Name:

Reference 101

Organisation

Young Persons Disability Group

On Behalf Of

Type of Consultee

Government/Public Body

Local Plan discussion – young persons disability group 7th January 2016

Eight members of the young persons disability group attended a discussion group to look at the Local Plan.

The group were asked what they thought the Local Plan was and what it included. The group then discussed what was working/not working in areas that they Local Plan covered before deciding on what the felt were the top three priorities.

What is the Local Plan?

- I don't know what the local pan is
- I don't have a clue what this is
- Is it to do with making things better that are not good at the moment?
- Is it like a local newspaper?
- Is it a website like the Local Offer that tells you everything about the local area?
- Is it what the short terms goals are for the local area?
- Is it the things that you are working towards such as building new schools
- I dint really understand is it things for the future

What do you think is covered in the Local Plan?

- I don't know
- Is it people you can talk to ie the different services that are available in the area
- Housing
- Children Services
- Local Services
- All the different services that are provided by Medway Council

Areas in the Local Plan

Housing

What is working	What is not working
Housing services do get back to you	The housing bidding site is really hard
wish your answers	to use and keeps crashing
	Young people can not afford to move
	out into a place of their own
	You can not qualify for housing
	benefit until you are 21, but you are
	keep being told from 16/17 to become
	independent. How can you be
	independent if you don't have help?

Solutions

- Build more houses such as high rose flats
- Build on old farm land (you would though need to consider the buying of land)
- Look at empty houses could these be used?
- What about empty shops/pubs these could be converted into houses
- What about the old Tesco building in Chatham houses could be built there
- There does need to be a mixture of housing as people have different wants/needs
- There needs to be more help for young people to afford to move out maybe the council could give additional benefits to young people
- Those people that are lonely and have a spare room could offer it out and then the person living there could have discounted rent
- What about house shares so spare rooms are filled?

Economy

• What do you mean by this?- I don't not understand what this means

What is working	What is not working
There are solutions for young people who have a disability to go out and do things. For example at the cinema you can get a carer in for free	It is too expensive to go out and do anything for example it cost almost £23 for me and my sister to go to the cinema
You can get disabled bus pass	It is hard to get a job when you have special needs/disability
	There is lots of debt around (nationally and locally)
	There are not many jobs around

Solutions

• More jobs need to be created but I am not sure how this can be done

Town Centres

What is working	What is not working
In Rochester there are lots of events such as Dickens Festival	rubbish. People don't really pay
	attention to fines
Rochester has a castle which is nice	There are lots of drug addicts around. I found a heroin needle in the toilets in Chatham once
Rainham has a nice high street, which is small and has the essential shops	

Solutions

- Clean up the area and in addition to fines make people clean up the rubbish. For example community clean up
- Offer more help to those that are drug addicts. For example a rehab centre. This could be ran in an empty shop

Environment

What is working	What is not working
The plastic bag charge is good as it	People dropping litter
stops waste	
Opening up the bus station has made	People going to toilet in the street
Chatham nicer	
	A rodent problem as people leave
	their rubbish out the night before
	collection day

Solutions

- Enforce harsher punishments for those that litter
- Stop charging for the toilets people won't go to toilet in the street if they are free
- Rubbish in streets on bin day is blown around. The recycling is collected at 7am and then the bins are collected at 11am. This means this gap allows for the rubbish to be blown everywhere and to smell. Maybe the collections could be closer together

Rural issues

What is working	What is not working
Living out in the rural areas means	Traveling out to these areas can a
less people, it is quiter and not as	long time. For example getting to
messy	Grain there is only the tunnel.
Its like living in the countryside	

Solutions

• What about another bridge or tunnel further in Medway which means you don't have to drive the whole way out to Grain?

