in the latest evidence.

In relation to affordable housing, the Council will require developers to provide details of how this evidence has been used to justify the proposed mix.

Where affordable housing is to be provided, developers should also take into consideration the needs of households on the Council's housing register and discuss affordable housing requirements with the Council's Housing Strategy team at the pre-application stage of the planning process.

Development schemes must demonstrate that sufficient consideration has been given to custom and self-build plots as part of housing mix.

6.2.3 Research on Medway's housing market shows that there is a need in Medway for all types and sizes of new homes. Dwelling mix analysis linked to demographic/household change in the 2021 LHNA supports a housing mix as set out below:

- Tenure mix - An overall tenure split of around three-quarters of units offered as market housing is required, with the remainder split between affordable/social rented and affordable home ownership, including First homes.
- Dwelling type mix – Analysis indicates a need for houses to provide around two thirds of new housing supply across all tenures, with flats and bungalow/level access accommodation to make up the remainder.
- Dwelling size mix - demographic analysis suggests a requirement range for between forty and forty-five percent of dwellings as two bed units, twenty-five to thirty percent of units as three-bed, fifteen to eighteen percent of units as four bed and between fifteen and twenty percent of units as one beds.

**Question 10: Do you think this policy provides effective guidance on the required housing mix in Medway?**

## 6.3 Affordable housing

6.3.1 As well as supplying a sufficient number of homes, Local Plans are required by national planning policy to make provision for affordable housing. With the cost of living pressures on our communities and escalating housing prices, there are many people in Medway who are priced out of the housing market.

6.3.2 Affordable housing in this policy refers to housing for rent or sale for households whose housing need is not met by the open market. It encompasses a range of options: affordable housing for rent, starter homes, discounted market sales housing and other affordable routes to home ownership.

6.3.3 The Government's First Homes scheme ensures that First Homes – unlike starter homes – will be sold with a minimum discount of 30 per cent off the market price. They are available via conventional mortgage products and when sold on the discount will be passed on to the new owner with the discount applied to the new value following an independent valuation. Homes will always be sold below market price and local communities will benefit for generations to come, with local authorities continuing to allocate these homes to first-time buyers and able to prioritise households with a local connection. First Homes are not allowed to be used as holiday homes or as buy to let properties.<sup>52</sup> The Council has set out guidance in a First Home Position Statement.<sup>53</sup>

6.3.4 The One Medway Council Plan, 2024 identifies Living in Good-Quality, Affordable Homes as a key priority.<sup>54</sup> The implementation of the Local Plan contributes to this priority, with a plan that reflects the needs of the communities in Medway, supporting a transition to a low- carbon future promoting affordable, energy efficient and sustainable homes. To meet this priority, a range of homes should be made available across a range of budgets.

6.3.5 National planning policy states that affordable housing should not be sought for residential developments that are not major developments.<sup>55</sup> Our proposed policy therefore states that all sites of 10 or more units shall be required to provide affordable housing.

6.3.6 To understand the need and appropriate levels of affordable housing required the authority has developed a significant evidence base to support the Local Plan and this policy. Two documents are key to this work - the Local Housing Need Assessment (LHNA) and the Local Plan Viability Assessment.<sup>56</sup> The Viability Assessment considers the level of affordable housing that can be provided, ensuring that development is deliverable and meeting policy requirements. Both documents have been prepared on an iterative basis to support the preparation of the Local Plan and will be further updated to inform the content of the next version of the plan as the Pre-Submission Draft Plan. The last Viability Assessment was produced in January 2022. The Council recognises that there have been some changes

in the development market since that time, and the range of specific strategic sites and locations tested in the document may not reflect the Council's latest position on a preferred indicative spatial strategy. However, the assessment provides a basis against which to consider the proposed policies that we have set out for consultation. The Council welcomes comments on the Viability Assessment and how its findings have been used to inform emerging policies.

6.3.7 The LHNA sets out the level of demographic need for housing amongst key groups, one of which is those seeking affordable housing. The Viability Assessment tests the economic impact of policies within the local plan and financial viability of proposed development in Medway. These documents are used in conjunction to set an appropriate affordable housing requirement.

## Policy T3: Affordable Housing

All developments in Medway of 10 or more residential units (net) will require the delivery of affordable housing.

The level of affordable housing required is informed by the Local Plan Viability Assessment, which distinguishes between high value and low value/marginal areas. In line with the viability evidence, the requirement will be for:

- In high value areas, including the Hoo Peninsula and suburban greenfield sites, 30% of all residential units proposed.
- In lower value areas, such as brownfield inner urban sites, 10% of all residential units proposed.

When delivering affordable housing it is required to:

- Be provided and retained for an affordable use in perpetuity.
- Be designed to be indistinguishable from the market housing on site.
- Be of the same size and scale as market housing.
- Avoid being visibly distinguishable as different from the wider neighbourhood and be delivered across the site where appropriate.
- Reflect the latest tenure mix as set out in the Local Housing Need Assessment as detailed below:
  - 51% social/affordable rented housing.
  - 49% affordable home ownership including First Homes.

Delivery of affordable housing should be on site in the first instance. If this cannot be achieved, then an alternative approach will need to be robustly justified. The local context and demographics will be a key consideration. The following delivery sequence should be followed to justify any alternative approach:

- A change in the tenure mix on site to facilitate delivery.
- Delivery of the required units on a separate site.
- An agreement with a registered provider to deliver the units off site.
- Only if both on-site and off-site delivery is demonstrated with robust justification not to be achievable should consideration then be given to a financial contribution provided to the Council to the equivalent value of the onsite provision to allow for offsite delivery.

A viability assessment in line with national policy and guidance should be submitted to the Council to be independently verified if the affordable housing proposed does not meet that which is required.

- 6.3.8 In Medway there is a significant need for affordable housing. The LHNA, 2021 identified a need of 55% of housing to be delivered as affordable units. However, such a requirement needs to be deliverable by demonstrating the viability of such a policy. Evidence from the Viability Assessment was applied to identify an achievable policy requirement.
- 6.3.9 The affordable housing element of the housing supply can be split further into the following tenures. 39% to be social rented, 21% to be affordable rented, with the remaining 40% as affordable home ownership, split as 25% First Homes and 15% 'other' affordable home ownership.
- 6.3.10 The Council has commissioned viability assessment work as part of the evidence base for the new Local Plan. This work has included consideration of the level of affordable housing that could be supported across different types of development and locations. The assessment showed that different rates of affordable housing contributions could be made between the higher value areas, such as greenfield sites, and lower value areas, such as inner brownfield sites.
- 6.3.11 In the areas where viability was challenged, such as urban brownfield sites, a 10% affordable housing rate could be supported. In the stronger market areas, such as the Hoo Peninsula and suburban locations, this rose to 30%. The difference was based on the different land values, house prices and build costs. The 2022 Viability Assessment has informed the content of this draft policy for consultation. The Council notes that there may have been changes in the development market since the preparation of this assessment, and variations in proposed development sites considered in the assessment. The Council will consider comments in relation to viability from this consultation, and address these in updating the evidence base and policy response for the Regulation 19 Pre-Submission Draft Plan.
- 6.3.12 The delivery of affordable housing should be on site in the first instance. National planning policy outlines this preference.<sup>57</sup> However off-site provision and financial contributions are allowed, but this should be tightly controlled to ensure that affordable housing is delivered to meet the needs of the local population.
- 6.3.13 The policy follows a cascade principle, where the preference is for on-site delivery. If this cannot be delivered, then consideration is given to off-site provision can be made through delivery on another site, or in the last resort a financial contribution. However, this should be justified and supported by evidence as to why it cannot be met via the Council's standard approach of on-site delivery.
- 6.3.14 If the development proposes no contribution towards affordable housing this needs to be justified. The Council will expect justification via a viability assessment undertaken and submitted by the applicant. This will then be verified by the Council's independent viability consultant with the cost for the work for the independent verification being paid for by the applicant.

6.3.15 It is noted that currently developers in Kent are having problems getting registered providers to take on affordable housing secured as part of a section 106 agreement. The Council will continue to work collaboratively to address this issue. National policy expects developments to foster social interactions between groups who 'might not otherwise come in to contact', and to be designed to be inclusive. Affordable housing needs to be well-integrated into a mixed tenure development.<sup>58</sup>

*Question 11: Do you agree with having a 10% requirement for affordable housing on urban brownfield sites and 30% requirement for affordable housing on greenfield sites and higher value urban locations? What do you consider would represent an effective alternative approach? Do you agree with a varied approach for affordable housing requirements based on the different value areas across Medway?*

*Question 12: What do you consider would represent an effective split of tenures between social/affordable rent and intermediate/low-cost home ownership housing in delivering affordable housing?*

*Question 13: Do you have any views on the delivery of affordable housing, and the cascade principle? What evidence can you provide to support your views?*

## 6.4 Supported housing, nursing homes and older persons accommodation

6.4.1 Policy T4 considers the need for housing specially designed for sectors of the community, such as older people, people with disabilities and vulnerable people with specific housing needs, who may, for a variety of reasons, face barriers to finding accommodation to meet their personal needs.

6.4.2 The NPPF promotes the need to supply homes where they are needed that meets the needs of groups with specific housing requirements. This is essential if the objective of creating mixed and balanced communities is to be achieved. The provision of appropriate housing needed for different groups in the community should be assessed and reflected in planning policies including older people and people with disabilities.<sup>59</sup> This translates into a need for all types of housing including retirement housing, children's homes, housing-with-care and care homes.

6.4.3 The Care Act 2014 includes the explicit need to consider accommodation suitability as part of the assessment and delivery of services.

6.4.4 The Medway Council Plan and Housing Strategy identify priorities for a supply of accommodation to enable residents who have additional needs to live independently in their own home. There is a commitment to ensure there is sufficient housing for specific vulnerable groups to provide equal access to housing for all residents in Medway.<sup>60</sup>

### Housing need

6.4.5 The health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support.

6.4.6 Similarly, people with disabilities can include, but are not limited to, people with ambulatory difficulties, blindness, learning difficulties, autism and mental health needs, which may generate a range of housing requirements which can change over time.

6.4.7 Medway's population is predicted to grow over the Local Plan period to 2041, with over 65's accounting for a significant proportion of this growth as people are living longer. The official population and household projections indicate a significant increase in older persons and older person's households.<sup>61,62</sup> With the ageing population, a range of health needs are projected across the population. These include an increase in people living with dementia. Medway's Joint Strategic Needs Assessment, 2024 for Adult and Social Care identifies key issues and gaps in services, and makes recommendations for commissioning.<sup>63</sup> These include working with the Planning Service to ensure the availability of suitable housing, and supporting adaptations to keep people living in their own homes.

6.4.8 Older people living on their own may be expected to have greater care needs than those living with a partner or family members, who may be more likely to receive unpaid informal care.

6.4.9 The household projections indicate a notable increase in older persons living alone, with over 65's single person households increasing by just over one quarter over the course of the Local Plan period.

**Table 2: Population Trend 2024 to 2041**

		Change	
2024	2041	Nos	%
282,049	291,445	9,396	3.3

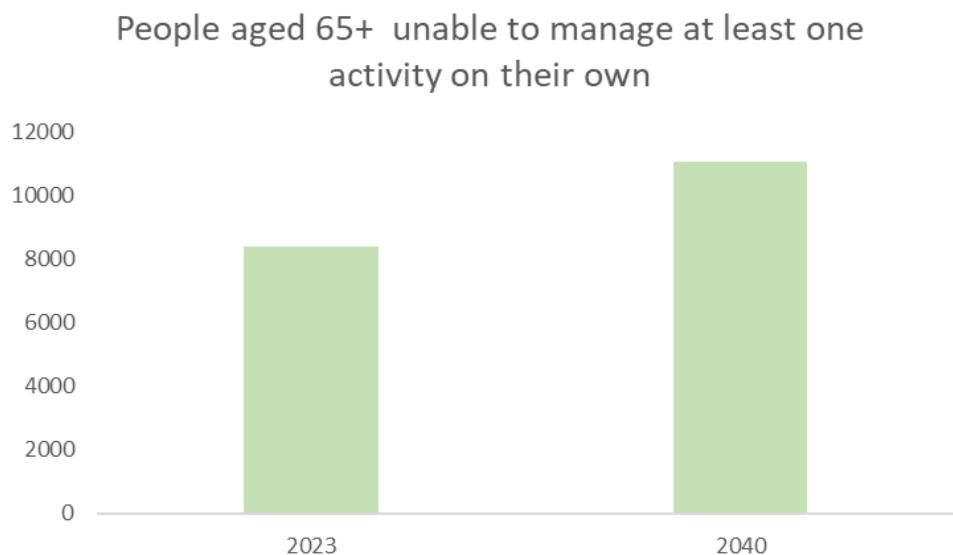
Source: *Office for National Statistics (2020). Subnational population projections: 2018-based.*

6.4.10 Medway is also seeing an increase in looked after children, and a need for additional specialist accommodation for children and young people.

6.4.11 A number of different models exist to meet the housing needs of those with specific needs including older persons and people of all ages with physical or learning disabilities or the homeless.

6.4.12 Housing with care can include extra care, sheltered housing and assisted living. This is normally delivered in the form of self-contained accommodation that is provided within a purpose-built block or small estate where all residents have similar support needs. Care is provided for those who cannot live completely on their own, or would like the comfort of knowing assistance is available, but do not need significant levels of personal care. This type of accommodation can also serve the wider needs of: young people at risk of, or who are homeless; young people leaving care; people with learning disabilities; those with clinical mental ill-health issues; people with added vulnerabilities who are or become homeless; and people experiencing domestic abuse. In planning for the mix of housing to meet our communities' needs, consideration will be given to specialist accommodation, including dementia care homes and children's homes.

- 6.4.13 Care or nursing homes provide a higher degree of personal care and / or long-term medical treatment for those who cannot live independently.
- 6.4.14 Modelled projections based on the official projections indicate a significant increase in the need for housing and schemes that offer an element of care for older persons and others with these specific needs.
- 6.4.15 Projected figures indicate an increase in older residents unable to complete at least one domestic activity on their own increasing by almost one third to 2040.



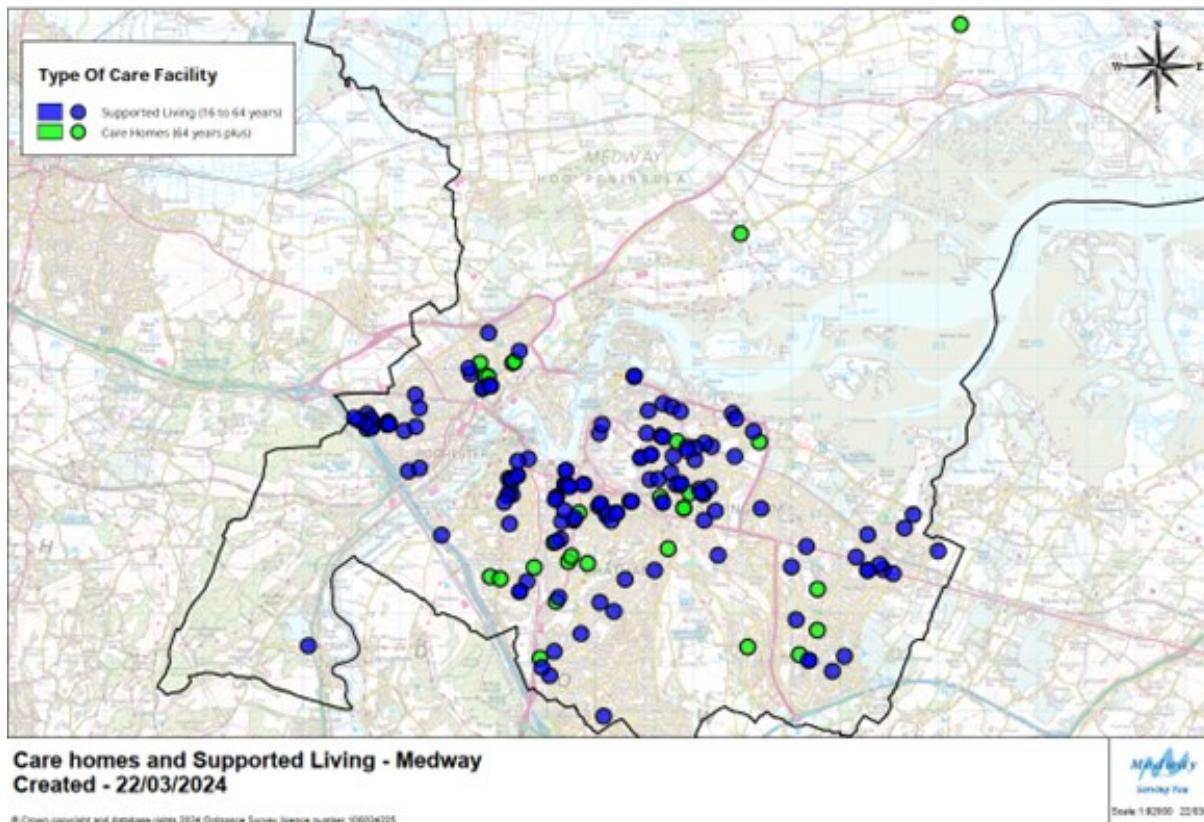
**Figure 3: Older Persons Need**

Source: *Projecting Older People Population Information*

- 6.4.16 The Council's housing register indicates that there are 487 applicants who have indicated a preference for sheltered housing.
- 6.4.17 Many people with learning disabilities will have been cared for by their parents. However, as the parents approach old age, they may no longer be able to care for them and therefore an alternative care arrangement maybe suitable for this group. However provision of alternative accommodation may be limited.

### Supply

- 6.4.18 Medway's supply of housing needs to account for the above growing demands, to provide suitable accommodation for a wide range of requirements. Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems.



**Figure 4: Care Homes and Supported Living**

6.4.19 In Medway there are around twenty-nine supported residential facilities for older persons and one hundred and thirty-nine facilities for working-age residents, as detailed in the map above. In addition, there are a number of children's homes, and a growing demand to support looked after children.

6.4.20 Medway had 8.1 care home beds per 100 people aged 75+ in 2021, which is fewer than the South East average of 10.1 and England average of 9.4. The number has been decreasing in the last ten years from a high of 10.1 in 2012.<sup>64</sup>

6.4.21 Good housing design is vital in promoting well-being and improving quality of life, both in general housing and in sheltered and supported housing or housing with care.

6.4.22 Housing design policy supports the need for flexible and adaptable accommodation to suit a wide range of needs to contribute to housing choice, long-term occupancy and lifelong homes.

## Policy T4: Supported Housing, Nursing Homes and Older Persons Accommodation

The development of specialist residential accommodation for older people, including care homes, nursing homes; and other specialist and supported forms of housing for those with particular needs will be supported where it:

- Meets a proven need for that particular type of accommodation.

- Is well designed to meet the particular requirements of residents with social, physical, mental and/or health care needs.
- Is easily accessible to public transport, shops, local services, community facilities and social networks for residents, carers and visitors. Local services are particularly essential in those developments where residents have fewer on-site services and greater independence.

Loss of specialist housing will be permitted only where it is demonstrated that there is no need for the form of accommodation.

6.4.23 Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. This is a key objective of the One Medway Plan and the Joint Health and Wellbeing Strategy.

6.4.24 The provision of appropriate housing for looked after children, people with disabilities, including specialist and supported housing, is crucial in maintaining safe and independent lives. Unsuitable housing can have a negative impact on disabled people and their carers. It can lead to mobility problems inside and outside the home, poorer mental health and a lack of employment opportunities. Providing suitable housing can enable disabled people to live more independently and safely, with greater choice and control over their lives.

6.4.25 There is a continued and growing need for specialist accommodation in Medway which is clearly indicated by the population projections.

6.4.26 Over the past five years there has been a small net gain of twenty-three bedrooms in older persons accommodation (C2). Looking forward over the next five years, extant permissions have been given for around 138 bedrooms, the majority of which is being delivered in Gillingham. Further opportunities will be coming forward over the Local Plan period.

## 6.5 Student accommodation

6.5.1 Promoting learning is a key ambition for Medway, and capitalising on a skilled workforce and the student economy. The Council needs to consider the needs of students as a sector of Medway's communities, in line with the NPPF in planning for specific housing requirements.<sup>65</sup>

6.5.2 Positive planning for students can contribute to Medway's regeneration objectives and potentially boost the vibrancy and vitality of town centres, and secure benefits for the growth of the local economy.

6.5.3 Medway's student population has continued to grow across the further and higher education sectors, largely clustered in the Learning Quarter at Chatham Maritime.

6.5.4 However, it is important to ensure that the expansion of the sector does not adversely affect established neighbourhoods by an over concentration of students and that existing privately rented accommodation is not 'lost' to tenants with otherwise limited housing options.

6.5.5 The highest concentrations of students are seen in Gillingham North ward, representing approximately 19.9% of the resident population as this area is within close proximity to the universities and colleges.<sup>66</sup> According to Medway Council tax exemptions (i.e. class N at March 2019), more than half of the student households in Medway which qualify for a student Council Tax discount are located in Gillingham.

6.5.6 Unlike some traditional student cities, evidence points to a 'not insignificant' section of students remaining living at home while studying in Medway, some commuting in from London, for example, as well as students at the Canterbury campuses being bused in from Medway, due to accommodation shortages there. The Universities, such as the University of Greenwich, are exploring the reasons why students choose to commute to Medway and are seeking to expand the accommodation and wider offer for students in Medway.

6.5.7 Students represent approximately 6.5% of the Medway population, however student households represent less than three percent of the private rented stock in Medway, suggesting the contribution of purpose-built student accommodation. The wider housing market pressures, including increased costs and demand for private sector rented accommodation impact on student households.

6.5.8 Growth in student numbers does not easily translate into a direct accommodation need for the reasons mentioned above. Evidence shows that private rental sector accommodation in Medway does not fully meet the housing requirements of students, and purpose-built student developments may be required to address these shortcomings.<sup>67</sup> This could also contribute to wider regeneration ambitions, particularly for town centre renewal.

## Policy T5: Student Accommodation

The Council aims to ensure that student housing is provided in the most appropriate and accessible locations and has due consideration to surrounding land uses.

Provision for students will be predominantly located close to the higher and further education establishments in Medway where there is deemed to be an identified local need for student accommodation.

The Council will favourably consider opportunities for student accommodation in town centres where the development can be shown to make a positive contribution to the vitality and sustainability of the centres, does not have a negative impact on the core functions of the town centres, and is consistent with strategic, regeneration and redevelopment plans.

Locations for student accommodation must be well served by walking, cycling and/or public transport and accessible to a wide range of town centre, leisure and community uses.

Student accommodation will be permitted where it does not involve the loss of permanent, self-contained homes, or the loss of designated employment land, leisure or community space.

Purpose built student housing will be required to provide a high-quality living environment and include a range of unit sizes and layouts, with and without shared facilities to meet the requirements of the educational institutions they serve.

- 6.5.9 The policy approach ensures a sufficient supply of accommodation to meet the needs of students and support the success of the universities and colleges in Medway.
- 6.5.10 The proposed policy approach seeks to balance the proximity of students to their places of study and avoid over concentration of student households, where this could impact negatively on amenity or access to family housing.
- 6.5.11 Opportunities to increase the supply of student accommodation as part of redevelopment/regeneration schemes in town centres, particularly Gillingham and Chatham, are welcomed.
- 6.5.12 National policy promotes the need to supply homes where they are needed that meets the needs of groups with specific housing requirements such as students.
- 6.5.13 Responses to previous consultations on the emerging Local Plan have been supportive of the need to provide accommodation for students.

## 6.6 Mobile home parks

- 6.6.1 Mobile home refers to a variety of accommodation units, such as 'caravan', 'park home' or 'lodge' and can be transported from place to place. Mobile home parks refer to sites developed for the placement of mobile homes. Mobile or park homes account for around one percent of the overall housing stock in Medway, this is around twice the national average. This policy does not consider free standing individual mobile homes or caravans, such as those provided for specialist workers in the land-based sectors, or specialist accommodation for gypsy and traveller communities or travelling showpeople. Nor does it consider where provision is made in the form of temporary accommodation such as during the construction of a new or replacement dwelling.
- 6.6.2 Two main residential park homes estates at Hoo Marina Park and the Kingsmead Park at Allhallows account for the majority of occupied mobile homes in Medway. These are in rural coastal locations on the Hoo Peninsula, in proximity to the estuarine habitats. These park homes are a popular form of housing, particularly in some age groups, and the Council recognises that they help to provide for a choice of housing in Medway.

### Policy T6: Mobile Home Parks

Proposals for mobile or park home developments will be given the same consideration as other dwellings and will be subject to the same compliance with planning policy in assessing impact and sustainability.

The Council seeks to protect existing parks from competing uses and restrict their expansion outside designated areas to limit adverse environmental impacts to the surrounding green and open spaces. It will restrict intensification beyond density

guidelines and seek opportunities to enhance the design and visual impact on the surrounding area, particularly those near areas of sensitive environmental interests.

Any development that may result in the permanent loss of mobile homes at the Hoo Marina Park or the Kingsmead Mobile Home Park, or a reduction in the area available for their use will not be permitted.

Intensification within the footprint of existing sites must adhere to latest Model Standards for Caravans in England.

Any proposals for updates or intensification must be carefully considered for the colour, massing and materials used, incorporate appropriate landscaping, and have no adverse impact on the character of the locality or amenity of nearby residents.

6.6.3 Previous consultation on this topic has generally found that there is support for this form of housing, to provide wider choice in Medway. Mobile homes are an attractive housing option for a number of households in Medway. Some cater for specific market sectors, such as people aged over 55 years. The Council supports the retention of mobile homes in these parks, to assist in the supply of a mix of accommodation.

## 6.7 Houseboats

6.7.1 There are approximately 462 houseboats in Medway. These are located in six marinas on the River Medway located at: Hoo, Port Werburgh, Chatham Maritime, Medway Bridge, Port Medway and Cuxton. Over the past five years the number of houseboats on the River Medway has increased by a little over thirteen percent, up from 400 in 2019.

6.7.2 Regeneration plans for waterfront development could impact on some sites. However, redevelopment plans could lead to improvements to the local environment around the areas where houseboats are located. This could lead to better access to key services for residents, in conjunction with better clustering of houseboats on the River Medway. There are wider environmental considerations, given the ecological sensitivity and importance of the river and estuary. The provision of adequate services to protect the health of the estuary is a key consideration, as well as providing for the needs of this sector of the community for good amenity and wellbeing.

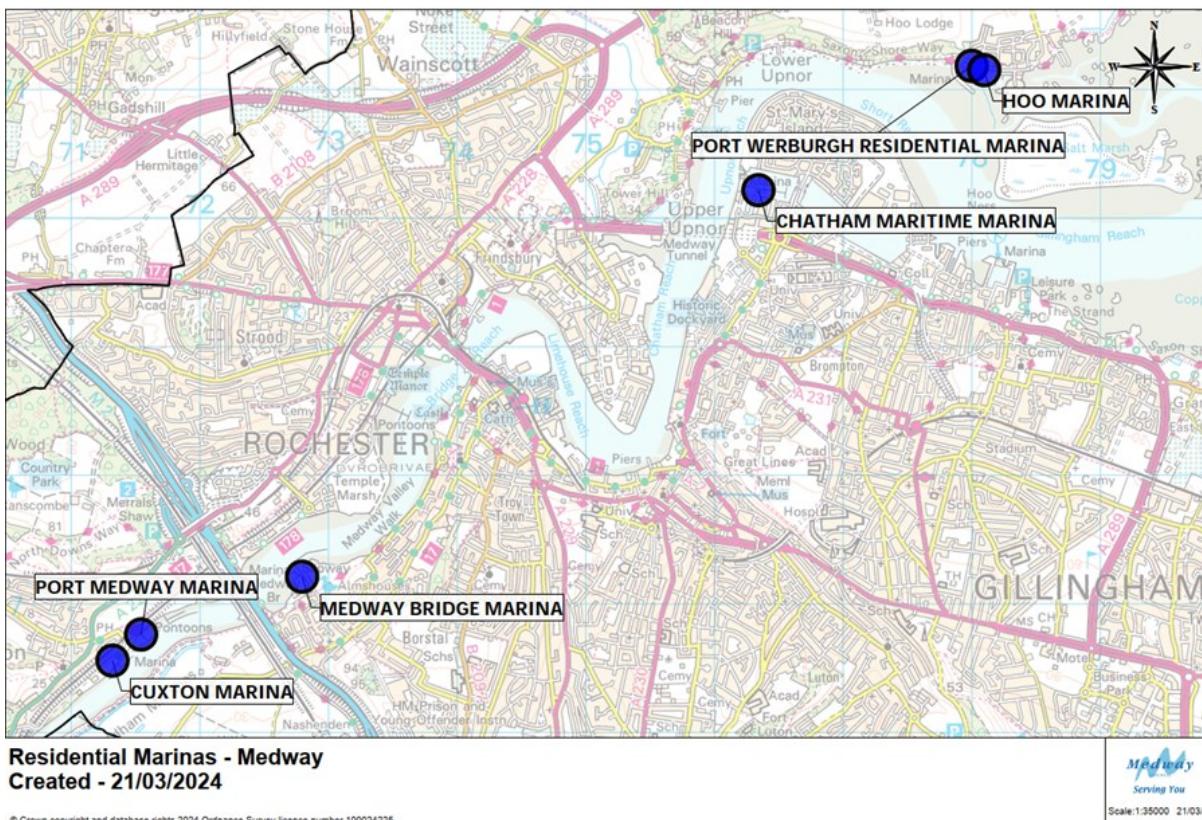


Figure 5: Residential Marinas

## Policy T7: Houseboats

The Council will seek to manage provision for houseboats in order to secure environmental benefits and address needs for this specialist type of accommodation. It will aim to:

- Protect the current mooring locations of houseboats and specify where any further growth may be allowed to take place.
- Seek the removal and disposal of any vessel so moored if a boat sinks, or becomes unfit for habitation, derelict or is otherwise abandoned.
- Provide for the amenity and wellbeing of residents through requiring appropriate foul water disposal in proposals for new houseboats.
- Seek opportunities to deliver improvements that benefit the local amenity and environment.
- Avoid impacts to designated sites from moorings and/or increased disturbance to habitats and the species they support.

Potential developments will only be supported where there are no adverse environmental impacts upon the health of the designated marine and supporting habitats of the estuaries and rivers.

Any proposal for further growth of houseboats, or the replacement of existing ones, will need to observe the above policy guidelines, as well as observing the criteria outlined in Policy T22 – Marinas & Moorings.

- 6.7.3 Comments from earlier consultations on the emerging Local Plan have supported the proposed houseboat policy with strengthened provision for managing environmental impacts.
- 6.7.4 Houseboats are part of the River Medway's character, providing a distinctive housing option. It is however important to ensure that the natural environment of the river is conserved and enhanced, and residents have good living conditions.
- 6.7.5 Development can have a positive or negative impact on the appearance of the area and on residential amenity. It is important that houseboats do not have a negative impact upon the natural environment and should respect the unique habitat with which they are situated.
- 6.7.6 Medway's river and estuary are designated for their environmental importance. This policy supports opportunities to upgrade facilities and amenities where there will be no adverse environmental impacts.
- 6.7.7 Particular regard needs to be given to the potential environmental impacts on designated marine and supporting habitats of the estuaries and river.

## 6.8 Houses of multiple occupation

- 6.8.1 A House in Multiple Occupation (HMO) is a property that is shared by three or more tenants who are not living together as a family, and who share basic amenities such as a kitchen, bathroom or a toilet facility, but have separate bedrooms. HMOs can provide an affordable type of housing for single people.
- 6.8.2 HMOs have a role to play in sustainable and inclusive communities, providing accommodation for single people on low incomes, and can also be the accommodation of choice for young professionals moving to an area for work for either temporary or permanent accommodation.
- 6.8.3 Evidence shows that areas with particularly high concentrations of HMOs can potentially undermine the sustainability of the community, through loss of family housing, or by lowering the standards of amenity experienced by local residents.
- 6.8.4 Poor management of properties, disturbance and poor provision or use of waste storage facilities can lead to a low-quality feel in relation to the street environment. The Council is also concerned that people have a decent place to live, and the standards of HMOs provide for a safe and healthy environment for residents.
- 6.8.5 A combination of issues can lead to an area attracting a high proportion of young, single people, which may be linked to short-term tenancies and a relatively high turnover of residents.

### HMOs in Medway

- 6.8.6 HMOs containing five or more residents require a licence. Licensable HMOs in Medway were mapped in 2021, as detailed below. Smaller HMOs do not need a licence, for that reason the total number of HMOs in Medway is not known.

6.8.7 As demonstrated in the map below, HMOs are situated in urban areas and are in close proximity to central areas of Gillingham, Chatham, Rochester and Strood. The highest concentration of licensed HMOs is located primarily within central, urban Medway, specifically areas in Gillingham and surrounding Chatham and Rochester Riverside.

### **HMOs and planning background**

6.8.8 There is a distinction between the planning and licensing regimes for HMOs. Single family houses and flats are classified as class 'C3 dwelling houses' in the Use Class Order. Privately rented HMOs with between three to six tenants are classified as small or 'C4 Houses in Multiple Occupation'.

6.8.9 Planning permission is not required to change the use of a C3 dwelling house to a shared rented house (C4 HMO), unless specifically controlled by condition on a planning application. Planning permission is required however to increase an HMO from six to seven or more tenants. This is because large HMOs are in their own distinct use class 'sui generis'.

6.8.10 A large HMO in England is defined if it is rented to 5 or more individuals who are not from the same household. A large HMO will need a license.

## **Policy T8: Houses of Multiple Occupation**

The Council seeks to avoid detrimental clusters of HMOs. Where planning applications for HMOs are not already covered by permitted development rights, they will be favourably considered where they:

- Do not adversely affect the character and amenity of the area.
- Do not contribute to an over concentration of HMOs in a particular area.
- Do not lead to the loss of units suitable for family housing, particularly in areas noted as already containing multiple HMOs.
- Do not contribute to the generation of excessive parking demands or traffic in an area.
- Make appropriate provision for the storage of waste.
- Do not adversely affect the health and well-being of the residents (new and existing).

6.8.11 Neighbourhoods containing transient populations can experience issues that conflict with the amenity of more settled residents within the same neighbourhood. A high turnover of residents can undermine the sense of community within an area.

6.8.12 The National Design Guidelines state that waste storage and management should be 'accessible and well-integrated into the design of streets, spaces and buildings, to minimise visual impact, unsightliness and avoid clutter.<sup>68</sup> Where refuse bins are required to be on a street frontage or in a location that is visible from a street, they are sited within well-designed refuse stores that are easy for occupants to use.

6.8.13 The Council recognises the role of HMOs in providing affordable choice in the housing market, but seeks to avoid unacceptable, adverse impacts on amenity, or loss of family accommodation, through managing the

development of new HMOs, and to secure decent living conditions for residents.

*Question 14: Do you have views on defining the limits to over-concentration of HMOs in a community? What criteria would be recommended?*

## 6.9 Self-build and custom housebuilding

6.9.1 Medway's vision for 2041 includes an aspiration that all sectors and ages of the community can find decent places to live; as part of this custom and self-build will provide new living opportunities for residents. This is supported by one of the Local Plan objectives of supporting people to lead healthy lives and strengthening communities by providing high quality, energy efficient homes that meet the needs of Medway's communities, reflecting the range of sizes, types and affordability the area needs, including provision for specialist housing, such as custom and self-build; and driving reductions in the carbon impacts of housing by securing opportunities for retro-fitting older properties.

6.9.2 Self-build is generally where the owner is directly involved with and/or manages the design and construction of their new home, while the custom housebuilding approach is where the owner commissions the construction of their home from a developer / builder / contractor / package company who builds the property to the owner's specifications. With custom build the occupants do not usually carry out any of the physical construction work but still make key design decisions.

6.9.3 National planning policy advises that authorities should include people wishing to commission or build their own homes when planning for the needs of different groups in the community.<sup>69</sup> The Government has also provided additional policy and guidance to support the demand from the self and custom house building market, which advises 'in considering whether a home is a self-build or custom build home, relevant authorities must be satisfied that the initial owner of the home will have primary input into its final design and layout'.<sup>70</sup>

6.9.4 To identify and provide for people who wish to build their own home, the Council maintains a Register of interested parties and reports the headline data annually on the Council website.<sup>71</sup>

6.9.5 Self-build and custom build can be an important source of delivering a mix of homes; all self-build proposals in sustainable and suitable locations will be positively considered. The contribution small and windfall sites can make to providing Self-build and Custom Housebuilding plots is encouraged and welcomed; it is also acknowledged that there can be opportunities on larger sites to meet expected demand. Larger site developers are encouraged to work with smaller sized builders to promote site diversity and to offer a range of plot sizes to provide the different types of plots self-builders are looking for. This enables people to have the opportunity to build their own high-quality homes, on a range of different sized developments, which can also boost and support the local economy by providing opportunities for local tradespeople and small and medium sized builders, as well as leading to a good mix of property designs, giving the area visual interest.

6.9.6 To meet the demand on the self and custom build register and to facilitate a wide range of opportunities of different types and tenures for self/custom builders:

- Small site and windfall plot provision in sustainable and suitable locations for self and custom builders is supported and encouraged.
- Sites within Medway will be allocated/part allocated to provide self and custom build plots.
- Sites of 100+dwellings will be required to supply no less than 4% of serviced dwelling plots for sale to self or custom builders, excluding flatted developments.<sup>1</sup>

6.9.7 This will provide a stream of plots on a variety of sized developments throughout the plan period. Developers and landowners may find it useful to work with a self and custom build 'enabler' for assistance in delivering the self/custom build plot element of the site.

6.9.8 Policy T9 aligns with the government's aspirations in the 'Planning for the Future' white paper, where sub-areas within 'Growth' areas for self and custom build homes are encouraged, so that more people can build their own homes.

## Policy T9: Self-build and Custom Housebuilding

The Council will support self-build or custom build home development in sustainable and suitable locations across Medway, encouraging plot provision in areas preferred by applicants on the Register.

### Site Allocations for self-build and custom housebuilding

The following potential sites are identified specifically for self-build and custom housebuilding:

- Fenn Farm, Ratcliffe Highway, Hoo (AS2) – 100%
- Land east of Stoke Road and North and South of Binney Road, Allhallows (AS22) – at least 5%

### Sites of 100+ dwellings will be expected to provide no less than 4% plots for self and custom build

To ensure a consistent supply for the demand identified from the Register, sites of 100+ dwellings will be expected to provide no less than 4% plots for self and custom build. They will be secured by use of a Section 106 agreement. If it is not viable to provide self-build plots on site, applicants would be expected to present robust evidence to show why for the Council to consider. Exceptionally, no provision will be expected where the scheme proposed is a predominantly flatted development.

### Affordable Housing

The affordable housing requirement of the site should be calculated on the total number of homes being delivered, including the self-build and custom

<sup>1</sup> In this calculation, if the result is not a full number, then any rounding would need to be made upwards if the decimal is 0.5 or higher and downwards if it is 0.4 or below.

housebuilding element. Self and custom build units delivered will not be accepted as part of the affordable housing provision.

### All new self-build/custom housebuilding applications

- Applicants will need to have regard to the local landscape and guidance from other relevant Local Plan policies in the same way that other types of residential applications do; this will ensure all types of new development are of high quality.
- Permission granted for self/custom build sites will be outline only; reserved matters applications would be required for each plot sold.
- In accordance with Government guidance on Self-Build and Custom Housebuilding, the plots must be serviced (have access to a public highway and connections for electricity, water and wastewater) or, in the opinion of a relevant authority, can be provided with access to those things within the duration of a development permission granted in relation to that land.
- For larger sites where a proportion will be self/custom build plots, the plots should all be located in one attractive area of the site and not pepper-potted throughout.
- For phased development, self/custom build plots must be provided and serviced at the earliest stage possible. This will be secured by a planning condition.
- Self/custom build plots must respond to the sizes identified on the Register.
- The person(s) occupying the plot will need to provide evidence confirming they have had primary input into the final design and layout of their property and that it will be their sole/main residence.
- To prevent overall completion of a site being drawn out and the delay of housing delivery, a short timeframe for building the plot(s) is desirable. This could be translated into a shorter time limited condition than the standard requirement, depending on the site.<sup>2</sup>
- Sites (including the self-build element) that meet or exceed the threshold to trigger the requirement for developer contributions will attract mitigation contributions in the same way as any other housing development.

### Design Code

- If the number of self/custom build plots on a single site exceeds 10, then a design code framework should be agreed with the Council prior to the submission of the outline planning application. This will ensure that the variety of design and construction materials will respect the character and appearance of a local area, without suppressing innovation and individuality. The Council may require a design code framework on sites smaller than 10 plots, depending on the location of the site. The design code will be secured by condition.

### Marketing the self/custom build plot

- Once a site has received outline permission and plots become available for sale, the landowner/developer is required to market (to the satisfaction of the

<sup>2</sup> For example, the site may already be serviced and have access to the public highway, electricity, water and wastewater, so once reserved matters are approved, there are no physical barriers to commencing construction.

Council) the plots available for self/custom-build for a minimum period of 12 months.<sup>3</sup> The 12 months will start from when the plots are first available for purchase, with the responsibility on the plot provider to notify the Council when the marketing period has begun.

- If any plot(s) remain unsold after being marketed for the minimum period, they can either remain for sale as a self/custom build plot or be offered to the Local Authority to acquire for the provision of affordable housing (separate from any relevant affordable housing requirement for the Development as applicable), before reverting back to the land owner to build out on the plot or sell without restriction.<sup>4</sup> To prevent the delay of housing delivery, the Local Authority will be given a time period of three months to acquire the vacant plot(s).<sup>5</sup> This provision will be secured as part of the original Section 106 agreement.

### **Expanding/intensifying existing residential permissions**

- Where there is an existing residential permission and the developer approaches the Council seeking to expand/intensify the development, the developer should demonstrate that they have considered some/all of the additional plots to be provided as serviced self/custom build plots, where there is identified demand.

### **Speculative residential applications**

- Where a landowner has a suitable site that they wish to obtain speculative outline residential permission for, they are encouraged to have regard to the Register and consider the plot for self-build or custom housebuilding, depending on the local demand.

### **Neighbourhood Plans**

- The Council supports the consideration of self-build and custom housebuilding in the preparation of Neighbourhood Plans, and joint working with Neighbourhood Plan groups to establish a locally derived design code.

### **Rural Exceptions**

- These will be considered on a site-by-site basis.

### **Council owned land and Regeneration**

- The Council will consider opportunities for self-build and custom housebuilding in disposal of Council land and in promoting regeneration schemes.

<sup>3</sup> The local planning authority would expect to see clear and robust evidence to show that there is no demand from self/custom housebuilders following a sustained 12-month period. This would include evidence showing records that the site has been actively marketed by a recognised commercial agent and should include a copy of the dated letter of instruction to the commercial agent, dated records of associated web-based marketing and the Estates Gazette, or similar publication. Plots should be marketed at a price commensurate with local market values. The commercial agents should provide records of enquires throughout the period of the marketing campaign, including date, contact details and nature of enquiry and the follow-up actions undertaken, e.g. whether the enquiry resulted in a site visit.

<sup>4</sup> All contact would need to be made through the Housing Team at Medway Council who will facilitate contact with housing associations.

<sup>5</sup> This timeframe shall be calculated from the date of the initial correspondence. This timeframe may be extended at the mutual agreement of the landowner, land promoter, local authority or housing association.

6.9.9 The need for plots of land on which people can build their own home has been identified through the Self-build and Custom Housebuilding Register, required by legislation from 1st April 2016.<sup>72</sup> Medway Council's Self-build and Custom Housebuilding Register is publicised on the website and operates in 'base years', which run from 31 October in one year through to 30 October the following year.<sup>73</sup> Eligible individuals or associations (groups of individuals) can apply to go onto the Register to record that they are seeking to acquire a serviced plot of land for their own self-build and custom housebuilding.<sup>6</sup>

6.9.10 From the commencement of the Register in April 2016, the Council has received regular applications from individuals and associations wishing to register their interest in acquiring a plot of land on which to build their own home. Applicants are interested in acquiring plots across the Medway area for building their own house or bungalow, with plot sizes ranging from 0.01ha to 0.2ha and above. As at 30 October 2023, there were 132 individuals and 2 associations who had applied to join the register since April 2016, resulting in an average of 18 applications per year. Around 24% of these applicants have also applied to go onto other authority registers which although could be a double-count of demand, is thought to be counteracted by numbers of people who possibly do not know about the register but still have a desire to build their own home. To date, permission has been granted for 18 self/custom build plots.

6.9.11 The Council wishes to better understand the wider level of demand in Medway, and in 2024 surveyed 44 local land/estate agents on the level of enquiries received on plots for sale. Only one agent responded to indicate any level of interest, and that was after sites were listed for sale.

6.9.12 The evidence so far shows that an average of 18 applications are received to join the register each year, which when projected forwards over the plan period and removing those already permitted to date, amounts to a need of around 430 plots. By allocating the three sites which could deliver between 20-25 plots and introducing a 4% policy on sites over 100 dwellings, this should be sufficient to provide the level of demand needed. When carrying out these calculations, we have only looked at sites over 100 dwellings which could be reasonably expected to provide self-build plots – we have excluded any that are likely to be flatted developments.

6.9.13 In order to assist landowners/developers providing plots and to gain even more of an understanding on what existing applicants to Medway's register are specifically looking for, we are also in the process of arranging for a detailed survey/questionnaire to be sent to applicants for completion before the next stage of the Local Plan – the results from this will inform and finetune the final direction of the policy.

6.9.14 Demand may shift over time, so the policy will be closely monitored and will be reviewed if the level of demand changes significantly.

6.9.15 In previous consultation, there has been support for the principle of the proposed policy, although developers were cautious about a percentage

<sup>6</sup> Eligibility criteria as stated in The Self-Build and Custom Housebuilding Regulations 2016

based policy approach and sub allocation of sites because of concern this could impede housing delivery.

6.9.16 Self-build and custom housebuilding policies across the UK have continued to evolve in recent years and there has been a marked increase in adopted plans with percentage based policies. Having a site partially devoted to self-build can help to balance different density requirements across a site and encourage larger house builders to work alongside smaller local house builders, with the potential to work successfully alongside the delivery of mainstream housing. These types of % policies can work most effectively as part of a package approach, which is why as well as applying a 4% requirement to sites 100+, Policy T9 also allocates specific sites for self/custom build development and encourages plot provision on smaller windfall sites, maintaining the key intention of providing self/custom build plots to meet expected demand.