Social and community

What is working	What is not working
There is a high amount of security at	Not many people know what
clubs and pubs which makes you feel	community services are out there
safe	
	Youth clubs and community services
	are not well advertised
	There is a lack of communication of
	what is going on
	Sexual health services really need
	improving – this is as a result of the
	sexual health mystery shopping
	Public toilets need to made more
	sanitary

Open spaces

What is working	What is not working
Some of the parks are easy to access (Gillingham Park,	Some parks are not closed in so children could run into the road
Chatham Waterfront and Lower	children could full into the road
Lions)	
There are nature parks around	People vandalising play equipment
	means that it gets taken away
The council do check on the play	
equipment at the parks	

Sports

What is working	What is not working	
Events on in sports halls such as a	It is too expensive to use sport	
free taster session in basket ball	centres such as Medway Park	
You can get student discounts on		
using sport facilities		
The leisure centre meets my needs		

Transport

What is working	What is not working
Rochester train station has a new	Bus timetables have changed
train station	
The bus drivers do tend to help	Transport is expensive
people who are disabled	
The bus drivers do ask people to	Disabled access to transport is really
move out of the sections which are for	difficult for example the access for
disabled people	Strood train station is really difficult
	for someone who is in a wheelchair
	Also to get onto a train you have to
	call ahead to arrange ramps to get
	onto the trains

Top three priorities

It was decided by the group that the top three priorities are:

- Transport
- Housing
- Environment

Name: Alan Moss

Reference 102

Organisation

City of Rochester Society

On Behalf Of

Type of Consultee

Charity/Community/Faith Group

The (ity of Rochester Society



Registered Charity No. 252603



Planning Policy, Regeneration, Community & Culture, Medway Council, Gun Wharf, Dock Road, Chatham, Kent, ME4 4TR

Sent by e-mail

23rd February 2016

Dear Sir,

Medway Council Local Plan : Issue and Options 2012 - 2035

This letter represents the response of the City of Rochester Society to the Local Plan Issues and Options consultation document. We have not sought to suggest answers to all the specific questions posed in the document, nor even to try to address all the complex issues raised; rather we have sought to present some thoughts on the way forward.

Clearly the projected growth in its population and the concomitant demand upon housing, employment and services are the key issues which any strategy for Medway's future must address – a vision which aspires to meet these challenges needs to be exactly that – a VISION, as opposed to a more or less coherent collection of separate, pragmatic objectives.

The Society would, then, like to see a Local Plan which is informed by a forward looking, coherent, confident and imaginative vision of what Medway will be like in 2035.

An example might lie in the latent potential of the river and its environs, widely accepted to be a poorly utilised asset. The River Medway touches the different towns which, with their interstices, comprise Urban Medway – it connects what are perceived to be (and have been characterised in local policy as) separate areas, each of which has own identity.

The options report recognises the difficulties faced in realising a Medway with Chatham as its 'civic and retail heart'. It seems unlikely that Chatham will be able to develop into the fully fledged urban centre which local policy has, heretofore, been oriented towards. An alternative vision is, perhaps, needed of a Medway without hierarchy, in which the different local centres collectively make up a balanced whole, with future policy identifying their respective strengths, qualities and characters and seeking to reinforce the ways in which they develop in mutually beneficial and complementary ways. It would, we suggest, be better to accept that all the towns contribute equally and in their unique ways to the whole, rather than being secondary to an urban centre. And through this collection of diverse neighbourhoods runs an accessible, well used and connecting river.

A clear and simple vision such as this, in tune with the intrinsic way in which the towns have developed would, we suggest, provide a frame of reference in which to answer the questions which the options report

raises for some specific areas of policy; the location, distribution and density of future housing, as well as retail and business accommodation; how to realise the potential of our heritage assets and what new tourist attractions might complement and supplement them; where to locate new any open space and how to promote the use of existing assets; promotion of sustainable modes of development and movement infrastructure.

Among the strategic issues to be addressed in the Local Plan, the Society has identified as being of particular importance the **balance of infrastructure to population growth** and the need to protect the towns' unique but diverse **heritage and character**.

So far as **infrastructure** is concerned it is vitally important for the planners to keep this issue fully in their sights. In this context 'infrastructure' includes the full range of services which modern civilisation deems to be essential, including: health (physical and mental), education (especially primary and secondary), social services, highways and transportation, water, sewerage, waste collection and disposal, power supplies and telecommunications. Already, most of these are fully stretched and a 20% increase in the population during the period of the new Local Plan will surely take them beyond breaking point unless some radical solutions are found. There must be a very careful balance between, on the one hand population growth with its new housing, and on the other hand the development of local infrastructure and services. The one must not be allowed to go forward without the other.

The protection of the towns' **heritage and character** must also feature strongly in the new Local Plan. The towns have developed in the way they have thanks to:

- their situation on the banks of the river;
- centuries of involvement with the nation's defences; and,
- (at least in the last 150 years) industrial innovation and development.

Whilst in no way seeking to fossilise the towns and turn them into a theme park, we must continue to celebrate that history and heritage. It is by our history, and of course through the writings of Charles Dickens, that the Medway Towns and the surrounding area are known throughout the world; it is what brings most visitors here and what contributes a substantial amount to the local economy. There is scope for improving the presentation of our heritage and for diversifying our 'offer'. The Local Plan must have that as one of its aims; it must be a means of protecting the uniqueness of the Medway Towns as a whole, and the uniqueness of the individual towns and communities within. It must not seek to re-mould the towns into a single 'super-city' – a carbon copy of many other large towns up and down the UK.

In its **housing and economy** chapters, the Issues and Options document invites thoughts on the location of new homes and businesses. The number of potential sites beyond those already under consideration is very limited if the cost to Medway's urban and rural environment is not to be a heavy one. However, the Society's view is that there is likely to be increasing scope for such development within parts of the existing town centres. The traditional retail function of our town centres is declining and the time may have come, through the medium of the Local Plan, to encourage the reduction of the retail area and the introduction of other forms of development within what has previously been considered to be shopping areas. This would of course need to be carefully controlled, especially in designated conservation areas. However, such areas could provide space for starter homes and new businesses, with scope for innovation in design.

The river itself must not be overlooked when it comes to business development. This is potentially one of our greatest assets and the opportunity of the Local Plan should be taken to encourage the development of businesses which can make use of the river. It would, in our view, be a grave mistake to allow more riverside sites to be developed for entirely land-based uses, such as housing or offices. Encouragement should be given to businesses which can make use of the river, such as those already in place using the wharves at Medway City Estate, or the ship repair businesses. Better road links to the riverside would also be helpful. There is a great opportunity here for the development of water-borne businesses; let's encourage it!

Tourism is of course very important to the economy of modern Medway, and the Issues and Options document rightly focuses on the need to develop this element further, especially the need to attract more staying visitors. More good quality hotel accommodation is vital. Those new hotels which have been built in recent years have tended to be on the periphery – Bridgewood, Rochester Airport, Medway Valley Park, etc. The Local Plan should encourage the provision of more, good quality, accommodation in the areas which people want to visit. In Rochester, for example, there is scope for such development on the riverside, close to the new railway station, and/or on the former Civic Centre site in Strood, with its views across to the castle and cathedral.

There is also scope for further diversification of Medway's tourism offer and this could include greater emphasis on our industrial heritage. The pioneering work of the Short Brothers and Aveling & Porter are among those which are under-represented at present.

The Issues and Options document rightly points to the river and the countryside as having important roles to play in the development of Medway's tourism offer. Unfortunately, so far as the river is concerned, the opportunity is limited by poor access. The Local Plan should encourage provision of more landing places. For boat-owners or day-trippers to be able to come ashore in the heart of the medieval city, as well as at the historic Dockyard, would be a great experience.

The Society's views on the **retail and commercial** development of the Medway town centres are touched on elsewhere in this response. Suffice to say that we do not believe that in the light of present day shopping trends it is in Medway's best interests to try to re-establish Chatham as the retail hub of the towns. We believe that the time has come to reduce the area dedicated to retail uses within the town centre and make it available for other uses such as business and residential. It is a fact that most comparative shopping activity is now carried out on-line or in the out-of-town centres, such as Bluewater. We believe it would be better for the town centres to develop as local shopping facilities with a mix of both convenience and specialist shops. We certainly believe this to be so in the case of Rochester where the small units are better suited to specialist outlets. Strood, on the other hand, has a somewhat different environment with, currently, a wider mix of types of retail units. Here there is greater opportunity for some larger retailers – as evidenced by the number of supermarkets currently trading there. Strood Retail Park is a useful asset to the area and, although visually unattractive, it has the advantage that its units can be used – and adapted – more flexibly. As in Chatham and Gillingham, there are in Strood a number of unused, or under-used, sites within or near the town centre which could be considered for alternative uses.