6.9.17 The fundamental purpose of Policy T9 is to deliver self-build and custom build housing in Medway, but it is plausible that due to circumstances out of the control of the Council and landowner, some plots may not receive the interest that has been anticipated and are not taken up by the self and custom housebuilding market. It is important that the land is not left unused or vacant for sustained periods while other essential types of housing are needed, such as 'affordable housing'. This is reflected in the 'cascade' approach.

6.9.18 A 12 month marketing period as a minimum is considered an acceptable length of time to allow potential self/custom builders time to view the site, arrange finances and apply for planning permission to ensure that what they actually want to build on the site is acceptable.

6.9.19 Purchased plots should not be left empty to the detriment of its neighbours or the developers as a whole – however it would prove difficult for the Council to control/enforce a requirement for purchased plots to be built out within a certain timeframe within Policy T9 but instead will include a desirability for a short timeframe for builds (which could be translated into a shorter time limited condition than the standard requirement depending on the site).

6.9.20 Respondents to the Regulation 18 consultation in Autumn 2023:

- Supported a move to provide a choice and mix of homes, particularly self and custom building.
- Said that some allocations of large sites owned by volume housebuilders should have some self-build areas.
- Said that the plan should ensure smaller sites are allocated for growth to give local construction companies the chance to provide good quality, well designed and sustainable homes as alternatives to large scale uniform estates built by one national developer.
- Said that innovation in more energy efficient buildings designed to reflect local distinctiveness, is likely to be achieved in developing smaller sites in Medway's villages for custom or self-built homes.
- Showed concern that there would be considerable noise and traffic generated with longer term custom built self-build projects.

- 6.9.21 Policy T9 responds to these comments by offering both allocated sites and requiring larger sites to provide an element of self-build as well as supporting small windfall sites to deliver plots. Generally, self-build mortgages are more expensive than standard mortgages, so in most cases builders will be eager to complete the build expeditiously to be able to move across to a standard product as soon as possible; however as mentioned previously, where relevant there could be a condition to require a shorter time for commencement than the standard requirement for builds.
- 6.9.22 Rural exception sites –These will need to be considered on a site-by-site basis when there is greater certainty on the preferred spatial strategy.

### Allocations

- 6.9.23 Fifteen sites were submitted to provide self-build plots as part of the most recent Call for Sites. The majority of applicants on the register are interested in plots anywhere across the Medway area, with the most preferred sub areas being on the Peninsula and in Rainham. Potential sites for self build have been identified, but further work will be needed on the preferred spatial strategy and site assessment to confirm if these are suitable for possible allocations in the Local Plan.

### Sustainable, green and high-quality design

- 6.9.24 Some self/custom builders seek to be more innovative and adventurous in their design/green credentials, which the policy allows for through the use of design codes where relevant. Using both traditional and modern methods of construction, self and custom builds can often be and most certainly are encouraged to be the pinnacle of energy efficient, environmentally friendly and sustainable standards, demonstrating superb examples of what can be accomplished in both green and high-quality design.
- 6.9.25 Made and emerging Neighbourhood Plans in Medway are positively promoting opportunities for self and custom housebuilding development, which is supported by the Council.

*Question 15: Do you have any sites you wish to promote for self-build allocation?*

## 6.10 Gypsy, Travellers and Travelling Showpeople

- 6.10.1 Medway Council is tasked with providing for the needs of all its residents including providing housing options for all that require it. Housing provision includes the consideration of the needs of Gypsy and Travelling Showpeople, which is supported by an up-to-date evidence base.
- 6.10.2 The Council commissioned an updated Gypsy and Traveller Accommodation Assessment (GTAA) to identify the need for gypsy and traveller pitches and travelling showpeople plots, to align with the Local Plan period, and to consider the implications of any changes to definitions or other requirements brought in since the last evidence base update.<sup>74</sup>
- 6.10.3 The definition of pitches and plots comes from national Government policy. A pitch for the purpose of this policy is defined as: 'means a pitch on a "gypsy and traveller" site. A plot is a: 'pitch on a "travelling showpeople" site (often called a "yard")'.

6.10.4 Planning Policy for Traveller Sites (PPTS), updated in 2023, provides a planning definition of gypsies and travellers, and the government's approach to decision making and plan making in relation to traveller sites.<sup>75</sup> The overarching aim of the national policy is to 'ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.

6.10.5 For the purposes of the planning system, the PPTS defines gypsies and travellers as:

*Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.*

6.10.6 For the purposes of planning policy, the PPTS definition of travelling showpeople is:

*Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers as defined above.*

6.10.7 There are a number of gypsy and traveller sites, and one travelling showpeople site in Medway. These include one public site at Cuxton, managed by Medway Council, and a range of permanent and temporary private sites across the authority area. The GTAA identified a need of 31 pitches for gypsy and travellers and 3 plots for Travelling Showpeople, from households that meet the planning definition. There is wider need from undetermined households and those that do not meet the planning definition.

## Policy T10: Gypsy, Travellers & Travelling Showpeople

For the period 2022-2041, there is a need for 31 gypsy and traveller pitches for households that meet the planning definition, and for 3 travelling showpeople plots for households that meet the planning definition.

To meet the identified need, existing sites will be protected and intensification or expansion sought. New sites will also be permitted where the criteria are met as set out below.

### Safeguarding existing sites

The following sites will be safeguarded over the plan period from 2022 to 2041:

- Two Acre Farm
- Sturhfields
- North Dane Way
- Cuxton Caravan Park (intensification is encouraged)
- Cobsview (intensification is encouraged)
- Orchard Grove

- The Paddock
- Strood Fairground and Showmen's Quarters site
- Chestnuts
- Harewoods
- Four Seasons
- Any sites awarded permanent consent during the plan period

Safeguarded gypsy and traveller and travelling showpeople sites will be retained, unless:

- there is a surplus of available accommodation over and above the required five-year supply of sites; or
- the site will be replaced elsewhere in Medway by a site of similar proportions and capacity for pitches or plots in an appropriate location which complies with the criteria listed below for new sites; or
- a site has been granted a personalised permission restricting residency to a named occupier or family.

### New sites

Proposals for new gypsy, traveller and travelling showperson sites (temporary or permanent) will be permitted, where they meet the following criteria:

- Definition - The intended occupiers meet the national definition of Gypsy, Traveller or Travelling Showpeople.
- Need – the Council is satisfied that there is a clear need for the site and that need can be met through the expansion of existing sites.
- Location – Not located in the Green Belt, flood risk zones 2 & 3, areas covered by landscape or environmental designations (AONBs, SSSI, Ramsar, SPA, SACs, Ancient Woodland or local nature reserves), protected open spaces or protected heritage assets (listed buildings, scheduled ancient monuments or conservation areas), or the best and most versatile agricultural land, of Grades 1, 2 or 3a).
- Accessibility to local facilities for education, healthcare, and convenience retailing.
- Scale – a site should respect its location and surrounding environment and be embedded within it and not intrude onto the landscape. The Council will require a landscape strategy as part of the application to confirm the details of this. Pitches and plots should be of a sufficient size and, on sites for Travelling Showpeople have space for adequate storage.
- Design – Any proposal should conform to the building design and spatial policies outlined elsewhere in the Local Plan.
- Access – there is safe and convenient pedestrian and vehicular access to the public highway, with adequate space on site for vehicle turning and parking.

6.10.8 The NPPF requires local authorities to make provision for the specialist accommodation needs of gypsy and traveller communities and travelling showpeople. This is achieved through assessing the accommodation needs of the gypsy, traveller and travelling show person population in their area and to set pitch targets for gypsy and travellers and plot targets for travelling showpeople and demonstrate deliverable sites in the short and long-term.

6.10.9 Responses to previous public consultations raised concerns over the potential for conflict between the settled community and the Gypsy and Traveller communities. In iterative Call for Sites, few sites have been promoted for gypsy, traveller and travelling showpeople uses. The approach to intensify existing safeguarded sites is therefore most appropriate to meet the need outside of permitting new applications meeting the required criteria, however consideration will be made towards the following:

- Overcrowding.
- Accessibility and scale of local amenities to meet the needs.

## 6.11 Small sites and SME housebuilders

6.11.1 Small sites and SME housebuilders have a key role to play in housing delivery in Medway, and broadening the choice of housing. A five-unit threshold is considered to be the threshold for a small site, while a 60-unit threshold is considered to be representative of the general threshold at which a medium sized developer may develop and the point at which sites become too small for larger regional or volume housebuilders.

6.11.2 Delivery of housing by a limited number of volume housebuilders will struggle to meet full housing needs. SME's offer the opportunity to supplement quality housing delivery and diversify the market which supports increased delivery.

6.11.3 Medway will pro-actively support well designed new homes on small sites through both planning decisions and plan-making in order to:

- Increase the contribution of small sites to meet Medway's needs.
- Support and increase SME Housebuilders and associated local businesses delivering in Medway.
- Diversify the locations, type and mix of housing being delivered in Medway.
- Support self and custom build housing developments as well as community-led housing projects.

### Policy T11: Small Sites and SME Housebuilders

The Council seeks to encourage the development of small housing sites that contribute positively to the local community and adhere to sustainable development principles. The Council will support the development of small housing sites in Medway, subject to the following criteria:

- The site must not exceed 60 dwellings (net) in order to maintain the character and scale of the local area.
- Proposed developments must demonstrate high quality architectural design that enhances and/or respects the character of the surrounding area.
- All dwellings must meet or exceed the national and local design guidance to ensure a high quality of living for residents.
- Proposed developments must not result in an unacceptable level of harm to residential amenity, designated heritage assets, or environmental resources and biodiversity.

- Developers must provide adequate measures to mitigate any potential impacts on the local environment, such as landscaping and green infrastructure, and make a clear contribution to mitigation and adaptation to climate change.
- Small housing sites should be well-connected to existing infrastructure, including public transportation and local amenities, to promote sustainable living practices.
- The site is not part of a larger site unless, through specific proposals to subdivide a larger site, to speed up the delivery of homes and includes SME builders as part of that delivery mechanism.

6.11.4 In the Regulation 18 Local Plan consultation, responses showed support for small sites, particularly in rural areas. The NPPF also supports the development of small sites. Small sites can help to diversify housing options, create opportunities for smaller developers, and contribute to the overall character and identity of Medway's neighbourhoods.

6.11.5 Moreover, developing small (and medium) sites may help to make the best use of existing infrastructure and resources, minimise environmental impacts, and prevent urban sprawl. SMEs are more intrinsically linked with the local supply chain and are more likely to invest in local materials and construction, offer apprenticeships and utilise wider Kent based partners from concept through to sale.

## 7. Economic Development

### 7.1 Introduction

7.1.1 The One Medway Council Plan 2024-2028 promotes the Council's ambition to accelerate economic growth in Medway to benefit every neighbourhood.<sup>76</sup> We want to see our businesses innovate and grow, and to attract new businesses to locate here, providing quality employment opportunities for all and enabling local people to thrive.

7.1.2 The One Medway Council Plan also reports that Medway is home to around 14,000 businesses and the area's economy is currently worth £6.3billion. Unemployment is also falling, from 9.6% in 2013, to 4% in 2023.<sup>77</sup>

7.1.3 The NPPF states that Local Plans should help create the conditions in which businesses can invest, expand, and adapt. Plans should also set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth.<sup>78</sup>

7.1.4 This chapter sets out the planning strategy which will support the economic vision for Medway and considers the distribution and management of employment uses in Medway.

7.1.5 A core ambition of the Local Plan is to strengthen the performance of Medway's economy, securing quality jobs in the local area, capitalising on the further and higher education offer, and realising the area's strategic potential.

7.1.6 By 2041 Medway will have successfully grown its economy, gaining competitiveness from its strategic location, and securing and developing its diverse business base and attracting inward investment in a range of employment sites.

7.1.7 However, recent years have been very challenging for the local, national, and global economy. There have been rapid and significant changes in employment practices and commercial land needs, in response to the COVID-19 pandemic, global instability and political changes. These are reflected in the demand for commercial land, including office space, retail and warehousing and distribution. The Council recognises the importance of a resilient employment land strategy that is flexible to market and structural changes.

7.1.8 More locally specific challenges include that although Medway is a major economic hub in the South East region, it does not perform to its potential. Medway has a number of pockets of deprivation where communities experience employment and income deprivation. Historically Medway experiences high levels of out-commuting typically to London and neighbouring local authority areas.

7.1.9 Medway Council commissioned an Employment Land Needs Assessment in 2015, and this was updated in 2020.<sup>79</sup> We are commissioning a further refresh of this needs evidence to inform the Pre-Submission Draft Plan. In the meantime, set out in the following policies is an economic strategy, to which your comments are invited. The policies are based upon the strategic

priorities of the Council, and our knowledge of the local economic environment.

## 7.2 Employment strategy

- 7.2.1 Medway's employment land needs over the plan period will be calculated and published in forthcoming evidence, and this will provide additional detail to this strategy. Nevertheless, the current strengths of our employment offer will be supported, and growth encouraged where possible.
- 7.2.2 New employment opportunities will be supported in sustainable locations, and especially where they can foster a critical clustering of economic activity. Therefore, new employment proposals will be directed in the first instance towards areas of existing business and commercial activity.
- 7.2.3 Our town centres have a resilient business presence and there are opportunities for the redevelopment of several smaller, centrally located sites with good accessibility for office and related activities.
- 7.2.4 There are also several large-scale business and industrial estates across Medway, including Medway City Estate, Innovation Park Medway, Gillingham Business Park, and Knight Road, Rochester.
- 7.2.5 There is significant potential for the regeneration, and redevelopment, of employment sites on the Hoo Peninsula, in particular at the Isle of Grain, and the site of the former Kingsnorth Power Station.
- 7.2.6 Some types of employment use, however, can emerge in a more spontaneous manner. This includes creative and cultural industries, and manufacturing services, which can occupy offices, cultural facilities, shops, education buildings, studio workspaces, industrial premises, and warehouses. Part of this need can be met through employment land allocations and existing employment sites. However, creative and cultural industry start-ups and newly establishing businesses for example, often emerge in unplanned urban locations due to a range of factors, including clustering of talent, ideas and flexible and cheap accommodation. Related activity needs to be supported, particularly in the area's town centres and regeneration areas, and within the context of masterplans and associated initiatives. This will also be considered in more detail by other sections of the Local Plan.

### Policy S10: Economic Strategy

The Council will seek to boost Medway's economic performance, securing a range of jobs for its workforce. In principle employment development will be directed to the following broad locations unless otherwise allocated:

- Office (E (g)(i) (formerly B1a) will be directed towards the main town centres and key regeneration opportunity areas.
- Industrial (E (g)(ii), E (g)(iii) (formerly B1b and B1c)) and warehouse (B8) uses will be located on the periphery of Medway close to the existing strategic road network.

- Larger scale Net Zero Carbon Energy generating uses and port using facilities to be directed to the Hoo Peninsula to sites at Kingsnorth and Grain.

The Council will make provision for the scale, range, quality, and locational requirements of employment land in its latest employment needs assessment, when published.

This will be achieved through the following measures:

- Seeking to retain as much employment land as possible.
- The identification of new employment sites in line with the spatial strategy.
- Redevelopment and investment opportunities within regeneration areas.
- Promoting rural employment opportunities in sustainable locations.

7.2.7 The plan will seek to increase the productivity of Medway's economy, as measured via Gross Value Added, through support for economic sectors with growth potential and higher value employment. This includes the designation of suitable employment sites that can accommodate growth, including the Innovation Park Medway. More generally, the plan also aims to provide a range of employment sites to meet business and organisational needs. Through this approach, the Council and its partners aim to support a wide range of job opportunities and promote growth of higher value jobs and priority sectors.

## 7.3 Existing employment provision

7.3.1 The Council acknowledges that the planning system is flexible and should respond to market signals. To ensure a balanced development plan, which meets both housing and employment needs, it is important that we manage existing employment space where we can.

7.3.2 Protecting viable employment sites will help Medway to grow; to promote a balanced economy, and to protect local services. Some level of protection will also put less pressure on needing to find new employment sites to replace ones that have been lost to other uses.

7.3.3 However, changes to the Use Classes Order in September 2020 brought together several previously separate uses into one new use class: Class E. Class E includes shops, restaurants, cafes, financial and professional services, some leisure uses as well as uses that previously fell under Class B1 (offices, research and development, light industrial uses). This means that planning permission is no longer needed to go from offices (and other types of employment land) to other uses within the same E Class.

7.3.4 Moreover, changes from Class E uses to dwelling houses (Class C3) can now also be made in many cases without the need for planning permission. Also, changes of land and buildings in use for storage and distribution (Class B8) are permissible without the need for consent in many cases, but there is currently an upper floorspace threshold of 500sqm.

7.3.5 However, where planning permission is required, this policy would apply.

## Policy S11: Existing Employment Provision

Where planning permission is required, proposals for the redevelopment or change of use of employment land and buildings to non-employment uses will be supported where:

- The existing use is proven to be no longer appropriate or viable.
- There is no market interest in the site, and it has been market for a reasonable period (of 12 months).

Once this has been proven then the site will be considered for loss or redevelopment if one or more of the following criteria apply:

- the site is no longer appropriate due to detrimental impact on residential amenity;
- proposals should demonstrate how employment opportunities have been maximised and incorporated into a scheme, where possible; and
- any redevelopment conforms to the Council's regeneration agenda.

## 7.4 New employment sites

- 7.4.1 The Council is in the process of commissioning an update to its employment land needs assessment. This evidence will be available for the next consultation on the Local Plan.
- 7.4.2 The previous assessment indicated a need for around 320,000 sqm of office / industrial and warehousing floorspace up to 2040. This equated to approximately 69ha of employment land (creating over 4,000 new jobs).
- 7.4.3 We expect that there will be some level of additional employment need over the plan period, and we know that there are employment development and allocation opportunities which have been promoted through previous consultations. Therefore, the following policy is directed at promoting certainty in the delivery of additional employment in Medway.
- 7.4.4 The Local Plan will provide a range of sites to meet the employment needs identified over the plan period. This will involve the retention of existing employment sites where possible; support for enhancing and consolidating current sites to better meet the market's requirements and make better use of land; and identifying additional locations that can provide attractive accessible sites for business growth.
- 7.4.5 The site of the former Kingsnorth Power Station, on the Hoo Peninsula provides an opportunity for new commercial and industrial uses at the 113ha site, of which half could be developable land. The landowner is seeking to deliver a modern and sustainable development to create new employment opportunities for skilled jobs and to attract investment to the region. A mix of commercial, manufacturing, industrial, distribution, data centre and energy uses, could be brought forward on site. The site has potential to be intensified to maximise the development potential of this strategic brownfield site, to deliver a high quality, commercial scheme with flexible space to meet market needs.

## Policy S12: New Employment Sites

New employment sites in Medway, as shown on the Policies Map, will be allocated to meet the needs set out in the latest Employment Needs Assessment.

### 7.5 Local Development Order for Innovation Park Medway

- 7.5.1 National Policy supports the use of Local Development Orders (LDOs) to help fast track delivery of development.
- 7.5.2 Medway Council and Tonbridge & Malling Borough Councils have separately adopted a LDO covering the land identified across both authorities. This now provides guidance for how proposals come through within the boundary of the identified LDO.
- 7.5.3 Development in the Innovation Park Medway is guided by the LDO, masterplan and Design Code. The former two set out the parameters for development and the latter sets out the detailed guidance on matters relating to layout of street hierarchy, communal collaborative spaces facilitated by the arrangement of plots to material and vegetation choices. This is essential to ensure that the main ambitions of the site are realised, which include innovation and a high-quality environment. Any planning application that comes forward on the IPM will need to be compliant with the design code and the aims and ambitions of the LDO, i.e. innovative uses. Uses supportive of innovation will be considered on its own merits.
- 7.5.4 Whilst there is currently a pause and review exercise happening with development connected to the LDO, the Council remains committed to the delivery of high-quality employment at Innovation Park Medway. It is expected that development will continue throughout the plan period.

## Policy S13: Innovation Park Medway

Innovation Park Medway is a high-quality environment and location for high value technology industries, engineering, manufacturing and knowledge intensive industries. This cluster of high-tech companies share similar skills, infrastructure, ambition and drive and offer opportunities for collaboration, innovation and skills retention. The core ambition for the IPM is to create a high-quality public realm with collaborative spaces supportive of innovation.

Only E(g) and B2 uses will be permitted and can be supported by appropriately justified small scale ancillary uses compliant with the requirements of the and its accompanying guidance documents including the design code and masterplan.

Proposals outside of the acceptable E(g) and B2 uses will be required to follow the standard planning application route. These proposals are required to be compliant with the aims and objectives of the and masterplan as well as prescribed requirements set out in the Design Code.

In-keeping with the sustainability ambitions all proposals will need to demonstrate compliance with policies DM18 and DM19 – climate change and carbon reduction.

## 7.6 Learning and skills development

- 7.6.1 The Council supports the development of skills and learning opportunities across Medway. Benefiting from good education, quality jobs and a growing economy is a main priority for the One Medway Council Plan. The Council wants to give local people the best chances to reach their full potential, including access to good quality education. Educational facilities include early years (creches/nurseries), schools (years reception to eleven), further education (post 16 –colleges or sixth forms) and higher education (universities).
- 7.6.2 Medway Council is a Local Education Authority. Medway has 87 day nurseries/ pre-schools, 42 nurseries within primary schools, 76 primary schools, 19 secondary schools, 5 special schools and 2 alternative provision schools and one all-through school. Medway also provides an adult education learning service, which reaches into the wider community. There are close links with apprenticeship schemes.
- 7.6.3 A learning cluster of further and higher education has been established in the Chatham Maritime area, with the Universities at Medway (Greenwich, Christchurch & Kent), Mid Kent College and the Waterfront University Technical College all sited here, supporting thousands of students. These and wider training facilities play a major social and economic role in the area and are anticipated to expand further over the plan period.
- 7.6.4 Education and learning opportunities are critical to developing and strengthening Medway's economy, and supporting the health and wellbeing of residents. Schools, colleges, and wider learning and training centres provide opportunities for co-location of wider services, improving accessibility for communities.

### Policy T12: Learning and Skills Development

#### Early years & schools

The Council will support the development of uses that would create schools, nurseries and crèches in the following circumstances:

- there is an identified need for the provision;
- have safe access by cycle and walking, public transport and car and incorporate a school travel plan;
- have safe drop-off and pick-up provision;
- provide outdoor facilities for sport and recreation; and
- avoid conflict with adjoining uses.

#### Further & higher education

The development and expansion of uses that facilitate further and higher education facilities within the 'learning quarter' at Chatham Maritime will be supported. Development of supporting uses where there is an identified link to the Universities, innovative uses, and other research and development establishments will be supported where appropriate and does not conflict with other policies in the plan.

## Other education providers

Development that delivers and encourages the creation and expansion of apprenticeship schemes and adult and community education will be supported.

- 7.6.5 Medway has seen an uplift in the skills and qualifications levels of residents. In the 2021 Census, 31% of the population had Level 4 Qualifications or above in Medway compared to 25% across Kent.<sup>80</sup> Approximately 7% of Medway's population is made up of students and this rises to 15% in some areas.<sup>81</sup>
- 7.6.6 Boosting educational attainment and qualifications and skills levels in Medway is a core priority. This underpins the area's economic performance and opens up greater job and social opportunities for residents, skills retention, job creation, securing job locally which means less commuting with environmental and health benefits. The Local Plan can help in these ambitions, by supporting the provision of nurseries and the timely delivery of new schools, and the development of the higher and further education sector.
- 7.6.7 A key aim of the Council is to continue to build on the success of further and higher education in Medway. Students spend over £150m per annum in Medway with local businesses and services supporting some 1,200 jobs. The added benefit from this is that it will lead to an increase in Gross Value Added of the economy.
- 7.6.8 To facilitate an improvement in skill levels in the economy the further and higher education facilities that support this level of qualification need to be supported. Higher and further education institutions in Medway contribute hundreds of millions to the local economy directly, but also indirectly add other benefits.
- 7.6.9 Apprenticeship programmes and adult education also support skills development and retention, as does developing good links between key business centres, such as Innovation Park Medway and the universities and other education providers which will support the creation of apprenticeships allowing further development of skills and enable residents to find good jobs locally, providing greater benefits to the area.

## 7.7 Tourism, culture and visitor accommodation

- 7.7.1 The tourism and cultural economy plays an important role in raising Medway's image and profile, and supporting employment, business, creative and leisure opportunities. Tourism, arts and culture, are therefore central to the Council's ambitions for the area and sit at the heart of the Medway Council Plan, its Regeneration Strategy – Medway 2035, the Medway Cultural Strategy (2020 – 2030), Thames Estuary Production Corridor, and as part of the Creative Estuary Initiative.<sup>82,83,84,85,86</sup>
- 7.7.2 Marketing campaigns have contributed to the growth of Medway's tourism economy. Trip numbers, sector value and employment, have all increased in recent years. Research commissioned by Visit Kent on the economic impact of tourism in 2022, reported that there were 4.5 million visitors to Medway.

This had an economic value of £312m and supported 5,782 jobs in this sector.<sup>87</sup>

7.7.3 Medway offers visitors and residents a wealth of heritage, riverside and countryside settings, parks and open spaces, and free festivals and events each year. The Historic Dockyard Chatham, Rochester and Upnor Castles, Rochester Cathedral, Royal Engineers Museum, literary links to Dickens, and wider museums, universities, theatres, art galleries, bars, cafes and restaurants, provide a range of attractions, day and night. Medway's town centres also play a significant role in supporting tourism with historic and cultural assets, and a focus for food and drink and community activities. Visitor activity can also strengthen the centres, supporting local businesses and services. Vibrant centres support our communities and boost pride in Medway.

7.7.4 Rural areas, estuaries and coast, nationally and internationally significant wildlife habitats, and public rights of way, including the King Charles III England Coastal Path provide a wider green tourism offer. Visitors and residents can enjoy walking, cycling, birdwatching and water-based recreation. Areas such as the Hoo Peninsula and the Kent Downs NL have a distinct sense of place and remoteness, on the doorstep of our towns and villages. There are opportunities to further support the rural economy through tourism in these areas, such as promoted through the Kent Downs work on sustainable tourism, and RSPB's work in highlighting the important birdlife around Medway's estuaries and marshes. Such opportunities should reflect the sensitivity of the natural environment, to safeguard their special features.

7.7.5 Medway's regeneration strategy seeks to strengthen our tourism sector by creating better places, making best use of heritage assets, improving venues and facilities for arts and culture, encouraging rural and marine based tourism, and promoting short break stays. Growth in tourism also means that potential exists to enhance the supply of visitor accommodation, across a range of short and longer stay markets, including budget and higher quality hotels, self-catering, camping and caravanning, and marinas. This is particularly the case within the context of proposals for mixed used developments, urban and waterfront regeneration, and sustainable rural tourism. Medway's visitor accommodation sector is smaller in comparison to the Kent, regional and England averages.<sup>88</sup> Tourism also promotes the opportunity for restoration and/or improvements to parts of Medway's industrial heritage which may now be underutilised or derelict.

7.7.6 Medway Council has produced a Design Code for Chatham, which will assist in creating an environment to support vibrancy and tourism. The development framework for Star Hill to Sun Pier also promotes activities to boost tourism and community activities.

## Policy T13: Tourism, Culture and Visitor Accommodation

The Council will support and promote tourism development where it contributes to the local economy, enhances Medway's cultural life, and meets sustainable development principles.

Development that contributes positively to the regeneration of Medway, extends the existing tourism, cultural and visitor economy offer, and enhances the vibrancy and vitality of town centres and waterfront will be welcomed.

The provision of new, and the enhancement of existing cultural assets and visitor facilities, will be supported, where they respect the integrity of their surrounding area and local historic environment.

The development of rural and marine based tourism opportunities will also be welcomed, where they can demonstrate that negative impacts on the environment can be avoided.

Proposals for tourism, cultural and visitor facilities will be assessed against the principles set out below:

- The proposal is appropriate in scale and nature for its location, sensitively designed, respects the characteristics of the built, historic and natural environment, and improves local amenity.
- Maximises opportunities for sustainable travel in accessible locations and minimises traffic generation.
- Avoids adverse impacts on the environment and biodiversity and where appropriate achieves BNG.

The Council will support the retention, enhancement and provision of visitor accommodation where it contributes to the sustainable development of Medway's tourism, cultural and visitor economy. Proposals will be assessed against the principles set out below:

- Where it meets a market need, particularly in those sectors of the market where evidence indicates an unmet or growing demand.
- Development enhances the quality and offer of existing visitor accommodation and its setting.
- Where the proposal contributes to the vibrancy, vitality and viability of town centres, local communities, and the sustainability of wider settlements.
- Where the proposal avoids negative impacts on the environment, is appropriate in scale and nature for its location, sensitively designed, respects local amenity, the characteristics of the built, historic and natural environment, avoids siting in areas of high flood risk and intrusion into the landscapes of open countryside.
- Avoids adverse impacts on biodiversity and where appropriate achieves BNG.

7.7.7 The NPPF states that planning policies should help create the conditions in which businesses can invest, expand and adapt. The NPPF also highlights the role tourism plays in supporting the rural economy and the need for it to respect the character of the countryside.

7.7.8 Responses to earlier consultation on the Local Plan supported the development of Medway's tourism sector, linked to waterfront regeneration, the natural environment, heritage, culture, and improvements to the supply and mix of visitor accommodation.

7.7.9 Tourism and culture are important for Medway, making a significant contribution to the area's current and future economic prosperity and wellbeing of our communities. It also has a broader role in terms of raising Medway's profile and supporting a positive image that helps attract

investment. Arts, entertainment and recreation industries are a valuable part of Medway's economy, and provide services to visitors.

7.7.10 As Medway grows over the plan period, our communities and visitors require improved and new community, cultural and creative facilities, public realm and open space, leisure uses, walkways and cycle routes, and visitor accommodation. The Council is leading on bringing forward such opportunities. Town centre masterplans and design codes, the Chatham Intra HAZ, urban regeneration sites and mixed-use developments can provide key mechanisms to enable this provision.

7.7.11 The potential to achieve greater value from the use of Medway's river frontage is a key aspect of the Council's regeneration and tourism aims. In the central urban areas, the waterfront also provides an opportunity to link heritage assets and provide a focus for cultural activities. The Council recognises the importance of planning for good quality public realm and providing a mix of leisure, food and drink offers in the town centres and waterfront areas. These can help provide a positive experience for communities and visitors, support the development of an evening and cultural offer, as well as boosting the local economy.

7.7.12 Green and blue infrastructure, rural areas, nationally and internationally significant wildlife habitats, comprise an invaluable tourism, health and wellbeing asset for local communities and visitors. Initiatives include the King Charles III England Coastal Path, which follows Medway's river fronts and estuaries and around the Hoo Peninsula linking Riverside Country Park with the RSPB's reserve at Cliffe Pools. Given the importance of the natural environment, the estuaries and marshes, it is essential for access to be managed sustainably to avoid damage to the area's environment.

7.7.13 The development of tourism and cultural facilities, and visitor accommodation, will be in line with the strategy promoted by the Local Plan and the priorities of the One Medway Council Plan. Proposals will also need to respect the character of urban and rural environments, respond to opportunities to improve Medway's diverse tourism and cultural offer, and provide benefits to local communities and visitors to the area.

## 7.8 Culture and creative uses

7.8.1 Medway's Cultural Strategy's (2020) vision is for Medway to be internationally recognised for its creativity and culture, exemplifying the positive impacts on everyone's lives.<sup>89</sup> The main ambition is to reposition Medway as a cultural hub. The vision is based on six values, including strategic working, environmentally sustainable actions, inclusion and access for all and recognising culture as integral to health and wellbeing. These ambitions align very closely with the Local Plan's vision and strategic objectives for our communities and areas.

7.8.2 Arts Council England has identified Medway as a Priority Place for culture and heritage. The Medway Heritage Place project will bring investment to use heritage to build pride in place, inspire local communities and drive regeneration.

7.8.3 Culture is often expressed generally in terms of its infrastructure: museums, galleries, theatre, libraries, music venues, public art, festivals and events. The Cultural Strategy also recognises wider heritage, food, the night-time economy and the creative industries. For purposes of the policy below, culture will be described in terms of 'cultural facilities and attractions'.

7.8.4 Medway has an established profile for some aspects of our culture such as heritage assets, festivals and events, there is opportunity to widen this offer. The Council will continue to support a conducive environment for culture and the creative economy. This will broaden residents' access to activities, services and jobs. The cultural needs of existing and new communities will be met by strategically developing cultural venues, facilities, uses and creative workspaces, and the retention and enhancement of existing cultural and creative uses in their various forms.

7.8.5 Medway has a diverse mix of towns, villages and communities. Culture and creativity are expressed and enjoyed by communities across Medway, but there are some noted clusters of activities and facilities, such as larger centres like Rochester and Chatham. The Council promotes inclusion and opening up opportunities for all in enjoying culture as part of a healthy quality of life.

## Policy S14: Supporting Medway's culture and creative industries

The continued growth and evolution of Medway's diverse cultural infrastructure and creative industries will be supported, enhanced and expanded to become a focus for culture. Development proposals must:

- Protect and enhance strategic clusters of cultural attractions, existing cultural facilities, venues and uses and support or create/develop new in town centres and places that are or will be supported by good public transport connectivity or other sustainable travel options and where sensitive to and respectful of Medway's historic environment and assets:
  - Rochester District Centre
  - Chatham Town Centre
  - Gillingham District Centre
  - Chatham Dockyard
  - Star Hill to Sun Pier
- Promote and deliver new or enhance existing, locally distinct clusters of cultural facilities, venues and related creative uses especially where they can provide an anchor for local regeneration and town centre renewal. These proposals must be sensitively designed and be in accordance with Medway's policies and ambitions for its historic environment and assets. Areas identified include but are not limited to the town centres of Chatham, Rochester, and Gillingham; Chatham Docks, Chatham Dockyard, Hoo and Star Hill to Sun Pier. Development proposals should identify further opportunities.

- Consider the use of vacant properties and land for multi-functional purposes, pop-ups or meantime uses for cultural and creative activities during the day and nighttime to stimulate vibrancy and viability and support diversity in town centres or elsewhere where appropriate.
- Seek to ensure that opportunity areas and large-scale mixed developments include new creative uses and cultural venues and/or facilities and spaces for outdoor cultural events.
- Ensure that public realm or spaces within the development are activated and/or activate spaces around it to ensure seamless connectivity with the existing surrounds.
- Promote and support circular economy uses which align with the creative industry uses and sustainability objectives.

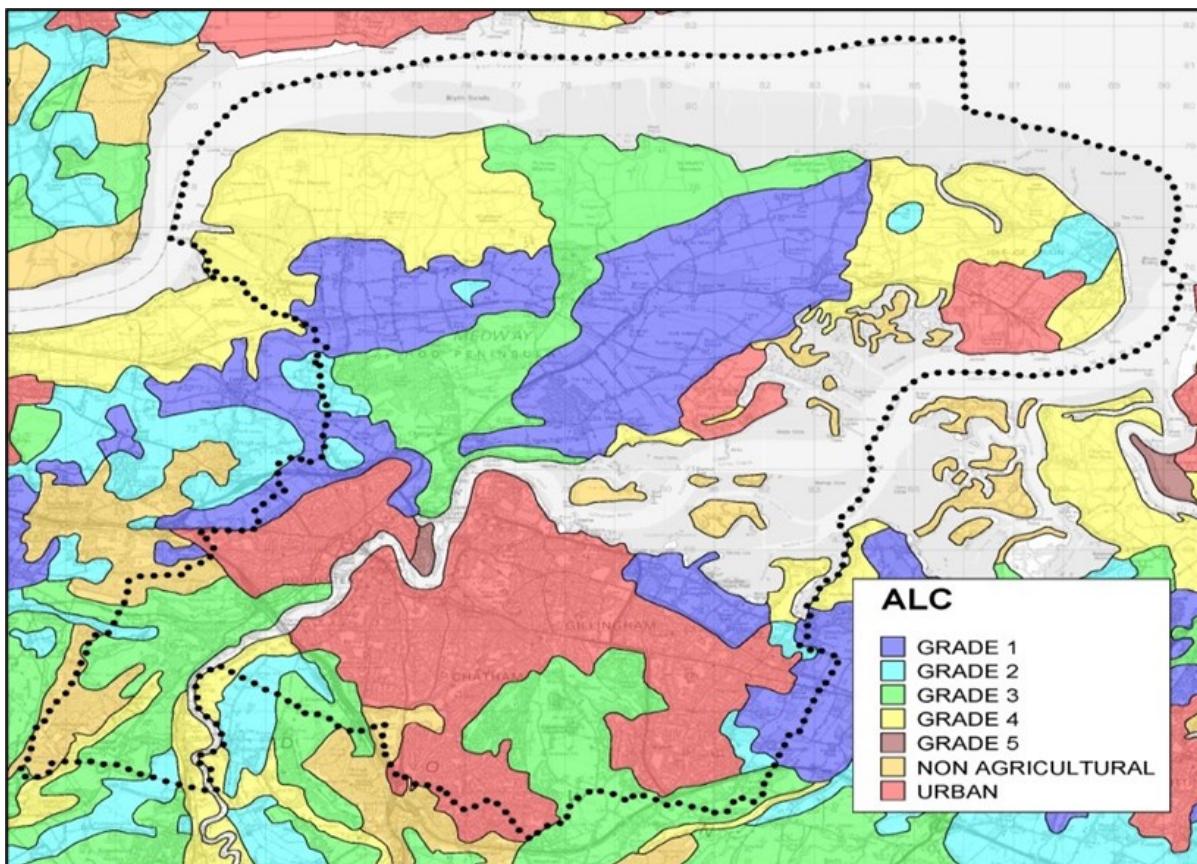
This policy must be read alongside the policy on tourism.

7.8.6 The cultural and creative sectors play a vital role in Medway and this policy approach will ensure a supportive environment for their increased contributions to economic growth and community benefits.

## 7.9 Rural economy

7.9.1 Medway's administrative area is home to over 279,800 residents and covers 19,354 ha of land, of which 35% are urban areas, and 65% is rural.<sup>90</sup> Around two-thirds of Medway's area is rural, and this is home to around a sixth of the population. Medway's rural areas include the Hoo Peninsula to the north, and Cuxton and Halling to the south-west, the Kent Downs, North Kent Marshes, and internationally and nationally designated wildlife habitats.

7.9.2 A total of 8,845ha of Medway's land is farmed, including for field scale vegetables, fruit, arable crops, and marshland permanent pasture, with cereal production a dominant land use.<sup>91</sup> Medway has a high proportion of land of the best and most versatile categories, particularly Grade 1, compared to the national and regional picture.



**Figure 6: Agricultural Land Classification**

7.9.3 The South East's horticultural production accounts for 1.6% of the total farmed area but delivers around a third of the region's entire agricultural output value. The region grows 40% of the nation's top fruit and soft fruit, much of it in Kent.<sup>92</sup> Within the county, the Thames Estuary is a key growing area, with top fruit and soft fruit production equivalent to approximately 11% of national production. Medway contributes about 6% of the South East's fruit and vegetable production, so horticulture is an important local farming activity.

7.9.4 With the agricultural sector responsible for about 12% of the UK's 2022 greenhouse gas emissions the climate emergency and climate change affects the countryside, habitats and water resources.<sup>93</sup> This places a responsibility on farming to adapt to new policy frameworks, environmental and market conditions.<sup>94</sup> Technology, innovation and changing agricultural practice may, however, bring growth and diversification opportunities for farm and land-based enterprises. The growth of viniculture across Kent and Medway is illustrative of this. New crops, and different ways of cultivating existing produce, could also make more efficient use of production inputs, including soil and land, water and energy. Industry bodies, consider the agri-food sector to be well placed to respond to the climate change and net zero carbon challenge in the South East, Kent and Medway.<sup>95</sup>

7.9.5 Growth and diversification of farming and horticultural activities may require supporting infrastructure, such as processing, packing and production facilities, within areas such as the Hoo Peninsula. Occasionally, visitor

attractions related for example to vineyards, also form part of an enterprise's approach to diversification. This can sometimes lead to significant change in the rural landscape, should existing employment locations and on farm sites, not be available or appropriate. Business growth needs under these circumstances will therefore need to be balanced by careful consideration of any potential adverse impacts on the character of the countryside and natural environment.

- 7.9.6 The Council recognises that the rural economy also encompasses an increasingly diverse range of farm diversification enterprises, and rurally located businesses, which contribute significantly to Medway's economy, spanning a variety of activities, beyond traditional land-based activities. This includes services, small scale manufacturing, food and drink production, community facilities, tourism attractions, and visitor accommodation. Locations include small industrial estates, settlements and local centres, and stand-alone locations within the built area of existing farm and other settings.
- 7.9.7 Rurally located businesses can experience however, poorer accessibility, quality of communications and broadband, in comparisons with urban areas. A further factor affecting the development of the rural economy and sustainable communities, is the limited availability of suitable land and buildings. The Council will therefore seek to retain existing community and employment sites and facilities, providing jobs and services for local communities, before considering other uses.
- 7.9.8 Medway's rural, estuarine and coastal areas also provide an asset and opportunities to develop tourism and leisure sector businesses and jobs, that are reliant on the special characteristics of the countryside, coast, and environment. This resource will therefore need to be safeguarded to ensure its environmental sensitivity and economic potential is not eroded by other developments.
- 7.9.9 Proposals for loss of employment uses, such as village shops, and community facilities will require a reasonable attempt made, without success, to secure a similar re-use of that property or site. Marketing evidence will have to be produced over a year or six-month period. Reasonable attempts mean responding to comments made by interested parties and offering flexibility to make the site more accessible, for example it could mean to lower the price but by a reasonable amount to ensure continuation of the use. A further option could be marketing the site in smaller parcels.

## Policy T14: Rural Economy

The vision for Medway's rural economy is to secure sustainable growth and service provision in rural communities, while seeking to protect and manage the impact on the environment, natural assets and landscapes.

Proposals for employment development in the countryside will be supported if the following criteria are met:

- It does not lead to significant loss of high-grade agricultural land and can be demonstrated that other employment locations, or locations of lower agricultural land value are not suitable.
- It can be demonstrated that the development will not create a significant amount of traffic that is inappropriate to the rural road network or results in unacceptable harm to the rural area and its surrounds.
- It is of appropriate scale to the location and the wider rural surroundings.
- It does not conflict with other policies in this plan.
- It does not result in the loss of key rural services and facilities that support the sustainability of settlements.
- Proposed developments must demonstrate high quality architectural design that enhances and respects the character of the surrounding area.
- Proposed developments must not result in an unacceptable level of harm to residential amenity, designated heritage assets, or environmental resources and biodiversity.
- Developers must provide adequate measures to mitigate any potential impacts to the environment.

Proposals for loss of employment uses and community facilities in rural settlements and locations outside of settlement boundaries, will need to demonstrate that existing uses cannot be viably sustained and that every reasonable attempt\* has been made, without success, to secure a similar re-use of that property or site.

\* Reasonable attempts mean responding positively and with flexibility to queries to enable securing an occupier for the use that needs to be retained. This could mean lowering the price, increasing or reducing the lease length if it were to be leased or looking at splitting the site up into parcels. To demonstrate this, marketing evidence will be required over a year or six-month period.

- 7.9.10 Medway's countryside contains a diverse range of employment opportunities from farming to industry, service-based and community focussed activities, and as such is not restricted to the UCO B classes, or the E classes use that usually defines employment.
- 7.9.11 The NPPF outlines the need to support a prosperous and sustainable rural economy; a need to make sufficient provision for conservation and enhancement of the natural environment; and measures to address climate change mitigation and adaptation.
- 7.9.12 The Government also recognises the many opportunities and challenges of rural areas across England, noting the need to take proper account of the needs and circumstances of rural communities to achieve outcomes in line with urban areas – a process referred to as 'rural proofing'. Challenges include the greater prevalence of smaller businesses in rural areas, a greater reliance in some areas on less productive industries – such as agriculture and tourism – and a smaller pool of labour on which to draw.
- 7.9.13 Infrastructure within the countryside is also designed for a sparser population and so any proposals need to ensure they do not impact adversely on the environment and existing communities, particularly where it is not appropriate to upgrade infrastructure to facilitate the development.

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- 7.9.14 Agriculture and rurally located businesses need to operate so as not to adversely impact on the integrity of Medway's international and national conservation designations, wider countryside, estuarine and coastal habitats. Rural and coastal areas, and agricultural activities, also provide valued ecosystems services, resources for flood risk management, recreation, human health and well-being.
- 7.9.15 Medway's villages provide a range of facilities for residents and visitors, such as shops, pubs, and local services. These community facilities and small businesses are critical to the sustainability of rural community life.
- 7.9.16 The UK's post 2020 trading arrangements with the European Union have created challenges and opportunities for agricultural and land-based businesses, the food and drink sector, which will take time to iron out. In part response the Government's support framework for the sector will lead to a changed approach to environmental land management, grant support and regulations.<sup>96</sup>

## 8. Retail and Town Centres

### 8.1 Introduction

8.1.1 Town centres play an essential role in community life and are intrinsic to perceptions of places. National planning policy states that town centres should be recognised as the heart of their communities, and Local Plans should pursue policies to support their viability and vitality. Town centres bring people together to shop, do business, and enjoy leisure time, and can also be a place to live. Medway has a complex geography with five traditional towns, and many neighbourhood, local and village centres at a smaller scale. Hempstead Valley Shopping Centre is a non-traditional District Centre, which has a good presence of major retailers.

8.1.2 There have been radical changes to how we shop over recent decades, notably the rise in online shopping. These trends were exacerbated during Covid and have led to changes in our traditional high streets, with decline in some town centres and the closure of many retailers. Changes to permitted development rights have extended the ability to change the use of buildings in town centres, such as from shops to restaurants and homes. Changes in national policy also leave weakened means to protect town centres.