The **built environment** is enormously important to Medway from both the historic and the economic points of view and new development in sensitive areas must be carefully designed to blend with the old. Nowhere is this more important than in Rochester's historic city centre. We entirely endorse that part of the Issues and Options document which addresses the need to deliver quality in design, to which might be added 'maintenance', which is equally important, especially in conservation and other sensitive areas. It is to be hoped, moreover, that Medway Council will have at its disposal the resources necessary to promote and police this worthy aspiration.

Medway is fortunate in having a wealth of **open spaces**. It is pleasing to note that they are, for the most part, well maintained. So far as those within the Society's area of interest are concerned, we would not wish to see any changes, or rationalisation. Any new development should ideally incorporate some open space or, at the very least, some landscaping to soften the often harsh appearance of new buildings.

Transport will always be a difficult issue to address, particularly in historic centres such as Rochester. There is conflict between the need to preserve the historic fabric of the city centre, the needs of the travelling public and those of the shopper and trader. Car parking is a particular problem in Rochester. We feel that the Local Plan should encourage some short-term free parking to give shoppers with cars an incentive to come into town, even for short spells, and patronise the local shops. Without it they will be more inclined to abandon the town for out-of-town centres where all parking is free.

As stated elsewhere in this response, we feel that the river is a grossly under-used resource and that the Local Plan should encourage greater use of the river for both commercial and leisure activity. This pre-

supposes that the necessary landward infrastructure will be there in the form of piers, wharves and access roads. Again we would hope that such provision will be provided for in the Plan.

The development of Rochester Airport is a contentious issue, especially with those who are affected by aircraft noise. However, new aviation technology and the careful management of flight paths, runways, etc, should mitigate the nuisance and, subject thereto, the Society welcomes the continued existence and development of the airport.

This response by no means answers – or attempts to answer – all the questions posed in the Options and Issues Consultation Document, but it is intended to make a small, and hopefully constructive, contribution to the debate.

Yours faithfully,

Alan Moss

Alan Moss Chairman

Name: Adam Reynolds

Reference 103

Organisation

Maidstone Borough Council

On Behalf Of

Type of Consultee

Government/Public Body

Alison Broom Chief Executive

Maidstone House King Street Maidstone ME15 6JQ 1 01622 602000 Minicom 01622 602224 w www.maidstone.gov.uk

Ms C Smith Planning Policy Medway Council Gun Wharf Dock Road Chatham Kent ME4 4TR

(BY EMAIL: planning.policy@medway.gov.uk)

29 February 2016

Dear Ms Smith

MEDWAY ISSUES AND OPTIONS LOCAL PLAN 2016

Thank you for consulting Maidstone Borough Council on the Medway Issues and Options Local Plan (2012-2035). The Council has a number of comments which are set out in this letter.

The Duty to Co-operate

The Issues and Options Local Plan sets out that the Medway Council is currently engaging with partner organisations and Maidstone Borough Council welcomes the opportunity to discuss matters under 'The Duty' in respect of both Maidstone Borough Council's emerging Local Plan and during the preparation of Medway Council's new Local Plan.

Housing

4) Do you agree with the approach and conclusions of the assessment of housing needs calculated for Medway over the plan period?

We note that the Issues and Options Local Plan sets out the objectively assessed housing need of 29,463 (paragraph 7.8) to meet the development needs of the Medway area. Maidstone Borough Council is supportive of the approach set out in paragraph 7.10 that Medway Council is committed to planning positively to meet its own full objectively assessed housing need within Medway's administrative boundary.

It should be noted that we are currently out to consultation on our Regulation 19 Local Plan and that we will be able to meet our objectively assessed housing need of 18,560 dwellings in full and we are not seeking assistance to do so from any neighbouring planning authority.

5) What do you consider to be the appropriate housing market area for Medway?



Medway Council will be aware of our previous concerns in regards to the Medway Draft Kent Strategic Housing and Economic Needs Assessment (SHENA) as set out by email on 27 October 2015.