8.1.3 Retailers have shown more interest in developing in out of centre locations, such as retail parks, rather than in town centres. Local people in Medway have raised concerns about the health and attractiveness of the main centres and have asked that the Local Plan address decline in areas such as Chatham, Gillingham and Strood. This is central to the plan's vision and strategic objectives for economic success, environmental wellbeing and quality of life. The Council is leading on a range of initiatives to promote and strengthen town centres across Medway, as part of wider regeneration and economic development plans.

8.1.4 Medway's town centres benefit from established infrastructure and transport links that support sustainable development.

### 8.2 Town centres strategy

8.2.1 The Council seeks to protect and strengthen our town centres, so that they are positioned to adapt to changing trends. They are no longer the primary focus for shopping, but still reflect the well-established role as places to bring people together and provide services. This can be enhanced through the cultural offer of our centres. Medway is rich in culture and heritage, which are key assets for successful centres. Medway's Cultural Strategy and our One Medway Council Plan place a strong emphasis on supporting, encouraging and creating cultural opportunities and businesses. Medway's town centres can play a significant role in this.

8.2.2 It is essential that our centres are inclusive, reflecting our communities – they should be dementia and child friendly places. Delivering housing in town centres locations will help to support demand for services and businesses, and provide for sustainable development, reducing the need to

travel to services, and having a choice of sustainable transport options. Opportunities for the provision of offices in these locations mean that workers benefit from access to services, and this has been identified as an attractive benefit for businesses in recruiting and retaining staff.

8.2.3 Medway has a network of six main centres with most in close proximity to one another, across the urban area, with Chatham at its centre/core. There are a further approximately 100 smaller centres across Medway that help to provide for Medway's residents in a sustainable way and support health (mental and physical) and social cohesion for healthier communities. Having a network of centres accessible by sustainable means and providing the facilities for day-to-day needs will help achieve a range of outcomes.

8.2.4 Medway Council is committed to securing healthy and vibrant town and local centres to meet community needs, provide choice, and contribute to our local economy. Town centres are key to sustainable development, as the cluster of services can minimise the need to travel, and they are well located in relation to a range of transport options. Making better use of the waterfront, which is a prevalent feature for three of Medway's main centres, will also add a dynamic and facilitate opportunities for supporting residents' health, providing a platform for events and festivals amongst other ambitions and encourages sustainable travel.

8.2.5 Our strategy aims to strengthen the centres by directing and retaining spend in the defined town and district centres, and managing proposals in inappropriate locations that would otherwise dilute the role and viability of the town centres if left unmanaged. This may include clawing back some trade being lost to locations outside Medway. The strategy will also seek to manage other retail designations and larger retail locations to ensure each functions appropriately and complementary to the defined centres and all work collectively as a network providing for the needs of Medway's residents.

8.2.6 Retail remains important for Medway's centres and will be directed to its centres with comparison (i.e. sale of goods like clothing, shoes, jewellery etc.) going to the larger centres and convenience (i.e. sale of food including supermarkets, green grocers, butchers, bakers etc.) retail being directed to existing and new centres, which achieves a good spatial distribution of provision allowing for easy and convenient access to such facilities. Chatham is the main location for the majority of comparison retail generally and could also benefit from further convenience retail. Where planned growth through the Local Plan results in significant change, there is scope to direct further convenience provision to a newly created centre or centres in identified strategic locations.

8.2.7 Urban regeneration sites offer opportunities to strengthen the role of town centres, including increasing the supply of housing and wider commercial and leisure activities. This approach would drive up footfall in town centres. Potential development in suburban areas would be required to avoid damaging the role of existing town centres. However dependent upon the scale of growth, there may be need to invest in new local centres so that residents can easily access local services. Potential development in rural areas, such as the Hoo Peninsula, where there are limited existing services,

would need specific consideration to enhancing retail floorspace to meet the needs of local communities.

8.2.8 Refer to Appendix A for maps of each centre, their proposed Primary Shopping Areas to which this policy relates in part.

## Policy S15: Town Centres Strategy

Active creation of a well-used sustainable, network of healthy centres and the regeneration of the Medway's existing town centres is supported; focussing on creating child-friendly, sustainable and accessible centres for people to connect, use for day-to-day purposes and enjoy throughout the day and night. Centres will retain and attract the required fundamental main town centre uses including residential, to support sustainable town centre living and reducing the need to travel. Healthy lifestyles and attractive centres can also be supported by improved green and blue infrastructure and public realm. Future-proofing our centres will need consideration of new technologies (communications, renewable and other), climate change mitigation and adaptation.

In doing so, planning decisions will have regard to the ambitions to provide the following alongside a growing and changing population:

- Retail provision is directed to Medway's centres with comparison goods retailing directed to the larger centres and new convenience goods retail provided in existing and new centres. This will achieve good spatial distribution of provision allowing for easy and convenient access to facilities.
- Creation of new centre/s in identified strategic locations of appropriate scale, quantity and distribution to support sustainable growth and travel patterns where justified by the plan's spatial strategy.
- The potential to deliver community, service, tourism, culture and creative uses, leisure and food and beverage uses in town centres must be explored thoroughly as sequentially preferable locations.
- The primary shopping area will be the focus of active uses that encourage footfall including E(a), E(b), E(c) uses alongside community, cultural and leisure uses. The focus of E(a) uses in Chatham will be along the frontage leading into the Pentagon, signalling its core along the High Street. All proposed uses must contribute positively to the vitality and vibrancy of the High Street, where individually or cumulatively do not have a detrimental impact on the function of the centre and High Street and the ambitions for each centre.
- In-centre and edge of centre locations will also be explored for further provision of employment uses outside of designated employment areas.
- Provision of housing to support urban-living and sustainable development.
- Enhancements and provision of green infrastructure, public realm and improved access to blue infrastructure where possible.
- Making better use of a valuable and distinctive waterfront.
- Consideration of advanced technologies and climate change.

8.2.9 The town centres strategy responds to changes in the economic climate. Many are market influenced changes, some reflect the impact of Covid, which have resulted in changed behaviours from retailers and residents.

Government policy changes have also weakened some of the planning tools available to local authorities to protect their high streets.

- 8.2.10 The Local Plan strategy is to create a network of centres, and direct growth to our main centres first before exploring other opportunities, i.e. brownfield first, main town centre uses in town centre locations first, and to define the roles and functions of our centres again. This reflects ambitions of national policy to provide sustainable living patterns with ease of access for residents. The NPPF also supports the town centre first strategy.
- 8.2.11 Commissioned evidence points to where growth of retail growth should be directed. The approach is consistent with this.

### **8.3 Hierarchy of centres**

- 8.3.1 The hierarchy of centres has been reviewed and confirmed through research and commissioned evidence including the North Kent Retail and Leisure Needs assessment 2016 and an update (2018) supported by in- centre surveys.<sup>97</sup> The evidence confirmed by analysis of the trading performance (turnover) and the presence of key infrastructure, services, retailing and supporting sustainable travel that Chatham should remain at the top of the hierarchy.
- 8.3.2 Each study had confirmed the hierarchy of centres with Chatham at the top, followed by the five district centres and numerous local centres, neighbourhood centres and village centres.
- 8.3.3 Many sites have been brought forward in Chatham including those owned by Medway Council. The Council has also led on public realm investment. The objectives identified in evidence base work remain valid and will be carried forward in policies to support delivery of our strategy.
- 8.3.4 The retail and town centre strategy supports a network of centres and directs growth to centres first. Chatham is the principal centre that has the highest scale of infrastructure and services; a bus station, community facilities, including two theatres; the largest proportion of comparison shopping, a diverse High Street offer, and access to a nearby train station. These aspects support sustainable travel, economic growth and social cohesion. The other district centres provide a distinctive role, which contributes to the creation of the network of complementary centres. Each of the local centres also add value, providing for local level top-up shopping and services without needing to go into the main centre.
- 8.3.5 New growth at strategic locations as part of the Local Plan spatial strategy may also need provision for additional retailing/community provision. The quantum and configuration of provision will need to factor in local needs, existing provision and shopping patterns. For example, on the Hoo Peninsula there is a limited offer of retail and wider services. Residents generally travel to Strood or Bluewater for their main grocery shop and comparison shopping in the latter location. The current main village centre in Hoo St Werburgh is constrained for further expansion and has lost some key services like banks and seen the change of use of properties to residential. Should further significant growth come forward on the Hoo Peninsula, additional provision for retail, wider commercial and community uses would

be essential for sustainable development. Similarly, where strategic scale growth take place in suburban areas, additional provision will be required for local and neighbourhood facilities. Provision should be complementary and slot into the existing network of centres that work together to provide convenience and for the needs of Medway's residents.

8.3.6 The retail hierarchy clarifies the sequential approach for prioritising and directing development to main town centres and provides guidance on the approach for the requirement of new centres emerging from the plan's development strategy.

## Policy S16: Hierarchy of Centres

The function of centres as multi-purpose destinations, meeting places and the main locations for retail, community, services, leisure and employment will continue to be supported in relation to their individual role, function and scale. Chatham is the primary centre with the highest level of infrastructure and services and has immense potential for further growth that will support multiple sustainability objectives. It therefore remains at the top of the hierarchy being the focus of the majority of comparison retail to meet the strategic needs for Medway's communities.

1. Medway's hierarchy of centres is:
  - a. Principal Town Centre: Chatham is the focus of high-quality regeneration, city scale infrastructure and services. It is the main location for comparison retail, community uses, essential services, leisure, tourism (in support of local heritage assets, tourism, creative uses and a cultural focus) and sustainable urban living with a vibrant evening economy.
  - b. District Centres: providing essential services, community uses to support sustainable living and creating efficiencies in linked trips. The Council will seek to maintain a balanced provision of uses appropriate and reflective of the character, scale and role of these centres (individually and in relation to Chatham to maintain the hierarchy): Strood, Gillingham, Rainham, Rochester, and Hempstead Valley.
  - c. Local/Rural Centres: The Council seeks to maintain the sustainably accessed local top up shopping offer and to satisfy the day-to day needs of the local population.
2. New local/rural centres or shopping parades/neighbourhood centres compliant with the Council's retail policies and strategy may be required in areas of strategic growth.
3. New centres need to be planned and appropriate in scale and function in serving the new/growing communities. In doing so, these centres also need to take into consideration the proximity and scale of existing provision to avoid compromising the health of existing centres. Proposals will need to be supported by a robust justification talking into account the existing provision, demographics, character and scale of the area.

8.3.7 Responses to earlier consultation on the emerging Local Plan challenged Chatham being at the top of the hierarchy. Officers commissioned further

work which has confirmed Chatham's position. The Council has adopted a Chatham Design Code that endorses this approach and provides a robust basis for further development and attracting investment to deliver on the strategy. Chatham is central to the network of centres to provide for day-to-day needs of people in a sustainable manner and includes a wider function for which it is best positioned to achieve.

- 8.3.8 Evidence base work has confirmed the distinct role of each centre and ability to complement one another in an effective network of centres.
- 8.3.9 Medway has six main centres, with their own character, and role to play in supporting Medway's sustainability ambitions.
- 8.3.10 The approach is compliant with the NPPF which requires definition of a robust hierarchy that can respond to rapid economic changes, that is able to respond to people's needs and provide choice. It also supports easy, sustainable access to services and facilities, which will support environmental objectives of reducing carbon emissions and helping reducing movements on the road networks.

## **8.4 Sequential assessment**

- 8.4.1 We need to protect our centres and one of the remaining mechanisms in national planning policy is the application of the sequential test. This requires a sequence in considering sites (for proposals not in the town centre and/or not in accordance with the development strategy in the local plan) in identifying the most appropriate location for main town centre uses. The approach on in-centre first, followed by edge and out of centre sites is set out in national policy. If no town centre or edge of centre sites are available, then, out of centre sites can be considered with preference given to accessible sites which are well connected to the town centre.
- 8.4.2 This will support the town centre strategy, retail hierarchy and will ensure a sustainable approach to providing for the needs of the local population and the ability to respond to future changes. To achieve this, priority is given to our designated centres as sustainable options. Medway's traditional (High Street) centres are those that require an economic uplift, enhancements and diversity in uses to provide choice and competition. Hempstead Valley Shopping Centre has a stronger economic position and ability in providing for the local population. The Council has supported its growth but recognises that a balance needs to be achieved between all its centres to create a healthy competitive network of centres and provide for local needs. Priority is therefore given where greater support is required.
- 8.4.3 Medway's retail parks and leisure designations, such as Medway Valley Park will also need to give due consideration to the sequential test to ensure that in centre locations are not capable of accommodating the proposed use.
- 8.4.4 Definition of catchment areas is the first step and needs agreement with the Council and is dependent on the scale of the proposal and the sphere of influence and trade draw. Through the sequential assessment, the applicant must also demonstrate flexibility in scale and format particularly taking account of issues of locality. The sequential assessment must be

proportionate to the scale of the proposal and/or importance of the site for delivery of the development strategy.

8.4.5 This policy approach will support all the strategic objectives of this Local Plan by supporting a concentration of activity in specific accessible locations that would create a stronger economy, encouraging sustainable means of travel, ease of access to service and facilities and thereby supporting a healthier lifestyle.

## Policy T15: Sequential Assessment

Main town centre uses are directed to Medway's centres first.

Proposals to provide or expand main town centre uses outside of defined traditional centres including retail parks, leisure designations and Hempstead Valley Shopping Centre, and where not in accordance with the development plan and/or any part of the retail and main town centre uses strategy within it, are required to demonstrate through a sequential assessment that there are no sequentially preferable sites available, i.e. the proposal must follow the assessment sequence of in-centre first, edge of centre and then out of centre.

The sequential assessment must be supported by a Council agreed and defined catchment area and proposal footprint at the earliest opportunity. The proposed use, scale and trade draw of the proposal will determine the appropriate location within the hierarchy of centres, e.g. city scale in Chatham, large scale specialised, evening economy and diversification of uses in main district/town centres and small scale within local centres.

LPA's and applicants must demonstrate flexibility in scale and format when assessing sequentially preferable sites. Flexibility includes locational requirements, in particular town centre sites are highly accessible, therefore car parking requirements are expected to be significantly reduced.

When considering sequentially preferable edge and out of centre sites, due to the unavailability of large central sites, preference will be given to sites that are accessible and well connected to town centres.

All proposals must demonstrate sustainable travel choices in support of the application submission and must thereby satisfy sustainable transport policies DM18 and DM19.

8.4.6 Government policy supports the growth and sustainability of town centres through a 'town centres first' approach. The NPPF makes clear that proposals for new main town centre uses should be located by preference within or on the edge of town centres.

8.4.7 Medway has six different main centres. Whilst each centre offers a unique character, the formation of Medway has resulted in a polycentric arrangement of centres requiring a definition of hierarchy and mechanisms to maintain and manage that hierarchy. The sequential test is one of them.

8.4.8 Medway's centres are also challenged by out of centre proposals including proposals within leisure or other retail designations. To ensure Medway's

centres and its High Streets grow to become healthier and successful in their own unique way, it is important to direct growth to the main centres first.

## 8.5 Ancillary development

8.5.1 With more interest in what may be considered cost effective out-of-centre locations for the provision of main town centre uses, proposals come forward in different ways, such as ancillary development. However, the ancillary nature does not necessarily always follow through and can result in permissions for main town centres uses in out of centre locations without requiring the appropriate tests. For example, local garages can provide a top up convenience function where a retail use supports the main function. In such circumstances the ancillary nature of the retail use needs to be appropriate in relation to the predominant use, i.e. the ancillary use must be dependent on the predominant use for access and operational purposes. There may be other circumstances that require an ancillary approach. However, this needs to be carefully managed to prevent adverse and cumulative adverse impacts on centres. Protecting Medway's centres contributes to strengthening the most accessible locations for residents to satisfy their needs, sustainable travel, and maintain healthy lives.

8.5.2 A predominant/main use can range from taking up a small to a much larger floor area (for example, a climbing wall takes up a small floor area, leaving possibly 80-90 percent of the unit for another use). The other use would not be classed as 'ancillary' based purely on the disproportionate scale. However, there may be circumstances where this could be classed as ancillary, i.e. it would then be important for the applicant to satisfy other required criteria to demonstrate the ancillary nature. The policy approach addresses this.

### Policy T16: Ancillary Development

Ancillary development proposals for main town centre uses are required to be compliant with the sequential test policy T15 as set out above. To demonstrate and justify its ancillary nature, it must also satisfy the following:

- a. the scale of the proposal must be smaller than the predominant/main use. Where this is not possible, the proposal must satisfy all other criteria listed below from b. to f;
- b. the proposal must be demonstrated as necessary or complementary to the business operations;
- c. the type of use is secondary/dependent on and cannot function independently of the predominant/main use;
- d. it must be demonstrated that there are dependencies and a direct relationship between the ancillary proposal and the predominant/main use;
- e. access to the ancillary use is dependent on access used by the predominant use and where not feasible, all other criteria listed in a, b, c, d and f are satisfied; and
- f. consideration will be given to the physical location of the proposal in relation to the predominant/main use when assessing c, d and e above.

It may be necessary to manage the ancillary use through condition to maintain its secondary nature. The scale of the proposal may also require an impact assessment and therefore requires compliance with Policy T17 (impact assessment) where it meets the criteria.

*Question 16: Do you support the approach to manage ancillary development outside of centres in this way?*

8.5.3 To ensure Medway's centres are protected from out of centre proposals that are not clearly defined and could result in cumulative impact if not managed appropriately. This will help protect Medway's centres from trade and spend being drawn away from its centres, where not justified appropriately and accords with the NPPF's 'town centre first' approach.

## 8.6 Impact assessment

8.6.1 The recession, desirability of out of centre locations, relocation of main anchors coupled with online shopping have left many of our high streets in a vulnerable position requiring a refocus of the role and function of our centres.

8.6.2 Medway's centres may not be able to claw back a significant amount of trade, but by protecting and strengthening our centres and giving priority to all retail designations, healthier centres can be created to support the needs of the local population in a sustainable way.

8.6.3 When assessing applications for retail and leisure development outside town centres not in accordance with an up-to-date Local Plan, local authorities are expected by national policy to require an impact assessment with the application of either a locally defined threshold or the national set threshold of 2,500sqm. Proposals to date have relied upon the national threshold, in absence of a locally defined threshold. 2,500sqm represents a large scale and quantity of floorspace compared to the typical size of units in each centre and would therefore have a significant impact. It is therefore too large to reflect the local context. In addition, the cumulative impact of out of centre proposals will also have a resounding impact on the health of centres in Medway. Monitoring of retail developments in Medway show that recently more planning permissions for retail in out of centre locations compared to in town centres.<sup>7</sup>

8.6.4 Given the vulnerability and regeneration initiatives for some of Medway's town centres, it is important that there is appropriate protection from the threat of trade being drawn to out of centre locations, and that a locally determined retail impact threshold be set. This approach supports building stronger centres encouraging a concentration of uses in centres that are better able to support future growth in Medway and in so doing supports healthier lifestyles where services and facilities are easily accessed sustainably.

8.6.5 The local thresholds will be defined by further detailed analysis of centres and the development strategy defined for the Local Plan. The evidence

<sup>7</sup> [https://www.medway.gov.uk/downloads/file/8541/authority\\_monitoring\\_report\\_-\\_volume\\_1\\_2023](https://www.medway.gov.uk/downloads/file/8541/authority_monitoring_report_-_volume_1_2023)

gathered up to late 2021 has been used to inform the policy approach captured below. A refresh of this evidence is underway and will be available to provide verification or updates to the actual thresholds indicated. For further detail on the definition and methodology for arriving at the thresholds refer to the retail topic paper. The outcomes of the 2021 analysis is used as a basis for consultation as presented below in the table within the policy. The identified thresholds become applicable where proposal sites are close to a particular centre and applicability will be reliant on case officer discretion.

## Policy T17: Impact Assessment

Proposals that seek to provide or expand retail and leisure uses in edge or out of centre locations including retail parks, leisure designations and Hempstead Valley Shopping Centre will be permitted where:

- it is supported by an impact assessment where proposals for comparison, convenience retail, or leisure (including food and beverage and other large-scale facilities like bowling alleys and ice-skating rinks etc.). The scale of food and beverage proposals will be given locational consideration.

Thresholds trigger	Comparison (gross sqm)	Convenience (gross sqm)	Leisure (gross sqm)
Chatham	1,000	200	500
Gillingham	250	250	250
Strood	250	250	100
Rochester	200	200	500
Rainham	350	400	150

- it is demonstrated that the proposal would not have a significantly adverse impact on:
  - The strategy - development, retail and main town centre uses strategy.
  - Vitality, vibrancy and viability of centres within the catchment of the proposal.
  - Existing, planned or committed investment in, or supporting town centres.
  - The health and sustainability of centres with due consideration given to the cumulative impact of proposals considered relevant.
  - The vulnerability of the Medway's centres with due consideration given to the local context.

Where appropriate development proposals may be conditioned or legal agreements established to manage the impact on centres, particularly where the impact is not considered significantly adverse to justify refusal and where proposals come forward in increments and can have a cumulative impact.

The Council may also require public realm works, signage or other to facilitate better linkage with neighbouring centres to assist with linked trips.

All proposals must demonstrate sustainable travel choices in support of the application submission and must thereby satisfy sustainable transport policies DM18 and DM19.

- 8.6.6 National policy supports the requirement of impact assessments where proposals are above 2,500sqm or a locally defined threshold exists.
- 8.6.7 This policy approach awards a level of protection for Medway's centres by ensuring locally defined thresholds are used as a trigger for the requirement of impact assessments, reflecting local circumstances. The impact assessments will determine how proposals outside a centre will draw trade away from the centre and/or have a significantly adverse impact. This will help inform decision-making.

*Question 17: Do you support the approach to protect Medway's centres by requiring impact assessments in circumstances set out in the policy above?*

## 8.7 Chatham town centre

- 8.7.1 Chatham town centre, as the highest order centre in Medway, is underperforming. The centre's role and function are compromised further by the lack of a modern foodstore, and by a limited evening economy offer. There are clear opportunities for delivering improvements to the retail and town centre offer and if these opportunities come forward, there is every potential to reinforce itself as a healthy, vital and viable centre. The Chatham Design Code, development briefs and masterplans produced for this primary centre identify a number of opportunities, which could accommodate additional comparison goods retail and commercial floorspace and housing. There are opportunities to accommodate new development and redevelopment in Chatham town centre, and these should be safeguarded and promoted over the plan period through pro-active planning coupled with resistance to out-of-centre competition.
- 8.7.2 The Council has identified opportunities to significantly increase residential development in the centre of Chatham. This has the potential to increase footfall and patronage to existing and new facilities on the High Street. The combination of investment in town centre living, provision of community uses, making it child friendly, comparison goods floorspace delivery, retention of anchor tenants, attracting new operators and a mix of wider town centre retail, wider business, culture and leisure uses, has the potential to underpin a more positive future for Chatham town centre as Medway's highest order centre. Chatham town centre should continue to be the highest-order centre in Medway; a hive of activity and a destination for people to live, work and enjoy.
- 8.7.3 Medway's Cultural Strategy sets its ambitions to reposition Medway as a hub for culture. Supporting the evening economy, celebrating heritage and hosting festivals and events form part of this strategy and can be achieved in Chatham. The Child Friendly Medway initiative has identified key strands that contribute to the Local Plan vision and strategic objectives and ambitions for Chatham Town centre including supporting healthy lifestyles, ensuring spaces are cleaner and greener, being more community focused, providing opportunities for culture and creativity, providing a safe place and being aspirational. These are also reflected in the One Medway Council Plan.

8.7.4 Chatham has recently seen investment in the public realm and new housing, through regeneration and development. The Council is leading on much of this work. A Design Code for Chatham has also been prepared to guide future development in delivering environmental and design quality.

8.7.5 Opportunity sites including the Pentagon Centre, the former Debenhams and Trafalgar Centre sites provide for redevelopment opportunities and enhancements to add increased value and change to the high street. Medway Council has acquired the Debenhams site and the Pentagon, the latter of which is seeing some changes to attract uses and make use of under-utilised units. The updated strategic guidance and influence on key development sites provide excellent opportunities to act as a catalyst to realise the vision and aspirations for Chatham and build confidence in the wider market.

8.7.6 Peripheral areas of the town centre – particularly the western end of the High Street (west of Military Road) have seen sites being redeveloped to provide for new homes in recent years. The Council continues to support the introduction of additional residential uses within the town centres on appropriate sites, to help attract additional footfall and therefore support the wider vitality and viability of the town centre. The Whiffens Avenue former car park and the Chatham waterfront sites are under construction. Mountbatten House at the bus station entrance to the Pentagon has also progressed and construction is underway. It is important for the primary shopping area to retain a critical mass of retailing activity, to meet the demand of new population, help ensure strong levels of footfall and complement the diversification of uses in secondary areas of the town centre.

8.7.7 Masterplans were prepared for three centres in Medway that had the highest potential for residential growth. These masterplans were commissioned to support the Local Plan strategy, which focusses on optimising brownfield sites first before investigating valuable greenfield sites. In the case of the Medway Local Plan, the brownfield areas of priority for consideration are the existing town and district centres. The Chatham masterplan provides strategic ambitions and some more detailed guidance on key focus areas and uses along the high street. Taking this a step further, the Chatham Design Code offers more detailed and considered guidance to steer developer proposals. Alongside this is the HAZ guidance along the lower high street and the Luton Arches Neighbourhood plan. The neighbourhood plan now forms policy and will be used to guide development. Linkages between these various strands of policy and guidance is very important in making clear the intention for the centre and Medway's aspirations.

## Policy S17: Chatham Town Centre

Chatham Town Centre is a sustainable waterfront town with the potential for city scale infrastructure and is the main centre within the network of well-connected centres in very close proximity to one another making ambitions of sustainable travel and urban living possible. Chatham Town Centre will be the heart of the community, hive of activity and a destination for people to live, work and enjoy. It has a diverse high street offer set in a respected historic context and is a location

for comparison retail, community uses and services, commercial leisure (food and beverage), creative uses, culture and tourism. Medway's primary centre's role extends beyond satisfying local need, attracting visitors from across Medway and neighbouring authorities.

It has strong links with the universities in Medway, the hospital and creative industries. Connectivity with the Chatham Dockyard and Chatham Intra areas are important linkages, which when enhanced will improve connections to and support the growth of the creative and cultural sectors and helping to reposition Medway as a cultural hub.

Development within the centre will grow the resident population and create the demand for the expansion and creation of further job opportunities, community uses and services and provide a range of creative, cultural and leisure experiences throughout the day and night and be supported by the appropriate level of enabling infrastructure. In doing so development:

- Must comply with the 2019 Chatham Masterplan and Chatham Design Code or the most up to date guidance.
- Must comply with the main thrust of the High Street quarters concept within the Chatham masterplan and the desired uses within a Primary Shopping Area. Each quarter provides a focus, which guides the type of uses that would be appropriate. The units at the entrance of the Pentagon are particularly important as signalling the core of the high street where retail is predominant. The type of uses can increase in diversification when moving away from the Pentagon along either side of the high street.
- Must also adhere to the Arches Chatham Neighbourhood Plan policies and Star Hill to Sun Pier Development Framework guidance where relevant.
- That explores opportunities for provision of convenience retailing will be favoured to complement the existing offer and extend operating hours.
- Proposals for ground floor residential uses along the High Street will be favoured on the eastern end of the High Street closest to the White Lion pub and above ground floor anywhere along the High Street with appropriate justification supporting planning applications. This does not preclude residential development from happening anywhere else in the town centre where justified and does not impede activity, sustainability or the health of the High Street.
- Proposals for employment uses in and on the edge of the town centre is encouraged to support sustainability and accessibility.
- Must include consideration and demonstrate of how to make the centre child-friendly. This could include uses that occupy shop units, creatively designed multipurpose furniture/seating, opportunities for active uses along the waterfront.
- Proposals that include enhancing or creating culture, creative industries, community uses as well as enhancing the evening economy will be supported.
- That includes creative, innovative and cultural uses must explore opportunities to enhance connectivity with the Chatham Intra and Dockyard areas by way of use proposed and its co-location/location along the high street.
- Will be favoured where they include public realm enhancements to create an attractive place to live, work, shop and enjoy.

Proposals for opportunity sites will be guided by the following:

- The former 'Debenhams' site is designated for comprehensive redevelopment, which could include residential, employment, leisure, commercial leisure, food court, child-friendly uses, car parking.
- The 'Pentagon' is designated as an opportunity site for enhancements. Units on either side of the High Street Pentagon entrance must sign post the Pentagon shopping centre and reinforce the 'core' along the High Street.

**Question 18: Do you agree with the proposed Chatham town centre boundary?**

**Question 19: Do you agree with the identification of the Primary Shopping Area boundary proposed within Chatham town centre?**

8.7.8 To assist in answering the questions above please refer to the Appendix A for the boundary map and the retail topic paper which provides background to the choices made and option proposed.

8.7.9 Chatham is Medway's highest order centre which has city scale infrastructure already established and able to respond most positively to sustainability requirements. It has been justified and supported through numerous studies that Chatham should remain at the top of the hierarchy.

8.7.10 Numerous development opportunities exist, have and are being delivered to increase footfall into the high street. This is supported by identification of a core shopping area.

## 8.8 Rochester district centre

8.8.1 Rochester is a centre rich in history, culture and heritage value. These assets draw in residents and visitors, which can be attributed to its success.

8.8.2 The strategy for Rochester over the course of the Plan period should be one of consolidation and continued support of the existing retail and town centre offer, rather than one of expansion. It is not appropriate to plan for a significant quantum of comparison goods floorspace where the constrained nature of the centre and its designation as a Conservation Area limit the scope for significant expansion of the existing retail offer. Individual proposals for extension, reconfiguration or modernisation of existing retail units should be considered on their individual merits.

8.8.3 The clear qualitative gap in the retail offer on Rochester High Street is the provision of a foodstore. However, the proportion of independent food retailers contribute toward its success. Whilst there is a small top-up food shopping facility on High Street, its offer is limited and in reality we expect most residents in the Rochester area will travel to facilities in nearby Strood. More recently planning applications in Rochester Riverside and the site adjacent to the rail station have included the provision of a small element of convenience retail (food store). Whilst not on the High Street, the offer presented by these two options are complementary and easily accessed. Linked trips are also a possibility where connectivity to the High Street is facilitated.

## Policy S18: Rochester District Centre

Rochester District Centre is well known for its heritage, leisure and cultural offer drawing on custom beyond the local population. The centre is supported by a strong restaurant and café offer complemented by independent shops and boutiques but is lacking in convenience retail provision. Opportunities for the provision of top-up convenience goods retailing will be supported as well as other proposals that support this centre's role where a balance is achieved with the existing provision and is in-keeping with the current independent shop character.

**Question 20: Do you agree with the Rochester district centre boundary proposed?**

**Question 21: Do you agree with the Primary Shopping Area boundary proposed within Rochester district centre?**

- 8.8.4 To assist in answering the questions above please refer to the Appendix A for the boundary map and the retail topic paper which provides background to the choices made and option proposed.
- 8.8.5 Rochester is one of the more healthy and successful centres in Medway with its heritage and cultural assets as the key attractor. The Council will continue to support the continued successes here. One missing element would be the convenience retail provision, which could be beneficial for residents in the area.

## 8.9 Gillingham district centre

- 8.9.1 Masterplans were prepared for three centres in Medway that had the highest potential for residential growth. These masterplans were commissioned to support the Local Plan strategy. The masterplan for Gillingham provides further guidance on key ambitions of the district centre and must be used to guide development proposals that come forward. Further corporate initiatives are currently underway for Gillingham, offering the opportunity to progress visioning for its future, and refreshing the design and development guidance for the centre.
- 8.9.2 The centre is tightly surrounded by a dense residential area with universities, colleges and student accommodation close by and captures trade from this local catchment. Whilst accessed by foot, bus, train and vehicles the most popular means of access is on foot (63%). This is probably down to the larger older and younger student age populations groups in the area. Opportunities therefore exist to diversify the existing offer for low spend top-up shopping to include additional uses for the younger generation like off-campus facilities closer to their residential quarters.
- 8.9.3 The western end of the high street provides the evening economy uses well frequented by the student population. This could be enhanced to increase footfall and dwell time on the high street.
- 8.9.4 Opportunity sites exist along the high street to modernise units, deliver housing (above ground floor) and assist in attracting retailers to support diversifying the offer.

- 8.9.5 Diversification at present takes the form of a much-loved market, which increases footfall into the centre and indicates where the offer is lacking.
- 8.9.6 A central focus/public square could also add value and interest and offer something additional that all can enjoy or participate in, where used for activities and tied into its military heritage.
- 8.9.7 Opportunities also exist to explore the traffic movement through the district centre to reduce traffic congestion and support a healthier centre.

## Policy S19: Gillingham District Centre

Gillingham Town Centre performs a local function, catering for the needs of residents within its catchment. It provides sustainably accessed community facilities and services and a vibrant market necessary to cater for day-to day needs. Opportunities for diversification and regeneration to enhance the offer, public realm, accessibility, emphasise and celebrate its military heritage will be supported.

This can include the formalising of a square for events and activities, opportunities to co-locate community facilities to improve accessibility and convenience, enhancing the food and drink offer on the western part of the high street, creating opportunities for a greater variety of uses on the high street that increases dwell time and improving vehicular movement that supports the function and health of the centre.

All proposals must comply with the Gillingham Masterplan 2019 or most up to date guidance.

- 8.9.8 The masterplan produced demonstrates opportunities that can be explored to help support growing a healthier centre. Gillingham has the potential to be a thriving centre, and have stronger links to wider regeneration and development areas.
- 8.9.9 Commissioned retail evidence provides an assessment that identifies areas for improvement and intervention in Gillingham.

*Question 22: Which option or combination of options would you choose for the Gillingham district centre boundary?*

*Question 23: Do you agree with the Primary Shopping Area boundary proposed within Gillingham district centre?*

- 8.9.10 To assist in answering the questions above please refer to the Appendix A for the boundary map and the retail topic paper which provides background to the choices made and options proposed.

## 8.10 Strood district centre

- 8.10.1 Strood sits to the west of the River Medway with access to the M2 motorway and Medway Valley to the south and Hoo Peninsula to the north. It has historically had a commercial focus serving the needs of Rochester across

the river that is dominated by its role as a gateway with major highways and rail connections running through it.

- 8.10.2 Strood has multiple supermarkets present within the district centre and fast train connections into London. Strood also has a retail park on the edge of the centre, which plays an important role in attracting footfall into the centre in combination with the supermarkets. Further opportunities to better connect the retail park and centre are encouraged. Recent developments have improved crossing points and provision for pedestrians.
- 8.10.3 The town centre boundary has been proposed to extend to include the shopping parade just before Rochester bridge. Recent public realm works has helped connect these two areas and bring the centre closer to the waterfront where opportunity sites for development exist.
- 8.10.4 The Strood Town Centre masterplan identified opportunity sites within the district centre and options for transport improvements. The indepth analysis and detailed outputs provides a very strong framework which can still be relied upon now as guidance. The detail has been captured in the policy as a basis for consultation.
- 8.10.5 The southern end of the site between Cuxton Road and the A228 is a mixed-use area that consists of residential housing and commercial spaces that provided for a range of services. This mixture of use gives this area a poor perception of space.
- 8.10.6 Adjacent to the River Medway is the former Council site that was scoped for the delivery of riverside residential use. This site is currently being considered by planners through a submitted planning application.
- 8.10.7 Between the Medway Valley Railway Line and the A228 are presently large-scale retail units that fall outside of the town centre. These consist of a supermarket and the Strood Retail Park.
- 8.10.8 Strood is going through significant change. The ambition for delivering major residential led riverside regeneration is illustrated in the Strood Waterfront Development Brief 2018. Major flood mitigations have been delivered and improvements made to the rail station access and parking. There are opportunities to consolidate Strood's role as an important integrated transport hub, supporting links to wider communities, including the Hoo Peninsula.

## Policy S20: Strood District Centre

Strood Town Centre is known as a convenience retail destination and performs a local function. Being the first train stop in Medway, Strood offers a greater potential to become a more attractive destination of choice with great travel links into London. In doing so, opportunities exist for the expansion of its role to include a more diverse employment and retail offer alongside further residential growth.

All proposals must comply with the Strood Masterplan 2019 or most up to date guidance.

Adjacent to the town centre is a large edge-of-centre retail park. At present, the retail park is a significant attractor of visits to the town. As a retail park or until alternate proposals emerge, opportunities for better connections to the High Street

and the centre, to encourage more linked trips, should be explored, particularly where proposals come forward for additional / re-organised space at the retail park.

The Strood Opportunity area, as defined on the Policies Map, identifies the regeneration opportunities over the plan period, supported by up-to-date evidence. Proposals for growth in the centre will be guided by the following:

- The development of approximately 800 residential units.
- The development of a central public open space.
- The development of approximately 22,000 sq. m commercial space (mainly office space).
- The centralisation of a community hub and creation of a new health hub.
- Approximately 14,000 sq. m of light industry.
- Highway improvements to relieve traffic problems and enable delivery of the vision for Strood.

8.10.9 This policy is a strategic policy to regenerate Strood to help improve its vitality and vibrancy as a centre, but also to make it a more productive and attractive place. It also supports the Council's vision to minimise the loss of greenfield land through the careful use of brownfield sites. National policy and guidance support this approach.

8.10.10 Strood has been chosen to be highlighted as an opportunity area due to its potential for regeneration. The potential of Strood for regeneration is due to the availability of land to bring forward and excellent connections that both make it an attractive proposition for development opportunities.

8.10.11 To support this policy the Council commissioned to Strood Town Centre Masterplan 2018. The masterplan set out proposals for uses, public realm and also delivery across the plan period.

8.10.12 The masterplan highlighted that Strood had poor quality open spaces, was dominated by traffic, suffered from flood issues; but did not lack in services and facilities environment.

**Question 24: Which option or combination of options would you choose for the Strood district centre boundary?**

**Question 25: Do you agree with the Primary Shopping Area boundary proposed within Strood district centre?**

8.10.13 To assist in answering the questions above please refer to the Appendix A for the boundary map and the retail topic paper which provides background to the choices made and options proposed.

## 8.11 Rainham district centre

8.11.1 Rainham district centre is amongst the smallest of the district centres in Medway, and generally appears to be functioning well in this context. The centre benefits from an anchor store (Tesco), which although housed in relatively dated premises, performs well. The presence of other multiple

retailers also aids the vitality and viability of the centre. Whilst the district centre has a low vacancy rate, it would appear that demand for premises in the centre is generally weak, and consequently when vacant units arise they are occupied by low-grade retailers.

- 8.11.2 In close proximity to Rainham is the Tesco Extra store and an Aldi at Gillingham Retail Park, so competition is strong. The existing Tesco in the district centre supports the daily needs, convenient shopping and still adds local value and function.
- 8.11.3 The centre's vulnerability and health is also reflected by its venue score market position (Lower Middle) and ranking (1167), which is significantly lower than the rest of the centres in Medway. Whilst the centre benefits from being pedestrianised, it appears visually dated and could benefit from upgrades. Landscaping and public realm are considered important in supporting the long-term vitality and viability of the centre. Efforts should be made to keep it fit for purpose. Improve its health by supporting opportunities to improve the food and drinks offer and sustainability with the cycle and green links.

### Policy S21: Rainham District Centre

Rainham District Centre provides for the local community needs and must remain fit for purpose. Improvements in connectivity by way of cycle links and green spaces and Wi-Fi will be supported. Opportunities for improving the food and drink offer will also be supported.

- 8.11.4 Various studies commissioned confirms Rainham's position in the hierarchy and identifies key areas for improvements. It provides for local needs and should be maintained as such.

*Question 26: Which option or combination of options would you choose for the Rainham district centre boundary?*

*Question 27: Do you agree with the Primary Shopping Area boundary proposed within Rainham district centre?*

- 8.11.5 To assist in answering the questions above please refer to the Appendix A for the boundary map and the retail topic paper which provides background to the choices made and options proposed.

## 8.12 Hoo Peninsula

- 8.12.1 The Council has identified the potential for significant development in some suburban areas in Medway and on the Hoo Peninsula as part of the preparation of the new Local Plan. The development strategy has not yet been finalised. However the Council recognises that should major growth take place in this rural area, the local services, including retail, will need to be expanded. Currently rural residents often travel to either Strood or Bluewater to undertake their main grocery shop, and comparison shopping

in the latter location. The existing provision in Hoo is limited, and the village centre is physically constrained. The smaller villages across the peninsula have even more limited retail facilities. There is a need to address the existing deficiencies to meet the needs of local residents. This may involve considering new services outside the existing village centres, and may be integrated with future development.

8.12.2 The Council is collating evidence as part of the preparation of the Local Plan, which includes identifying the infrastructure and services needs linked to growth. The retail evidence base notes that the current provision for the Hoo Peninsula is limited and the reliance on shops off the Peninsula and delivery services. This is unsustainable. There is evidence of potential demand for further food stores on the Peninsula to better serve the existing population. Should the area see further major growth as part of the wider spatial strategy for Medway, specified increases in retail floorspace will be required. Dependent on the scale, location and nature of future development, this may involve a complementary centre to the existing village centre. New provision needs to be mindful of the existing provision in the area to prevent harming the existing centres.

8.12.3 Should the area see further growth, appropriate locations for additional neighbourhood centres should be chosen guided by sustainable and safe access to the majority and creating a network of neighbourhood centres within 15-minute walking distance. These neighbourhood centres should provide for either community uses, essential services or top up shopping facilities at its core. It could be composed of 1 to 5 units grouped together. A main centre that could accommodate a larger convenience retail offer would be best co-located with other community uses to ensure benefits are optimised that best serve new communities. Concentrating uses in one area ensures ease of access for all, safe access, convenience and time-saving of undertaking more than one task/errand in one area, higher footfall to support the shops and hence a healthier centre.

## Policy S22: Hoo Peninsula

New growth for the Hoo Peninsula will require support infrastructure and centres to provide for the needs of new residents. Current deficiencies in provision provides a unique opportunity to ensure appropriate provision for residents but also support efficiencies and sustainability.

New centres need to be planned and appropriate in scale and function in serving the new/growing communities.

A balance needs to be achieved taking into account the existing centres and their roles and functions. New centres must be complementary to the existing and should not undermine the existing village centre. Proposals will need to be supported by a robust justification and up to date evidence talking into account the existing provision, demographics, character and scale of the area.

To ensure place making ambitions are achieved, the new centres must ensure co-location of uses in a concentrated area to benefit from footfall and linked trips. This is key to ensuring healthy centres in support of social cohesion.

8.12.4 Where growth in Hoo is envisaged, it will need to be supported by infrastructure, service and facilities. Updated retail evidence tests a range of housing thresholds which can help guide planning applications. These new centres will help create a better network of provision supporting the resident population on the Hoo Peninsula.

*Question 28: Would provision of a supermarket in Hoo be beneficial to residents to encourage sustainable travel patterns, convenience and sustainable lifestyles?*

## 8.13 Hempstead Valley district centre

8.13.1 Hempstead Valley district centre is unique amongst the Medway centres in that it compromises, in its entirety, a purpose-built indoor shopping centre. Although a district centre in retailing terms, the lack of a High Street and the relative shortage of non-retail facilities means that Hempstead Valley functions in a different way to the 'traditional' district centres of Strood, Gillingham, Rochester and Rainham. There is ample free car parking and there are advantages over the 'traditional' town centres in Medway in that expansion / reconfiguration is much easier for modern stores being a modern built form. It is anticipated that Hempstead Valley will be a key retail area supporting the proposed growth of Lidsing Garden Community, just over the border in Maidstone borough.

8.13.2 Hempstead Valley shopping Centre is a healthy centre and has seen more proposals for expansion with a particular focus on commercial leisure uses in recent years. The North Kent retail study recommended a need for modernisation and provision of service-oriented uses in support of its growth but not necessarily for it to be equalised with the traditional centres. Proposals for its growth will be considered on its own merits against its role and function in the retail hierarchy.

8.13.3 The study concluded that there was no qualitative need for additional comparison and convenience retail provision. It also raised concerns over the potential for additional space to have a detrimental impact upon Chatham town centre. Recent trends have shown a change of focus for our centres and the nature of retail becoming more digital rather than having an on-street presence. Therefore, whilst the shopping centre does provide a focus for the population living in the southern part of Medway and also helps to retain shopping trips, there is strong case for a policy approach which manages how Hempstead Valley evolves over the life of the Plan in order to protect other town centres and retain and manage the hierarchy of centres. It is considered that a criteria-based policy in assessing retail and leisure development within the centre boundary would provide a sound approach, which has been confirmed as successful in other authorities in similar contexts.

## Policy S23: Hempstead Valley District Centre

Hempstead Valley is a non-traditional centre without a high street. It functions differently to the other traditional centres with high streets and therefore has a varied role and function. The Council recognises that it provides for local needs and therefore supports its modernisation and growth in appropriate circumstances, particularly proposals are supportive of its local function and role in the retail hierarchy.

Further retail and leisure development, appropriate to the character, function and role of the centre will be supported, following a sequential assessment (Policy T15) and impact test (Policy T17), where it can be demonstrated that it does not undermine the vitality, viability, role and function of the main town centres in Medway, or undermine the retail hierarchy as set out Policy S16.

The Council may also require consideration of the cumulative impact of recent consents to manage impact on other centres more appropriately.

8.13.4 The Council seeks to ensure that centres that require support to grow into healthier centres are prioritised and given the opportunity for growth. Hempstead Valley Shopping Centre is supported and plays a function in the network of centres across Medway.

## 8.14 Local and rural centres

8.14.1 Local centres play an important role in creating the aspirations for a high-quality built environment and strong, vibrant and healthy communities. It is necessary to support sustainable living patterns and recognise the bigger role that smaller centres play in rural areas. Smaller centres are a meeting place and support community cohesion where such opportunities are limited. Protection of these centres are therefore vital to support the day-to-day activities of residents and the sustainability of settlements and communities.

8.14.2 At the heart of the policy approach is the aim to support a sustainable way of living by encouraging the provision of new centres where areas of significant growth are identified and protecting and supporting the growth of existing centres. A review of centres has provided an opportunity to refresh boundaries and reflect changes that has occurred over time to inform a network of centres across the authority within which local centres, rural centres, shopping parades and neighbourhood centres fit.