Paragraph 2.105 and 2.106 of the SHENA recognises that whilst there are strong relationships between Medway and Maidstone, they are however not consistent across the full local authority area. We welcome the recognition in the SHENA that the strongest relationship is with the north of the borough.

MBC has undertaken its own SHMA (in 2014/2015) in partnership with Ashford and Tonbridge & Malling Borough Councils. This work identifies a Maidstone HMA which includes the majority of the borough with the exception of the easternmost wards of the borough which fall within the ambit of the Ashford HMA. Additionally the HMA extends to the west to include the Medway Gap area of Tonbridge & Malling. In contrast to the Final Medway SHENA, it does not conclude that the Medway area forms part of the same HMA. The analysis which leads to this conclusion is set out in paragraphs 2.39-2.43 of the Maidstone SHMA:

(http://www.maidstone.gov.uk/__data/assets/pdf_file/0007/44656/Strategic-Housing-Market-Assessment-2014.pdf) and can be summarised as follows:

- There is a functional relationship between the northern part of Maidstone and the Medway towns (and Swale) indicated, in particular, by commuting and migration movements;
- Analysis of the housing market characteristics (nature of the stock and cost) however, identifies a notable distinction between the Medway area and Maidstone; and
- Overall, there is not the widespread market integration to include Medway and Maidstone in the same market area.

Table 14 in the Medway SHENA illustrates a considerable difference in median house prices between the two local authority areas; the 2013 median for Medway is £160,000 compared with £210,000 for Maidstone. Furthermore, taking the proposed HMA as a whole, the median average house price ranges from £160,000 (Medway) to £249,000 (Tonbridge & Malling).

The Medway SHENA also identifies indicators which point to Medway having a high degree of self-containment in its own right:

- Tables 7, 8 and 9 identify the highest level of containment in terms of migration moves when the Medway area is considered alone.
- 51% of Medway residents work in Medway (table 11) whereas only 7% of Medway residents work in Maidstone borough (the next highest proportion).
- 70% of people who work in Medway live in Medway, the next highest figure is Swale at only 6%. Only 5% of people who work in Medway live in Maidstone.

Whilst housing market areas are not necessarily discrete, the Medway HMA is considerably at odds with that defined in Maidstone's SHMA and is also understood to be at odds with the HMAs defined in both Swale and Tonbridge & Malling's SHMAs. In our opinion, the analysis appears not to have given equivalent weight (as cited in the guidance) to the signals from market factors. The wide area encompassed in the HMA, which extends to cover Medway, Gravesham, Swale, Maidstone; and Tonbridge & Malling, does not appear to reflect the strongest interrelationships. This council does not, therefore, agree with the Medway housing market area which has been defined.

Inclusion of housing projection figures

The Borough Council also previously expressed concerns about the inclusion of household projection figures in the draft SHENA. Table 46 (page 97) of the final SHENA document includes 'updated' household projection figure

Page 2



for Maidstone of 844 households per annum for the period 2012-2037. This differs, albeit marginally, from the published DCLG household projections figures for this period of 836 households per annum and the reasons for this are not transparent.

In addition two further projections are included for household and dwelling growth which have been calculated using the consultants own methodology. These figures have been calculated using a methodology which has not (and cannot) be endorsed by the borough council. The figures do not relate to Maidstone's own assessment of the borough's OAN which takes account of, for example, market factors or to the housing need across the Maidstone HMA.

The SHENA states that these figures are included to provide an understanding of wider housing needs in the sub region but, in our view, this could be achieved equally as well by referring to adjoining local authorities' own OAN. In Maidstone's case the figures are 928dpa (18,560 dwellings 2011-31). We must underline that this is the confirmed position on the scale of housing need in the borough and is the clear evidential basis for the borough's Local Plan which has now reached an advanced stage of preparation. We strongly recommend that our identified OAN should be the figure used in any future contextual or comparative analysis as the Medway Local Plan progresses.

14) <u>What is the level and type for gypsy, traveller and travelling showpeople's accommodation in Medway</u> and what criteria should be used to identify appropriate sites?