8.14.3 Local, rural, village, neighbourhood centres and shopping parades play a local role and as such should not contain uses of large scale, form or massing. The scale of provision should be appropriate to the location and the function for local services. Cinemas, drive through restaurants, concert halls etc. are therefore not appropriate for smaller centres. Smaller centres are fundamentally based on their convenience but also perform a community function and are of particular value in rural areas where provision is limited, and travel distances much longer to other facilities.

## Policy DM12: Local and Rural Centres

1. Uses within a newly defined (in areas of significant growth where justified) or existing local centre/s or rural centre/s (equivalent to an urban local centre) must be appropriate to the scale, character and role of the centre, be compliant with the Council's retail policies and include the following uses to support the core function:

- a. Convenience retail offer to provide top up shopping is essential and central to the function of centres and is vital in rural centres.
- b. Community uses (such as hall, library, notice board).
- c. Services (such as hairdressers, cash machines).
- d. provide convenience for local communities (allowing various activities to be undertaken).

Where substantial growth is envisaged in areas of strategic growth, the Council will identify and encourage new centres to support new growth.

2. Proposals resulting in the loss of a top-up shopping facility where there are no other similar facilities within walking distance will not be permitted.

3. Proposals resulting in the loss of the core uses listed b. to d. above will be permitted in local and rural centres where the proposals are in compliance with the Council's retail policies and it is demonstrated that:

- a. the loss is mitigated by the provision of a similar uses of community value;
- b. it is demonstrated that abundant provision exists in close proximity, is easily accessed, within walking distance and adds value to the centre;
- c. the proposed use would make a positive contribution to the vitality and viability and balance of uses in the centre and is of appropriate scale and character; or
- d. the unit has remained vacant for at least 6 months and can be demonstrated that reasonable attempts have been made, without success, to let or sell the premises for a shop, service or community use.

4. The importance of local services in rural areas is critical in supporting sustainable communities. In addition to the above, loss of any facilities in rural centres will need to demonstrate no or limited impact on the sustainability of the rural centre. Proposals will be resisted where determined to be demonstrably harmful to the sustainability of the rural centre.

### Local centre:

- LC 183-193 Station Road, Rainham
- LC 126-146, 141-143 High Street, Rainham
- LC 1-45 Parkwood Green
- LC 151-169, 198 & 208 Fairview Avenue
- LC 140-148 (evens) Hempstead Road
- LC 30-48 (evens) Hoath Lane, 2 Wigmore Road, 2 Woodside
- LC 367, 371-377 (odds), 390, 392 Maidstone Road, Rainham
- LC 1-64 Twydall Green & Goudhurst Road
- LC 12-40 (evens) London Road, Rainham
- LC 42-58 (evens) & 59-65 (odds) Sturdee Avenue
- LC 1a-8, 15, 17 Livingstone Circus, 1-6 Livingstone Buildings Barnsole Road, 196-206 (evens), 239 & 253-261 (odds) Gillingham Road, 142 Franklin Road
- LC 46-100 (evens) & 27-147 (odds) Watling Street

- LC 428-432 (evens), 541-543, 551-563 Canterbury Street, 168-184 (evens) Rainham Road, 1-23 (odds) Watling Street
- LC 88-135 (evens), 95-115, 123-131, 139-171 (odds) Canterbury Street
- LC 172, 178-200 (evens), 237-255 Canterbury Street
- LC 302-304 (evens) and 318-320 (evens) Canterbury Street
- LC 60, 70, 94-96 (evens), 65, 67 Duncan Road, 2 Franklin Road, 60, 68, 82 77-79 Balmoral Road
- LC Chatham Waters
- LC Victory Pier
- LC 2-16, 28-46, 64-76 (evens) Luton Road, Chatham
- LC 23-55 (odds), 50-54 (evens) Luton High Street, 4-10 Nelson Terrace and 10a Beacon Hill
- 161 - 183b (odds) Wayfield Road, Chatham
- 1 – 5 (incl) and 20 – 25 (incl) Shirley Avenue, Tiger Moth and 16a Highview Drive and Formula One Autocentre Maidstone Road Chatham
- LC 42-86 Silverweed Road
- LC Princes Park, Chatham
- LC Kestrel Road, Newton Close and Sultan Road Lordswood
- LC Walderslade Village Centre
- LC 1-12 (incl) Admirals Walk, 17-19 Gould Road and 600 Lordswood Lane, Lordswood
- LC 2-16 (evens) and 1-5 (odds) Ordnance Street Chatham
- LC 106-112 (evens) and 27-35 (odds) Pattens Lane Chatham
- LC 64-70 (evens) and 1-4 Leake House, The Fairway
- LC 118-130a Maidstone Road Rochester
- LC Borstal Village
- LC 48-136 (evens) and 166-168 Delce Road, 179-181 and 160 Rochester Avenue and 4,5 and 6 Cossack Street, Rochester
- LC 165 – 181 (odds) Bligh Way, Strood
- LC Darnley road. Cedar road
- LC 1-7 and 15 – 43 (odds) Wells Road, Strood
- LC Darnley road. Elaine Avenue
- LC Brompton high street
- LC 34,36, 61-69 Bryant Road, Strood
- LC 86-110 (evens) 116, and 103 - 109 (odds) Frindsbury Road, Strood

**Rural centre:**

- RC Hoo village – existing
- RC Hoo – Miskin Road
- RC Cliffe Woods

8.14.4 National guidance recognises the importance of providing local shops to satisfy the needs of local communities. Local planning authorities are required to plan positively for local shops to enhance the sustainability of communities and guard against unnecessary loss of valued facilities and services.

8.14.5 The importance of centres in rural locations is vital for community cohesion, health and ensuring people's needs are met.

**Question 29: Do you agree with the boundaries and retention of these listed local and rural centres?**

**Question 30: Are there any other local and rural centres you may want to suggest for inclusion?**

8.14.6 To assist in answering the questions above please refer to the retail topic paper which provides background to the choices made, centres carried forward and boundary changes.

## 8.15 Shopping parades and neighbourhood centres

8.15.1 Shopping parades and neighbourhood centres do not form part of the retail hierarchy. National policy for town centres will therefore not apply to them. They still do, however, play a vital role which supports residents of Medway and will in time grow to become local centres or rural centres. Shopping parades and neighbourhood centres are local centres and rural centres in their infancy. The policy approach is therefore to protect these centres, support their growth and encourage provision of new where required in an area of significant growth.

8.15.2 Their role in rural areas is of greater value due to the limited provision. The policy approach is tighter to ensure replacement provision is similar. This will ensure that the rural areas will be provided for.

8.15.3 The policy aims to support a sustainable way of living. Officers maintain a review of all centres in Medway to determine the current condition.

### Policy T18: Shopping Parades and Neighbourhood centres

Shopping parades and neighbourhood centres are not part of the retail hierarchy. Their function and role is very localised and will not compete with defined centres in the hierarchy but they are essential in creating a sustainable network to provide for residents' essential needs.

The Council will encourage the provision of a network of services and facilities, in accessible locations, to support the day-to-day activities of residents in a sustainable manner, particularly where significant growth is envisaged in strategic locations. Considerations of sustainability will include the offer (balance of retail, community uses and services), and accessibility - the mode of travel and distance. Each parade should at least have a convenience, service or community offer at its core to support the community.

#### Shopping parades (urban areas):

- SP 173-179 Rainham high street
- SP 88-94 Station Road, Rainham
- SP 116-120 Wakeley Road, Rainham

- SP 1-4 Norreys Road
- SP 286-288 Lonsdale Drive
- SP 45-49 Peverel Green
- SP 275-277, 277a, 277b Gillingham Road and 219 Barnsole Road
- SP 153, 155 Barnsole Road
- SP 499, 511 Canterbury street
- SP 55-63, 67 Canterbury Street
- SP 38-46 (evens) Gillingham Road and 129-135 (odds) Trafalgar Street
- SP 119-123 James Street, Gillingham
- SP 105, 124, 138, 140 Richmond Road, Gillingham
- SP Forge Lane
- SP 268-274 (evens), 291 Luton Road, Chatham
- SP Luton Road, Chatham
- SP 110a -114 (evens) Luton Road, Chatham
- SP 11-16 The Links, Wayfield
- SP Churchill Avenue?
- SP 27-31 Yarrow Road, Chatham
- SP 60-70 (evens) Holland Road, Chatham
- SP 121-125, 135 (odds), 124 Walderslade Road
- SP 111-113 Boundary Road Chatham
- SP 94-104 Maidstone Road Chatham
- SP 5-7 Scotteswood Avenue, Chatham
- SP 7-12 (incl) Central Parade, Marley Way
- SP 76-82 (evens) Leander Road and 53-57b (odds) Orion Road
- SP 208-214 Maidstone Road, Rochester
- SP 1, 1A and 1B Beaty Road (City Way junction)
- SP 65-71 City Way (Pattens Lane junction)
- SP 69-83 Maidstone Road
- SP 80 - 86 John Street
- SP 1-3 (odds) Cazeneuve Street, Rochester
- SP 2-16 (evens) and 3 Victoria Street, Rochester
- SP 41-47 Carnation Road. Strood
- SP 64, 89-97 (odds) Bryant Rd & 49 Weston Road, Strood
- SP 59 and 59b Grove Road, Strood
- SP 1-9 Rochester Court

#### **Neighbourhood (rural areas):**

- NC Hoo Village – Pottery Road
- NC Cliffe
- NC High Halstow
- NC Allhallows
- NC Lower Stoke
- NC Grain
- NC Cuxton
- NC Halling Village
- NC Wainscott Village

- 8.15.4 This policy approach will ensure a network of centres are available to provide for the day-to-day needs of Medway's residents. These centres will provide sustainable access and encourage healthy lifestyles and better social cohesion.
- 8.15.5 The importance and value of smaller centres is recognised by national policy and reciprocated by Medway seeking to establish a network of centres, which also supports sustainability ambitions.
- 8.15.6 National guidance recognises the importance of providing local shops to satisfy the needs of local communities. Local planning authorities are required to plan positively for local shops to enhance the sustainability of communities and guard against unnecessary loss of valued facilities and services.

*Question 31: Do you agree with the boundaries and retention of the listed shopping parades and neighbourhood centres?*

*Question 32: Are there any further neighbourhood centres or shopping parades you may want to suggest for inclusion?*

- 8.15.7 To assist in answering the questions above please refer to the retail topic paper which provides background to the choices made, centres carried forward and proposed boundary changes.

## 8.16 Meanwhile uses

- 8.16.1 Meanwhile/temporary/pop-up uses benefit an area by creating interest and activating spaces and places especially in the early phases of development or where a unit is vacant and difficulties are experienced in finding a suitable occupier for the desirable, complementary use. In the current context of structural changes to our High Streets, they also offer opportunities to boost the offer and support small businesses and charities.
- 8.16.2 As examples of meanwhile uses, within development proposals spaces can be landscaped, portable community vegetable gardens or public realm provided. When development is due to be phased on that space, the portable vegetable garden can either be harvested or moved to a suitable area. In town centres or other suitable areas pop-ups/temporary uses can include commercial leisure (food and beverage), cultural and creative activities operational during the day and night, which would add to the diversity of uses and stimulate vibrancy and viability. Pop-ups can occur for a day, a week or more depending on the requirement. Pop-up/Temporary uses can also take the form of a business occupying a shelf in an established business shop unit, but this arrangement can be negotiated between businesses.
- 8.16.3 The benefit of meanwhile uses is that it activates places and spaces, in some instances can create safer environments and in other instances it can create and support momentum for economic growth by being a catalyst. As well as supporting the economy, meanwhile uses present a positive, uplift to vacant shops or land, which can contribute to a better appearance and

possibly encourage better quality developments. Meanwhile uses are additionally supported through the Chatham Design Code, Medway's Cultural Strategy and Star Hill to Sun Pier Development Framework.

## Policy T19: Meanwhile Uses

Proposals for a temporary use of space, vacant units and vacant plots will be supported for a period of up to 6 months where compliant with the Council's strategies and policies for the area and:

- where no more than one previous temporary permission was granted since the last permanent occupation of the unit/plot/space;
- does not preclude permanent use of the space, plot or unit, which better aligns with the Council's strategies;
- reinforces the longer term uses planned for the area;
- it contributes toward the function of the area or meets a specific need identified by the Council;
- contributes positively to the character and early activation of the area;
- where the unit has been vacant for at least 2 months and can demonstrate reasonable\* attempts at occupying the unit with the desired use;
- where the proposed use/s makes a positive contribution to the vitality and viability of the centre including the consideration of commercial leisure, cultural and creative uses;
- would not impact on the deliverability of the Local Plan and its site allocations;
- does not give rise to unacceptable impact on residential amenity and on the transport network; and
- erection of structures and fixtures for the operation of the business must be easily removable and the space or unit returned either to its previous condition or better.

All major development proposals will be required to submit a proportionate Meanwhile Feasibility Study and if feasible, a Meanwhile Strategy. This should identify:

- The types of meanwhile uses considered most appropriate for the site and how these can meet needs and support regeneration, early place making and the longer-term success of the development.
- The proposed approach to how these meanwhile uses would be taken forward, including details on timescales, phasing and how the proposal would complement surrounding developments and the longer-term place making vision for the area.
- The proposed approaches to engaging with potential occupiers of the meanwhile space. This should focus on looking to incentivise business start-ups and local businesses and organisations to occupy spaces.
- The proposed approaches to enable meanwhile uses to occupy the permanent structures in the development. This should include providing business support, staggered rental rates and offering right of first refusal.

\*reasonable – marketing evidence is provided showing the unit marketed for the appropriate use with a real estate agent. Attempts were made to address requirements by prospective occupiers where enquiries were made.

- 8.16.4 Temporary permissions with time specific restrictions can address long standing vacancies in centres without hindering the medium to longer term ambitions. Meanwhile uses can also provide interest for visitors and therefore have value in stimulating footfall, creating a positive image and adding to the vitality of the High Street. However, the wider objective of securing uses more appropriate for the location is an overriding consideration.
- 8.16.5 In building a strong and competitive economy, The NPPF encourages the need to support economic growth and productivity and in doing so, suggests that policies should allow for new and flexible working practices and to be able to respond rapidly to changes in the economy.

## 8.17 Medway Valley Leisure Park

- 8.17.1 Medway has a limited number of leisure designations. Medway Valley Leisure Park is one of them and functions well in providing restaurants, a cinema, hotel and bowling alley. This location provides for the needs of Medway residents and those visiting and has in recent years diversified and continues to do so.
- 8.17.2 A deficiency of leisure provision in town centre locations was identified in commissioned evidence and supported by findings in town centre surveys in 2018, which would have been further exacerbated by the impact of Covid. Town centres are weaker in supporting an evening economy and are therefore the first locations considered for the provision of main town centre uses including leisure. The retail and town centre strategy directs growth to its centres first. A sequential assessment will be required for main town centre uses outside a town centre including where sought within a retail or leisure designation emphasising the importance of Medway's larger centres and the sustainable growth strategy of the Local Plan.
- 8.17.3 It is important to achieve a balance between maintaining leisure destinations and protecting and encouraging growth in our town centres to support the health of our centres and its evening economy.
- 8.17.4 This leisure designation also sits adjacent to the River Medway and is prone to flooding (refer to proposals map for location and boundary). All new proposals need to give due consideration to flooding mitigation measures that may be necessary to future proof the leisure site.

### Policy DM13: Medway Valley Leisure Park

Medway Valley Leisure Park is a family leisure destination that attracts visitors and residents to the location. It also provides accommodation and supporting uses for those staying overnight in Medway for business or pleasure.

All new leisure proposals are directed firstly to Medway's centres as the sequentially preferable locations.

Development proposals will be supported where compliant with the leisure designation and where enhancing or replacing current provision without requiring

expansion beyond the designated boundary unless justified by growth in the area and subject to consideration of necessary flood mitigation, compliance with policies DM18 and DM19 and the Council's retail policies:

- satisfying that no sequentially preferable sites were found in centres, edge or out of centre locations that are well connected;
- that the impact assessment has been satisfied where triggered.

8.17.5 There is limited potential for this designation to grow and it already has a good draw. With further residential development in close proximity, this location may want to respond to support the growing population in other ways beyond leisure provision. There is room for leisure diversification within the site, but the leisure designation does not allow for diversification outside of the predominant use to ensure consistency with the retail and town centre strategy. Other needs emerging from new residential growth should be responded to by neighbouring centres. Having this area as a leisure designation is an asset of limited representation in Medway and an asset worth retaining and supporting within the context of the wider strategy.

8.17.6 No responses to the earlier consultation on the emerging Local Plan objected to this approach.

8.17.7 Socialising is important in supporting healthy lifestyles and mental health. Retaining such areas and supporting the growth of the evening economy in centres is invaluable in playing many roles beyond the physical infrastructure; it supports the social networks and community cohesion.

8.17.8 The Council seeks to protect centres by ensuring the town centre is considered first and impact assessment done where triggered.

8.17.9 This strategy supports the town centre first approach confirmed by the NPPF.

## 8.18 Dockside

8.18.1 Dockside Outlet Centre is the main retail provider in the Chatham Maritime area outside of Chatham Town Centre (refer to proposals map for location and proposed boundary). It has a number of retail stores mixed with limited commercial leisure (food and beverage) and service uses. Immediately adjacent to the outlet centre is an area particularly known for attracting evening activity with the mix of cinema, bars and restaurants, and some leisure and entertainment during the day as well. This entire area is considered within the policy approach as 'Dockside'.

8.18.2 Medway's previous policy looked at encouraging this area to grow as a leisure destination fundamentally, making use of the waterfront location for water-based leisure and land-based leisure. Much has evolved over time and new residential developments have come forward on St Mary's Island with more development in the wider area. The Dockside area has responded and evolved in providing a more thriving leisure-based environment to support residents. Dockside outlet was previously permitted to sell discounted/past season stock but can now sell goods without the imposed conditions requiring goods to be at a discounted rate.

8.18.3 Dockside is a location worthy of a leisure designation. However, its close proximity to Chatham Town Centre and Gillingham District Centre requires careful management to avoid harming the existing centres in its current form or future plans to improve the high street, its offer, its role and function in the hierarchy of centres. Chatham is Medway's primary centre and together with the other centres provides for its residents at a 'city scale'. Chatham is central to this and therefore of high importance. All other designated centres should also be given priority consideration for main town centre uses.

8.18.4 In order to ensure Chatham and the other centres are protected, it is proposed that whilst Dockside is designated as a leisure destination, it has a cap on retail provision and is required to prepare a sequential and impact assessment where triggered as per policies T15 and T17. This is consistent with the approach for other leisure and retail designations across Medway and the need to prioritise the town centre first approach.

## Policy DM14: Dockside

Dockside is a family leisure and retail destination attracting visitors and residents.

All main town centre uses including new retail and leisure proposals are directed firstly to Medway's centres as the sequentially preferable location. Development proposals will be supported where unable to be accommodated in the other defined centres upon satisfaction of sequential test (T15) and impact assessments (T17).

The retail floorspace in this designation shall not exceed a maximum of 30% of all floorspace in the designation and will be predominantly located in the Outlet Centre.

The leisure floorspace shall occupy at least 50% of all floorspace in the designation with a complementary 15-20% food and beverage offer, a significant proportion of which will be provided around the Dockside Outlet Centre.

All proposals must:

- Provide sustainable transport options and also demonstrate compliance with policies DM18 and DM19.
- Consider necessary mitigation measures to future proof against flooding.
- Be sensitively designed with due consideration of its location within the Zone of influence identified for the Medway Estuary and Marshes SPA
- Include public realm improvements.
- Be respectful of heritage assets and designed with sensitivity.

8.18.5 Chatham is Medway's primary centre which plays a key role within the network of centres providing for residents. Many changes have emerged in recent times which reduces Local Authorities' ability to protect town centre and the high streets and therefore leaves them vulnerable.

8.18.6 The approach manages the relationship of out of centre proposals with centres, respecting the retail hierarchy and supporting the growth of the leisure destination without impacting on aspirations for centres.

**Question 33: Do you agree with the proposed boundary for Dockside as a leisure destination? Please refer to the proposal map for the boundary suggestion.**

**Question 34: Do you support the percentage mix of uses proposed? If not, can you provide evidence for an alternate mix?**

## 9. Transport

### 9.1 Vision for access and movement in Medway

9.1.1 The River Medway is a key asset, providing a strong sense of place and identity. However, the river bisects the area and movement is constrained by three main crossings. The severance caused by the river, past commuting flow patterns and travel behaviour, the legacy of post-war development designed for the car, generous car parking provision in dense employment areas and the existing public transport offer make for a challenging environment in which to accommodate Medway's development needs. Crucially, new development must not reinforce historic travel patterns or car dependency; rather, it will support a place-based vision for access and movement, and a sustainable future for Medway and its communities.

9.1.2 Medway's location in north Kent gives rise to additional opportunities and challenges associated with wider growth, in particular the proposed LTC. The LTC is a proposed road crossing of the Thames estuary that would link Kent and Essex. New destinations, infrastructure and technologies are emerging along with increasing prominence of the decarbonisation agenda.

9.1.3 The 'net zero' target followed the Paris Agreement signed at the United Nations Climate Conference in 2015 (COP21) and the UK parliament passing legislation in June 2019 to reduce greenhouse gas emissions to zero by 2050. A net zero target recognises that it will be difficult to remove some emissions pre-2050, however these could be offset to ensure the UK's balance of emissions is zero.<sup>98</sup>

9.1.4 The integration of land use and transport planning has an important role to achieve net zero. In short, the planning of new development needs to shift from a mitigative to a creative approach, i.e. leading with a vision.<sup>99</sup> In this way, and further to the Council's declaration of a Climate Emergency, a place-based vision for access and movement provides the basis for local living on an everyday basis. This calls for policies to ensure new development helps to reduce trips through local living, before considering how to increase the proportion of the remaining trips taken by active and public transport.

9.1.5 Development proposals will describe how they support the place-based vision for access and movement:

## Vision for Access and Movement in Medway

By 2041, Medway is an accessible place where people can meet most of their daily needs in their local area, such as schools, grocery shopping and places to socialise and exercise.

Space for home working has been provided in every new home, while co-working spaces have reduced the need to travel for people who are more likely to be able to work remotely.

A growing network for active travel converges on urban centres following the successful implementation of a Local Cycling and Walking Infrastructure Plan (LCWIP).

Urban centres will be characterised by design interventions to create a healthier, safer and more equitable environment for people.

Car clubs, demand responsive transport and e-scooters provide other credible transport choices.

The Hoo Peninsula has reduced car dependency and achieved a higher level of self-containment to facilitate local living in an age of increased remote working, while local employment opportunities are available at Kingsnorth and the Isle of Grain. Travel choice to/from the rural area has been improved through planning and investment in public transport.

Villages are less car dependent with increased home working supporting local services and amenities, and demand responsive transport is removing the barriers posed by distance to traditional public transport stops.

Digital commerce has been supported through the protection of existing distribution and warehouse uses, particularly those near to the urban area, to enable efficient courier services by ultra-low emission vehicles and cargo bikes.

The LTC and the Blue Bell Hill improvement scheme, along with rail timetable and station enhancements, have improved connections to wider destinations for work and leisure.

- 9.1.6 The levels of change required are unprecedented and equate to an 80 per cent reduction in carbon emissions from surface transport by 2030. The remaining 20 per cent of carbon emissions from surface transport would need to be eliminated by 2050.
- 9.1.7 No single intervention, or even a combination of interventions, will achieve the required 80 per cent reduction in carbon emissions from surface transport by 2030. In particular, over-reliance on the mainstream uptake of electric vehicles would reinforce car dependency. Furthermore, an 80 per cent reduction would require increasing the share of trips made via walking, cycling and electric public transport in the best practice scenarios that previous evidence suggests is possible.
- 9.1.8 The place-based vision for access and movement marks a shift from the traditional 'predict and provide' approach to the latest best practice 'vision and validate' approach.<sup>100</sup>

## 9.2 Monitoring and managing development

9.2.1 The Strategic Transport Assessment (STA) is informing the preparation of the new Local Plan. It involves iterative assessments of cumulative impacts associated with committed development and future development up to 2041. The STA will identify the necessary interventions, phasing and funding of mitigations for future development, and provide for the monitoring and managing of future development.

9.2.2 The STA has been tailored to meet the requirements of National Highways and the neighbouring Local Transport Authority, Kent County Council, to demonstrate a reasonable worst-case scenario in terms of traffic generation. It is the basis for a Statement of Common Ground supporting cross border strategic planning, by providing certainty for stakeholders in terms of the maximum highway capacity enhancements required to 2041.

9.2.3 The STA will establish a vehicle trip budget. This is aligned with a reasonable worst-case scenario. Committed developments would benefit from the first tranche of vehicle trip credits, followed by site allocations. Vehicle trip credits for unimplemented consents that subsequently expire would be recycled.

9.2.4 The STA will set out developer contributions for the package of transport mitigations across individual site allocations. This will be based on the distribution of new trips routing through junctions that would require mitigation.

9.2.5 Some elements of the package of transport mitigations are likely to be required earlier in the plan period. Therefore, the Council will seek opportunities to forward fund these elements to ensure full funding is in place.

9.2.6 However, it will be important to monitor and manage the implementation of the package of transport mitigations; it may be increasingly difficult to realise the place-based vision for access and movement once more highway capacity is delivered, which is based on a reasonable worst-case scenario. Development proposals should therefore be incentivised to demonstrate trip generation that would be lower than the vehicle trip credit set in the STA.

9.2.7 The 2019 amendments to the Community Infrastructure Levy (CIL) Regulations will enable the pooling of developer contributions in an infrastructure fund towards the package of transport mitigations. This will provide an alternative to developers being required to implement specific off-site infrastructure requirements through Section 106 agreements. Section 106s for individual site allocations will require payment of developer contributions into the infrastructure fund.

9.2.8 In order to allow developers to spread the cost of their contributions and to maintain a revenue stream, the trigger points for payments prior to commencement and/or completion will be agreed through the development management process.

9.2.9 Appropriate Grampian-style conditions may be imposed on grants of planning permission to ensure development occupations are controlled prior to the implementation of elements of the package of transport mitigations.

- 9.2.10 Medway Council would be responsible for the monitoring of vehicle trip credits and the collection of developer contributions, along with funding from all relevant public sources.
- 9.2.11 The exact approach to securing the implementation of mitigations through Section 106 planning obligations or other legal agreements, including Section 278 agreements, will be agreed through development management process.

## Policy DM15: Monitoring and Managing Development

As a minimum, development proposals for site allocations will demonstrate how vehicle trip generation would be 10 per cent lower than the vehicle trip credit set in the STA. This target is intended to positively challenge developers to pursue a creative approach, however full policy compliance should ensure that this is achievable.

Developer contributions towards the package of transport mitigations will be due in line with the Infrastructure Delivery Plan (IDP) or the outcome of a Medway-wide Monitor and Manage Mitigation Strategy.

Development proposals in urban centres, including site allocations, are exempt due to their accessible location, providing they comply with all other transport-related policies in this Local Plan.

Development proposals for ‘windfall’/unforeseen sites will also be expected to make proportionate developer contributions towards the packed of transport mitigations.

- 9.2.12 The STA will comprise a robust and proportionate evidence base, prepared in consultation with National Highways and Kent County Council. However, planning for a reasonable worst-case scenario is incompatible with the need to shift from a mitigative to a creative approach. In practice, impacts associated with future development should reflect a policy-on scenario and take account of wider issues and developments.
- 9.2.13 This policy is concerned with realising the place-based vision for access and movement and not the reasonable worst-case scenario. The cumulative effect of trip generation across site allocations being lower than the vehicle trip budget set in the STA could be significant, however this would require the commissioning of a Medway-wide Monitor and Management Mitigation Strategy. This could avoid the need for some elements of the package of transport mitigations and their developer contributions which could otherwise be invested in development quality and other forms of necessary infrastructure.
- 9.2.14 Moreover, the full delivery of the package of transport mitigations could undermine the place-based vision for access and movement. It would be inappropriate to seek a full developer contribution (based on the reasonable worst-case scenario) if a development proposal can demonstrate how trip generation would be lower than the vehicle trip budget set in the STA. Therefore, a proportionate developer contribution discount is available.

9.2.15 A Medway-wide Monitor and Management Mitigation Strategy, is appropriate due to:

- future uncertainty in travel patterns, which may result in more sustained home working;
- the potential for the highway mitigations to create induced demand and reinforce car dependency;
- trip generation associated with traditional employment density assumptions, i.e. the number of employees per square metre, as a result of changes in workplace settings; and
- the potential for a comprehensive improvement scheme for Blue Bell Hill, which would seek to accommodate local growth and require new development in Medway to make a proportionate contribution, thus avoiding the need for relatively minor abortive works.

## 9.3 Active travel interventions

9.3.1 The River Medway is a defining feature of the area, providing a strong sense of place and identity. The local character of the river and its edges varies along its length, from extensive areas of intertidal habitat to historic military uses and industrial facilities. A series of spectacular meanders, framed by steep escarpments, create the opportunity for stunning views and connections between the urban quarters. It also provides opportunities for sport and recreation, however access is restricted in some areas due to historic uses and environmental constraints.

9.3.2 The river represents an important transport corridor for commercial and leisure traffic. The introduction of a new river crossing and a riverside path could facilitate sustainable transport and address the restrictions that apply to pedestrians and cyclists who are unable to use the Medway Tunnel, or where the local road network is not conducive to walking and cycling.

9.3.3 A riverside path or boardwalk will establish new infrastructure that inspires place-making and how people move around the area. A defined route would be a draw for residents and visitors, linking key heritage sites, stations with town centres, the universities and workplaces, supporting healthier lifestyles and cultural activities. It would be a focus for quality public spaces.

9.3.4 The highest quality place-making standards will be realised along the urban waterfront, with public spaces as focal points, and increased access to the riverside and the river itself. Where appropriate, this will align with the route of the King Charles III England Coastal Path that runs along Medway's frontage with the river and estuaries.

### Policy T20: Riverside Path

Waterfront development proposals will incorporate public space to facilitate walking and cycling and demonstrate the highest design standards, including Local Transport Note 1/20 (Cycle Infrastructure Design) and Sport England's Active Design guidance.

Development proposals will demonstrate how any impacts will be mitigated.

Opportunities to provide linkages with other path networks should be explored where these are compatible with other policies and do not result in impacts on coastal designated sites.

9.3.5 The LCWIP has identified cycling and walking improvements required at the local level. This enables a long-term approach to developing local cycling and walking networks, ideally over a 10-year period. LCWIPs represent best practice to provide high quality cycling and walking networks. The Council will seek funding to deliver interventions identified in the LCWIP to provide for high quality cycling and walking networks. In the meantime, the disused Chatham Waters Line presents a clear opportunity to contribute towards the place-based vision for access and movement.

### Policy DM16: Chatham Waters Line

The Policies Map shows safeguarded land for a new active travel corridor, linking the riverside around Chatham Maritime and Gillingham Riverside with Gillingham town centre.

Development proposals which compromise this policy will be resisted.

9.3.6 A strong emphasis on the river and the promotion of cycling and walking can help to deliver multiple elements of the vision, strategic objectives and wider policy outcomes. Responses to the consultation process generally supported the proposed vision which highlights the river itself and its strategic role. Natural England suggested that the Riverside Path policy could encourage opportunities to provide linkages with other path networks, subject to impacts on coastal designated sites.

9.3.7 The disused Chatham Waters Line to Gillingham station could make a significant contribution to the place-based vision for access and movement, for example as an active travel corridor or transitway. It provides a significant opportunity to address the severance between communities, and to enhance links between neighbourhoods, through improved walking and cycling routes.

## 9.4 Grain Branch

9.4.1 The government has described its strategic vision for rail, including commitments to expand the network to boost housing and economic growth, reinforce the importance of rail freight to support the economy and the environment and to explore opportunities to restore routes withdrawn during the 1960s and 1970s.<sup>101</sup>

9.4.2 Passenger services were withdrawn from the Grain Branch in 1961, however the line continues to facilitate the import/export of aggregates, along with rail freight associated with the aviation fuel storage depot and Thamesport activity.<sup>8</sup> Network Rail's 'South East Route: Kent Area Route Study' indicates

<sup>8</sup> Soft sand, sharp sand, gravel, crushed rock and recycled rail aggregate.

that the Grain Branch is underutilised.<sup>102</sup> As part of the consultation in preparing the Kent Area Route Study, the Council emphasised its potential role in making the Hoo Peninsula a sustainable location for growth, while maintaining freight movements during off-peak periods. Network Rail subsequently included the Grain Branch in the final Kent Area Route Study as part of Network Rail's 30-year strategic vision and options for third party funders.

9.4.3 The geography of the peninsula and its position in relation to the River Medway means that development in this location is less likely to impact on the wider road network. Engagement with Network Rail's Strategic Planning Team found that a rail passenger connection at Sharnal Street presents the only opportunity to significantly increase rail capacity in Medway, supporting wider sustainable transport.

9.4.4 A rail passenger connection at Sharnal Street would provide a focus for future growth and improved travel choice. Moreover, it would:

- underpin a wider strategy in conjunction with exemplary approaches to design and green infrastructure;
- serve an improved employment offer at Kingsnorth; and
- allow for increased rail freight.

### Policy DM17: Grain Branch

The Policies Map shows safeguarded land for new rail infrastructure, including a station, route alignment and buffer stop zone.

Development proposals which compromise this policy will be resisted.

9.4.5 National planning policy expects the planning system to actively manage patterns of growth in support of several objectives, including the promotion of walking, cycling and public transport use and to avoid and mitigate any adverse effects.<sup>103</sup> Sites and routes should be protected, where there is robust evidence, in developing infrastructure to widen transport choice and realise opportunities for large scale development.<sup>104</sup> The Grain Branch policy is considered to be in line with these aspects of national planning policy.

9.4.6 Many commuters from the Hoo Peninsula currently drive from villages to stations at Strood, Gravesend or Ebbsfleet; a continuation of this travel pattern is unsustainable. This will exacerbate congestion on the A228, which in turn contributes to the poor air quality on Four Elms Hill, itself a designated Area Quality Management Area. A potential future rail offer, together with improved bus services, supports sustainable travel on the Hoo Peninsula.

## 9.5 Riverside infrastructure

9.5.1 The River Medway is a key asset, providing a strong sense of place and identity. It is highly visible from some areas, particularly from public areas of the waterfront and areas of higher ground. However, in some areas it is less accessible due to historic military and industrial uses. Historically the river

has played a functional role in the transportation of goods to wharves, reflecting the area's manufacturing and industrial heritage. Some of this activity continues today, where some areas are characterised by the infrastructure associated with a range of economic activities, from aggregates importation to marine engineering and leisure activities.

9.5.2 London Thamesport and Medway's docks and wharves are of regional importance, facilitating the bulk transport, handling and processing of minerals, waste and other defined materials. A network of piers, jetties, slipways, steps and stairs are interspersed along the urban stretches of the river, although some facilities are in a poor state of repair.

## Policy T21: Riverside Infrastructure

Riverside infrastructure associated with the transport of minerals, waste and other defined materials will be safeguarded in accordance with national planning policy.

The existing network of piers, jetties, slipways, steps and stairs will be safeguarded to support the potential for visitor and river taxi services and to accommodate visiting vessels, while any new facilities will be encouraged. Riverside infrastructure will be required to comply with the requirements of conserving the designated environmental features of the estuaries and river. Development must demonstrate adequate mitigation and no loss of protected or priority habitats or species, unless the impacts are not significant at a waterbody scale.

9.5.3 National planning policy requires the planning system to afford significant weight on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.<sup>105</sup> In addition, local planning policies should require local plans to safeguard existing, planned and potential infrastructure for: the bulk transport, handling and processing of minerals; the manufacture of concrete and concrete products; and the handling, processing and distribution of substitute, recycled and secondary aggregate material.<sup>106</sup> However, national planning policy also stipulates that local plans should reflect changes in the demand for land and be informed by regular reviews of both the land allocated for development and of land availability.<sup>107</sup>

9.5.4 The Riverside Infrastructure policy intends to reinforce Medway's strategic location in the Thames Estuary. Ports, docks and wharfage will be safeguarded to support existing business sectors and to attract businesses requiring such facilities where feasible.

9.5.5 The Council supports the potential for new services on the river to complement the regeneration and tourist attractions along the waterfront, therefore the retention of and access to wharves and public piers will be promoted, subject to the need to meet the requirements of conserving the important environmental features of the designated river and estuarine habitats.

## 9.6 Marinas and moorings

9.6.1 A marina is a dock or basin with moorings and supplies for yachts and small boats. It can include activities such as boat sales, repair facilities, chandlery, boat storage, club house and parking. It is effectively a small port that is used for pleasure rather than trade, often with hotels, restaurants and bars ancillary to the main function. Marinas therefore can have a very urban appearance and can generate a significant amount of vehicular movement. Rural areas are therefore generally not preferred locations for marinas of this scale of supporting facilities.

9.6.2 However, within or adjoining an existing built-up area, a marina can, if well designed, be a positive asset. Where existing or historical facilities are located in smaller settlements or rural areas it may be appropriate to support the development of larger or more permanent marina facilities.

### Policy T22: Marinas and Moorings

Proposals for upgraded or new high quality marina facilities and amenities will be supported in principle.

Planning permission for marinas and moorings will be granted if the application demonstrates how the proposed development:

- Will meet a proven need.
- Is required for the proper functioning of an existing facility or to enhance and improve access to the waterway.
- In an urban location, is supported by the provision of other commercial leisure uses at an appropriate scale, without undermining the role, vitality and vibrancy of town centres.
- Will have adequate land-based utility infrastructure and supporting facilities, including sewage, waste, water, secure storage and washing.
- Will not conflict with neighbouring uses, have a significant adverse impact or result in unacceptable environment consequences. A detailed Habitats Regulations Assessment may be required.
- Has specific regard to the SPAs, Ramsar sites, Sites of Special Scientific Interest and the Marine Conservation Zone.
- Adheres to the Council's policy for the North Kent SAMMS – 'Bird Wise'.
- Will not result in increased flood risk further downstream or elsewhere.
- Will not adversely impact on amenity, particularly with regard to the waterways, in terms of access, servicing and car parking provision.
- Will not have a significant adverse impact on the highway network.

9.6.3 Existing marinas operate at or close to full capacity. Facilities for visiting vessels are currently limited, but there is significant potential for growth. It is recognised that better co-ordination between marina operators would improve Medway's leisure boating offer. Evidence at the regional level indicates that there is a shortfall of marina provision along the North Kent coast between Ramsgate harbour and facilities around the Medway Estuary.

- 9.6.4 Therefore, proposals for upgraded or new high quality marina facilities and amenities will be supported in principle. In particular, river access to shore facilities and attractions requires improvement.
- 9.6.5 Moorings can have a negative impact on the landscape of the waterway. In urban locations, marinas and sites used historically for the function would be appropriate for permanent moorings. In other areas recreational boat users require short stay or overnight moorings necessitating only mooring posts and public footpath access to limit the impact on the waterways and natural and marine environment. The development of moorings, other than overnight stays, will be judged on their merits, having regard to their impact on the landscape, access, parking and cumulative provision.
- 9.6.6 Residential houseboat moorings occupy areas that could be utilised for additional marina berthing. Many of the houseboats have limited facilities and can create negative environmental impacts.

## 9.7 Aviation

- 9.7.1 Rochester Airport is a general aviation facility catering for leisure, business, training, heritage and emergency service uses. A small part of the site itself falls partly within the Tonbridge and Malling administrative area.
- 9.7.2 Adjacent to and on either side of the airport is the Innovation Park Medway. The Council approved the Innovation Park Medway Masterplan in March 2019, subject to comment from National Highways. The masterplan provides the vision and guidance for the consideration of development proposals, while a LDO and supporting Design Code sets out what development is permitted and the associated conditions.
- 9.7.3 The Innovation Park Medway sites benefit from Enterprise Zone status enabling the creation of skilled employment opportunities. There are no plans to transform the airport facility into a commercial airport, with regular scheduled and/or chartered passenger flights, and the operations will be subject to conditions to mitigate and manage the impacts.

### Policy T23: Aviation

Rochester Airport will provide an enhanced aviation facility for business, public service, training, heritage and leisure uses, and support the development of a strategic gateway and an economic hub.

- 9.7.4 Under the policy theme of sustainable transport and specifically in relation to general aviation airfields, the government requires a Local Plan to recognise the importance of maintaining a national network of general aviation airfields and their need to adapt and change over time, taking into account their economic value in serving business, leisure, training and emergency service needs.<sup>108</sup>
- 9.7.5 There is a small aviation operation at Stoke on the Hoo Peninsula. The Stoke facility, which primarily caters for microlights, is limited in scale and

constrained by high voltage power lines and other features. It is not proposed to safeguard this facility.

## 9.8 Urban logistics

9.8.1 Wider changes in retailing and logistics have created a new demand for industrial land in urban areas. Products ordered online are rarely delivered from the central warehouse to customers' doors; they need to be consolidated before the 'last mile' delivery is completed by couriers. However, the pressure to deliver housing has reportedly resulted in significant losses of industrial land across the country. The demand and constrained supply of logistics floorspace has been reported in the last 10 years due to population growth, urbanisation and changes in retail and manufacturing.<sup>109</sup> New approaches to warehousing are also emerging.

9.8.2 These structural changes to economic sectors and the way areas need to function present new challenges for local planning policy. It is nonetheless a national requirement that local plans proactively encourage sustainable economic growth, having regard to local industrial strategies and other local policies for economic development and regeneration.<sup>110</sup>

9.8.3 Storage and distribution premises comprise B8 uses under the Use Classes Order 1987 (as amended). Land use records contain over 600 B8 uses in Medway. Larger units are located in industrial estates and business parks, while the majority are relatively small units, typically dispersed across the main urban area.

### Policy T24: Urban Logistics

The loss of existing B8 (storage or distribution) uses will be resisted, unless it can be demonstrated that the site is no longer suitable for this activity, for example due to amenity issues.

9.8.4 The policy will support the logistics sector to develop in Medway and encourage efficient courier distribution, which is likely to mitigate local traffic congestion. The logistics sector is likely to prefer sites near main roads, providing convenient and economic access to urban areas. B8 uses in the main urban area are more likely to support the use of low emission vehicles due to their limited range and this would help to address poor air quality.

9.8.5 The pressure to deliver housing is likely to place undue pressure to convert or redevelop existing B8 uses. The Council's annual monitoring has found that 164 new homes replaced B8 uses since 2017. The continued and cumulative loss of B8 floorspace could undermine the ability of the logistics sector to serve communities and businesses in Medway.

9.8.6 The Strategic Housing and Economic Needs Assessment highlighted the rising demand for logistics space in the Thames Estuary Corridor. As one of the largest conurbations in the South East, Medway is reportedly an area of significant interest for logistics operators given the large population and manufacturing sector requiring distribution.<sup>111</sup> Medway has underperformed

in this sector, with areas either side of the Dartford Crossing traditionally more attractive.<sup>112</sup>

9.8.7 The sector has seen recent expansion with new activity, such as London Medway Commercial Park, a major new facility at Kingsnorth. Furthermore, the proposed LTC is likely to increase demand for sites in Medway, creating new employment opportunities.

## 9.9 User hierarchy and street design

9.9.1 Development proposals should adhere to the prioritisation of pedestrians and cyclists and second – so far as possible – to facilitating access to public transport.<sup>113</sup> Streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.<sup>114</sup>

9.9.2 Almost all journeys start and end on foot and therefore the pedestrian should be the focus of street design. The design of streets should prioritise users in the order illustrated in Figure 7.



**Figure 7: Street User Hierarchy**

9.9.3 A development, depending on its scale and the context, will require a range of streets and spaces with differing characteristics. Certain planning applications require a Design and Access Statement to be submitted and this should show how street design has been considered.

9.9.4 A Design and Access Statement should be informed by best practice guidance, such as Local Transport Note 1/20 (Cycling Infrastructure Design), the Chartered Institute for Highways and Transportation's 'Streets and Transport in the Urban Environment' series and the Kent Design Guide.<sup>115,116,117</sup> In addition, Sport England's Active Design (2015) guidance promotes sport and physical activity through the design and layout of the built environment. Depending on the location of the proposed development, the Design Manual for Roads and Bridges may be the required standard.

9.9.5 If there is the possibility that a street will serve further homes or businesses in the future, for instance if there is an adjacent allocated site which is likely to be developed (and accessed through the first site), then the streets should be designed to the appropriate standard, or be capable of being altered in the future. No 'ransom strip' or other gap should be left between the adopted highway and the site boundary, so that a durable street layout can be provided that can accommodate future changes.

## Policy T25: User Hierarchy and Street Design

Planning permission for major developments will be granted if the Design and Access Statement submitted as part of the application demonstrates how the proposal:

- adheres to the user hierarchy (see Figure 7);
- provides for an appropriate range of streets and spaces, meeting the needs of all users;
- integrates with adjacent built-up areas, with no 'ransom strip' or other gap left between the adopted highway and the site boundary to accommodate future changes;
- promotes active frontages, particularly in relation to publicly accessible areas, for the purposes of natural surveillance and creating characterful places; and
- ensures appropriate street furniture and signage is included only when necessary for reasons of safety, orientation or comfort of residents and visitors.

9.9.6 Revised national planning policy places greater emphasis on the role of design and requires the prioritisation of non-car modes of transport. The preparation of the policy has been informed by the publication of best practice guidance, notably the Chartered Institute for Highways and Transportation's 'Streets and Transport in the Urban Environment' series.

9.9.7 The multiple benefits of walking and cycling for individuals and the community are well documented and promoted, for example through the Living Streets campaign, not least in terms of addressing public health, environmental and economic issues as a result of traffic congestion. Research suggests the lack of attractive routes and perceptions of crime are factors that deter walking and cycling.<sup>118</sup> This is especially pertinent to Medway, where some areas are car dependent. New development must not replicate the unintended consequences of the past; this would only help to reinforce unsustainable travel behaviour and exacerbate traffic congestion.

9.9.8 There are many examples of fragmented development in Medway due to the way in which urban areas have expanded over time, typically by patterns of land ownership and the legacy of development designed for the car. This has resulted in enclaves which are characterised by low levels of external connectivity (i.e. the number of access points) and internal permeability (i.e. various convenient routes through an area).

9.9.9 Individual and household travel choices are complex; however certain forms of street layout are more likely to be conducive to walking and cycling. Such design considerations are also important factors for specific groups. For

example, a legible environment, incorporating a range of street types, has been emphasised in urban design guidance to help people living with dementia to lead an active and independent life for longer.<sup>119</sup>

9.9.10 Due to the way in which development will be built out over time, it is crucial that proposals demonstrate careful consideration of every opportunity for connections to integrate with adjacent areas, whether existing or likely to come forward in future.

## 9.10 Accessibility standards

9.10.1 The '15-minute neighbourhood' concept enables people to 'live local'. This means people can meet most of their everyday needs within a 15-minute walk or cycle from their home, such as schools, grocery shopping and places to socialise and exercise.<sup>120</sup>

9.10.2 Providing access to affordable, integrated public transport and new forms of shared mobility such as e-bikes, e-scooters and electric vehicle car clubs is vital. This would help to ensure such means of transport are credible for the medium and longer distance journeys that are responsible for most surface transport emissions.<sup>121</sup>

9.10.3 It is important to note the need for flexibility on the application of the accessibility standards, taking into consideration the specific characteristics of the particular location or route, e.g. topography, attractiveness and safety.<sup>122,123</sup>

### Policy T26: Accessibility Standards

Strategic and major development proposals for new homes will describe how they meet the following accessibility standards within 15 minutes for local destinations:

Local destination	Mode
Primary school	
Secondary school	  
'Top-up' grocery shopping	 
Places to socialise	  
Places to exercise	

Access to shared mobility, such as e-bikes, e-scooters and electric vehicle car clubs is encouraged through a Travel Plan for medium and longer distance journeys.

Strategic and major development proposals for new homes will also be planned to enable the maximum walking distances to bus stops as part of medium to longer distance journeys:

Situation	Maximum walking distance (metres)
Core bus corridors with two or more high-frequency services	500
Single high-frequency routes (at least every 12 minutes)	400
Less frequent routes	300
Town/city centres	250

The journey times and distances will be demonstrated by the characteristics of the route itself, rather than as the crow flies / notional circular catchments.

- 9.10.4 New development will need to reduce trips through local living – linking to local services, before considering how to increase the proportion of the remaining trips taken by active and public transport.<sup>124</sup> This is consistent with national planning policy, which expects local planning policy to minimise the number and length of journeys needed through an appropriate mix of uses across an area and within larger scale sites, and to provide for high quality walking and cycling networks and supporting facilities.<sup>125</sup>
- 9.10.5 The 15-minute standard will help to ensure that the number and length of daily journeys is reduced, resulting in carbon savings. Furthermore, this will help to achieve public health benefits and more equitable and inclusive communities by removing the transport barriers to jobs and services faced by people without access to a car.<sup>126</sup>
- 9.10.6 The proportion of elderly people is increasing. Along with people with children, buggies and heavy shopping, elderly people are more likely to be sensitive to the range of factors (e.g. distance, topography, attractiveness and safety) that would inform accessibility to bus services. The maximum walking distances to bus stops are intended to enable the bus to compete effectively with the car and to benefit a wide range of people with differing levels of walking ability.<sup>127</sup>

## 9.11 Transport assessments, transport statements and travel plans

- 9.11.1 New developments, or the intensification of existing uses, can have a detrimental impact on the highway network by generating additional traffic, while new vehicular accesses can cause a road safety hazard or delays to other road users.
- 9.11.2 National planning policy requires all developments that generate significant amounts of movement to provide a Travel Plan, with applications supported by a Transport Assessment or a Transport Statement.
- 9.11.3 A Transport Assessment sets out transport issues relating to a proposed development and identifies measures required to improve accessibility and safety, and other measures to mitigate the anticipated transport impacts of the development. A Transport Statement is a simplified version of a Transport Assessment; this can be required where the anticipated transport impacts of the development are limited. A Travel Plan is a long-term management strategy, subject to regular review, for an organisation or site that seeks to deliver sustainable transport objectives.
- 9.11.4 National Highways are the highway authority, traffic authority and street authority for the Strategic Road Network (SRN), comprising of motorways and all-purpose trunk roads in England. The SRN is a critical national asset. National Highways works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

9.11.5 National Highways is a statutory consultee in the planning system. Proposals that could have an impact on the SRN should be informed by engagement with National Highways as early as possible. The following policy documents should be consulted when engaging with National Highways:

- Planning for the Future: A guide to working with National Highways on planning matters (2023).
- DfT Circular 01/2022: Strategic road network and the delivery of sustainable development.

9.11.6 An initial judgement on the need for a Transport Assessment, a Transport Statement and / or a Travel Plan for the sites allocated for development has been set out in the site-specific requirements (see Site Allocations). However, in addition to the transport evidence base supporting the Local Plan itself, Medway Council (as local transport authority), Kent County Council (as the neighbouring transport authority) and National Highways may need to agree the scope to make a full assessment of development proposals on sites allocated for development. This underlines the need to seek early engagement, ideally during the pre-application stage.

9.11.7 The Council has adopted guidance for Transport Assessments which promotes the use of its traffic model.<sup>128</sup> The potential advantages may result in a more efficient planning process, leading to increased confidence, reduced costs and higher quality developments. This will also help to ensure that the Council can effectively plan for growth.

9.11.8 Development proposals on the Hoo Peninsula will adhere to an Area-wide Travel Plan. This reflects the specific circumstances of this rural area. This will identify mode share targets and specific measures aligned with the anticipated phasing of new development. The Area-wide Travel Plan will set out positive and practical measures; it will need to be flexible, but sufficiently detailed and meaningful. Having established a baseline, monitoring arrangements will assess the performance of the road network and, should targets not be met and/or the performance of the road network found to be unacceptable, set out any additional measures required.

## Policy DM18: Transport Assessments, Transport Statements and Travel Plans

Development proposals that will generate a significant amount of movement will be supported by a Transport Assessment, Transport Statement and/or a commitment to provide a Travel Plan.

The requirement for a Transport Assessment or Transport Statement will need to be agreed with National Highways for development proposals that impact on the SRN. National Highways, in conjunction with the Council as local highway authority, will agree the scope of the Transport Assessment or Transport Statement at an early stage. National Highways will need to be satisfied that development proposals will not materially affect the safety, reliability and/or operation of the SRN.

Early discussion will provide an initial judgement on the need for and scope of a Travel Plan. The following aspects of a Travel Plan should be specified in a Section 106 agreement, or the subject of a condition, as appropriate:

- A timetable for the preparation, implementation, monitoring and review of the Travel Plan.
- The appointment and funding of a Travel Plan Coordinator to be responsible for the management of the Travel Plan, including the relationship with the local planning authority and/or other key stakeholders.
- The overall aim and objectives (e.g. to determine mode share targets) of the Travel Plan.
- Requirements for occupiers and future occupiers.
- The measures to be implemented, such as the provision of transport infrastructure or services.
- A monitoring and review programme for surveys.
- Any sanctions where the targets are not being met, and how and when they should be applied.
- Any procedure for the variation by means of amendment, substitution or addition of targets or measures.

Development proposals on the Hoo Peninsula will adhere to an Area-wide Travel Plan.

9.11.9 Transport is one of the most high-profile matters associated with development. Consultation on the emerging Local Plan confirmed concerns about existing pressures on transport networks and their capacity to accommodate growth. These concerns were substantiated in the traffic modelling undertaken to support the new Local Plan, i.e. the STA.

9.11.10 The STA will provide an understanding of the cumulative impact of sites allocated for development in terms of the capacity of the highway network and the associated safety issues. This is a high-level piece of work, intended to help identify locations which can accommodate growth. However, the site-specific impacts are beyond the scope of the STA.

9.11.11 National Highways' 2023 policy document states that development proposed which has not been subject to an appropriate level of assessment, or is not included or consistent with an approved Local Plan, should be subject to early engagement to agree the scope of work required to make a full assessment.

9.11.12 Planning obligations are considered to be the most appropriate mechanism for securing an effective Travel Plan.<sup>129</sup>

9.11.13 The Area-wide Travel Plan to cover the Hoo Peninsula will help to:

- reassure local communities in providing for better transport;
- deliver the proposed place-based vision for access and movement;
- satisfy the requirements of the relevant transport authorities;
- provide for a smooth planning process; and
- address air quality and noise impacts.

## 9.12 Parking

9.12.1 The Council's current vehicle parking standard was adopted in 2004 and revised in 2010. The residential vehicle parking standard provides for a minimum number of parking spaces per dwelling size. The relevant documents are set out in Appendix B. The 2010 addendum states that:

*Reductions of the standard will be considered if the development is within an urban area that has good links to sustainable transport and where day-to-day facilities are within easy walking distance.*

9.12.2 This is intended to provide flexibility in the application of the vehicle parking standard to achieve the most effective use of land and reduce travel demand.

9.12.3 In addition to the overall quantity, best practice guidance emphasises the need to follow a design-led approach, recognising that there is no single solution to vehicle parking provision. In short, vehicle parking provision should respond to the location, type, size and tenure of development proposals.<sup>130,131,132</sup>

9.12.4 Cycling is recognised for the contribution it can make as a sustainable and healthy form of transport for trips within our towns and between rural communities. To support this, the Council is committed to providing measures that make the choice to cycle a more natural one. The cycle network and associated infrastructure, including cycle parking, are essential to encourage cycling as a viable means of transport.

### Policy DM19: Vehicle Parking

Planning applications for residential and non-residential development will be determined in accordance with the adopted vehicle parking standard, including future revisions, subject to consideration of site-specific circumstances or material considerations that indicate otherwise.

The Council's current vehicle parking standard is set out in Appendix B. This is anticipated to be updated over the plan period. The 2010 addendum provides for flexibility in the application of the vehicle parking standard in order to optimise the density of development and reduce travel demand.

Vehicle parking will be consistent with any maximum vehicular trip generation set out in an associated Travel Plan.

For residential development, Design and Access Statements will demonstrate how the proposed vehicle parking adheres to best practice design principles. This is comprehensively set out in the Chartered Institute for Highways and Transportation and the Building for a Healthy Life guidance.

Where garages are to be provided, additional curtilage and/or on-street parking will be required.

All on-street and off-street parking bays will accommodate an electric vehicle charging point. There may be circumstances where compliance with this aspect of the policy would make the development unviable. In each case these circumstances would need to be fully demonstrated to warrant a departure from compliance with this aspect of the policy. Any departure should be able to

demonstrate how on-street and off-street parking bays will be capable of accommodating electric vehicle charging points.

Electric vehicle car club membership is encouraged through a Travel Plan. Some parking bays will need to be set aside solely for car club vehicles; they will be located to achieve the greatest exposure and use of the vehicles, subject to any specific requirements of the operator.

If on-street controls are needed, the potential for parking in neighbouring streets will need to be considered. Residents in neighbouring streets will need to be involved in preparing any Traffic Regulation Order (TRO). A developer contribution will be sought for any TRO, along with any additional enforcement.

Where there are no on-street restrictions proposed, a design-led allowance for on-street unallocated parking is preferred for visitors, deliveries and any additional vehicles owned by residents.

Retirement and other residential developments with particular occupancy controls will be expected to take a site-specific approach to vehicle parking provision.

**Question 35: Adequate overnight lorry parking would reduce the risk of lorries parking in locations that lack proper facilities and/or cause a nuisance. Are there local shortages for overnight lorry parking in Medway?**

## Policy DM20: Cycle Parking and Storage

Planning applications for residential and non-residential development will be determined in accordance with the adopted cycle parking standard, subject to consideration of site-specific circumstances or material considerations that indicate otherwise.

Long-term cycle parking facilities for residents, visitors and/or employees of the development will be conveniently located, safe to use, secure, weatherproof and be well integrated into the building and/or layout of the site.

Short-term cycle parking facilities should be conveniently located in relation to the public realm, provide effective security for cycles and be safe to use.

For dwelling houses, individual provision should be made within the private garden area.

For flatted developments and commercial uses, communal cycle stores should be provided in individual cages or containers, situated in secure locations where access is restricted to residents. Where on-site provision is demonstrably not practical, a developer contribution towards secure on-street residential parking or maintenance of strategic cycle routes will be sought.

Access to shared mobility, such as e-bikes and e-scooters, is encouraged through a Travel Plan.

9.12.5 Transport issues are among the most frequent and contentious issues raised during the previous consultations on the emerging Local Plan. Ill-considered vehicle parking provision was often cited in written responses and during public exhibitions as a matter of particular concern, given the potential for

existing neighbouring streets to be adversely affected, giving rise to the potential for neighbourhood dispute.

9.12.6 A response to an early round of consultation in the plan-making process highlighted recent case law as to what can and cannot be contained in a SPD. An SPD cannot contain policy identifying development and use of land; this should be set out in the Local Plan itself. As a result, and for clarity purposes, the Council's current vehicle parking standard is set out in Appendix B.

9.12.7 It is generally accepted that the most desirable streets are dominated by lined trees with cars parked in the street, either parallel to the pavement or at an angle, providing a buffer for pedestrians. In contrast, cars often dominate the street scene of cul-de-sacs developed since the 1960s.

9.12.8 More recently, car parking is often placed to the rear of houses in parking courts. Parking courts are designed with the intention to reduce the visual impact of cars, maintain the overall required number of parking spaces and enable the free movement of vehicles. The streets in such developments are often relatively narrow to reduce construction costs. However, drivers often choose to park on the street in front of houses, where there may be better surveillance. This can lead to instances of vehicles parking with two wheels on the pavement, impacting on the public realm and pedestrian safety, causing obstruction to public transport, emergency and delivery vehicles, and reducing the scope for children using the street for play.

9.12.9 'Home zones' have been advocated to encourage more street activity through the integration of play, socialising and car parking. Such designs often incorporate traffic calming measures, signage, public seating, planting and street surfacing to promote uses in addition to vehicle movement.

9.12.10 There are further disadvantages to parking courts, including the inefficient use of land to accommodate parking, smaller rear gardens, lack of surveillance and residents preferring to use their rear door, resulting in a loss of street activity. A design-led approach is promoted in best practice guidance to achieve a high quality and actively used public realm, to enable developers to meet market expectations and to discourage inconsiderate parking.

9.12.11 Research indicates that the allocation of parking spaces can be inefficient.<sup>133,134</sup> Car ownership levels will vary with the churn of occupants and their circumstances, therefore the allocation of most parking spaces will inevitably lead to households with too few or too many spaces. Visitors are more likely to require parking during the evening and at the weekend. There are times when demand for visitor parking coincides with the highest demand for resident parking, particularly in the evening, where there may be insufficient capacity and result in pressures on spaces and inappropriate parking.

9.12.12 In addition to a private car, some households may also need to park a commercial van. Some parking spaces may not be designed to accommodate larger vehicles and this can also lead to inconsiderate parking.

9.12.13 The latest iteration of the Viability Assessment assumed that schemes would provide electric vehicle charging points. It was noted that the costs of electric vehicle charging points vary and are falling, while in some cases the costs are covered in part by grants. An allowance of £250 per unit was allowed for.<sup>135</sup>

9.12.14 In the case of new developments and re-developments, good quality cycle parking should be designed in from the outset and not introduced as an afterthought. Cycle parking must be easy to use and accessed by all members of the community at all life stages and the need to lift or drag the bicycle at any time should be designed out of all new parking layouts.

9.12.15 Cycle parking should always give cyclists the confidence that their bicycle will still be there upon their return and therefore racks or other support systems should be conveniently sited and provide good security. Cycles are generally expensive goods. Parking and storage facilities that rely on the securing of wheels are unlikely to provide effective deterrents against theft or damage. It is much easier to remove cycle wheels without the need for tools. Cyclists are not likely to use communal cycle stores with limited security, and this could lead to storing cycles inside properties and/or on balconies, which can impact on amenity.

9.12.16 It is recognised that an affordable, reliable e-bike and e-scooter hire system could help to overcome parking and storage issues, ensuring people can benefit from cycling as an everyday mode of transport irrespective of income or their ability to store a bike at home.

## 10. Health, Communities and Infrastructure

### 10.1 Introduction

10.1.1 Promoting the health and wellbeing of Medway's communities is one of the priorities of the One Medway Council Plan. Medway's Joint Local Health and Wellbeing Strategy 2024-2028 sets out priorities to meet the needs of local people. It highlights the health inequalities across Medway, with a 10-year gap in life expectancy in men between the most and least deprived communities in Medway. The priority themes in the Strategy are wide ranging, and the Local Plan makes important contributions to these ambitions:

- Healthier and longer lives for everyone
- Reduce poverty and inequality
- Safe, connected and sustainable places
- Connected communities and cohesive services

10.1.2 This section considers the wider contributions to health and wellbeing, in providing access to health care services, but also greenspaces, sports and leisure facilities, and community buildings and services, that support social interaction and cohesion.

### 10.2 Health and wellbeing

10.2.1 Supporting people to lead healthy lives and strengthening our communities is one of the four strategic objectives of the local plan. Meeting this objective is necessary to achieving the local plan's vision: that Medway is a healthy place in which to live, study and work.

10.2.2 In line with the World Health Organisation's definition, health refers not just to the absence of disease but also positive physical, mental and social wellbeing. Wellbeing refers to wider purpose and meaning, life satisfaction and positive emotions and relationships. It is important in its own right because it generally leads to better physical and mental health.

10.2.3 Health and wellbeing is about much more than health care services. A long and healthy life comes from a strong foundation supporting all the building blocks of health, such as good education and employment; good quality, affordable housing; access to healthy food; and strong social and community networks. Many of these building blocks relate to the natural and built environment and are influenced by the Local Plan. For example, access to open space, the provision of community infrastructure and co-located services to support social cohesion, access to sport and leisure facilities and healthy food provision can help improve mental and physical health. Good health in turn can enable resilient communities and a strong economy.

10.2.4 Health inequalities are avoidable, unfair and systematic differences in health between different groups of people. Currently there are significant health inequalities across Medway. In our least well-off neighbourhoods, men are dying 10 years earlier than those in the most well-off. For women the life expectancy gap is 7 years, mainly due to circulatory disease, cancer and

respiratory disease. Ill health is often concentrated in the most deprived areas, and Medway has 37 neighbourhoods ranked in the 20% most deprived areas nationally.

- 10.2.5 Medway's population is also changing with implications for planning. The number of people aged 65 and over is projected to increase by 24% by 2040, with a particularly large increase of 55% in those aged 85+. <sup>136</sup>
- 10.2.6 The Local Plan has a key role to play in reducing health inequalities and improving health and wellbeing through the planning process by setting out objectives which aim to mitigate against these inequalities. It supports wider Council priorities such as delivery of the Medway's Joint Local Health and Wellbeing Strategy, which has four major priorities: healthier and longer lives for everyone; reduce poverty and inequality; safe, connected and sustainable places; and connected communities and cohesive services.
- 10.2.7 An Integrated Care Strategy has been produced by NHS Kent and Medway, Kent County Council and Medway Council, supported by district councils, Healthwatch organisations and the voluntary sector. The strategy emphasises the importance of creating healthy environments and communities:
  - Everyone who lives in Kent and Medway should have access to a decent, safe, secure, warm, and affordable home.
  - Encourage housing that is designed with health and wellbeing built in, promoting healthy lifestyles, and responding to the impacts of climate change and changes to the way we all live and work.
  - Partners will work together to plan housing development and regeneration in a way that improves quality of life for new and existing communities.
  - Support everyone to be able to access open spaces including at parks, at the coast, and via safe walking and cycling routes.
  - Protecting and enhancing our environment is a priority across the system. There are clear health and wellbeing benefits to reducing carbon emissions, improving air quality and managing the impacts of climate change.
  - Integrated support for families must include a wide offer that spans housing, communities, health, education, social care and the voluntary sector.
  - In tackling childhood obesity our built environment also has a role to play e.g., access to green spaces and safe walking and cycling routes to schools. <sup>137</sup>

## Policy T27: Reducing Health Inequalities and Supporting Health and Wellbeing

The Council will maintain and improve the health and wellbeing of our residents, encouraging healthy lifestyles and tackling the causes of ill health and inequalities. This will be achieved by:

- Promoting active and healthy lifestyles through the design of new development, including applying Active Design principles, improving the green and blue infrastructure network, enhancing the quality and accessibility of play and

recreation opportunities, expanding the network of attractive walking, wheeling and cycling routes and public transport.

- Reducing and mitigating drivers of poor health and health hazards such as those associated with climate change, poor air quality, noise, ground and water contamination, flooding, crime and hazardous uses.
- Creating inclusive, well-connected centres and neighbourhoods where services and facilities are co-located, including for older people and those with different abilities.
- Improving and creating better access to education, training and employment and promoting a stronger local economy.
- Supporting good mental health by tackling deprivation, promoting social interaction through the design of high-quality public spaces and places, and improving access to nature and green spaces.
- Providing decent and affordable homes within an attractive environment.
- Supporting the delivery of essential community services.
- Creating a healthy food environment by increasing opportunities for growing food, controlling the location of, and access to, unhealthy eating outlets, and improving the accessibility of retail facilities selling fresh food.
- Providing good access for all to health and social care facilities.

The Council will support development in Medway that provides opportunities for healthy lifestyles, contributes to the creation of healthier communities, and helps reduce health inequalities. In doing so, will need to satisfy the following:

- Major development will be permitted where it provides facilities and services that support health objectives with priority given to new or enhanced existing health, social care, community, sport, and leisure facilities.
- Major development must ensure that primary health care facilities provided are of an appropriate scale in relation to the proposal and meets the needs of residents. These primary health care facilities must be located alongside other community services and facilities to foster a sense of community, improve accessibility, promote sustainable travel, and enable combined trips.
- Development that protects and increases the availability of allotments and private and communal gardens for exercise, recreation and for healthy locally produced food will be supported.
- In exceptional circumstances, health, social care, community, sport and leisure facilities may be replaced by another appropriate use or lost where there is a demonstrated overprovision. This must be justified and supported by evidence showing the use is not needed, demonstrating the following:
  - a) Community engagement has been undertaken to inform the preferred use within the proposal's red line boundary of the development area as a replacement.
  - b) Consideration has been given to repurposing the built form or providing new facilities to support health objectives with priority given firstly to health, social care, community, sports and leisure facilities.
- Development must retain or re-provide existing health, social care, community, sport, and leisure facilities.
- All major development proposals or those that the Council would consider having the potential to have a significant impact on health and wellbeing must be supported by a Health Impact Assessment (HIA). Proposals will be

supported where it can be demonstrated that the design of the scheme has been informed by the conclusions of the Health Impact Assessment.

- Development that would have an unacceptable impact on health or wellbeing will not be permitted.
- Development proposals will help to create healthy and sustainable places, recognising the cumulative effect individual units and specific uses can have on the success of places.<sup>138</sup> The Council will seek to manage the concentration and mix of specific premises to support healthier communities. In particular, the location and concentration of the following types of development will be carefully managed to avoid possible adverse impacts on health and wellbeing):
  - a) hot food takeaways;
  - b) off-licences;
  - c) facilities that encourage smoking, for example smoking shelters and shisha lounges; and
  - d) payday lenders, betting shops and amusement arcades.
- Where uses identified in points A-D above can be justified, acceptability will be informed by the location proposed. Locations away from places that are regularly frequented by younger people such as schools and youth facilities, and where they are likely to worsen health inequalities are considered preferable.

10.2.8 Chapter 8 of the NPPF makes it clear that local planning authorities have a responsibility to promote healthy communities. It says that “planning policies and decisions should...enable and support healthy lifestyles, especially where this would address identified local health and well-being needs” and should “take account of and support local strategies to improve health, social and cultural wellbeing for all”.<sup>139</sup>

10.2.9 Public Health England’s Spatial Planning for Health 2017 is centred on five aspects of the built and natural environment: neighbourhood design, housing, healthier food, natural and sustainable environment, and transport. These five aspects of the built and natural environment were identified as the main characteristics that can be designed and shaped, by planning, in order to promote health outcomes.<sup>140</sup>

10.2.10 Responses to earlier rounds of consultation on the emerging Local Plan called for greater recognition to be given to health in planning for Medway’s future. Key themes relating to health highlighted by respondents included the need to tackle health inequalities, address the lack of affordable housing, ensure sufficient appropriate health, community and social infrastructure and services, improve the availability of safe, accessible green space, improve access to healthy food, strengthen local centres and businesses, increase the availability of public transport and walking and cycling routes, and ensure inclusive public spaces accessible to all abilities.

10.2.11 In 2023 Medway Council conducted a Better Health Survey with 526 adults and 148 children and young people. Focus groups and interviews were conducted with groups less likely to respond to surveys such as those in deprived areas and rural areas, people experiencing homelessness, sex workers, older women and men, ethnic minority groups, the Gypsy, Roma and Traveller communities, people whose life experiences have made it

more difficult for them to manage their own physical and mental wellbeing and people in the armed forces. A survey and workshop were also conducted for health, care and voluntary sector organisations. Many of the themes related to the need for planning to support health:

- Adult survey respondents emphasised the need for better access to health and care services, affordable, good quality housing and improved job security.
- Children and young people highlighted the need for more social connections, opportunities for physical activity, better access to public green spaces and tackling environmental issues.
- Key themes across both surveys included a healthy environment, opportunities for physical activity and social connections, access to healthy and affordable food, and better access to health and care services.
- Focus groups and interviews reported the need for social groups and places where people can connect with others, better access to health and care services, integrated hubs in the community where people can meet many of their health needs in the same place, and green spaces.
- Health and care and voluntary sector organisations emphasised the importance of good quality and affordable housing, a healthy environment, community cohesion and access to health and care services.

10.2.12 With the increasing proportions of older people and greater diversity in our communities there will also be challenges ahead to make sure that the needs of all are met. The built environment can contribute to this through a considered approach to the location, design, and accessibility of development as well as the re-purposing of built form for uses that mitigate health inequalities. This will ensure that residents have equal access to opportunities for good health and the factors that contribute to it such as employment, housing, and participation in community life.

10.2.13 The provision of an accessible environment that allows people to participate in physical activity, such as walking and cycling, is of paramount importance for promoting health and wellbeing. Active travel that encourages access to local employment, amenities, and community facilities, can have real public health outcomes and supports the objective of supporting people to lead healthy lives and strengthening our communities. The Active Design's foundation principle 'activity for all' states, "all environments should support physical activity equitably across all ages, ethnicities, genders, and abilities - enabling everyone to be active and build long-term active habits and behaviours."<sup>141</sup>

10.2.14 Health, social care, community, sport and leisure facilities are important in enhancing people's quality of life. They also perform wider health and wellbeing functions, helping to build inclusive communities, promoting healthy lifestyles and protecting green spaces for reflection and relaxation. Similarly, community facilities play a significant role in developing the social wellbeing of individuals and communities by allowing activities and interests to grow outside of the home and the workplace. They also bring people together and help to establish new communities. There are benefits to the

co-location of facilities to foster a sense of community, improve accessibility, promote sustainable travel, and enable combined trips.

10.2.15 New development has the potential to support significant improvements in human health but can also have considerable adverse impacts on health, both within the red line and on the wider environment, if it is inappropriately located, designed, constructed and/or operated. Certain types of use can cause detrimental cumulative impacts as a result of their concentration. It is important that specific consideration is given to the potential overall impact of development on health during the planning process, with individual proposals seeking to maximise their positive contribution as far as practicable, recognising that health requirements and issues can vary between different groups of identity and on an individual basis. Health impact assessments will be an important tool for this.

10.2.16 An important contributing factor to poor diet and health in certain parts of Medway is the distribution and access to unhealthy eating outlets. In certain locations there is an issue where such uses cluster together, reinforcing the ease of access to unhealthy foods and adversely affecting the vitality of the area. Consideration will therefore be given to managing the proliferation of and therefore access to, such uses to avoid over-concentration.

10.2.17 Health, social care, community, sport, and leisure facilities are important in enhancing people's quality of life and developing the social wellbeing of individuals and communities. The co-location of these facilities creates a supportive environment that encourages healthy lifestyle choices, fosters community interaction and cohesion. This integration promotes sustainable travel by reducing the need for multiple trips, thereby contributing to environmental sustainability, it also supports economic development by creating a vibrant, multifunctional space that attracts investment.

**Question 36: Are there any core health and wellbeing issues or opportunities missing from the policy?**

**Question 37: What are examples of healthy development in Medway you would like to see more or less of?**

**Question 38: Of those health areas listed, what are the most important for the local plan to address?**

**Question 39: How can the local plan ensure that development is inclusive and accessible for all members of our community, including people with disabilities?**

## 10.3 Open space, sport, recreation and play

10.3.1 Medway's open space and green infrastructure network makes an important contribution to its landscape, townscape, and biodiversity. Along with indoor sport facilities, open space including equipped and informal play spaces and allotments support the health and well-being of communities. The River Medway, and the skiing and ice skating facilities, provide for other activities beyond mainstream sports.

10.3.2 National planning policy defines open space as 'all open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.'

10.3.3 Alongside the provision of new open spaces, it is important that existing publicly accessible open spaces are protected for future generations. Existing open space, sports and recreational buildings and land, including playing fields, is protected through national planning policy. Such areas should not be built on unless the site is surplus to requirements, equivalent or better facilities will be provided or the development is for alternative sports or recreational provision, the benefits of which clearly outweigh the loss.

10.3.4 National planning policy also provides for the designation of land as Local Green Space through local or neighbourhood plans. This allows communities to identify and protect green areas of particular importance to them.

10.3.5 Child-friendly Medway is a place where young people's voices are recognised, and they feel safe, valued, included, learn new skills and make the most of their talents. Providing the best start in life for children and young people helps them to aim high, reach their goals, hopes and dreams for their future.<sup>142</sup>

10.3.6 The Council's Playing Pitch Strategy (2019) and the draft Medway Open Space Assessment (2024) clearly identify the need for new and improved open spaces and sports facilities over the period of the Local Plan to respond to the pressures that additional growth will place on existing provision, including in areas of Medway which already experience deficits in specific typologies of open space.<sup>143</sup>

10.3.7 The Council will consider the need for additional guidance to ensure that open spaces secured through the development management process are delivered and managed effectively for communities.

## Policy T28: Existing Open Space and Playing Pitches

Proposals for development which would result in the loss of publicly accessible open space will only be permitted if:

- a. There would be no material harm to the contribution the open space makes to the visual or recreational amenity of the area, and the Council has assessed the open space as making no positive contribution to its overall strategy on open space.
- b. Where there would be material harm, this would be balanced against demonstrable need for the development in that specific location. Should there be no alternative site available to accommodate the proposed development, any harm must be offset by the provision of other open space of comparable accessibility, quality, size, character and usability in a suitable location, in addition to any open space requirements of the new development.
- c. The proposal is for the construction of a new building that is an essential facility for outdoor sport, recreation, play or allotment use or other open space typology uses that does not conflict with the purpose, character or accessibility of the open space.

- d. The proposal is for the re-use or replacement of existing buildings provided that the proposed uses do not conflict with the purpose, character or accessibility of the open space; and any replacement building is not materially larger.
- e. The proposal is for the carrying out of engineering or other operations required for public safety.

In addition, proposals for development which would result in the loss, in whole or in part, of sports or recreation facilities must also demonstrate that:

- f. The site has first been considered for other sport, open space, recreation, biodiversity or community uses.
- g. It has been demonstrated that the playing field is surplus to requirements having regard to the Council's Open Space Assessment or Playing Pitch Strategy.
- h. There is an overriding need for the proposed development which outweighs the loss and the loss would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location.
- i. The development is for a small part of the site; where it has been demonstrated that it will result in enhanced sport and recreational facilities.

Proposals for development that would result in the loss of publicly accessible open spaces provided as part of a planning permission for development will be refused.

## Policy DM21: New open space and playing pitches

Residential-led developments will be required to provide new open space and playing pitches according to the following accessibility and quantity standards:

Open space type	Definition	Catchment	Quantity per 1,000 people
Parks and gardens	Urban parks and formal gardens, open to the general public. Accessible, high-quality opportunities for informal recreation and community events	9-minute walk time (710m)	0.80 ha
Natural and semi-natural greenspace	Supports wildlife conservation, biodiversity and environmental education and awareness . e.g. woodlands,	9-minute walk time (720m)	3.09 ha

Amenity greenspace	nature reserves, grassland.	6-minute walk time (480m)	0.80 ha
	Opportunities for informal activities close to home or work or enhancement of the appearance of residential or other areas.		
	Local Area of Play targeted at 0 to 5 year olds		1-minute walk time (100m)
	Local Equipped Area for Play (LEAP)		5-minute walk time (400m)
	Neighbourhood Equipped Area of Play, targeted at 12 to 18 year olds, and provision for young people, such as skate parks		12.5-minute walk time (1,000m)
Provision for children and young people	Play facilities that have a distinctive feature and are part of a larger facility. Could include skate parks or multi-use games areas, but taking into account Making Space for girls' guidance.	9-minute walk time (700m)	0.25 ha
	Areas marked for pitch sports (e.g. football, tennis). This is in addition to any sports pitches provided as	Applicants to seek use of Sport England's Play Pitch Calculator to determine site specific	TBC
Outdoor sport			

	part of any on-site school provision	requirements based on Play Pitch Strategy
Allotments	<p>Provides opportunities for communities to grow their own produce.</p> <p>Added benefits include the long-term promotion of sustainable living, health and social inclusion</p>	<p>No standard set</p> <p>0.25 ha</p>

Development proposals should make appropriate space available to meet the quantity standards within the site as set out below:

- Residential development of 10 or more dwellings will be required to provide either new and / or enhanced publicly accessible open space and recreation provision to meet the needs of their occupants. Provision should be provided based on the size of the dwellings proposed.
- In the case of sheltered housing and special needs housing for the elderly, children's play will not be required. However, formal/informal open space provision will be sought on-site in lieu of the formal play requirement.
- The expectation is for development to deliver provision on-site in accordance with the quantity standards above, unless in exceptional circumstances where off-site provision would better facilitate the needs of the development or where provision may not be suitable onsite due to either the nature / size of the site or specific constraints.
- In cases where it can be demonstrated that it better meets local need, play provision may be secured through the improvement and expansion of existing facilities within the local area, rather than new play provision. This will be considered on a case-by-case basis for minor developments only.
- Where off-site open space provision is required developer contributions for the enhancement and maintenance of existing open space and recreation provision will be sought with contributions secured through a S106 legal agreement.
- Where on-site open space provision is required, the type of on-site open space provision to be delivered will be discussed with the applicant at the pre-application stage and will be dependent on the suitability of the site to accommodate different types of open space provision as well as the quantity and type of provision needed in the local area. The starting point for the consideration of provision should be based on the quantity standards.

The open space requirements will be calculated by multiplying the number of people expected to occupy the development by the standards as expressed in square metres per person.

The number of people expected to occupy the development will be based on the average household size for Medway. This will be based on the most up-to-date Office for National Statistics household projections. The standards will be reviewed where high levels of student or sheltered accommodation is proposed.

### Design of new open space

Proposals for development which include provision of new on-site open space must ensure that new open spaces meet these quality standards below:

- a. Be designed as part of the green infrastructure network, contributing to local landscape character, connecting with local routes and green corridors for people and wildlife as well as providing multi-functional benefits such as addressing surface water management priorities without compromising access.
- b. Play provision is diverse to encourage all appropriate ages and play opportunities for all abilities, reflecting up to date play guidance, including Fields in Trust and Making Space for Girls.<sup>144,145</sup>
- c. Be fully accessible and inclusive provide a range of formal and informal recreation, to encourage physical activity to improve mental well-being and health inequalities that will benefit both new and existing residents.
- d. Integrate formal sports provision into wider open space networks.
- e. Provide meaningful and safe recreation and be sufficiently overlooked by active building frontages while maintaining appropriate distances from residential properties.
- f. Link with active travel routes both within and beyond the site.
- g. Be easily found and accessible walking and cycling, and public transport and road where appropriate, including by those with disabilities, with pedestrian crossings on roads where necessary.
- h. Promote biodiversity and maximise opportunities to deliver benefits for nature, supporting efforts to address climate change.
- i. Where new schools are provided in major new residential developments, they should be designed to facilitate community access, with opportunities for meeting the community's outdoor sports needs explored at the outset to maximise the potential for facility provision to be made within the developments.
- j. Provide adequate funding towards the long-term maintenance of new provision. A management plan for the on-site provision will also be required as relevant to the proposal to ensure the site is managed and maintained in the long-term.

10.3.8 The accessibility and quantity standards were recommended in the Open Space Assessment (2024). Notably, new provision was based on current provision, as opposed to the Fields in Trust's benchmarks, which do not take into consideration the local circumstances.

10.3.9 The Playing Pitch Strategy (PPS) justifies the protection, enhancement and provision of playing pitches. Based on an audit and assessment of the supply and demand for existing and future playing pitches (in consultation with local clubs, national governing bodies of sport and other users and providers), the PPS provides recommendations and an action plan for addressing issues regarding the quantity, quality and accessibility of playing pitches and ancillary facilities.

10.3.10 The Sports Facility Strategy and Action Plan provides an assessment of need up to 2035 and a phased approach to planning.<sup>146</sup> It sets out

opportunities for improvements in a range of sports facilities across Medway. The potential use of a Community Use Agreement to ensure schools sports facilities can be made available for community use outside of school hours to help meet demand was highlighted in the PPS and in the Sports Facility Strategy and Action Plan.

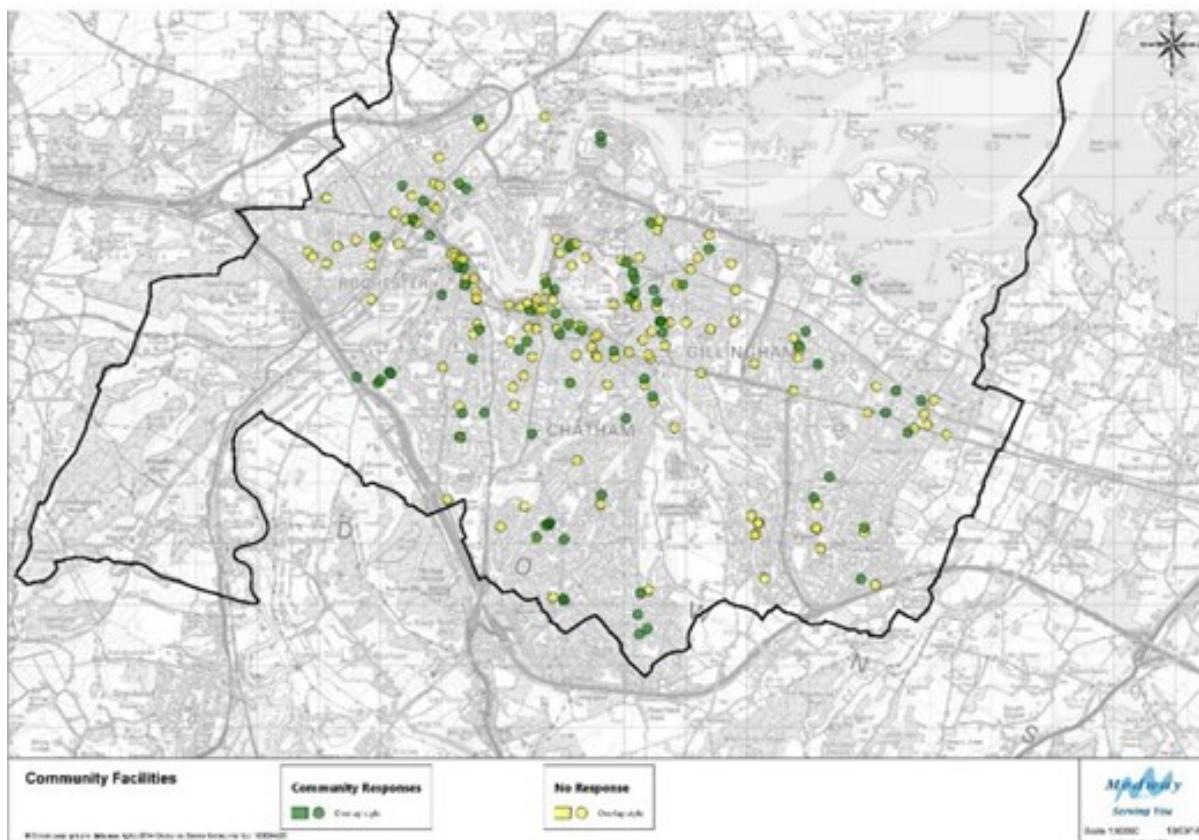
*Question 40: The designation of land as Local Green Space allows communities to identify and protect green areas of particular importance to them. The Local Green Space designation should only be used where the green space is: a) in reasonably proximity to the community it serves; b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and c) local in character and is not an extensive tract of land. Please use the online map to identify a green area for consideration as designated Local Green Space.*

*Question 41: Sport England require an up-to-date PPS to justify the protection, enhancement and provision of playing pitches. Based on an audit and assessment of the supply and demand for existing and future playing pitches, the PPS provides recommendations and an action plan for addressing issues regarding the quantity, quality and accessibility of playing pitches and ancillary facilities. Medway Council's latest PPS was completed in October 2019 for the period 2018-35. Medway Council is inviting local clubs, national governing bodies of sport and other users and providers to review the latest PPS. More specifically, are there any matters in the latest PPS that should be updated?*

## 10.4 Community Facilities

- 10.4.1 Community facilities, such as village halls and community centres, sports venues, cultural buildings, pubs and places of worship, make an important contribution to the quality of life. They support access to key services, adding to the vibrancy of neighbourhoods and centres, and encourage social interaction and boost wellbeing.
- 10.4.2 Protecting, improving and making provision for new community and cultural facilities will help to maintain and improve the quality of life enjoyed by Medway's residents. Further information is available in Medway's Cultural Strategy 2020-2030.<sup>147</sup>
- 10.4.3 The Council has gathered evidence on how well urban communities are served by local facilities as detailed in Figure 8. Many of these facilities are located in the town centres, but there is a wider network of social infrastructure in neighbourhoods across the urban and suburban areas, often located in district and local centres. The survey found that facilities were generally well used, were well located and most were in sufficient condition for the activities undertaken. However, many had plans to expand to keep pace with demand from users.
- 10.4.4 Community halls for example are important to residential neighbourhoods for promoting health and well-being, sustainable communities and community cohesion. These facilities are recognised in planning policy as important in meeting the social needs of sustainable development.

10.4.5 Developer contributions allow for the provision or expansion of neighbourhood facilities to the local community to meet service deficiencies exacerbated by the new developments, including community buildings to meet a wide range of needs across all sections of the community. The contributions can also allow for community provision of youth facilities within new or existing facilities including provision for sport and games development.



**Figure 8: Distribution of Urban Community Facilities**

Source: *Medway Urban Community Facilities Survey 2017*

10.4.6 National planning policy states that strategic policies must make sufficient provision for community facilities under health, education and cultural infrastructure.<sup>148</sup>

#### **Support for community and cultural facilities**

10.4.7 For proposals that involve the loss of community (including shops), health and cultural facilities, the Council will require evidence firstly that an alternative facility or facilities can be found within easy walking distance, where planning permission is required. Evidence will need to demonstrate that there is at least one such facility which offers services and an environment comparable to that of the facility subject to the proposal.

10.4.8 In determining local need in relation to a community or cultural facility, the Council will require evidence that there has been public consultation to ascertain the value of the facility to the local community. If the facility is registered as an 'Asset of Community Value', the Council will regard this as

a material consideration in the determination of any planning application affecting the facility.

10.4.9 In relation to viability, the Council will require evidence demonstrating that:

- the existing or recent business is not financially viable, as evidenced by trading accounts for the last three years in which the business was operating as a full-time business;
- a range of measures were tried during this time to increase trade and diversify use; the potential for the property to extend the range of facilities offered at the site has been fully explored.

10.4.10 For public houses, the Campaign for Real Ale Public House Viability Test, or a similar objective evaluation method, has been employed to assess the viability of the business and the outcomes show that the public house is no longer economically viable.<sup>149</sup>

10.4.11 The Council will also require evidence that all reasonable measures have been taken to market the facility to other potential operators. The business must have been marketed for at least 12 months either as the current type of facility or as an alternative community facility, at a price agreed with the Council following an independent professional valuation (paid for by the developer). In turn there must have been no interest in purchasing either the freehold or leasehold as a community facility. The business must have been offered for sale locally, and in the region, in appropriate publications and through relevant specialised agents.

## Policy T29: Community and Cultural Facilities

The Council recognises the importance of community and cultural facilities and the need for an appropriate range of facilities as a key component of sustainable development. The Council will seek to protect and enhance existing facilities, services and amenities that contribute to the quality of life of residents and visitors.

The Council will support appropriate development that seeks to enhance community and cultural facilities that do not have a negative impact on the surrounding amenity, historic and natural environment and transport networks.

The Council will require provision to be made for community and cultural facilities in planning for new development. Large scale residential developments will be required to provide community facilities to meet the needs of new residents and integration with existing communities where possible.

New community and cultural facilities should be located within or near the community they are intended to serve and should be appropriately located to support sustainable travel by being accessible to users by walking, cycling and public transport. If the development is smaller scale and community facilities cannot be accommodated on site, a contribution will be sought to upgrade appropriate facilities off site, where it can be demonstrated that they are accessible to residents of the new development and that there is capacity to support the increased population.

All developments for over 10 homes will be required to contribute to upgrading community facilities in line with the Council's policy on infrastructure contributions from developers.

There is a presumption against the loss of community facilities in rural and urban areas.

Any proposal which would result in the loss of a community or cultural facility will not be permitted unless:

- An alternative community facility (social infrastructure) which meets similar local needs to at least the same extent is already available.
- It can be shown that the proposal does not constitute the loss of a service of particular value to the local community nor detrimentally affect the character, sustainability and vitality of the area.
- Additional/improved provision including the utilisation of vacant and under-used land for arts, cultural and creative purposes is provided.
- It has been demonstrated that it is no longer economically viable and cannot be made so, unless sufficient marketing evidence has been supplied.
- Proposals for new community facilities should:
  - Have safe access by cycle and walking within reasonable walking distance, public transport and car and incorporate a travel plan.
  - Have safe drop-off and pick-up provision.
  - Avoid conflict with adjoining uses.
  - Healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan.

10.4.12 National guidance states that 'To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should: plan positively for the provision and use of shared spaces, community facilities and other local services to enhance the sustainability of communities and residential environments.'