It is noted that the scale of Medway's need for Gypsy & Travellers pitches is yet to be confirmed in the light of the revised definition and it is also understood that site assessment work is in train which could identify potential sites for allocation. This Council's position is that identified needs will be met through permanent consents, site allocations, turnover the two public sites in the borough and an allowance for consents coming forward on unidentified sites.

Economy

15) Where should such sites be located, considering opportunities in existing employment area and potential new sites such as Lodge Hill or other developments?

It is noted that the employment land requirements are based on an employment forecast which is above what might be expected from past trends and anticipates a future strengthening of the manufacturing and industrial sectors in Medway. The supporting evidence in the SHENA identifies that the existing supply of sites may not be able to cater for these future requirements and that additional allocations are likely to be required. The SHENA suggests that this could include the allocation of new space in and at the edge of town centres, refining the uses on existing identified sites and possibly mixed use allocations in locations such as Lodge Hill. As these sites are yet to be identified, the Council simply notes the evidence at this stage and would welcome being consulted on more specific details at future stages in the plan making process.

Transport

71) What infrastructure is required to support Medway's growth over the plan period?



Maidstone Borough Council supports the ambitions contained within this chapter to increase sustainable modes of transport. To accommodate the level of growth proposed, the Local Plan will need to promote significant measures to further encourage modal shift to public transport and walking and cycling.

Maidstone and Medway has good public transport connections through both rail and bus services and we welcome further discussions in future on how to enhance public transport provision between the two areas.

Thank you again for consulting the borough council and we look forward to on-going, productive discussions with yourselves as our plans progress.

Yours sincerely,

Rob Jarman Head of Planning & Development





Name: Michael Smirh

Reference 104

Organisation

On Behalf Of

Type of Consultee Member of the public

<u>Comments on Medway Local Plan Issues & Options 2012 – 2035</u> <u>Consultation Document</u>

We have listed below our comments on the above document, they are not necessarily against specific sections of the document as in many cases more than one section is involved.

Overall Comment

From reading the plan this area seems to be lagging behind it's local neighbours in many important criteria. All of which will be made worse by increasing the population. Open space local standard of 3.25ha per 1000 population is nearly half that used by Tonbridge & Malling and a third used by Gravesham. More dwellings are very likely to reduce the available green space even further. Air Pollution is very high along the major routes, without improved traffic management increasing the population will make matters far worse. Whilst we accept the population is growing and more dwellings are required should the Council be querying with government the level of dwellings required in this area, when surrounding areas have more space etc.

The South East in general has less rainfall than other parts of the UK but a higher population density. With more people living in our area, infrastructure such as water supply needs to be addressed, a winter with low rainfall will cause water shortages. The plan should address how a consistent supply can be maintained in all but a national water shortage.

Medical facilities

With the increase in population proposed for the area is Medway Maritime Hospital going to be suitable. Currently it is stretched, increasing the local population will cause more problems. Building a new hospital on the Lodge Hill site which is well connected to the road network would be a possible solution. The Lodge Hill new town development is as mentioned in the document still under review, a hospital and some houses may be able to fit in with the local wildlife etc. An alternative would be to expand the current hospital site onto The Lines.

The current hospital site could be redeveloped for housing with a small walk in minor injuries unit. St Barts hospital has just recently been declared not suitable as a modern hospital, this site could also be redeveloped for housing.

With an ageing population more facilities will be required for Residential and Nursing home beds, this will also reduce the pressure on hospitals from "bed blockers".

Encouraging more GP's to the area is difficult as I am sure like everyone they like nice surroundings and a good working environment. Until the area can be improved the task will be difficult.

<u>Comments on Medway Local Plan Issues & Options 2012 – 2035</u> <u>Consultation Document</u>

Air Quality

Air quality particularly on New Road Chatham is bad due to the standing traffic waiting for traffic lights. Much of this traffic is trying to get to or from Gillingham, since the bus station has been placed by the Chatham Riverside this has meant all traffic must use New Road, Union Street & Brook to make this journey. The bus station is a good investment in the area but it's location has aggravated the local traffic / air quality issue. The local plan needs to include a brave option to overcome this issue, such as tunnel under Chatham Riverside, or a flyover.