10.4.13 National guidance recognises the importance of providing local shops to satisfy the needs of local communities.

10.4.14 Community facilities are those 'shared spaces' enabling 'shared activities' that the Government recognise as helping to create a sense of place and foster local residents' pride.

10.4.15 Feeling part of a community can improve wellbeing and reduce social isolation and loneliness, while involvement in community and cultural activities can also contribute to improved mental health.

10.4.16 New provision or renewal of established facilities will serve existing and new residents and create places for a diverse range of residents to meet and interact.

10.4.17 Integrated and resilient communities with high levels of participation and trust can help protect and enhance the local environment.

10.4.18 For these reasons it is essential that the range of community facilities in Medway is maintained, of the type and location that is appropriate to the needs of residents.

10.4.19 In planning for town, village and local centres across Medway, the Local Plan will consider the need to secure a range of community facilities. Much of the growth planned for Medway over the plan period is likely to be located in large developments that extend or establish neighbourhoods, towns or villages. The Council will expect the provision of community facilities to be integral to the planning of large developments, so that residents can easily access a range of services, supporting community life. Large scale housing development without adequate provision of community facilities will not be acceptable.

## 10.5 Infrastructure delivery

- 10.5.1 Infrastructure is a vital component of the Local Plan as it is essential for a place to function well.
- 10.5.2 Infrastructure is a broad term and falls into three categories: physical, social and green (including grey and blue). The Planning Act 2008 defines it as including: roads and other transport facilities, flood defences, schools and other educational facilities, medical facilities, sporting and recreational facilities, and open spaces.<sup>150</sup>
- 10.5.3 This section will focus on planning for the delivery and safeguarding of infrastructure, but will not include a review of transport facilities, flood defences, sporting and recreational facilities and open spaces, waste, minerals or energy as these elements are to be dealt with in other areas of the plan.
- 10.5.4 The Local Plan vision and objectives sets out that infrastructure is crucial to the development of Medway in coming years, especially its timely delivery and effective scale. Noted as key to this is the delivery of education, health, transport and community facilities.
- 10.5.5 The following policies seek to support the vision and ensure that it is delivered in an appropriate and efficient manner. They focus on infrastructure delivery and communications.
- 10.5.6 The Council will seek the timely and effective delivery of infrastructure for strategic and smaller sites to support the local economy and meet the needs of Medway's communities. The Council will also seek to protect existing infrastructure assets and safeguard land where required for new infrastructure.
- 10.5.7 To support the growth strategy in the Local Plan the Council will produce an updated Infrastructure Delivery Plan (IDP). This will set out the required level, cost, funding and phasing of a broad range of infrastructure to support the proposed development over the plan period. It is an iterative document that is to be monitored and reviewed.
- 10.5.8 Supporting the Local Plan and IDP to bring forward the required infrastructure at the right time, the Council will use planning contributions and obligations. These are planning and legal mechanisms to mitigate a development. They currently include planning conditions, Section 106 Agreements, Section 278 Agreements and unilateral undertakings. Further

mechanisms, such as an Infrastructure Levy (IL) may come forward through national policy over the plan period.

10.5.9 Medway Council uses Section 106 Agreements and planning conditions as the mechanism for developer contributions and obligations. This has been a successful method for the Council to secure infrastructure and the Council will continue with this approach, subject to further evidence in the preparation of the Local Plan, and potential changes to national policy.

10.5.10 The Council has not adopted a CIL, as evidence to date does not support this as a preferable method to the use of S106 agreements. It will respond to any updated government guidance and legislation on developer contributions, planning conditions and approaches to viability testing. This may involve the possible implementation of a locally adopted IL or other recognised funding mechanism to provide for contributions for strategic infrastructure supporting the development of the wider area.

10.5.11 The Council will also continue to engage with appropriate bodies on strategic infrastructure planning matters, through the Duty to Cooperate and where appropriate use Statements of Common Ground to plan to overcome issues identified.

## Policy S24: Infrastructure Delivery

Development coming forward in Medway will be expected to deliver new or improved infrastructure, to mitigate the impact of development. This will be achieved through the use of planning obligations and/or contributions and their use as defined in national policy and guidance, and as set out in the latest Medway Guide to Developer Contributions and Obligations. Infrastructure includes requirements having regard to the details set out in the latest IDP, as well as studies on leisure, green infrastructure, neighbourhood plans and development orders and other needs assessments.

To support sustainable development and the delivery of infrastructure planning permission will be granted for new developments in the following circumstances:

- Applications can demonstrate that there is sufficient infrastructure capacity to support what is proposed.
- Development is phased to reflect the timely delivery of infrastructure to serve and support future occupants and users.
- Developer contributions and/or obligations are agreed that will mitigate the impact of the development.
- To achieve timely delivery of infrastructure the Council will expect infrastructure to be delivered in the following sequence unless proven otherwise through the application process via the viability appraisal process below:
  - Onsite delivery of infrastructure ahead of occupation.
  - Onsite phased delivery of infrastructure.
  - Financial developer contribution for offsite provision.

In the event that a developer considers that providing or contributing towards infrastructure requirement would not be achievable the Council would expect the following:

- The submission of an "open book" viability appraisal. Any sensitive information which could compromise the applicant's operations in any way will remain confidential from the public.
- Proof that the cost of potential infrastructure had been accounted for within the purchase price of the site.

If development is phased, the Council would expect a reassessment of the viability of the site for financial contributions to be undertaken at the submission of details for each phase.

Any viability appraisal is to be tested by the Council's independent advisors and this is to be paid for by the applicant.

Infrastructure provision will require collaborative working with infrastructure providers including Medway Council, the NHS, and utilities providers amongst others. Developers and landowners must work positively with the Council, neighbouring authorities and other infrastructure providers throughout the planning process to ensure that the cumulative impact of development is considered at the outset and is then mitigated, at the appropriate time, in line with their published policies and guidance.

**10.5.12** Medway is made up of very different urban and rural areas, with varying levels of service provision. The character and circumstances of different places in Medway needs to be considered in planning for new infrastructure. Some urban locations may have limited land for new services, and villages may have a low level of existing service, and sustainable transport links. Local factors are important in considering the mitigation needed.

**10.5.13** Communities across Medway have raised concerns in previous consultations about pressures on services and infrastructure. Health, education and transport services are particular concerns. Residents want to be reassured that new development, particularly housing, will be accompanied by upgrades in infrastructure to meet the needs of expanded communities. The Council is setting out in the policy a preferred approach to sequencing the delivery of infrastructure. This would be based on delivering infrastructure ahead of occupation of the development, phased throughout it, or through a financial contribution. The sequencing would be negotiated between the developer and the Council and reasons for a course of action chosen justified.

**10.5.14** To effectively manage infrastructure delivery for planned developments the Council will produce an updated IDP for publication with the Pre-Submission Draft Plan in early 2025. The IDP identifies the interventions needed to secure relevant infrastructure to bring forward the planned developments in Medway. The IDP will also be used to address issues raised by local communities about significant pressures on infrastructure.

**10.5.15** The IDP will be an iterative document, refreshed over the plan period. The decisions on obligations and level of contribution for these developments will be identified through the Medway Guide to Contributions & Obligations Guide or successor documents and cover the full spectrum of potential 'infrastructure' required to mitigate a development. Any allocation of the

contributions outlined will be through negotiation between the applicant and Council based on the individual attributes of the planning application.

10.5.16 The plan will be informed by a whole plan viability assessment to demonstrate that the allocations and policies provide for the delivery of sustainable development. However the Council needs to allow for some flexibility within the provision of infrastructure. Over the plan period the economy and property market are likely to pass through moments of change. As a result individual sites may suffer viability issues and so flexibility needs to be built into the process to allow for delivery of development.

*Question 42: Do you agree identifying the required infrastructure to support the scale and locations of growth within Medway is the correct approach? Would a 'mini IDP approach' focusing on broad locations and strategic sites be preferred? Or do you have an alternative suggested approach?*

*Question 43: Align infrastructure provision in line with this growth – how can we balance growth and new infrastructure requirements with funding gap?*

## 10.6 Digital communications

- 10.6.1 Telecommunications are intrinsic to how we now live and work. Access to good broadband and telephone services are essential for business, learning and communities, and provision of high-speed broadband services is a key component of a successful economy.
- 10.6.2 National policy supports the development of digital and communications infrastructure in planning for sustainable places.<sup>151</sup> This form of development should be carefully sited, with regard to local amenity, heritage and landscape. The mobile phone network and coverage has increased in importance with the reliance on mobile technology to stay in contact and do business through mobile phones and tablets.
- 10.6.3 The Government's UK Wireless Infrastructure Strategy (2023) has an ambition to deliver nationwide coverage of standalone 5G to all populated areas by 2030.<sup>152</sup> The Government's UK Digital Strategy seeks to accelerate the commercial delivery and nationwide gigabit broadband, aiming to achieve at least 99% gigabit coverage by 2030, and ensuring that rural areas are not left behind.<sup>153</sup>
- 10.6.4 Medway Council is working with Kent County Council on Project Gigabit the Broadband Delivery UK programme to provide connections offering download speeds of connections offering download speeds of 1 Gigabit per second (Gbps) or 1000 megabits per second (Mbps). There is currently coverage of 8% of properties across Medway.<sup>154,155</sup>
- 10.6.5 There are still issues within the provision of the broadband across Medway. Statistics indicate that there are areas of disparity within Medway with a rural urban split.<sup>156</sup> Medway is generally well served by mobile network coverage. Data (3G-5G) and voice coverage is nearly absolute. However there are weak spots across on the Hoo Peninsula for both voice calls and 4G/5G coverage.<sup>157</sup>

- 10.6.6 The Council aims to maximise economic growth and deliver the required infrastructure through, amongst other elements, gigabit capable broadband. This will help the Council to achieve its ambitions for quality jobs and a growing economy.<sup>158</sup>
- 10.6.7 The development and enhancement of digital communications will assist Medway's economic ambitions. Improving coverage and reducing weak spots of the mobile network and gigabit capable broadband will also attract more investment across these areas, in addition to helping residents in their connections.

## Policy DM22: Digital Communications

For Medway to achieve its economic and social potential and maintain its status as a well-connected place in which to live and work, the Council will seek to develop and enhance the provision of broadband and telecommunications infrastructure coverage across Medway.

All new major development proposals (residential, employment and commercial) should:

- Ensure that there is full fibre to the premise.
- Have confirmed with broadband providers that a connection can be made to the development.
- Be ready for 5G technology and gigabit capable broadband with the relevant infrastructure in place, where relevant.

Evidence of this shall be submitted as part of a planning application.

If none of the above is possible, reasoned justification as to why this is not possible should be given as part of a planning application and then alternative methods to deliver gigabit capable broadband used instead. These include other forms of infrastructure, such as facilities supporting mobile broadband and wi-fi to support gigabit capable broadband.

Exceptions to this policy will need to be justified with evidence submitted to the Council for consideration.

- 10.6.8 During previous stages of consultation, comments were received on the need to address deficiencies within existing infrastructure and current service improvements. Policies can be developed in order to manage this infrastructure moving forward so that deficiencies do not occur in the future. This can be best achieved through the provision of digital infrastructure within a development.
- 10.6.9 The government has recognised the role of effective high-speed broadband in supporting and driving the economy. It has invested in its Broadband Delivery UK programme to extend gigabit broadband coverage across the UK and has introduced a broadband Universal Service Obligation so that from 2020 everyone across the UK has a clear, enforceable right to request high speed broadband.<sup>159</sup>
- 10.6.10 In March 2017, the Government released its 5th Generation (5G) Strategy for the UK, with the rollout of the next generation of mobile networks

continuing the Council will work with the telecommunications industry to agree suitable provision and shared guidance on the 5G rollout. The Government also recognises that 4G will continue to have an important role to play in delivering mobile connectivity which the Council will continue to support.<sup>160</sup>

10.6.11 In terms of actual connections and intended providers, applicants should engage with network providers from the outset to ensure the needs of the service (including new ducting) can be introduced alongside other on-site infrastructure works as part of new developments to ensure the most efficient and viable approach is taken to securing connectivity.

## 11. Minerals Supply

### 11.1 Introduction

11.1.1 As the Minerals Planning Authority for Medway, Medway Council provides planning policy, and determines planning applications, related to the supply of minerals in Medway. This section sets out the planning policy for development related to the supply of minerals in Medway.

#### Policy context

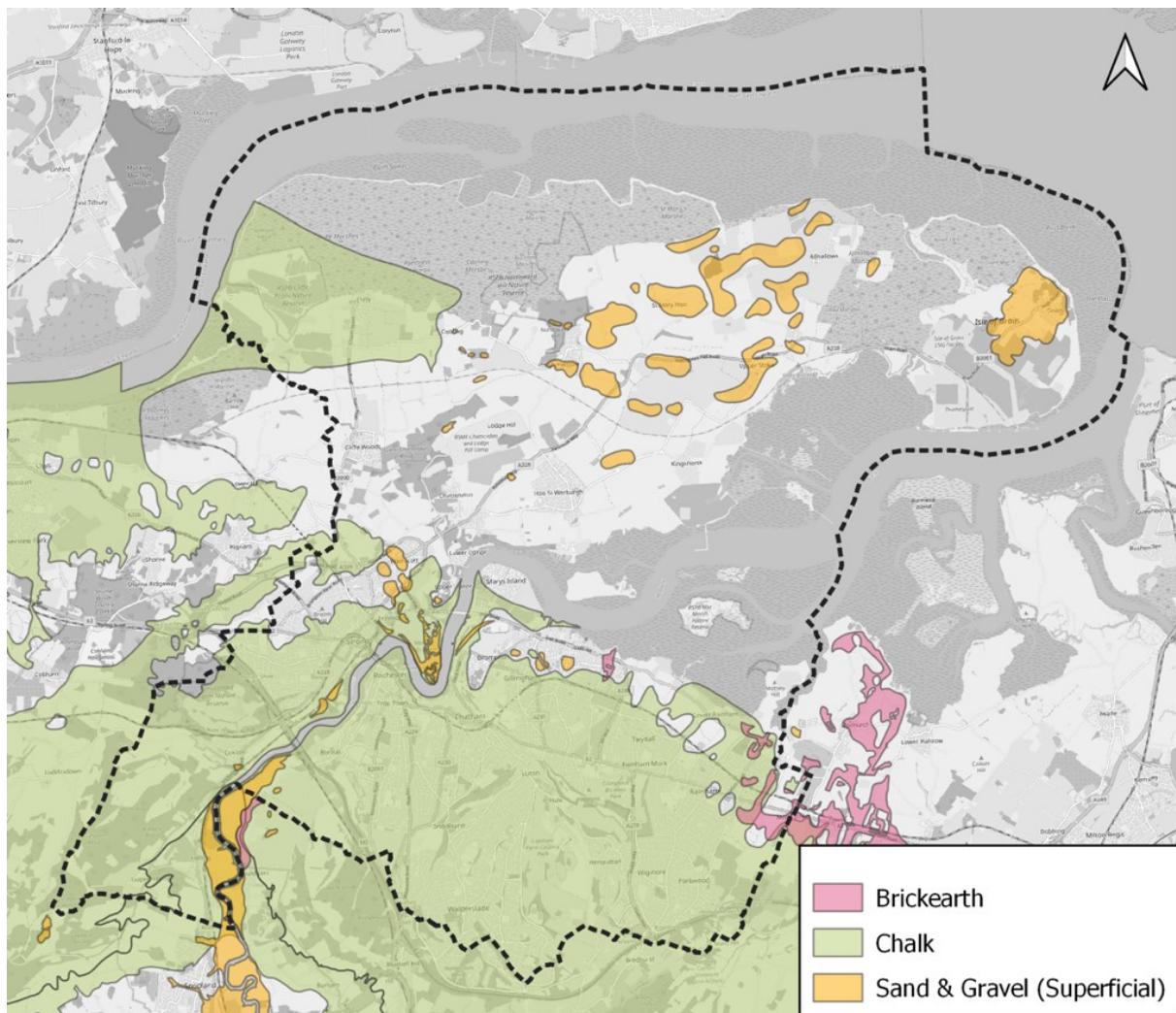
11.1.2 The NPPF contains the Government's overarching policies on minerals planning. The NPPF identifies a need to ensure that a sufficient supply of minerals is available to support the economy and states that great weight should be given to the economic benefits of minerals extraction when determining applications, whilst also making clear that minerals should be used sustainably. It identifies a range of mineral resources that are of 'local and national importance' for which planning authorities should have policies in their Local Plans.

11.1.3 The NPPF requires Mineral Planning Authorities (MPAs) to aim to source minerals supplies indigenously and, so far as practicable, take account of the contribution that substitute, or secondary and recycled materials and minerals waste would make to supply, before considering extraction of primary materials. For land-won primary materials the NPPF expects MPAs to identify, and include policies for the extraction of, mineral resources of national and local importance in their area.

#### Minerals in Medway

11.1.4 Minerals of 'local and national importance' that exist within Medway are sharp sand and gravel (aggregates), chalk and brickearth.<sup>9</sup> As shown on Figure 9, much of the sand and gravel resource is located on the Hoo Peninsula, and brickearth to the south of the Medway estuary.

<sup>9</sup> Brickearth is a clayey silty loam used in the manufacture of bricks and tiles.



Data source: BGS mineral resource data

© OpenStreetMap contributors

**Figure 9: Economic Geology of Medway**

11.1.5 In recent times sand and gravel has been the only mineral actively extracted in Medway. Sand and gravel are essential aggregate materials used primarily in concrete, with substantial quantities being used for construction fill. 'Soft' sand is a particular sub-category of sand and gravel used in mortars and asphalt.

11.1.6 The supply of, and demand for, aggregate in Medway is monitored on an annual basis and the results are reported in the Medway 'Local Aggregates Assessment' (LAA). Currently there are only two permitted quarries for the extraction of 'sharp' sand and gravel in Medway, one inactive and the other commencing extraction in 2017:

- Kingsnorth Quarry
- Perry's Farm (currently inactive)

11.1.7 The current permission for extraction at Kingsnorth Quarry expires on 1 May 2027.

11.1.8 At the end of 2022, the permitted reserve of sand and gravel in Medway was 0.372Mt and the landbank was 5.2 years. Due to production at the

Kingsnorth Quarry site only commencing in 2017 the 3-year average of sales has been used to calculate the landbank rather than 10-year average sales.<sup>10</sup>

11.1.9 The sand and gravel deposits in the Medway area are primarily concentrated on the Hoo Peninsula where river terrace sands and gravels proven resources may be in excess of 1.6 million tonnes, with between 0.9 million tonnes and 3.6 million tonnes of unproven resources, plus buried channel sand and gravel potential resources of 35.6 million tonnes.

11.1.10 There is no significant soft sand resource in Medway. Historically soft sand requirements in Medway (for use in mortar and asphalt) have been met by resources in Kent and so Medway's requirements for soft sand are captured within Kent's LAA and its needs are planned for in the Kent Minerals and Waste Local Plan.

11.1.11 There are no crushed rock mineral resources in Medway although there are local ragstone resources in Kent. Substantial, and strategically significant, quantities of crushed rock are imported to wharves in Medway from other countries including Northern Ireland, Scotland and Norway.

11.1.12 Medway currently has four wharves that are used for the importation of aggregates:

- Grain Terminal, Isle of Grain (wharf and rail depot)
- North Sea Terminal, Cliffe, Rochester (wharf and rail depot)
- Euro Wharf, Frindsbury, Rochester
- London Thamesport, Isle of Grain

11.1.13 Marine dredged sand and gravel is landed along with crushed rock. Together these wharves are operating well within their capacity of 4.30 million tonnes per annum (Mtpa) and so there is potential to increase throughput in response to market demand. Two of the wharves, at Cliffe and the Isle of Grain, have associated rail depots which allow for export, and import, of aggregate by rail.

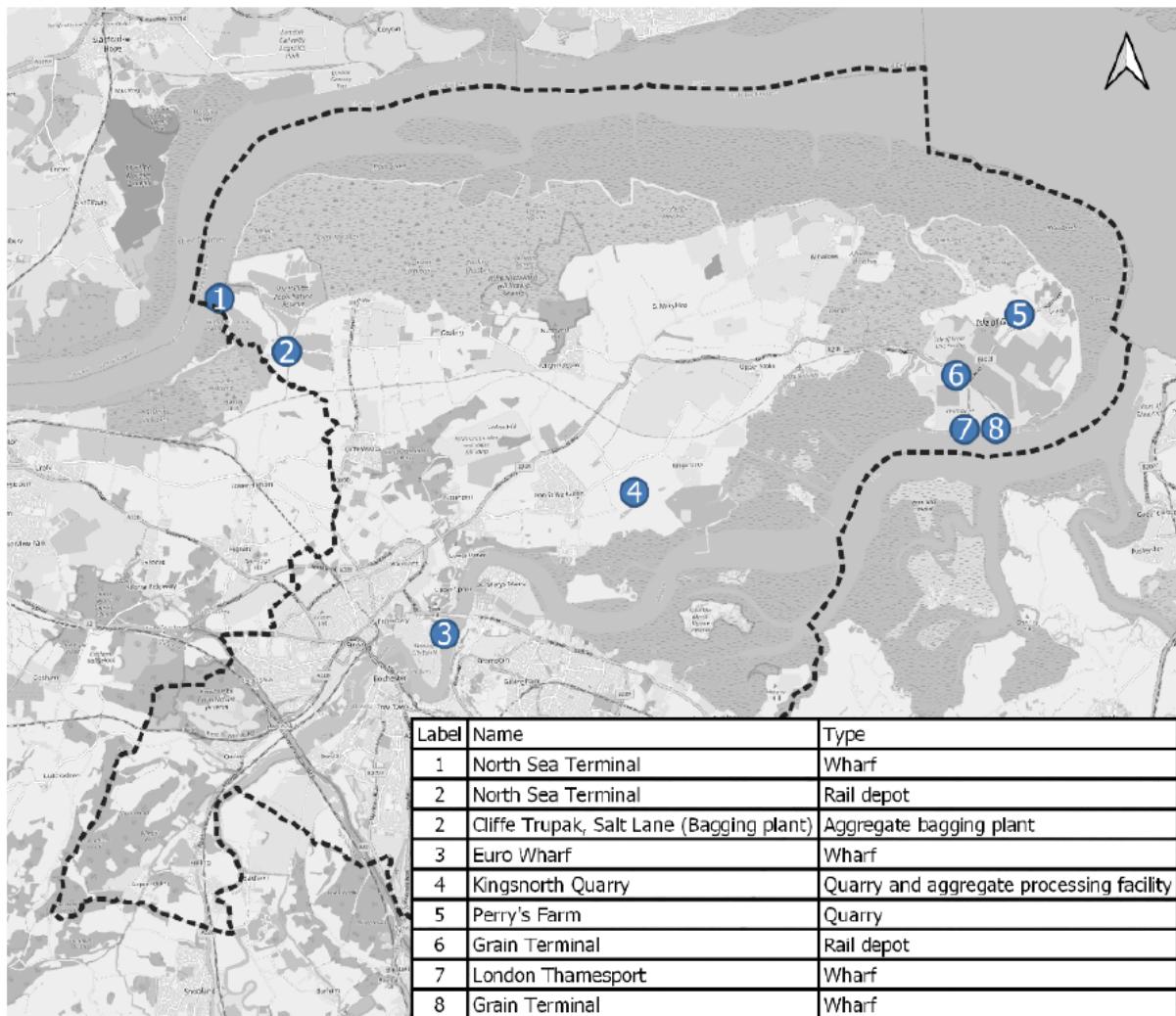
11.1.14 Facilities exist within Medway for the recycling of construction, demolition and excavation (C,D&E) waste at fixed sites to produce recycled aggregate. There is also additional capacity, where significant amounts of material are dealt with on site by mobile plant as part of demolition and construction processes. Secondary aggregate may also be supplied from a stock of coal derived fly ash that was produced during the operation of the, now demolished, Kingsnorth Power Station.

11.1.15 Other minerals supply infrastructure includes an aggregate bagging plant at Cliffe and a temporary aggregate processing plant at Kingsnorth Quarry.

11.1.16 Figure 10 shows the location of all currently permitted mineral supply facilities in Medway.

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<sup>10</sup> Information regarding aggregate in Medway is taken from the Local Aggregates Assessment (LAA) 2020. An updated LAA taking account of sales in 2022 was published in December 2023. The landbank calculation is the permitted reserves divided by the LAA rate (average annual demand).



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**Figure 10: Minerals Supply Facilities in Medway**

11.1.17 The following Vision and Objectives for minerals supply set out the Plan's approach to allowing for the supply of minerals in Medway.

## Vision for Minerals Supply

Medway's economic mineral resources may be worked to meet needs and will be safeguarded from unnecessary sterilisation and for use by future generations.

Wharves and rail depots will continue to be utilised for the importation and distribution of minerals and will be safeguarded for this purpose. A positive legacy will be left by mineral supply development in Medway.

## Objectives for minerals supply

The Plan's objectives for minerals supply are to:

- safeguard economic mineral resources;
- safeguard mineral supply infrastructure from other development;
- make best use of primary mineral resources;
- maximise the production and use of recycled aggregate from construction and demolition, as well as secondary aggregate, in place of primary aggregate;

- meet demands for minerals in Medway and elsewhere without compromising the quality of Medway's natural and built environment; and,
- restore quarries to a high standard in a manner that benefits the community and environment of Medway.

## 11.2 Safeguarding mineral resources

11.2.1 Minerals Safeguarding Areas (MSA) cover areas of land where there are known geological deposits of minerals which are desired to be kept safeguarded from unnecessary sterilisation by surface development. Identification of the MSA has included consideration of the following:

- Areas where the mineral of economic importance is known to exist;
- existence of surface development which has caused the minerals to be sterilised; and,
- allocations for other forms of development in this Plan

11.2.2 The economic viability of exploiting the buried channel sand and gravel is unknown and the likely impact of the extraction methods could be substantial, therefore only the identified reserves of river terrace sand and gravel are safeguarded by this Plan.

11.2.3 A 'Minerals Consultation Area' (MCA) is applied to the MSA which includes the MSA and extends 250 metres from its boundary. Planning applications for development not exempt from minerals safeguarding within the MCA will need to be accompanied by a Mineral Assessment (MA) which shows how safeguarding of the mineral resource has been considered including:

- potential extent of sterilisation which could occur as a result of the development;
- extent or distribution of survey boreholes/pits;
- site specific considerations;
- options for prior extraction; and,
- economic viability of the mineral, i.e. the local market interest.<sup>11</sup>

11.2.4 The Policies Map shows the extent of the MSA and Minerals Consultation Areas in Medway.

11.2.5 Safeguarding does not rule out non minerals development coming forward within an MSA and the certain circumstances in which proposals will be acceptable are stipulated in the policy below.

### Policy T30: Safeguarding Mineral Resources

Planning permission will only be granted for development that is incompatible with safeguarding mineral resources within the Mineral Safeguarding Areas, or development in a location which might hinder access to the mineral resource, where it is demonstrated that either:

- a. the mineral is not of economic value or does not exist; or
- b. that extraction of the mineral would not be viable or practicable; or

<sup>11</sup> Requirement for MAs to be included with planning applications is included in the local validation list.

- c. the mineral can be extracted satisfactorily, having regard to the need to demonstrate no unacceptable adverse impacts to the environment or communities and is for a temporary period, prior to the non-minerals development taking place without adversely affecting the viability or deliverability of the non-minerals development; or
- d. the incompatible development is of a temporary nature that can be completed and the site returned to a condition that does not prevent mineral extraction within the timescale that the mineral is likely to be needed; or
- e. material considerations indicate that the need for the development overrides the presumption for mineral safeguarding such that sterilisation of the mineral can be permitted following the exploration of opportunities for prior extraction; or
- f. it constitutes development that is exempt from mineral safeguarding policy, namely: Householder applications; infill development of a minor nature in existing built-up areas; advertisement applications; reserved matters applications; minor extensions and changes of use of buildings; minor works; and non-material amendments to current planning permissions.

11.2.6 Mineral safeguarding is an essential way of ensuring that future generations are able to access the minerals that they may require to meet their needs. The NPPF expects Minerals Planning Authorities to safeguard minerals by identifying MSAs to ensure that mineral resources are not needlessly sterilised by non-mineral development.

11.2.7 Some forms of development requiring planning permission will have no, or negligible, impacts on the mineral resource and it is important that this is made clear to avoid unnecessary constraints on development and burdens on developers.

11.2.8 As development in proximity to a mineral resource may hinder access to the resource, it is also necessary for the impact of such proposals to be considered and hence MCAs have also been identified which extend beyond the MSA.

### 11.3 Safeguarding of existing mineral supply infrastructure

11.3.1 Minerals supply infrastructure constitutes storage, handling and transport facilities and includes the following:

- Wharves
- Rail depots
- Recycled and secondary aggregate production facilities
- Mineral processing facilities including:
  - mortar plants;
  - facilities for the manufacture of coated materials, e.g. asphalt;
  - facilities for concrete batching and manufacture of concrete products; and
  - bagging plants.

11.3.2 Minerals supply infrastructure with permanent planning permission, and their proximity, will be safeguarded against development that could prejudice or adversely affect their operation. The area safeguarded is that delineated by the boundary associated with the planning permission for the site. A list of safeguarded mineral supply infrastructure in Medway and maps with indicative boundaries are shown on the Policies Map and will be maintained and updated in the Medway Annual Monitoring Report.

11.3.3 Minerals Consultation Areas which extend 250m from the boundaries also apply to all of the identified mineral supply infrastructure.

11.3.4 Where it is demonstrated that a proposed development may affect the operation of mineral supply infrastructure, proposals for replacement, compensatory, capacity must be provided of at least equivalent tonnage, accessibility, location in relation to the market, suitability, and availability of land for processing and stockpiling of materials. In the case of wharves, replacement capacity must include consideration of the size of the berth(s) for dredgers, barges or ships, ensuring the depth and tidal flows (including any potential for 24-hour operation according to tidal movements) are equivalent.

11.3.5 Facilities used for the production of recycled aggregate using Construction and Demolition waste are also safeguarded.

## Policy T31: Safeguarding of Existing Mineral Supply Infrastructure

Identified mineral supply infrastructure will be safeguarded from development that would prejudice or prevent their operation.<sup>12</sup> Such development will only be allowed in exceptional circumstances where it is demonstrated that:

- the proposed site is already allocated for other non-mineral uses in the Local Plan; or
- the facility is no longer required; or
- material considerations indicate that the need for the proposed development overrides the presumption to safeguard; or
- alternative equivalent provision for the loss of the importation or distribution facility can be made elsewhere in Medway.

11.3.6 Minerals supply infrastructure is essential to the effective supply of minerals. Without such infrastructure minerals cannot be supplied, processed and transported. National policy requires MPAs to safeguard such infrastructure, recognising that other development pressures could mean capacity is otherwise lost.

11.3.7 Medway makes a critical contribution to the development of essential infrastructure in London and the South East by importing aggregates through its wharves. Associated rail depots allow for sustainable and efficient transportation of the aggregate from Medway, therefore providing valuable

<sup>12</sup> Identified in this document and subsequently in the Annual Monitoring Report.

infrastructure for the distribution of aggregates to London and the wider South East region.

- 11.3.8 Safeguarding wharves and rail depots ensures Medway can continue to contribute to the importation and distribution of aggregates by preventing development that would prejudice or prevent their use.
- 11.3.9 A 250 metre consultation area is included which ensures that consideration is also given to whether applications falling within 250m of safeguarded development are likely to hinder the operations of existing minerals infrastructure.
- 11.3.10 To promote the continued use of secondary and recycled aggregates as a sustainable alternative to primary aggregates, current facilities must be safeguarded against development that would prejudice or prevent their operation.
- 11.3.11 National policy requires other types of mineral infrastructure to be safeguarded. This includes existing, planned, and potential sites for concrete batching, the manufacture of coated materials and other concrete products.

## 11.4 Supply of recycled and secondary aggregates

- 11.4.1 Recycled and secondary aggregates can provide an alternative to primary aggregate from land or marine won sources for a number of applications and, in-line with government policy to secure the best use of finite primary mineral resources, the use of alternatives to primary aggregates as far as practicable is encouraged. Recycled aggregate is sourced from Construction and Demolition waste and may also be sourced from closed inert landfill sites and dredging disposal sites.
- 11.4.2 Industrial estates and sites where minerals supply, and waste management takes place may offer suitable locations for recycled and secondary aggregate production where the proposals are compatible with other policies set out in the development plan.
- 11.4.3 In locations where permissions for the existing use are temporary, for example in the case of a quarry, the development associated with recycled and secondary aggregates will usually only be permitted for the period of the host site's permission.
- 11.4.4 Proposals will also need to demonstrate consistency with other policies of this Plan intended to ensure that development does not give rise to unacceptable adverse impacts on communities or the environment as a whole.

### Policy T32: Supply of Recycled and Secondary Aggregates

Proposals for additional capacity for secondary and recycled aggregate production, including those relating to the expansion of capacity at existing facilities, will generally be supported in the following locations:

- a. Temporary demolition, construction, land reclamation and regeneration projects and highways developments where materials are either generated or to be used in the project or both for the duration of the project.
- b. Other mineral operations (including wharves and rail depots).
- c. Other waste management operations.
- d. Industrial estates.

Proposals for additional capacity for secondary and recycled aggregate production may be supported in other locations which are well located in relation to the source of input materials or demand for output materials and have good transport links.

Proposals to re-work old inert landfill sites and dredging disposal sites to produce recycled aggregate will be supported where it is demonstrated that net gains in landscape, biodiversity or amenity can be achieved by the operation and environmental impacts can be mitigated to an acceptable level.

- 11.4.5 The production of secondary and recycled aggregate is an industrial activity which lends itself to being located where similar activities are already taking place including industrial areas.
- 11.4.6 Quarries are generally located in rural areas and should be restored in a timely manner, and while they may offer suitable locations for the production of secondary and recycled aggregates while operational, ongoing operations might unduly delay their restoration and they are less likely to offer suitable locations for permanent facilities once the quarry has ceased operation.

## 11.5 Extraction of land won minerals

- 11.5.1 The likelihood of additional mineral extraction is uncertain in Medway, although if it occurs it is more likely that the sand and gravel, rather than the chalk and brickearth, resource will be worked over the period of this Plan.
- 11.5.2 The LAA (2022) identifies that there are very few sand and gravel reserves remaining and what does remain is expected to be fully worked out in the next few years. Despite this there has been no industry interest in establishing further reserves beyond the existing sites.
- 11.5.3 A nominal demand for land won sand and gravel of 72,000tpa is included in the latest LAA which suggests a landbank of 5.2 years at the end of 2022.<sup>13</sup> It is therefore considered unlikely that a minimum landbank of reserves equivalent to at least 7 years' supply will be able to be maintained over the Plan period.
- 11.5.4 Medway wharves are capable of supplying 4.3 million of tonnes of sand and gravel per year which is considered sufficient to meet current needs and provides potential for meeting future needs. However, should a proposal come forward, this will be supported depending on its nature and location and compliance with policies of this Plan.

<sup>13</sup> LAA 2022 based on 2022 data.

11.5.5 Areas of Search for the working of sand and gravel within which planning permission may be granted, particularly if there is a potential shortfall in supply, are included on the Policies Map.

## Policy T33: Extraction of Land Won Minerals

### **Sand and gravel**

Proposals for the extraction of sand and gravel within the Sand and Gravel Areas of Search shown on the Policies Map, will be acceptable in principle, provided it can be demonstrated that there is a need for the mineral to make a contribution to meeting local and regional requirements, and to achieve and maintain at least a 7-year landbank.

Proposals beyond the Sand and Gravel Areas of Search are not encouraged but may also be permitted depending on whether other sources are available to meet demand and any constraints can be overcome.

### **Industrial minerals**

Proposals for the extraction of chalk and brickearth will be permitted which demonstrate there is a need for the mineral to meet the demands of new or existing plant.

The need for chalk should be demonstrated to be contributing to a stock of chalk reserves of at least 15 years to support a cement works.

The need for brickearth should be demonstrated to be contributing to a stock of clay reserves to supply brick works.

### **Restoration and aftercare**

Proposals will need to demonstrate how mineral excavations will be restored in a timely manner that results in ongoing benefits to the local community and environment.

11.5.6 The NPPF requires Minerals Planning Authorities to plan for a steady and adequate supply of aggregates based on the assessment of supply and demand set out in the latest LAA. It also seeks for plans to make provision for the maintenance of landbanks of at least seven years for land-won sand and gravel.

11.5.7 The NPPF expects that, as appropriate, provision is made for land-won aggregates in Local Plans in the form of specific sites, preferred areas and/or areas of search and locational criteria. The Areas of Search in the Plan provide a guide to potential developers on the areas where sand and gravel resources are known to exist and working would be less likely to have an unacceptable adverse impact on communities and the environment and so planning permission may be more likely to be granted.

11.5.8 More generally, aggregate minerals are in constant demand and the sand and gravel resource in Medway may be exploited to contribute to meeting this demand. For this reason, Policy T33 does not quantify the amount of land won sand and gravel that should be provided from Medway, but instead

it allows development to come forward where it is shown that a contribution to local and regional supplies can be made.

11.5.9 The NPPF expects local planning policy to ensure that worked land is restored at the earliest possible opportunity and to a high quality. Restoration of quarries should provide opportunities for BNG and may be included as part of Local Nature Recovery Strategies.

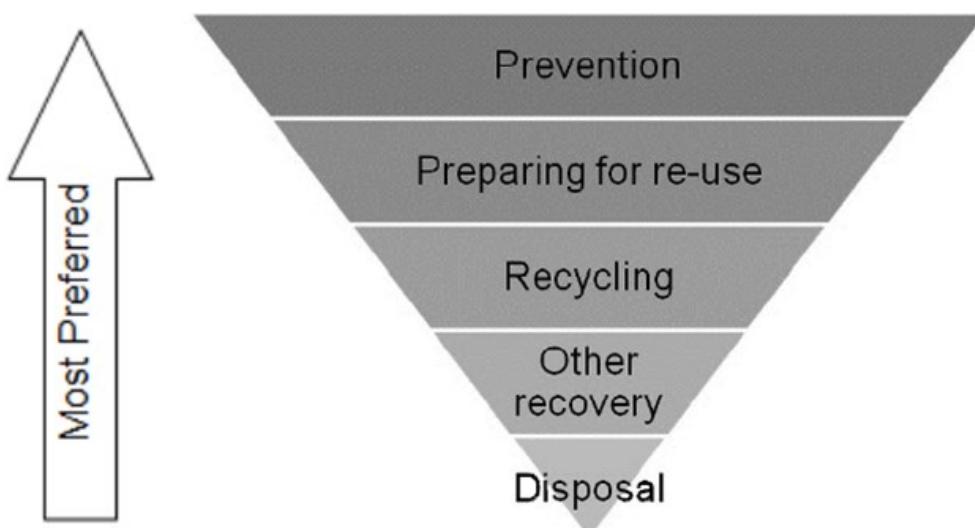
## 12. Waste Management

### 12.1 Introduction

- 12.1.1 Medway Council is the Waste Planning Authority (WPA) responsible for waste planning policy and for determining planning applications related to the management of waste in Medway. The Council is also responsible for the collection and management of waste produced by households.
- 12.1.2 The Minerals and Waste Topic Paper and Waste Needs Assessment (WNA) sets out further background information on waste generation, management, and requirements for Medway.

#### Policy context

- 12.1.3 The National Planning Policy for Waste 2014 (NPPW) and national Resources and Waste Strategy for England 2018 (RWS) require application of the Waste Hierarchy in priority order as one of the key principles of sustainable waste management.<sup>161,162</sup> The 'Waste Hierarchy' identifies different ways of dealing with waste as set out in Figure 11 below. This shows that 'Prevention' is the most preferred option with 'Disposal' at the bottom being the option of last resort.



**Figure 11: The Waste Hierarchy<sup>163</sup>**

#### Waste movement and net self sufficiency

- 12.1.4 NPPW requires waste planning authorities to: 'plan for the disposal of waste and the recovery of mixed municipal waste in line with the proximity principle, recognising that new facilities will need to serve catchment areas large enough to secure the economic viability of the plant.'
- 12.1.5 The proximity principle requires mixed municipal waste collected from private households to be disposed of, or be recovered, in one of the 'nearest appropriate installations'. This is to be achieved by establishing an integrated and adequate network of installations (facilities) for disposal and recovery of mixed municipal waste collected from private households. The requirement extends to similar types of waste collected from non-household sources.

12.1.6 NPPW requires Waste Planning Authorities to include strategic policies in their development plans setting out an overall strategy for the pattern, scale and quality of waste development, and to make sufficient provision for infrastructure for waste management, and energy that may be produced (including heat).

12.1.7 The WNA completed in 2024 for Medway shows that varying quantities of waste are transported between Medway and other Waste Planning Authority areas.<sup>164</sup> Medway Council and these other WPAs recognise that cross-boundary movement is typical of the way in which waste is managed in general, as it has little regard for administrative boundaries.

12.1.8 Medway Council is a member of the South East Waste Planning Advisory Group (SEWPAG) which considers waste planning issues across South East England including agreement of Statements of Common Ground. Amongst other things, this includes an agreement to plan for the management of waste on the basis of 'net self-sufficiency' that means each WPA plans to provide facilities with sufficient capacity to manage an amount of waste equivalent to that which is predicted to arise within its area over the period of its plan. The use of the term 'net' allows for the normal movement of waste across boundaries. This approach is intended to ensure that sufficient waste management capacity is provided across a collective area (region or sub-region) consistent with NPPW.<sup>14</sup>

12.1.9 The principle of net self-sufficiency does not apply to hazardous waste because the quantities of different hazardous waste types produced within each WPA area are unlikely to make the local provision of the full range of specialist hazardous waste management facilities viable. Indeed, it is quite normal for relatively small quantities of hazardous waste to be transported across the country for specialist treatment.

12.1.10 The current Municipal Waste Management Strategy (MWMS) for Medway was adopted in 2006. The MWMS focuses on the management of Local Authority Collected Waste (LACW). Key aims of the MWMS are:

- 55% recycling of LACW by 2020
- 35% (or less) of LACW to landfill by 2020

12.1.11 While these targets relate to past dates, they define a baseline from which future targets are likely to be established. The Medway Local Plan takes account of the MWMS by ensuring that development can come forward to help facilitate its aims.

### **Current waste management in Medway**

12.1.12 The main types of waste produced are:

- LACW;
- Commercial and Industrial Waste (waste from businesses) (C&I waste);
- Construction, Demolition and Excavation Waste (CDEW);
- Hazardous Waste from various sources; and,
- Wastewater and Sewage Sludge.

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<sup>14</sup> NPPW states that "Waste planning authorities should prepare Local Plans which identify sufficient opportunities to meet the identified needs of their area for the management of waste streams."

12.1.13 WPAs should also plan for the management of Agricultural Waste and Low-Level Radioactive Waste (LLW).

12.1.14 The WNA found that just under 0.5 million tonnes of wastes arose within Medway in 2022. Each waste type is considered in more detail below.

12.1.15 Medway has a range of waste transfer and processing facilities that handle waste arising both within and beyond Medway. In 2022, there were 23 operational permitted waste transfer and processing facilities in Medway, managing around 710,000 tonnes of waste.

### LACW

12.1.16 In Medway the production of LACW has fallen slightly from c135,000 (2018) to c131,500 tonnes per annum (tpa) and recycling has plateaued since 2014/15. Recycling of LACW is c46% and diversion of waste away from landfill by energy recovery is c53%.

12.1.17 Recyclable material is collected as comingled dry mixed recyclables at the kerbside. It is taken to a bulking facility within Medway and then onto a Materials Recycling Facility (MRF) in the London Borough of Southwark. In 2022 around 18,500 tonnes of recyclate was managed via the Medway bulking facility, with c14,000 tonnes going on to be managed at the Southwark MRF. In addition, c21,000 tonnes of mixed green and food waste collected from households or delivered to Household Waste Recycling Sites provided by Medway Council, was managed at composting facilities in 2018. These are all outside Medway.

12.1.18 Table 3 shows how the management of LACW arising in Medway has changed over time with a particularly notable reduction in waste sent to landfill.

**Table 3: Management of LACW Arising in Medway (2018/19 to 2022/23)**

	2018/19	2019/20	2020/21	2021/22	2022/23
<b>Waste arising</b>	134,215	126,091	125,161	128,104	131,650
<b>Recycling</b>	61,739	63,183	55,746	54,370	60,681
<b>Recycling rate<sup>15</sup></b>	46%	50%	45%	42%	46%
<b>Other recovery</b>	58,066	57,687	67,153	71,811	69,284
<b>Landfill</b>	14,465	5,221	2,262	1,923	1,685

### Household waste

12.1.19 'Household waste' is defined as:

- All waste collected from households by or on behalf of Medway Council as Waste Collection Authority (WCA).
- Waste delivered to Household Waste Recycling Sites and bring banks.
- Street cleaning waste, collected litter and gully sweepings.

<sup>15</sup> This relates to LACW which extends beyond household waste. Hence the recycling rate shown does not correspond to that reported to DEFRA under NI192.

12.1.20 Household waste forms a subset of LACW, but generally comprises around 95% of LACW arisings.

12.1.21 The forecast increase in population over the local plan period may require additional capacity to be developed. This need might be met by upgrades to the existing facilities, but consideration may also be given to other options such as creating a single purpose-built facility in an accessible and appropriate location.

12.1.22 The principal contract for the management of LACW is due to expire in 2035. The replacement contract may result in changes to where LACW arising in Medway is managed and the suitability of any related proposals in Medway which require planning permission would be considered against the policies in this Plan.

### **Commercial and industrial waste**

12.1.23 The WNA found that c141,000 tonnes of C&I waste was produced in Medway in 2022, with around 68% being recycled/composted or recovered in some way.

12.1.24 Much of the LACW and C&I waste is of a similar composition and so may be managed at the same facilities. The WNA indicates that the following capacity types exist within Medway which are capable of managing LACW and C&I waste:<sup>16</sup>

- Waste Recycling:<sup>17</sup>
  - In vessel composting – 32,000tpa<sup>18</sup>
  - LACW/C&I Recycling Capacity inc metals – c553,000tpa<sup>19</sup>
- Waste Recovery (other than recycling/composting):
  - RDF (Refuse Derived Fuel) Production Capacity (from LACW and C&I) - c 400,000tpa<sup>20</sup>

### **Construction, demolition and excavation waste**

12.1.25 Approximately 152,500 tonnes of CDEW was produced in Medway in 2022. An estimated breakdown of the overall waste stream into the main different types of waste is included in the WNA 2024 update report on CDEW Waste.

12.1.26 Different types of CDEW require different forms of management but there is very little CDEW that cannot be recycled or recovered. The WNA estimates that at least 86% of CDEW arising in Medway is recycled or recovered which is well above the national target of 70% by 2020.<sup>21</sup>

<sup>16</sup> See Medway Waste Needs Assessment 2024 Update – Medway Management Requirements, BPP Consulting, June 2024.

<sup>17</sup> Kerbside collected LACW recyclate sent to Veolia MRF in Southwark. This is a c85,000 tpa capacity MRF and receives waste from across the wider South East.

<sup>18</sup> Single IVC at Kingsnorth Industrial Estate, Hoo; currently managing c 30,000 t of sewage screening and sludge. This is a specialist facility which may not be suitable to process other waste for which IVC may be sought for management of compostable material such as food waste.

<sup>19</sup> Including HWRC Capacity for LACW plus c89,000 tpa at P&D Material Recovery at Berth 6 Chatham Docks which may be lost if Chatham Docks is redeveloped.

<sup>20</sup> Berth 6, Chatham Docks (Streetfuel).

<sup>21</sup> Backfilling operations using waste to substitute other fill materials may be counted towards the target, i.e. backfilling of mineral workings may be classed as recovery. Naturally occurring material

12.1.27 Existing consented CDEW management facilities in Medway offer the following capacity:

- Inert Waste Landfill - just under 2 million cubic metres (2.9 million tonnes (at 1.5t/m<sup>3</sup>))
  - Alpha Lake, North Sea Terminal, Cliffe - 1,000,000 m<sup>3</sup>
  - Chalk Lake, North Sea Terminal, Cliffe - 400,000 m<sup>3</sup>
  - Manor Farm Barn Landfill Frindsbury - 520,800 m<sup>3</sup>
- Inert Waste Recycling - three sites capable of producing recycled aggregate with a combined production capacity of 157,000 tpa.
- Non-inert Recycling/composting – 16,000 tpa.

12.1.28 Given the estimated peak capacity requirement is estimated to be around 184,500 tpa for the Plan period, there appears to be sufficient capacity to manage virtually all Medway's CDEW arisings through recycling given that its composition makes it amenable to that form of management. Otherwise, soft material may need to be deposited on land for beneficial purposes.

### **Hazardous waste<sup>22</sup>**

12.1.29 Hazardous wastes are categorised as those that are harmful to human health, or the environment, either immediately or over an extended period of time. In Medway, hazardous waste arises mainly from: construction and demolition activity, vehicle maintenance and/or dismantling activity and healthcare. Approximately 33,000 tonnes of hazardous waste was produced in Medway in 2022.

12.1.30 The total assessed management capacity for hazardous waste in Medway is approximately 52,500tpa hence this indicates that Medway has sufficient capacity to manage the equivalent tonnage of hazardous waste produced.

### **Wastewater and sewage sludge**

12.1.31 Wastewater generally comprises surface water runoff and effluent discharged to the foul sewer system from where it is channelled to wastewater treatment works for treatment.<sup>23</sup>

12.1.32 In Medway wastewater and sewage sludge are managed by Southern Water and the principal wastewater treatment works is at Motney Hill, Rainham, Gillingham, which lies to the north west of the Plan area, on the southern side of the Medway estuary. The works include an anaerobic digestion plant where sludges from other wastewater treatment works may be taken to produce biogas. Southern Water also manages a wastewater treatment works at Whitewall Creek near Upnor.

### **Agricultural waste**

12.1.33 Given the relatively small amount of agricultural land in Medway, arisings of agricultural waste are small, with quantities requiring offsite management especially so.

categorised under EWC 17 05 04 (soil & stones) is excluded from the target, i.e. its use is unconstrained by targets.

<sup>22</sup> See Medway WNA 2024, 'Hazardous Waste' Report

<sup>23</sup> These works can provide a valuable function in managing wastes, other than wastewater, that arise in liquid and sludge form such as septic tank emptyings.

## Low-level radioactive waste

12.1.34 Very little if any LLW is produced within Medway, and the small quantities of Very Low-Level Radioactive Waste (VLLW) is expected to be managed through existing arrangements.<sup>24</sup>

## Other recovery of non-hazardous residual waste

12.1.35 Residual waste is the non-hazardous non-inert waste left over after measures to reuse and recycle and is sometimes referred to as 'black bag' waste. Residual waste is principally derived from the LACW, and C&I waste streams. This waste is generally managed either by incineration with energy recovery (referred to as Energy from Waste (EfW)) a form of 'other recovery' providing it meets minimum standards for energy efficiency or landfill.

12.1.36 In Medway, residual waste is currently converted to RDF sent on to 'other recovery' capacity either located within the UK or elsewhere in Europe.

12.1.37 Current capacity in Medway can produce up to 400,000 tonnes of RDF each year which represents significantly more than is forecast to require management arising in Medway itself. This capacity is counted as 'other recovery' as the output fuel has a proven market. Planning permission has been granted for an Energy Centre as part of the 'Medway One' redevelopment of the old Kingsnorth power station site which could accept up to c200,000tpa of refuse derived fuel (RDF) or solid recovered fuel (SRF).

## Landfill

12.1.38 Controls relating to groundwater protection and landfill design and operation, combined with increasing landfill tax and its place at the bottom of the hierarchy, make the prospect of development of a non-inert waste landfill in Medway remote. In addition, the quantity of waste requiring disposal is expected to continue to decline with diversion to EfW facilities, meaning that non-inert waste landfill development in Medway is unlikely to be viable. In response to the Call for Sites, no sites were promoted for the development of a non-inert waste landfill facility in Medway.

## Additional waste management capacity requirements

12.1.39 Tables 4 and 5 below summarise the additional waste management capacity needed to meet waste management targets.

<sup>24</sup> See Medway WNA 2024, 'Other Waste' Report

**Table 4: Medway Waste Recycling and Composting Capacity Requirements**

Waste Type	Measure d Baseline (Actuals)	Recycling & Composting Capacity Requirement				Peak requirement (tonnes) rounded
		2022	2023/24	2028/29	2035/36	
Non-inert	LACW	60,681	72,613	80,335	88,729	97,124
	C&I	68,036	70,836	87,149	97,766	108,485
	CDEW	18,636	18,636	18,636	18,636	18,636
	<b>Total</b>	<b>147,353</b>	<b>162,085</b>	<b>186,120</b>	<b>205,131</b>	<b>224,245</b>
	<i>Plan Area Recycling Capacity<sup>25</sup></i>	<b>585,000</b>				
	<b>Shortfall</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

**Table 5: Medway Residual Waste Management Capacity Requirements**

Waste Type	Measure d Baseline (Actuals)	Residual Waste Management Capacity Requirement (Tonnes at Plan Milestone)				Peak or Cumulative Capacity Requirement (tonnes) rounded
		2022	2023/24	2028/29	2035/36	
Energy recovery	LACW	69,284	52,809	50,879	46,412	40,237
	C&I	27,916	28,334	43,575	37,602	43,394
	CDEW	0	0	0	0	0
	<b>Total</b>	<b>97,200</b>	<b>81,143</b>	<b>94,454</b>	<b>84,014</b>	<b>83,631</b>
	<i>Plan Area Other Recovery Capacity</i>	<b>400,000<sup>27</sup></b>				
	<b>Shortfall</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Non-Inert Landfill	LACW	1,685	6,601	2,678	1,365	1,387
	C&I	45,015	42,501	14,525	7,520	3,100
	CDEW	1,787	1,787	1,787	1,787	1,787
	<b>Total</b>	<b>48,487</b>	<b>50,889</b>	<b>18,990</b>	<b>10,672</b>	<b>6,274</b>
	<i>Plan Area Non inert LF Capacity</i>	<b>0</b>				
	<b>Shortfall</b>	<b>-</b>	<b>50,889</b>	<b>209,638</b>	<b>309,297</b>	<b>357,937</b>

<sup>25</sup> See paragraph regarding additional consented recycling capacity that may be developed.<sup>26</sup> Total not given as peak requirement of each waste stream do not occur in the same milestone year.<sup>27</sup> Assuming the existing site at Chatham Docks is retained for the Plan period or capacity is re-provided within Medway in the event of its release for redevelopment.

## 12.2 Future management of waste in Medway

12.2.1 Vision and Objectives specifically relating to the management of waste in Medway have been prepared which take account of the above context.

### Vision for Waste Management

A more circular economy will be achieved which minimises the production of waste and makes the best use of the waste that is produced in Medway, enabling waste to be managed as far up the Waste Hierarchy as possible.

#### Objectives for waste management

The Plan's objectives for waste management in Medway are to:

- minimise the production of waste in the first place;
- ensure waste is managed in accordance with the Waste Hierarchy;
- enable waste to be managed in a way that contributes to the mitigation of, and adaptation to, climate change;
- where appropriate encourage and support development of waste management capacity that is at least equivalent to the amount of waste arising in Medway;
- maximise the potential for the management of waste at suitable existing waste management facilities; and,
- guide waste management facilities to appropriate locations which maximise the integration of waste management with, and contribute positively to, other forms of development.

## 12.3 Waste prevention

12.3.1 The planning system has an important role to play as factors affecting waste production can be applied to the built environment in particular.

12.3.2 In Medway applications for development will be required to demonstrate how they are consistent with circular economy principles.

12.3.3 For development proposals of a particular scale, a Circular Economy Statement will need to be submitted showing how the above matters have been taken into account.<sup>28</sup> These Statements will include a waste management audit showing how waste is to be managed during construction, including demolition and refurbishment, if applicable; and during the lifespan of the development.

12.3.4 The Circular Economy Statement must also establish targets relating to efficiency of material usage to minimise waste production and show how their achievement will be monitored and reported.

### Policy DM23: Waste Prevention

Proposals for development, including waste management facilities, must as a minimum demonstrate the following:

<sup>28</sup> Development requiring a Circular Economy Statement will have a total floorspace of greater than 1,000 square metres and/or comprise greater than 10 no. units of housing referred to as "qualifying development" in Policy DM23.

- a. construction and demolition methods will be used that minimise waste generation and facilitate the re-use/recycling of existing materials and structures, as far as practicable on site;
- b. design principles and construction methods that minimise the use of primary aggregates/virgin materials and encourage the use of fit for purpose building materials made from locally produced recycled and secondary resources; and
- c. a design that facilitates the effective management of waste produced during its use in accordance with the waste hierarchy.

Qualifying development proposals must be supported by a Circular Economy Statement which includes details of the management of waste at all stages of development (demolition, construction and subsequent occupation).

12.3.5 CDEW constitutes the largest amount of waste produced in Medway and so particular focus is required to ensure all development comes forward in a manner which reduces the amount generated, uses recycled material where possible, and facilitates the management of unavoidable waste up the waste hierarchy.

12.3.6 A circular economy approach involves:

- making better use of existing buildings through sharing and reuse so fewer new buildings need to be created;
- designing new buildings in such a way that their useful life is maximised e.g. by being easily adapted to a range of uses and ensuring they can be deconstructed at the end of their useful lives if necessary;
- ensuring buildings and their component materials can easily be reused, repaired and refurbished;
- eliminating waste in construction;
- ensuring waste arising during the occupation of a development can easily be reused or recycled e.g. by allowing storage of separate recyclable materials and providing space to allow for reuse and repair and for the storage of reusable goods and materials; and,
- elimination of the use of hazardous materials, which pose particular issues with end-of-life management.

12.3.7 The Government's Waste Prevention Programme, states that it will 'continue to support local authorities to promote sustainable resource use through planning' and both the NPPF and NPPW include policy intended to help achieve this.<sup>165</sup>

12.3.8 Existing legislation expects all waste to be managed in accordance with the Waste Hierarchy, which is to be applied in priority order, and so all forms of development must seek to reduce the quantity of waste produced, and allow for the separation and storage of different waste materials produced during their operational life to promote its recycling. The Environment Act and associated regulations set specific requirements for the separate collection of recyclable waste (including food waste) from:

- households;
- non-domestic premises that produce household waste; and
- producers of industrial and commercial waste that is similar in nature and composition to household waste.

12.3.9 The household waste kerbside collection service currently provided by Medway Council ensures residual waste is collected separately from recyclable and compostable waste and so it is essential that all proposals for residential development are designed to allow for separate storage of these materials. Collection services may change in the future to ensure compliance with the Environment Act.

## 12.4 Safeguarding of existing waste management facilities

12.4.1 To help ensure waste continues to be managed within Medway, the presumption is that existing consented waste management facilities are safeguarded from loss to non-waste uses, or from proximate development that may limit or hinder their operation. Sites with temporary planning permission for a waste use are safeguarded for the duration of the permission. However, there are circumstances where non-waste development resulting in loss of or impact on a safeguarded site will be permitted and this will be assessed on a case-by-case basis. A list of safeguarded waste sites is included in Appendix C and this list will be monitored with updates reported in the Annual Monitoring Report.

12.4.2 Redevelopment of land (or part of land) that has an existing lawful waste management use (in planning terms - including land with planning permission for a waste use), for non-waste uses, will only be considered if compensatory and equal provision of management capacity for waste in Medway, in quantity and waste hierarchy position, is made. Compensatory provision should be based on the maximum design throughput of the facility to be redeveloped or the peak input over the previous 5-year period as reported through waste returns submitted to the Environment Agency, whichever is the greater.<sup>29</sup>

12.4.3 Applicants seeking permission for potentially sensitive non-waste development ('Agents of Change') in proximity to safeguarded waste management facilities will be required to demonstrate that their proposed development will not prejudice or constrain the ability of the existing facility to operate to its safeguarded capability. This may require incorporating measures into the design and orientation of buildings and other structures, to mitigate potential effects and reduce sensitivity.

12.4.4 Where replacement capacity is proposed the following matters may also be considered when determining the adequacy or comparability of compensatory capacity: accessibility; location in relation to the market; suitability; availability of land for processing; and stockpiling of waste (if applicable).

12.4.5 For development proposals within 250m of safeguarded waste management facilities to be acceptable they will need to demonstrate that impacts, e.g. noise, dust, light and air emissions, that may legitimately arise from the activities taking place at the safeguarded sites, would not be experienced to an unacceptable level by occupants of the proposed development including

<sup>29</sup> Acknowledged by planning condition and/or information provided in original planning application.

through mitigation measures, and that vehicle access to and from the safeguarded facility would not be constrained by the proposal.

## Policy T34: Safeguarding of Existing Waste Management Facilities

The following types of land and waste management facility are safeguarded from non-waste uses:

- a. sites in existing lawful waste use including wastewater and sewage treatment works (including those with temporary permission); and,
- b. land with extant planning permission for waste use.

Proposals for non-waste development in proximity to safeguarded sites must demonstrate that they would not prejudice the operation of the site, including through incorporation of measures to mitigate and reduce their sensitivity to legitimate operation of the safeguarded site.

Proposals that would lead to loss of waste management capacity, prejudice site operation, or restrict future development of safeguarded sites will not be permitted unless it can be demonstrated that either:

- a. the waste capacity and/or safeguarded site is not required; or
- b. equivalent, suitable, and appropriate replacement capacity is provided in Medway in advance of the consented waste use ceasing or the non-waste permission being implemented; or
- c. material considerations indicate that the need for the proposed development overrides the presumption for safeguarding and clause a) and/or clause b) above applies.

12.4.6 NPPW makes it clear that non-waste development should not prejudice the implementation of the waste hierarchy or the efficient operation of waste management facilities.<sup>166</sup> Similarly, the NPPF confirms that proposals for new development, known as the 'agent of change', should ensure that the intended development does not unreasonably restrict an existing business' lawful operation. Existing waste management operations should not have unreasonable restrictions placed on them as a result of new development that may be sensitive to their operation that could be deemed a statutory nuisance (e.g. noise) or problematic e.g. Heavy Goods Vehicle movements.

12.4.7 In Medway there are different waste management facilities capable of handling a range of waste streams. Many of these facilities make a significant contribution towards Medway achieving net self-sufficiency and some are of regional significance, particularly with regard to hazardous waste. In order to achieve net self-sufficiency, the current waste management facilities and their context require safeguarding against non-waste development that would prejudice their lawful use.

12.4.8 Opportunities for the development of waste management capacity are limited in Medway. The safeguarding of sites in existing waste use in addition to those with planning permission, will ensure that existing waste management capacity is maintained and the contribution existing or planned waste

management infrastructure makes towards the Plan's strategic objectives is taken into account when decisions are made concerning development proposals in proximity to them.

## 12.5 Provision of new waste management capacity

12.5.1 The need for additional waste management capacity to help drive the management of waste up the waste hierarchy over the Plan period has been considered in the WNA. The conclusions on the need for different types of capacity to manage different waste types are summarised below.

12.5.2 Proposals intended to intensify the use of existing facilities, through increasing capacity and/or improve their efficiency, are supported in principle. This may include changes made at sites to compensate for loss of capacity at sites re-developed for non-waste uses.

### LACW Recycling Capacity

12.5.3 A target of 65% recycling of LACW and similar waste by 2035 has been set by the Government and the waste management targets for LACW waste reflects this as set out in Table 6.<sup>30</sup>

**Table 6: Targets for LACW Management for Medway**

Management method	Target year			
	2023	2028	2035	2041
<b>Recycling/composting</b>	55%	60%	65%	70%
<b>Other Recovery<sup>31</sup></b>	40%	38%	34%	29%
<b>Overall diversion from landfill</b>	<b>95%</b>	<b>98%</b>	<b>99%</b>	<b>99%</b>
<b>Remainder to Landfill<sup>32</sup></b>	8%	2%	1%	<1%

12.5.4 Taking account of potential changes in waste production, if Medway Council were to achieve the 70% recycling/composting target by 2040/41 by the collection of separated recyclable material (including food waste) alone, and if the existing arrangements were to be utilised, up to c97,000 tpa of source separated waste would need to at least be bulked up in Medway prior to management through a MRF and an organic waste treatment facility.

12.5.5 The current capacity at the bulking facility receiving Medway LACW has been assessed to be 250,000tpa and this facility could therefore accommodate the increased quantity to be managed. The MRF facility in Southwark that receives recyclate from the bulking facility has a capacity of 85,000tpa. The additional c35,000 tpa of LACW food waste could, potentially be accommodated at the IVC facility located in Medway although its

<sup>30</sup> See Medway WNA 2024, LACW Report

<sup>31</sup> The consequential management requirement assuming the recycling/composting and landfill diversion targets are met.

<sup>32</sup> Progressive reduction towards more ambitious target due to predicted limited availability of landfill capacity and ambition to drive waste up the hierarchy.

capability to manage this waste would need to be confirmed as it is currently operating as a specialist facility.

12.5.6 Planning permission has been granted for the construction of a MRF on Medway City Estate that would be capable of managing up to 100,000 tpa of recyclate. This facility would meet the LACW recycling requirement and would provide additional capacity for Dry Mixed Recyclables from the C&I waste stream from within, and potentially beyond, Medway. The capacity needed to meet the Council's aspirations for the management of LACW will be monitored and reported in the AMR.

### Commercial and industrial waste recycling

12.5.7 This Plan sets a target of 65% recycling by 2035 and 70% recycling by 2041 for C&I waste. This follows the Government target of 65% recycling of MSW by 2035 and the anticipated recycling rate of 72%+ needed to achieve the national residual waste reduction target for 2041. C&I waste that arises from places such as shops, offices and restaurants is similar to household waste and is included within the definition of MSW. A 70% target for C&I waste overall has been set to account for the fact that recycling of C&I waste is at a similar rate to that for LACW (c48%).

12.5.8 The waste management targets for C&I waste are set out in Table 7.<sup>33</sup>

**Table 7: Targets for C&I Waste Management for Medway**

Management method	Target Year			
	2023	2028	2035	2040/41
<b>Recycling/composting</b>	50%	60%	65%	70%
<b>Other Recovery</b>	20%	30%	25%	28%
<b>Remainder to Landfill</b>	30%	10%	10%	2%

12.5.9 The above targets equate to the following peak built capacity requirements over the Plan period:

- c108,500 tpa recyclate bulking or MRF sorting capacity for Dry Mixed Recyclables (DMR) plus capacity for food/green waste bulking and/or treatment.
- c43,500 tpa other recovery - either RDF production or EfW.

12.5.10 Bulking capacity for recyclate arising from the commercial waste stream already exists in Medway. Material specific recyclate may be taken directly from the bulking facility to reprocessors such as Kemsley Mill in Kent (cardboard) or O-I in Essex (glass). Once constructed, the consented MRF at Medway City Estate would provide sorting capacity for DMR.

12.5.11 The 35,000 tpa of biowaste could be managed at Medway's permitted IVC facility, alongside the c35,000 tpa of LACW biowaste. Although its capability

<sup>33</sup> See Medway WNA 2024, C&I Waste Report

to manage this waste would need to be confirmed as it is currently operating as a specialist facility.

12.5.12 Residual C&I waste requiring management by 'other recovery' could be converted to RDF at the existing facility in Medway or managed at EfW facilities in other areas.

12.5.13 Any proposals for the development of EfW and landfill capacity will also be considered against policies T37 and T38 respectively.

### Construction, demolition and excavation waste management

12.5.14 It is anticipated that at least 75% of construction and demolition (C&D) waste will be recycled and, because capacity exists, this could be accommodated at sites within Medway. In practice much demolition waste is crushed and screened on the site of its production using mobile plant and is then either utilised on the site itself or sold as a recycled aggregate and transported directly to its site of use, reducing generation of this waste and eliminating the need for provision of land to accommodate separate management capacity.

12.5.15 As the production of recycled aggregate also contributes towards overall aggregate supply it is supported in principle.

12.5.16 Diversion of inert CDEW from disposal to landfill also occurs in the form of 'recovery to land'. Recovery to land involves the beneficial use of inert waste when permanently deposited on land e.g. in engineering operations and backfilling of mineral workings for restoration purposes. Policy T35 and Policy T39 set out how applications for such development will be considered.

12.5.17 The quantities of CDEW recycled and recovered to land will depend on the actual composition of the CDEW arising. For example, demolition results in the generation of 'hard' materials which can be recycled. Greenfield development tends to result in greater quantities of excavation waste, i.e. soils suited to permanent deposit to land, hence the proportion of CDEW being managed by recovery to land is likely to be higher. For this reason, setting separate targets for recycling and recovery may give the impression of under-performance in any one year depending on the type of CDEW arising. To avoid this issue, a combined management target has been applied to the inert fraction of CDEW as set out in Table 8 below.<sup>34</sup>

**Table 8: Inert CDEW Management Targets**

Component	Yr0 (2022)	Yr3 (2025)	Yr8 (2030)	Yr13 (2035)	Yr19 (2041)
Inert	Recycled Aggregate	12%	>86% <sup>35</sup>	>86%	>86%
	Recovery to Land	75%			

12.5.18 The non-inert CDEW fraction has greater potential environmental impacts and so separate targets and limits have been identified which allow for

<sup>34</sup> See Medway WNA 2024, CDEW Report

<sup>35</sup> Floor target (minimum)

changes in waste composition over time (see Table 9).<sup>36</sup> Landfill is required for a small element of non-inert CDEW that cannot practicably be recovered.

**Table 9: Non-inert CDEW Management Targets/Limits**

<b>Component</b>	<b>Yr0 (2022)</b>	<b>Yr3 (2025)</b>	<b>Yr8 (2030)</b>	<b>Yr13 (2035)</b>	<b>Yr19 (2041/42)</b>
<b>Non-inert</b>	Source Separated Materials				
	Organic Composting	13%	13%	13%	13%
	Timber (EfW)				
	<i>Remainder to Landfill</i>	>1%	1% <sup>37</sup>	1%	1%

### **Other recovery of residual waste**

12.5.19 To minimise the disposal of waste by landfill, waste that cannot be practically recycled (residual waste) is to be diverted to facilities where some value can be obtained from the waste mainly in the form of energy and bottom ash that can be converted into construction materials.

12.5.20 In light of the existing RDF production facility, sufficient 'other recovery' capacity for the management of residual waste by 'other recovery' (set by the Plan targets) already exists in Medway. In addition, 'other recovery' capacity is available in neighbouring Kent which is surplus to the achievement of targets in the Kent Minerals and Waste Local Plan. Management of residual waste in Kent by 'other recovery' has been confirmed by Kent County Council as a satisfactory arrangement and in light of this it is anticipated that Plan requirements may also be met in this manner. Residual LACW arising in Medway is already managed through this route.

### **Non-hazardous waste landfill**

12.5.21 Historically the requirement for landfilling of non-hazardous waste arising in Medway has been met in various locations including Medway, Kent or other neighbouring areas. Most recently (2022) c27,500 tonnes of non-hazardous waste was landfilled at the Ockendon landfill in Thurrock, adjacent to Medway, on the north bank of the Thames.

12.5.22 The estimated requirement for non-hazardous landfill is set out in Table 10. The requirement takes account of the Plan's targets for recycling and other recovery.

<sup>36</sup> See Medway WNA 2024, CDEW Report

<sup>37</sup> Ceiling limit.

**Table 10: Waste to Non-Hazardous Landfill Over the Plan Period (Tonnes)**

Year	Annual waste to non-haz landfill (tonnes)	Cumulative Waste to non-haz LF (tonnes)
<b>2023/24</b>	50,889	50,889
<b>2024/25</b>	44,510	95,399
<b>2025/26</b>	38,130	133,529
<b>2026/27</b>	31,749	165,278
<b>2027/28</b>	25,370	190,648
<b>2028/29</b>	18,990	209,638
<b>2029/30</b>	17,801	227,439
<b>2030/31</b>	16,614	244,053
<b>2031/32</b>	15,425	259,478
<b>2032/33</b>	14,237	273,715
<b>2033/34</b>	13,049	286,764
<b>2034/35</b>	11,861	298,625
<b>2035/36</b>	10,672	309,297
<b>2036/37</b>	9,939	319,236
<b>2037/38</b>	9,207	328,443
<b>2038/39</b>	8,473	336,916
<b>2039/40</b>	7,740	344,656
<b>2040/41</b>	7,007	351,663
<b>2041/42</b>	6,274	357,937
<b>Cumulative Total</b>		<b>357,937</b>

12.5.23 Non-hazardous waste will continue to be diverted from landfill driven by the landfill tax escalator and so the depletion of void in the remaining consented landfills in the wider South East is occurring at a slower rate. This conserves remaining landfill void capacity so that Medway's predicted cumulative non-inert landfill capacity requirement of around 360,000 tonnes over the Plan period (residual waste remaining after diversion to other recovery), may be accommodated within landfills outside the Plan area. WPAs hosting non-hazardous waste landfills within a two-hour travel time of Medway have previously confirmed that in principle waste from Medway may be accepted at landfills in their areas.

12.5.24 A Joint Position Statement on non-hazardous landfill prepared by SEWPAG in 2019 suggested that if no additional void comes forward, existing non-hazardous landfill capacity within the South East will be exhausted by 2040. In light of its proximity to the East of England, Medway is also well located to rely on non-hazardous waste landfill capacity in this region as is currently the case with the landfill of waste from Medway in Thurrock.

## **Hazardous and low-level radioactive waste<sup>38</sup>**

12.5.25 Approximately 41,500 tonnes of hazardous waste was produced in Medway in 2022. This is predicted to fall to c33,000 tonnes by the end of the Plan period with the depletion of hazardous materials such as asbestos in the building stock, the fall in use of hazardous raw materials in electronic appliances and transition to electric vehicles.

12.5.26 The overall quantity of hazardous waste arisings currently produced (c41,500 tonnes) quite closely matches to the quantity of hazardous waste managed (c52,500 tonnes) within Medway implying that theoretically net self-sufficiency is being achieved. However, given hazardous waste management involves regional and sometimes national scale operations it is not considered appropriate to apply the goal of net self-sufficiency to this waste stream in Medway. This is also consistent with the SEWPAG Statement of Common Ground.

12.5.27 Overall, given a fall in arisings, there will be a theoretical surplus of hazardous waste management capacity in Medway, however different hazardous waste types require different types of management, and a detailed analysis shows that significant (in terms of quantity and/or type) exports of hazardous waste were managed at facilities outside Medway in 2022. Past engagement with other WPAs where hazardous waste from Medway has been managed confirmed that all reported hazardous waste arising in Medway appears to be effectively managed and there are no obvious stresses in the system.

12.5.28 It can be concluded that there is no identified strategic need for additional hazardous waste management capacity within the Plan area; however, Policies T35 and T36 provide for such capacity to come forward within Medway should a need be justified.

12.5.29 Similarly, the WNA identifies no strategic need for the management of low-level radioactive waste in Medway.

## **Wastewater and sewage sludge**

12.5.30 There is currently sufficient wastewater treatment capacity to meet current and future growth.<sup>39</sup> The implications of proposed development on requirements for wastewater treatment in the Medway area will be assessed to ensure sufficient 'headroom' exists.

12.5.31 Any proposals for additional wastewater treatment capacity would be considered against Policy T40.

12.5.32 Southern Water has previously indicated a potential capacity shortfall in sewage sludge treatment capacity during the period 2020-34 in North Kent and an intention to seek additional capacity.

<sup>38</sup> See Medway WNA 2024, Hazardous Waste Report

<sup>39</sup> Medway WNA 2024, 'Other Waste' Report

## Policy T35: Provision of Additional Waste Management Capacity

Proposals for the development of additional waste management capacity (as well as improvement or extension of existing facilities) will be supported where it is demonstrated that the development will contribute towards achieving:

- a. targets specified in this Plan for recycling, 'other recovery' and the diversion of the waste away from disposal in a manner that does not prevent management of the waste at the highest point practical in the waste hierarchy; and,
- b. net self-sufficiency of the Plan area in waste management capacity.

Proposals for 'other recovery' facilities will only be supported where a need for the capacity has been identified such that additional capacity would not cause waste to be diverted from management methods further up the waste hierarchy.

Proposals for the improvement or extension (physical or temporal) of existing waste management facilities will be supported where the quantity of waste to be managed is at least equal to the quantity of waste currently managed at the site.

Proposals for the improvement or extension (physical or temporal) of facilities with temporary planning permission should include consideration of the original reason(s) for the permission being time limited and not result in development (or extensions to time) that would undermine them unless conditions have changed in the intervening period.

12.5.33 Management of waste in accordance with the waste hierarchy in priority order is a legal requirement and also a key tenet of NPPW and is generally consistent with the aim of achieving the Government's target of net zero greenhouse gas emissions by 2050.

12.5.34 Having been in operation for many years, existing permitted waste management facilities in Medway may be well-established and accommodated within the community. The improvement or extension of an existing waste management facility may improve the efficiency of a site by enabling more waste to be recycled, recovered or processed for re-use and/or have the potential to reduce impacts of current operations due to changes in technology or site layout. Such extensions and improvements may therefore mean that fewer facilities need to be developed in new locations which may otherwise lend themselves to other forms of development needed within Medway.

12.5.35 The Policy is consistent with paragraph 128 of the NPPF that is concerned with ensuring that land is used efficiently.

## 12.6 Location of waste management facilities

12.6.1 The management of waste can be carried out within units or buildings located in urban areas and on industrial estates. Such facilities might include smaller specialised operations, such as those engaged in the processing of waste electrical and electronic equipment (WEEE). Generally open areas are needed to facilitate site logistics, e.g. waste deliveries and removals.

12.6.2 Many of the existing waste management facilities in Medway are clustered within existing industrial areas (such as at Medway City Estate and Kingsnorth, near Hoo St Werburgh) and these locations are likely to offer suitable opportunities for the development of waste management capacity.

12.6.3 Allocations of employment land are included in the Plan which may be suitable for waste management development as amenity impacts may be reduced due to their accessibility and distance from residential areas.

12.6.4 Greenfield locations are least preferred for new waste management facilities, consistent with NPPF requirement for making efficient use of land.

12.6.5 The suitability of locations will also be assessed against other policies in this plan, for example in terms of their accessibility to transportation networks including the River Medway and the River Thames. In that regard proposals for additional waste management capacity that utilise existing rail facilities, the River Medway or the River Thames as a means of transportation are encouraged.

12.6.6 Other policies of the Plan will also be applied to ensure that waste management development is consistent with the Plan's wider objectives of ensuring sustainable development comes forward in a manner which does not have an unacceptable adverse impact on communities and the environment.

12.6.7 Policy T36 does not apply to proposals involving the permanent deposit of waste (landfilling, land raising and recovery to land) which are addressed by Policies T38 and T39.

## Policy T36: Location of Waste Management Facilities

Proposals for additional waste management capacity (excluding permanent deposit) will be supported in the following locations:

- Established industrial estates.
- Land identified for employment uses or industrial and storage purposes in this Plan.
- Land considered to be previously developed and/or redundant agricultural buildings and their curtilages.<sup>40</sup>
- Land that is otherwise suitable for waste development when assessed against other policies in the Plan including the following considerations:
  - There is no unacceptable adverse impact on sites designated for environmental or heritage significance.
  - The site is not allocated for other non-employment uses in the Local Plan.
  - The site is located in an area that can accommodate the proposed development and does not have an unacceptable impact on amenity, the local environment and transport networks.

<sup>40</sup> See glossary for definition of term 'previously developed land', but note that this does not include land that has been developed for minerals extraction where provision for restoration has been made through development management procedures.

- Proposals on 'greenfield' land will only be permitted where no alternative suitable previously developed land can be identified.<sup>41</sup>

- 12.6.8 The management of waste is an industrial activity which involves the bulk transport of materials, often using Heavy Goods Vehicles, and it is therefore important that adverse impacts caused by waste management, including those related to transport, are minimised.
- 12.6.9 The preference for the use of existing sites and previously developed land is consistent with the Plan's wider vision and objectives concerned with achieving the most efficient use of land in Medway.
- 12.6.10 NPPW specifically identifies previously developed land and redundant agricultural (and forestry) buildings and their curtilages as offering potential opportunities for waste management development.

## 12.7 Other recovery

- 12.7.1 The principal form of management capacity that falls under the 'Other Recovery' category is EfW.<sup>42</sup> This often takes the form of plants that incinerate waste and capture the heat to generate electricity.
- 12.7.2 Combustion of waste results in emissions of carbon dioxide so the more energy that can be recovered the lower the emissions per unit of energy. To ensure maximum efficiency it is important that EfW facilities are developed in a manner and in locations that allows the surplus heat to be fully utilised, for example in district heating or by a local industry with a process heat requirement. This type of EfW is classed as Combined Heat and Power (CHP). The Energy section of this Plan supports development associated with the delivery of heat and cooling to buildings within the vicinity of a CHP facility.
- 12.7.3 To qualify as 'recovery' (in terms of the waste hierarchy) an EfW plants must achieve a minimum level of energy efficiency as defined by R1 status. Facilities must achieve its 'R1' status to be preferred over disposal to landfill as a means of managing residual waste.
- 12.7.4 Combustion of the biogenic fraction of residual waste is considered to be a source of low carbon renewable energy whereas the combustion of the non-biogenic fraction including materials such as oil-based plastics is not. These fractions are currently considered to occur in approximately equal proportions, but are expected to change over the Plan period, when initiatives such as the separate collection of food waste across households and businesses are implemented.

<sup>41</sup> 'Greenfield' land is taken to mean land previously in agriculture or non-urban/industrial use or which has not been damaged by a previous use. Not to be confused with Green Belt.

<sup>42</sup> To qualify as 'recovery' (in terms of the waste hierarchy), and so preferred over disposal to landfill as a means of managing residual waste, energy from waste plants must achieve a minimum level of energy efficiency as defined by R1 status. Without R1 status such plants are technically classed as disposal.

12.7.5 EfW facilities must be Carbon Capture and Storage enabled with a reasonable prospect of it being executed to ensure the national aim of achieving net zero carbon emissions by 2050 is not compromised.

12.7.6 RDF preparation capacity might be developed in conjunction with EfW facilities on the same site, or as standalone facilities where the waste is processed to produce a fuel off-site. In order to avoid the risk of under provision by double counting both fuel preparation capacity and fuel use i.e. EfW capacity, only one of the two facility contributions will be counted towards meeting 'other recovery' requirements if both are in Medway. Where fuel preparation takes place as a stand-alone activity, its contribution to 'other recovery' capacity will only be counted as the difference between the input quantity and the output quantity unless the output fuel has a proven market in accordance with the Government definition of RDF.<sup>167</sup> Where that is the case, if the output fuel is to be used in an EfW plant beyond Medway, then this contribution will also be counted.

## Policy T37: Other Recovery

Proposals for development which allow for forms of waste recovery other than reuse, repair and recycling, (e.g. where waste is used as a fuel and/or fuel is produced from waste) will be supported where the waste being managed cannot be practicably repaired, reused or recycled i.e. it is unavoidable residual waste.

### Energy from waste facilities

In addition to the above, proposals for EfW facilities will be supported where it can be demonstrated that:

- the maximum amount of energy from the process will be utilised including the use of surplus heat;
- residues arising from the process will be converted into a material with a proven end use; and,
- the facility is designed to enable non biogenic emissions of carbon to be captured, utilised and, failing that, stored.

12.7.7 RWS anticipates greater efficiency of EfW plants by encouraging use of surplus heat recognising that at that time only around a fifth of EfW plants operate in CHP mode, despite most being enabled to do so. This will support a shift from using carbon rich gas heat sources to lower carbon generation via heat networks. Government funding initiatives have been introduced to help facilitate this.

12.7.8 Given the expectation that residual waste will continue to include a non-biogenic fraction into the future, such plants will continue to produce energy that is non-renewable. In order to mitigate this, Carbon Capture, Utilisation and Storage (CCUS) is being developed for deployment by the sector. Therefore, in addition to a heat off take, any such facilities must be CCUS ready with a reasonable prospect of it being implemented by 2040 to contribute to the achievement of net zero carbon emissions by 2050.

12.7.9 The Climate Change Committee's Sixth Carbon Budget recommends that all EfW facilities will need to have carbon capture and storage in place by

2040 for the national target of net zero carbon emissions by 2050 to be achieved. Given EfW plants have an operating life of at least 30 years, any proposal for EfW development must provide for this as it may not be possible to retrofit CCUS once operational. The Committee's budget also identified that the necessary carbon reduction from waste management is expected to come from increases in recycling which must not be compromised by provision of additional EfW capacity.

## 12.8 Landfill

- 12.8.1 While non-inert landfill capacity across the South East is declining, the quantity of waste that needs to be disposed of in this way is also declining and this is expected to continue in light of Government initiatives.
- 12.8.2 Waste should only be landfilled if it cannot be managed by means further up the Waste Hierarchy. The justification of need for additional non-inert landfill capacity must demonstrate that sufficient waste requiring disposal to landfill will be available to ensure the site can be completed in a timely manner. Non-inert landfill sites should be filled in cells and restored progressively back for a useful purpose e.g. for agriculture, recreation or biodiversity. Providing new capacity is almost wholly dependent on having the right geological conditions.
- 12.8.3 There are no existing voids in Medway which would be suitable for non-inert waste landfilling, so any provision would either involve the creation of new void space by extraction of material for other uses such as engineering, or re-profiling land by raising its natural contours (land raise), or a combination of the two approaches.
- 12.8.4 As well as creating additional void space, the reworking (or 'mining') of existing or historic and restored landfill sites may offer opportunities for the release of development land and/or extraction of recyclable or recoverable materials previously disposed of. For some time, landfill sites have been carefully engineered to ensure the risk of pollution, in particular from leachate and landfill gas, is minimised. However, this has not always been the case and old landfills may need reworking to remove wastes causing pollution and/or to ensure pollutants are not released in an uncontrolled manner.
- 12.8.5 Reworking landfills can be a hazardous activity especially when there are no, or poor, records of the types of waste deposited and present. Disposal of hazardous materials may not have been recorded in old/historic sites and these may be present. Site investigation to assess and evaluate the presence of hazardous materials will be necessary. In particular, proposals for landfill reworking would need to address the potential for adverse impacts associated with the release of leachate and landfill gas, handling of hazardous materials, as well as potential impacts on existing restoration and aftercare. Following the closure of landfills other development, such as housing, may have occurred nearby which may be sensitive to any reworking activity and the need to avoid adverse impacts must be taken into consideration. The reworking of landfills containing hazardous waste is

generally not encouraged due to the potential impacts on communities and the environment.

12.8.6 Impacts arising from non-inert landfill may occur due to the following:

- transportation of waste;
- degradation of biodegradable waste materials resulting in landfill gas and leachate which are both pollutants if not managed correctly;
- site operations which may give rise to noise and dust; and,
- the scale of operations which may make them highly visible especially in open countryside.

12.8.7 Landfill gas includes methane which is a flammable gas that can be used as a fuel. Proposals for non-inert landfill development must explain how landfill gas would be managed during the operational and aftercare phases. The use of landfill gas to produce energy provides a potential benefit by offsetting demand for fossil fuels, and that benefit should be realised wherever possible.

12.8.8 Despite its theoretical geological suitability to accommodate new void space for non-inert waste, the lack of local demand and remoteness of the Hoo Peninsula to the wider market, means that no specific allocations for new non-inert landfill or land-raising facilities are proposed; however criteria for determining any proposals that may come forward in this area are provided in Policy T38.

## Policy T38: Non-inert Landfill

Proposals for the creation of void space or land-raising to facilitate a disposal facility for non-inert waste will be supported where the following is demonstrated:

- a. that the waste to be deposited cannot be reasonably managed in any other way (that is that the waste comprises irreducible residues or materials that it is not possible to manage higher up the waste hierarchy);
- b. a clear programme and time limit for the operation which will ensure the timely completion and restoration of the site;
- c. measures are included to ensure:
  - i. maximum practicable recovery of energy from any landfill gas generated; and,
  - ii. satisfactory provision for the restoration and after-use of the site.

Proposals for the reworking of old landfill sites will be supported where the criteria above have been demonstrated, and that:

- a. during its operation, it is demonstrated that the site did not receive any hazardous waste for disposal;
- b. any extracted materials, are to be managed as far up the waste hierarchy as practicable.

12.8.9 While landfill falls under disposal at the bottom of the waste hierarchy some wastes will need management through this route for the foreseeable future and, as it has certain unique characteristics relating to the use of land, it is

important that the Plan includes policy against which to judge a proposal for non-inert landfill in the event that such a proposal came forward.

12.8.10 For some hazardous wastes, disposal to landfill currently offers the only practical waste management solution. Such wastes are produced in relatively small quantities and are managed at dedicated hazardous waste landfill sites or within specially engineered cells at non-inert landfill sites.

12.8.11 In line with the Plan's objective to manage waste in accordance with the Waste Hierarchy and the national goal set by RWS for the cessation of landfilling of any biodegradable waste by 2030, only waste which cannot be managed by means other than landfill may be proposed for management by landfill.

12.8.12 Progressive restoration helps ensure that the impacts associated with the landfilling of waste are minimised. The NPPF and NPPW expect that the restoration of minerals voids should take place 'at the earliest opportunity' to ensure sites are restored for a high quality beneficial afteruse as soon as possible rather than left as an unnatural feature in the countryside.

12.8.13 As methane is a highly potent greenhouse gas it is important that proposals for non-inert landfill clearly set out how it will be captured and its potential as a fuel maximised.

12.8.14 Benefits may be derived from the reworking of old non-hazardous landfill sites where it is demonstrated that it is technically feasible and will not cause unacceptable adverse impacts on the environment and/or communities.

*Question 44: In light of the geological/spatial constraints in Medway and predicted limited ongoing need, do you agree that it is appropriate for the Council to plan for the management of non-inert waste that may require landfill on the basis that it will be managed at landfill sites located outside Medway?*

## 12.9 Beneficial use of inert waste by permanent deposit

12.9.1 Inert excavation waste may not be easily recycled but does lend itself to beneficial uses involving its permanent deposit on land.<sup>43</sup> Such uses can be classed as 'recovery' rather than 'disposal', for example, the restoration of mineral extraction sites or construction of acoustic or flood protection bunds or retention on the site of its production for landscaping purposes. It is considered that 100% of inert excavation waste that cannot be recycled can be put to some beneficial use.

12.9.2 Proposals should demonstrate how the activity constitutes a genuine beneficial use of inert waste. For such activity to be deemed recovery, proposals must demonstrate how the development will involve deposit of the minimum amount of inert waste material necessary to achieve the desired outcome.

12.9.3 In certain circumstances the deposit of excavated material for which a use has been previously identified may be controlled under a regime known as "The Definition of Waste: Development Industry Code of Practice". While this

<sup>43</sup> Inert excavation waste may include contaminated soils that have been fully decontaminated.

may not constitute an operation involving waste, planning permission may still be required.

## Policy T39: Beneficial Use of Inert Waste by Permanent Deposit

Proposals for the deposit of inert waste on land will be permitted, subject to other policies of this Plan, where it is demonstrated that the waste is inert and the proposal:

- a. is an engineering operation such as that which forms part of a comprehensive permitted scheme for restoration of previously developed land or minerals sites; or
- b. significantly enhances other development or its setting; or
- c. would result in measurable improvement to the use or operation of agricultural and/or forestry land; and
- d. the resulting final landform, landscape and afteruse enhances the environment and protects the landscape, visual amenity and nature conservation interests of the site and the surrounding area including its landscape character; and
- e. the minimum volume of inert material is used to achieve necessary improvements; and
- f. where appropriate, the proposal includes ancillary on-site facilities for the recovery of the waste which can be managed by methods further up the waste hierarchy.

- 12.9.4 The Waste Management Plan for England notes that inert waste can and should be recovered or recycled whenever possible. The deposit of inert waste in or on land, remains a valid way of restoring quarries and mineral workings where this is a planning requirement.
- 12.9.5 The permanent deposit of inert waste on land generally constitutes a beneficial use and therefore contributes to efforts to manage waste in accordance with the Waste Hierarchy
- 12.9.6 The approach taken in the Plan to the beneficial use of inert waste draws upon, and is consistent with, the SEWPAG 'Joint Position Statement: Permanent Deposit of Inert Waste on Land in the South East of England'. Further advice on this matter can be found in this Joint Position Statement.

## 12.10 Wastewater treatment

- 12.10.1 A range of development related to the treatment of wastewater can be undertaken without planning permission. However, proposals for new, and extensions to, existing wastewater treatment works or built facilities for the management of sewage sludge generally require planning permission. Due to the necessity to construct facilities that can connect to the existing wastewater network, exceptions to the locational requirements set out in Policy T36 may be appropriate.

12.10.2 The Council will work with Southern Water and the Environment Agency to ensure wastewater arising in Medway is treated to at least the standards required by relevant legislation.

## Policy T40: Wastewater Treatment

Proposals for new or extended facilities for the management, treatment and disposal of wastewater and sewage sludge will be supported where the development is:

- a. required to meet current or prospective environmental standards or regulatory provisions; and/or
- b. required to improve the operational efficiency of wastewater and sewage sludge management.

12.10.3 The treatment of wastewater is required to ensure that pollution of the environment and harm to human health does not occur when it is discharged to waterbodies. The Environment Agency will only consent the discharge of effluent from a wastewater treatment works when it is satisfied that it has been treated to an adequate standard. Such treatment may require the development of additional infrastructure which requires separate planning permission, and this policy allows specifically for the consideration of whether the infrastructure is needed to be factored into the decision of whether to grant permission.

## 13. Energy

### 13.1 Introduction

13.1.1 A key driver of the Local Plan is to support Medway's transition to net zero carbon by 2050. This is embedded in our One Medway Council Plan, and the Climate Change Action Plan.<sup>168,169</sup> Energy use and supply are intrinsic to the Council's aims. Medway has an established strategic importance for energy infrastructure, particularly on the Hoo Peninsula. In the 20<sup>th</sup> Century, this was a key location for fossil fuel powered Power Stations. The sector is now transitioning away from carbon-based energy and seeking wider opportunities. This transition provides new opportunities for Medway's economy, and innovation in meeting energy needs for existing and new communities.

### 13.2 Energy supply

13.2.1 Section 19 of the Planning and Compulsory Purchase Act 2004 places a legal duty on local planning authorities to ensure that development plans "include policies designed to secure that the development and use of land in the LPA's area contribute to the mitigation of, and adaptation to, climate change".<sup>170</sup>

13.2.2 The Planning and Energy Act 2008 enables local planning authorities to set reasonable requirements for renewable energy, low carbon energy and energy efficiency.<sup>171</sup>

13.2.3 The government expects the planning system to support the transition to a low carbon future and to support renewable and low carbon energy and associated infrastructure. Local plans can help to increase the supply of renewable and low carbon energy and heat by identifying suitable areas for development.<sup>172</sup>

13.2.4 Neighbourhood plans enable communities to plan for community-led renewable energy developments, for example through a supporting community energy plan.<sup>173</sup>

13.2.5 Power generation, electricity distribution and Liquefied Natural Gas (LNG) infrastructure in Medway are of national significance. This was originally founded on coal and oil, with large plants at Kingsnorth and Grain respectively.

13.2.6 Power stations located at Damhead Creek and the Isle of Grain have a combined installed capacity of over 3GW. This represents 38% of the total installed capacity for the South East region and 4% for the UK.<sup>174</sup> Damhead Creek has planning permission for a significant expansion in power generation.

13.2.7 The Grain LNG terminal is the largest in Europe and eighth largest in the world, with plans for further expansion.<sup>175</sup> The terminal has a vast regasification capacity and a ship reloading facility to help meet high export demand. Global LNG supplies are expected to increase substantially, making this a competitive fuel source for various purposes. LNG is

considered a vital part of the energy mix, given the reduction of domestic gas production.<sup>176</sup>

13.2.8 Various pipelines and cables forming part of the national energy supply network also cross the Medway area, including the two-way electrical inter-connector (BritNed) linking Grain and the Netherlands, and the NeuConnect interconnector linking Grain to northern Germany. Aviation fuel is also imported, stored and distributed from the Isle of Grain.

13.2.9 However, the benefits to the local area have been limited; the construction workforce is drawn from around the world, while the operational workforce for each facility is small. There are opportunities for:

- The creation of a maintenance and support services cluster to the local energy sector, building on Medway's traditional manufacturing and support industries.
- Long-term research and development opportunities associated with carbon capture technology.
- The potential for heat networks.
- Local matching of skills development to the needs of the sector.

## Policy S25: Energy Supply

Kingsnorth and the Isle of Grain are suitable locations for renewable and low carbon energy development. Proposals for such developments will be supported if the potential adverse impacts are or can be made acceptable, including cumulative landscape and visual impacts.

For proposals in other locations, the latest Landscape Character Assessment will inform an assessment of cumulative landscape and visual impacts.

Energy developments over 50 megawatts capacity are considered by the Secretary of State for Energy under the Planning Act 2008, and the local planning authority is a statutory consultee.

Low carbon hydrogen production will meet the relevant safety regulations and a national emissions standard.

Proposals will have regard to the latest regional, sub-regional and local strategies for economic development and skills, such as the Skills and Employability Plan for Medway or equivalent.

Community-led initiatives for renewable and low carbon energy through neighbourhood planning will be supported.

13.2.10 The energy supply policy is intended to increase the supply of renewable and low carbon energy and heat by identifying Kingsnorth and the Isle of Grain as suitable locations for renewable and low carbon energy development. It recognises that proposals for renewable and low carbon development may come forward in other locations.

### 13.3 Heat networks

13.3.1 Heat networks can help to decarbonise a local area's heating requirements, balance demands on the local power grid and provide a catalyst for regeneration.<sup>177</sup>

13.3.2 Heat networks deliver heat and cooling to buildings within a vicinity. Heat networks and their infrastructure generally consist of:

- one or more energy centres, where heat is generated or collected from a central source;
- insulated pipes connecting them to one or more buildings; and
- a heat exchanger that transfers heat from liquid in these pipes to a secondary network of pipes within the building.

13.3.3 More modern heat networks generally include a means to regulate and monitor the flow of heat into a building. The latest heat networks use lower temperatures to reduce pipe heat loss and are more suited to use heat from waste and renewable sources. The sources of heat can be swapped with lower carbon alternatives over time, with no or minimal need to reinstall network infrastructure. Large heat networks serving a mixture of residential, public and commercial buildings tend to be more efficient, with different heat demand profiles becoming more constant.<sup>178</sup>

13.3.4 The South2East Local Energy Strategy calls for the building and extension of heat networks to be encouraged, particularly in new developments. Medway Council commissioned an initial feasibility study to assess current and future energy demand and identify potential low carbon energy sources following engagement with stakeholders.

13.3.5 Medway Council secured match funding from the Heat Networks Delivery Unit (part of the Department for Business, Energy and Industrial Strategy) to commission initial feasibility studies. These have considered locations across urban and rural Medway. Further work is underway to progress from the feasibility stage.

#### Policy T41: Heat Networks

Development proposals of 10 dwellings or more (including conversions) or 1,000 sqm or more will follow the heat network provision hierarchy, unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable:

- a. Connect to an existing heat network.
- b. Construct a heat network served by a low carbon heat source.
- c. Collaborate with neighbouring development sites and/or existing heat sources to develop a shared heat network.
- d. Where heat networks are unviable, but there is potential for future heat networks, demonstrate how the design would allow for a connection to a future heat network.

Development proposals will have regard to further feasibility studies and the role of 'anchor loads', such as the Civic Centre and Strood Waterfront sites in Strood and other sites on the Hoo Peninsula.

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- 13.3.6 National planning policy expects local plans to identify opportunities for development to draw its energy supply from decentralised energy supply systems. In addition, new development should comply with local requirements for decentralised energy supply, unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable.<sup>179</sup>
- 13.3.7 Heat networks are often complex to deliver; they generally have high initial capital costs and long investment payback times. However, local authorities can help to provide certainty by initially connecting 'anchor loads' from public buildings that have a larger, more constant heat demand, such as hospitals and leisure centres.<sup>180</sup>

## References

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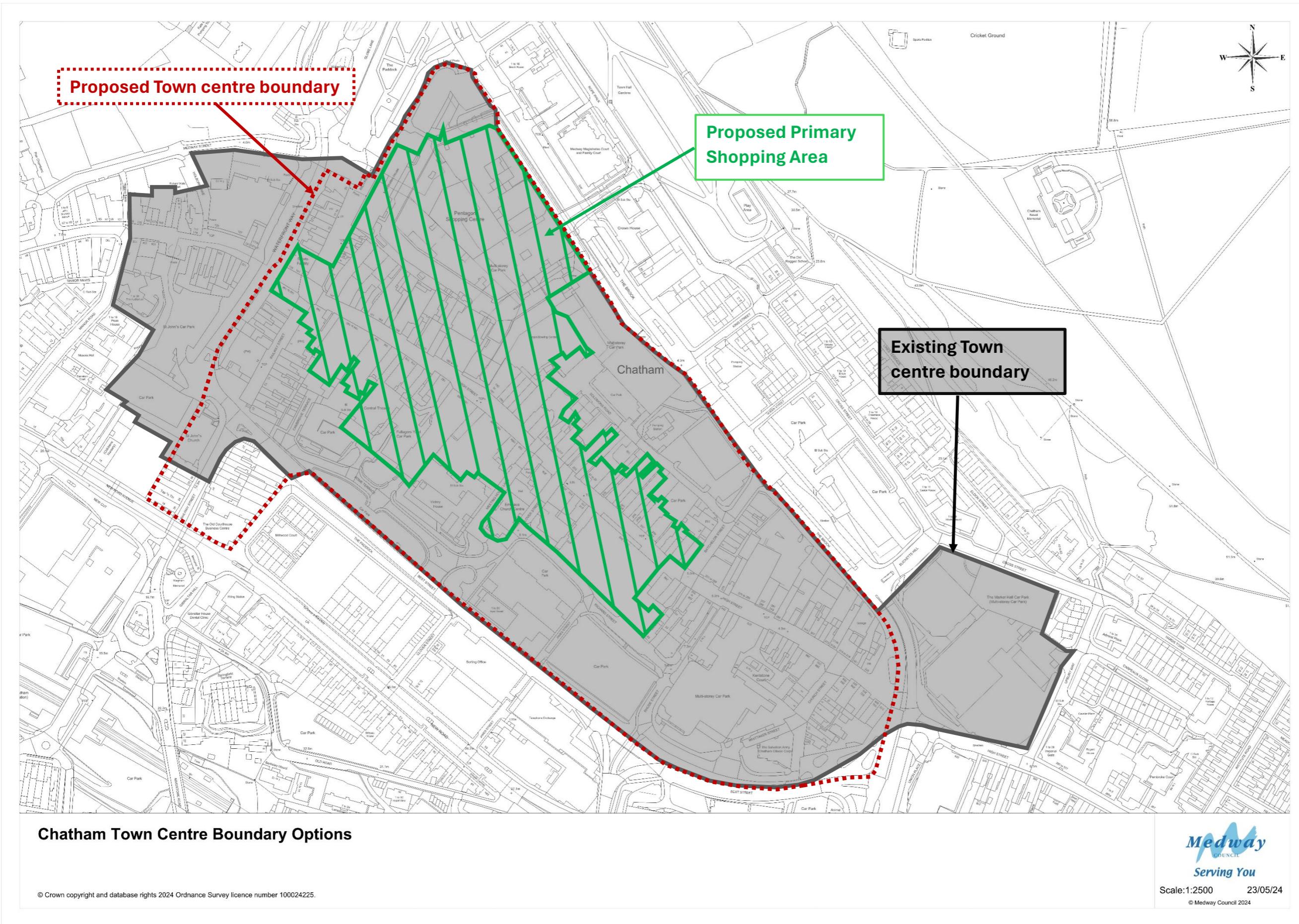
[Accessed 28 June 2024]

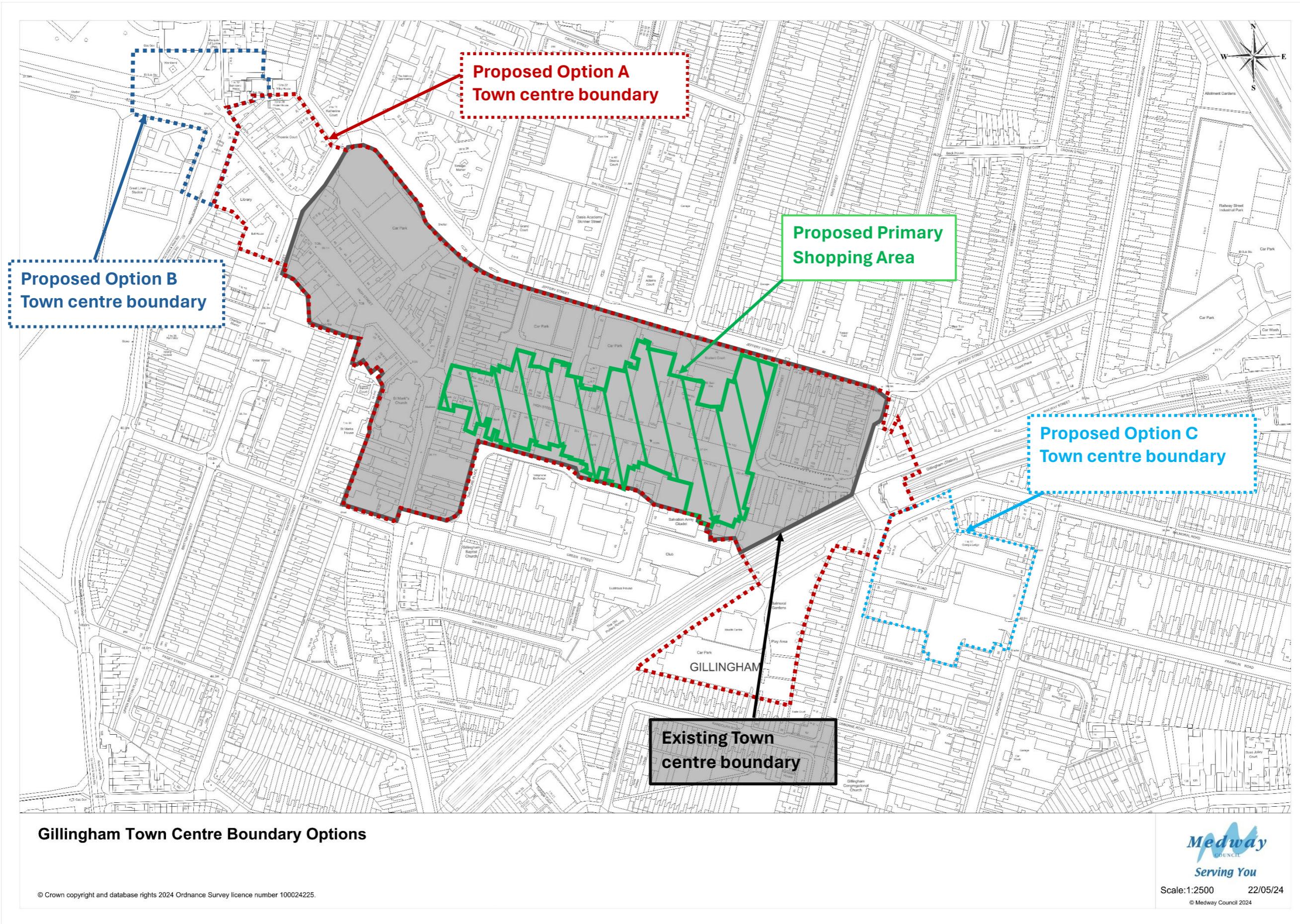
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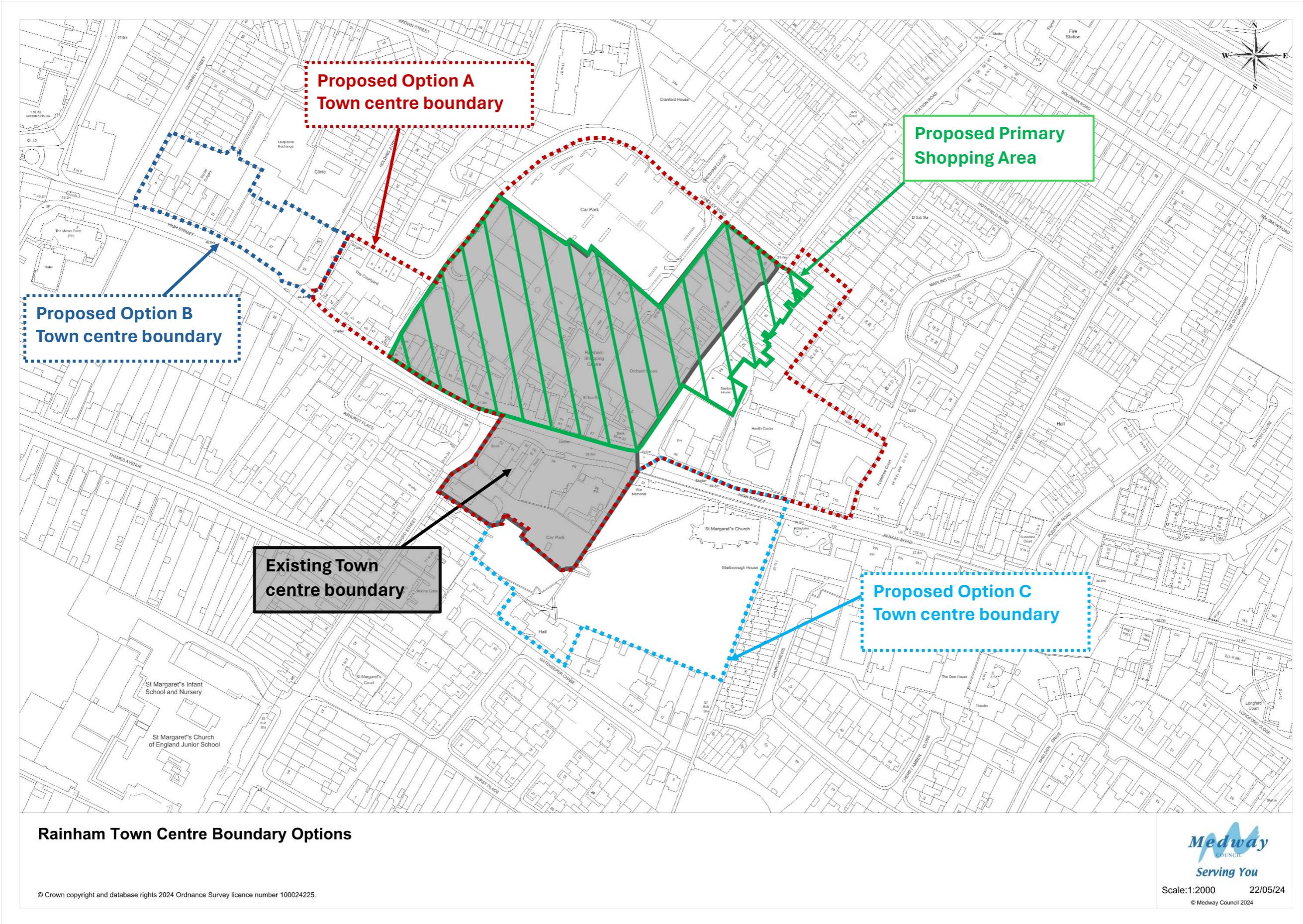
<https://post.parliament.uk/research-briefings/post-pn-0632/> [Accessed 28 June 2024]

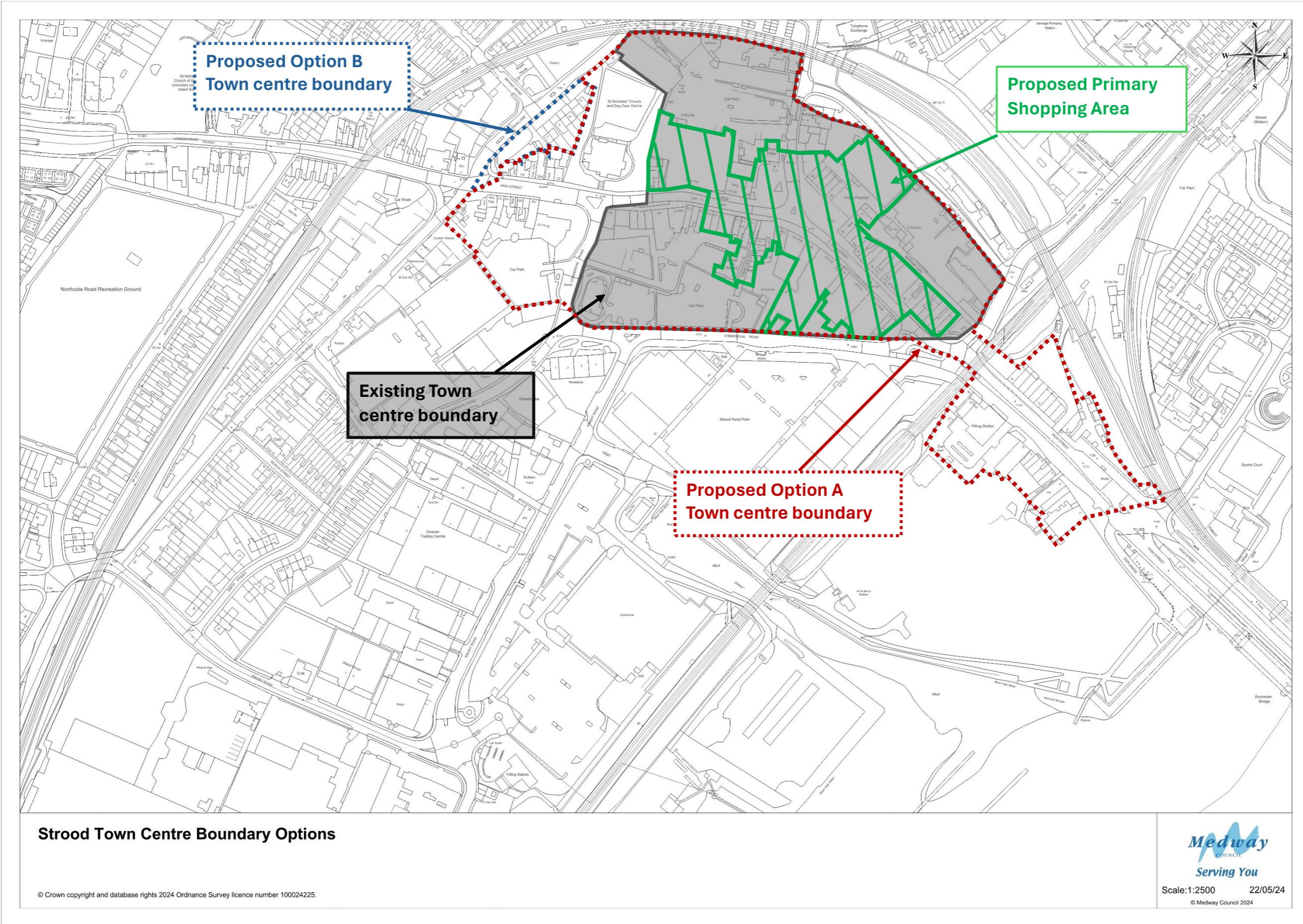
# Appendix A

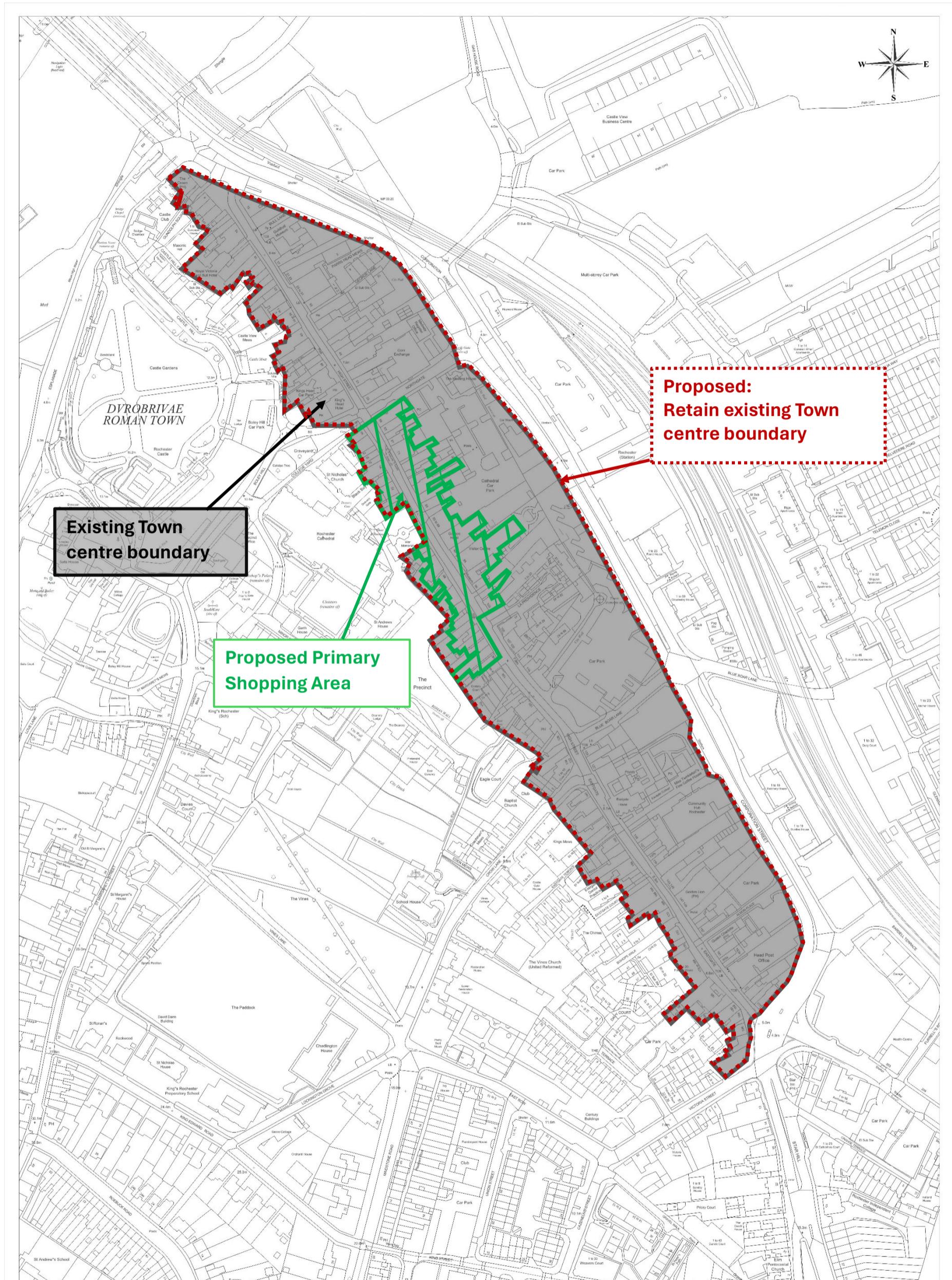
## Town Centre Boundary Options











Rochester Town Centre Boundary Options

# Appendix B

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## **Vehicle Parking Standard**



# Medway Council Parking Standards

**(Adopted May 2001)  
Second edition  
September 2004**

# Integrated Transport Team – who to contact

For further information on Medway Council's Parking Standards please contact the Integrated Transport Team :



Telephone **(01634) 331427**



Fax **(01634) 331125**

Write to **Integrated Transport Team  
Regeneration and Environment  
Medway Council  
Compass Centre  
Chatham Maritime  
Kent ME4 4YH**



Email **ltp@medway.gov.uk**

or visit our website at **www.medway.gov.uk**



Minicom **(01634) 331300**

This information is available in other formats from **(01634) 331427**

If you have any questions about this leaflet and you want to speak to someone in your own language please ring **(01634) 335577**

এই লিফলেট সম্পর্কে আপনার যদি কোন প্রশ্ন থাকে এবং এ বাপ্পারে আপনার নিজের ভাষায় কারো সাথে আলাপ করতে চান, তাহলে দশা করে এই নম্বরে টেলিফোন করুন: **331780 (Bengali)**

如果你對這本小冊的內容有任何疑問，且想與會說你的語言的某人談話，請打這個電話號碼 **331781 (Chinese)**

જો તમને આ પત્રિકા વિશે કોઈ પ્રશ્નો હોય અને તમે તમારી માતૃભાષામાં કોઈની સાથે વાત કરવા માગતા હો તો કૃપા કરીને આ નંબર ઉપર ફીન કરો **331782 (Gujarati)**

यदि आपने इस लीफलेट के बारे में कुछ पूछना है और उस व्यक्ति के साथ आप अपनी भाषा में बात करना चाहते हैं, तो कृपया निम्नलिखित नंबर पर टैलीफोन करने करें: **331783 (Hindi)**

ਜੇ ਤੁਸੀਂ ਇਸ ਲੀਫਲੈਟ ਦੇ ਬਾਰੇ ਕੁਝ ਪ੍ਰੋਗਨਾ ਚਹੁੰਦੇ ਹੋਵੋ ਅਤੇ ਤੁਸੀਂ ਉਸ ਵਿਅਕਤੀ ਦੇ ਨਾਲ ਅਪਣੀ ਬੋਲੀ ਵਿੱਚ ਗੱਲ ਕਰਨੀ ਚਹੁੰਦੇ ਹੋ, ਤਾਂ ਕ੍ਰਿਪਾ ਕਰਕੇ ਅੱਗੇ ਲਿਖੇ ਨੰਬਰ ਤੇ ਟੈਲੀਫੋਨ ਕਰੋ: **331784 (Punjabi)**

اگر آپ اس کتابچے کے بارے میں کوئی سوال پوچھنا چاہتے ہیں اور آپ کسی فرد سے اپنی زبان میں بات کرنے کے خواہشند ہیں تو براہم بانی اس نمبر پر فون کیجئے۔ **331785 (Urdu)**

Elinizdeki bu yazılı duyuru ile ilgili herhangi bir sorunuz varsa ve dilinizi bilen birisi ile konuşmak istiyorsanız, lütfen 331786 numaraya telefon edin. **331786 (Turkish)**

## **Medway Council parking standards**

### **(Adopted May 2001)**

#### **Introduction**

Medway's Local Transport Plan 2000-2005 aims to reduce the use of car travel and encourage cycling, walking and public transport as alternative modes. Vehicle parking standards help achieve this by limiting the number of parking spaces in new developments.

This approach is fully supported by national, regional and local government policies such as the Medway Local Plan (Adopted Version 2003). The following policies from the MLP (2003) are applicable to parking standards:

- T1: Impact of development
- T2: Access to the highway
- T4: Cycle facilities
- T11: Development funded transport improvements
- T13: Vehicle parking standards
- T14: Travel Plans
- T15: Parking strategy
- T16: Rainham town centre parking
- T17: Park and ride
- T22: Provision for people with disabilities
- BNE2: Amenity Protection
- R18: Take away hot food shops, restaurants, cafes, bars and public houses

## Parking standards for people with a disability

Parking for people with a disability must be provided in addition to maximum parking standards. The minimum number of parking spaces required for disabled motorists is given in the table below.



Minimum number of parking spaces for motorists with a disability		
Land use category	Car park size	
	Up to 200 spaces	Over 200 spaces
<b>Business premises - employees</b>	One for each registered disabled employee	One for each registered disabled employee.
<b>Business premises - visitors</b>	Two or 5% of the maximum parking standard (whichever is greater)	Six or 2% of the maximum parking standard (whichever is greater)
<b>Shopping and recreation</b>	Three or 6% of the maximum parking standard (whichever is greater)	Four or 4% of the maximum parking standard (whichever is greater)
<b>Hotels with specially designed rooms</b>	One space for each specially designed room	

## Parking standards for new development

The parking standards for private cars for land use classes A1, B1, C3, D1 and D2 were adopted in May 2001 as interim parking standards and take account of the guidance in PPG13, PPG3 and RPG9. It is hoped that Kent County Council and the District Councils in Kent will be able to work in partnership with Medway Council to agree common standards across Kent. The remaining vehicle parking standards for private cars and commercial vehicles are based on Kent County Council adopted standards.



Cycle parking standards are taken from the Medway Council's *Strategy to encourage walking and cycling and to assist people with restricted mobility*, which is a supporting document to the council's Local Transport Plan. The following tables show parking standards for new developments. A transport assessment will be required if the proposed development is above a certain threshold (and in some cases if requested) and this is indicated in the tables.

Land use category	Parking standards			Threshold for transport assessment
	Maximum no. of car parking spaces	Minimum no. of commercial vehicle parking spaces	Minimum no. of cycle parking spaces	
<b>A1 retail</b>				
Food retail, including cold food take-away	One per 18m <sup>2</sup> GFA	One per 500m <sup>2</sup> GFA	One per 250m <sup>2</sup> GFA for staff and customers (refer to note 6)	1000m <sup>2</sup>
Non food retail warehouses	One per 20m <sup>2</sup> GFA	One per 500m <sup>2</sup> GFA		(refer to note 3)
Garden centres	One per 10m <sup>2</sup> of area open to public	(refer to note 1)		

For notes see page 12

Land use category	Parking standards			Threshold for transport assessment
	Maximum no. of car parking spaces	Minimum no. of commercial vehicle parking spaces	Minimum no. of cycle parking spaces	
<b>A2 Financial and professional services</b>				
Accountants, betting offices, banks or building societies, solicitors, etc.	One per 18m <sup>2</sup> GFA plus one space per member of staff	Nil	One per 400m <sup>2</sup> GFA for staff	Over 500 trips per day
<b>A3 Food and drink</b>				
Public houses and licensed bars	One per 4m <sup>2</sup> GFA, plus one per 8m <sup>2</sup> GFA for off-licence	(refer to note 1)	One per 250m <sup>2</sup> GFA for staff and customers (refer to note 6)	(refer to note 3)
Restaurants, cafes and banqueting halls	One per 6m <sup>2</sup> GFA, plus one per member of staff			
Transport cafes	(refer to note 8)	One per 5m <sup>2</sup> GFA		
Hot food take-aways	Six per unit (refer to note 4)	Nil		

For notes see page 12

Land use category	Parking standards			Threshold for transport assessment
	Maximum no. of car parking spaces	Minimum no. of commercial vehicle parking spaces	Minimum no. of cycle parking spaces	
<b>B1 Business</b>				
Offices, research and development of products and processes, industrial processes	One per 30m <sup>2</sup> GFA	(refer to note 1)	One per 400m <sup>2</sup> GFA for staff	2500m <sup>2</sup>
<b>B2 General industrial</b>				
General industrial	One per 50m <sup>2</sup> GFA	(refer to note 1)	One per 500m <sup>2</sup>	3000m <sup>2</sup>
<b>B3 – B7 (Refer to note 3)</b> <b>B8 Storage and distribution</b>				
Storage and distribution	One per 110m <sup>2</sup> GFA (refer to note 10)	One per 1500m <sup>3</sup> GBV	One per 500m <sup>2</sup>	(refer to note 3)
Wholesale trade distribution	One per 35m <sup>2</sup> GFA (refer to note 10)	One per 500m <sup>2</sup> GFA		

For notes see page 12

Land use category	Parking standards			Threshold for transport assessment
	Maximum no. of car parking spaces	Minimum no. of commercial vehicle parking spaces	Minimum no. of cycle parking spaces	
<b>C1 Hotels and hostels</b>				
Residential hostels	One per two occupants plus one space per member of staff	Nil	(refer to note 8)	Over 500 trips per day
Hotels	One per bedroom	Nil	(refer to note 8)	Over 50 bedrooms
<b>C2 Residential institutions</b>				
Nursing homes with attendant care	One per six residents (for visitors) plus one space per member of staff	One space (refer to note 5)	(refer to note 8)	Over 500 trips per day
Hospitals	Two per three beds plus four for each consulting room			
Residential schools, colleges or training centres	Visitor/student parking (refer to note 11) plus one space per member of staff	(refer to note 1)		

For notes see page 12

Areas of <b>high</b> transport accessibility (refer to note 12) - any no. of bedrooms	Average of one and a half per dwelling across site	Nil	One per five dwellings (refer to note 7)	Over 50 households
Areas of <b>medium</b> or <b>low</b> transport accessibility (refer to note 13) - one bedroom	One and one third per unit (refer to note 2)			
Areas of <b>medium</b> or <b>low</b> transport accessibility (refer to note 13) - two or three bedrooms	Two per unit (refer to note 2)			
Areas of <b>medium</b> or <b>low</b> transport accessibility (refer to note 13) - four or more bedrooms)	Three per unit (refer to note 2)			
Sheltered housing and warden-controlled homes for the elderly	One per unit (refer to note 2) plus one per staff member		(refer to note 8)	

For notes see page 12

Land use category	Parking standards			Threshold for transport assessment
	Maximum no. of car parking spaces	Minimum no. of commercial vehicle parking spaces	Minimum no. of cycle parking spaces	
<b>D1 Non-residential institutions</b>				
Places of worship	One per five seats	Nil	(refer to note 8)	Over 500 trips per day
Schools (non-residential) - primary and secondary	One per member of staff plus drop off area (refer to note 9)	(refer to note 1)		
Schools (non-residential) - sixth form college	One per member of staff plus 10% casual parking plus one per seven students plus drop off area (refer to note 9)			
Further and higher education	One per 15 full time students plus one per two staff members			2500m <sup>2</sup>

For notes see page 12

Land use category	Parking standards			Threshold for transport assessment		
	Maximum no. of car parking spaces	Minimum no. of commercial vehicle parking spaces	Minimum no. of cycle parking spaces			
<b>D1 Non-residential institutions - continued</b>						
Libraries	One per 60m <sup>2</sup> GFA	Nil	(refer to note 8)	Over 500 trips per day		
Clinics	Four per consulting/treatment room plus one per member of staff					
Crèches/playschools or nurseries – includes day nursery and day centre	One per two staff members plus one per four children for parents					
Art galleries, museums	(refer to note 3)					
<b>D2 Assembly and leisure</b>						
Cinemas, ballrooms, bingo, church halls, community centres	One per five seats	Nil		1000m <sup>2</sup>		
Sports facilities	(refer to note 3)					
Night clubs, social halls	One per 20m <sup>2</sup>	Nil				

For notes see page 12

Land use category	Parking standards			Threshold for transport assessment
	Maximum no. of car parking spaces	Minimum no. of commercial vehicle parking spaces	Minimum no. of cycle parking spaces	
<b>Unclassified</b>				
Vehicle sales	One per 50m <sup>2</sup> of site area	(refer to note 1)	(refer to note 8)	(refer to note 3)
Petrol filling stations	One per 20m <sup>2</sup> of site area			
Car servicing and repairs	Four per service bay	Nil		
Open commercial uses	One per member of staff	(refer to note 3)		
Boating facilities, marina	One per berth			
Touring caravan sites	1.1 per unit plus one per member of staff	Nil		
Amusement arcades	One per member of staff			
Car hire	One per four cars in service plus one per member of staff			
Theatre	One per five seats			

For notes see page 12

## Parking space dimensions

The following table shows Medway Council's minimum and optimum dimensions for parking spaces and aisle widths.

	Minimum size	Optimum size
Car parking space	2.4m x 4.8m	2.4m x 5.5m
Car parking space for motorists with a disability	3.2m x 4.8m	3.6m x 5.5m
Car parking spaces laid end to end	2.4m x 6m	–
Van parking space	3.5m x 7.5m	–
Articulated lorry space	3.5m x 16m	–
Rigid lorry space	3.5m x 12m	–
Width of aisle giving direct access to 90° parking	6m	–
Single garage size (for the purpose of parking assessment)	13.2m <sup>2</sup> (See note 2)	
Double garage size (for the purpose of parking assessment)	26.4m <sup>2</sup> (See note 2)	

## Additional information

Additional information to justify the standards can be found in the following documents:

- Central government's white paper on the future of transport - *A New Deal for Transport*.
- PPG3, PPG13 and RPG9.
- *Reducing Mobility Handicaps* (IHT, London, 1991).
- *Strategy to encourage walking and cycling and to assist people with restricted mobility* - Medway Council.

### Notes

1. Space for deliveries off the public highway required.
2. A single garage with a GFA of less than 13.2m<sup>2</sup> is not included in the parking assessment. A double garage with a GFA of less than 26.4m<sup>2</sup> but greater than 13.2m<sup>2</sup> is treated as a single garage. Multiple longitudinal parking per plot will be assessed as a maximum provision of two spaces irrespective of combined length of driveway and garage. Communal spaces should not be located more than 20m from the dwellings they serve.
3. Assessment on an individual basis.
4. Drive-in or drive through facilities must provide sufficient on-site waiting space for vehicles to stand clear of the highway.
5. Separate provision must be made for ambulances and delivery vehicles.
6. Cycle parking for GFA below threshold to be determined on individual merits.
7. Applicable only to high density developments sharing common facilities.
8. To be determined on individual merits.
9. Space should be provided for the setting down and picking up of children away from the highway.
10. Plus car space provision for site offices up to maximum B1 (office) standard.
11. One space per two students of driving age, one space per ten resident pupils below driving age for visitors.
12. Urban areas where good public transport links exist together with attractive amenities within the vicinity.
13. Suburban and rural areas where public transport opportunities are limited and schools, shops and places of recreation are not provided locally.

### Glossary

**GFA** Gross Floor Area (internal)

**GBV** Gross Building Volume

**PPG3** Planning Policy Guidance 3 - Housing

**PPG13** Planning Policy Guidance 13 – Transport

**RPG9** Regional Planning Guidance 9

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**September 2004**

## Medway Council Residential Parking Standards

from 1 March 2010

C3 Residential dwellings *		
Dwelling size	Minimum number of car parking spaces per dwelling	Minimum number of cycle parking spaces per dwelling
1 bedroom	1.0 <sup>(1)(2)</sup>	1.0 <sup>(4)</sup>
2 bedrooms	1.5 <sup>(1)(2)</sup>	1.0 <sup>(4)</sup>
3 bedrooms & above	2.0 <sup>(1)(2)</sup>	1.0 <sup>(4)</sup>
Visitor parking	0.25 <sup>(3)</sup>	0

### Notes

- 1 Reductions of the standard will be considered if the development is within an urban area that has good links to sustainable transport and where day-to-day facilities are within easy walking distance.
- 2 Excludes garage if less than 7m x 3m internal dimension.
- 3 Applies to a minimum threshold of 4 residential units. Requirement for provision is rounded down, i.e. 5 to 7 units require 1 visitor space, 8 to 11 units require 2 spaces, etc. Visitor or unallocated vehicle parking can, subject to appropriate design, be located on or near the road frontage.
- 4 Not required if garage or secure area is provided within curtilage of dwelling

\* Parking standards for all other land use categories are unchanged. Please refer to Medway Council Parking Standards (Adopted May 2001), Second edition September 2004.

# Appendix C

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## Safeguarded Waste Sites

Category	Site Name	Operator	Postcode	Easting	Northing	Planning Permission?
Landfill	Alpha Lake	Brett Aggregates Ltd	ME3 7SX	571228	176087	Y
	Manor Farm Barn Landfill and Recovery Operation	Downland Trading (Kent) Ltd	ME2 4UT	574568	169993	Y
MRS	Whitewall Road	European Metal Recycling Ltd	ME2 4DZ	575008	169436	Y
On/In Land	Commissioners Road Recovery Operation	Medway Preservation & Development Ltd	ME2 4EQ	574320	169715	Y
Transfer	Capstone	Medway Norse Ltd	ME7 3JL	577560	164821	Y
	Cuxton		ME2 1LF	571690	167239	Y
	Hoath Way		ME8 0PU	579608	165493	Y
	Rochester Clinical Waste Treatment Facility	Tradebe Healthcare National Ltd	ME2 4LY	575000	169590	Planning Status uncertain but permit granted pre 2012
	Chatham Docks, Gillingham Gate	Mobile Compactor Services Ltd	ME4 4SW	577571	170067	Y
	Isle Of Grain Stone Terminal	Aggregate Industries UK Ltd	ME3 0AG	587574	174292	Y
	Medway WTS	Veolia ES (UK) Ltd	ME2 4DZ	574709	169545	Y
	Unit 18 Morgans Timber Yard	Andrew David Stevens	ME2 2BA	573330	168446	Yes, but planning for redevelopment to commercial space
	212 Kingsnorth Industrial Estate, Hoo	Albus Environmental Ltd	ME3 9NZ	580810	197290	Y
	Kingsnorth Works, Kingsnorth Industrial Estate	Composting Facilities Services Ltd	ME3 9NZ	580815	172942	Y
Treatment	Pelican Reach (Plot L)	Viridor Polymer Recycling Ltd	ME2 4NF	575410	169210	Y
	Berth 6, Basin 3 Chatham Dockyard,	P & D Material Recovery Ltd	ME4 4SR	577300	170200	Y
	Berth 6, Chatham Dockyard	Street Fuel Ltd	ME4 4SR	577300	170200	Y
	Units 106 & 139, Kingsnorth Industrial Estate	Slicker Recycling Ltd	ME3 9ND	580840	173450	Y
	Medway Recycling Centre, Malmaynes Hall Farm	OCL Regeneration Ltd	ME3 9SG	580923	175410	Y
	Darnet Yard	Parkes Utilities Surfacing Ltd	ME39NZ	580785	172772	Planning Status uncertain - permit granted post 2012
	Units 127 & 190 Kingsnorth Industrial Estate	Syntech Biofuel Ltd	ME3 9ND	580860	173140	
	Building 63, Chatham Docks	Chatham Freight Station Ltd	ME4 4SR	577500	169900	
	Unit 5 Temple Boat Yard	Saward Tipping Services Ltd	ME2 2AG	573512	168707	
T9 Exemptions	The Woodlands Hempstead Road	Robert Beck And Sons	ME7 3QL	578822	163324	Planning Status uncertain - no permit but may be lawful use due to time.
	Unit 6, Shamel Business Centre Commissioners Rd	Medway Metals Ltd	ME2 4HQ	574460	169486	
Scrap Metal Dealers	1 Vicarage Lane, Hoo St Werburgh	Hoo Marina Metals	ME3 9AZ	578525	171382	
	28 Glencoe Road, Chatham	WB Phillips Metals Ltd	ME4 5QB	576024	166952	
<b>Planning but Site not yet operational</b>						
Landfill	Chalk Lake Landfill	Brett Aggregates Ltd	ME3 7SX	572030	175466	Y
ERF	Medway One	Low Carbon W2E2 Ltd	ME3 9NQ	580617	172195	Y
MRF	George Summers Close	Veolia	ME2 4DY	575424	169656	



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