<u>Retail</u>

To improve the quality of retail in the town centres there needs to be an improvement in the disposable income of local residents. This comes back to the lack of skilled jobs in the area and those that commute to London etc are only in the town centres during weekends.

Improved traffic flow within the towns would make it possible for workers to pop into town during lunch to buy goods or pick up internet orders etc. Free 30 minute parking would also make this more conducive. If traffic is always bad then it is not feasible as being late back to work generally costs money.

Improved traffic flow may also attract out of town shoppers, if you know the traffic is always bad, you do not go, you choose somewhere else.

<u>Transport</u>

Public transport in the form of non polluting buses need to be frequent and reasonably priced. If busses run every hour there is less incentive to use it, if it's every 10 minutes missing one is not a problem and they become an alternative to the car, providing they continue to a reasonable time into the evening. Currently the busses are run by a company which needs to make a profit. To achieve a good bus service that will pay for it's self will take time and some initial loss leading investment. With shops open on Sunday and bank holiday's the bus service needs to operate at these times as well and normal week days.

Increasing the number of cycle routes would make using a cycle more conducive. However many of the cycle lanes in Medway are a narrow strip on the actual road which offers no protection from passing vehicles.

Car parking is a requirement for all developments. In town developments for housing need parking, personal transportation will be a requirement for the foreseeable future. The fuel used may change but people will need personal transport. Parking is also required in town for retail and leisure use.

<u>Comments on Medway Local Plan Issues & Options 2012 – 2035</u> <u>Consultation Document</u>

Open Space

Medway's open spaces need to be preserved for the residents to use. The use of certain types of trees along roads can improve the air quality and general feel of the area.

Social & Community

Large new developments should be encouraged to include the appropriate social facilities, such as GP surgery, primary school, community centre, green space and local shop. Where several small independent developments occur in an area the council needs to ensure the facilities are provided by making a suitable charge on each development.

Housing

A mixture of housing development is required to enable all members of the population to live in the towns, or rural areas. Town centre developments in the 5 main towns also needs to be varied to encourage a mixture of social classes. Much of the recent development in Chatham centre has been quality social housing, more owner occupier development is required to lift the local area. The increase in more affluent residents will also encourage quality retail outlets to the town centre.

Economy

Attracting skilled jobs to the area needs to be seen as part of the plan, skilled workers need suitable dwellings and the company needs suitable business premises with good communication links. With the local universities and technical college Medway should be able to provide skilled local people to help staff new businesses.

With the majority of mass production carried out abroad the type of businesses needed may be smaller niche operations using the expertise available at the universities and technical college.

Bold moves may be needed to revitalise current industrial sites such as "Big Blue" on Chatham Maritime which are the wrong size and shape for modern industrial use. Demolition and either rebuilt in suitable size individual units or change of use to residential should be encouraged. Empty buildings that are not suitable for modern uses are a blight on the area and do not encourage new businesses to move in.

With good rail links to London it is unlikely that residents will stop commuting. London wages are generally better than locally. Residents that commute often have a higher disposable income, the plan should address ways to allow those residents to spend their money in Medway and improve the local economy.

Name: Cllr Roy Freshwater

Reference 105

Organisation

On Behalf Of

Type of Consultee Councillor/MP/Parish Council

From: Roy Freshwater Sent: 28 February 2016 13:50 To: policy, planning; smith, catherine Subject: Re: Local Plan 2012 to 2035

Good afternoon - can you please include the following in the Local Plan responses - Kind regards, Cllr Roy Freshwater

I am aware that my comments below do not respond to 19 important areas of consultation in the local plan including schools, health, services for the ageing population and strategic issues. I have limited my views to housing because if we cannot get housing needs adequately delivered for the people of Medway all other Council plans and services will fall into crisis management.

Response to Medway Council Local Plan- Housing Policy in Medway is **Controlled By Private Building** Companies for Profit Medway Housing is being built for Profit - Not For Communities - Although Medway Council would like Medway residents to believe Medway Council is in control of housing policy, including urgently needed affordable housing for buying and renting, the truth is Medway Council is not in any way in control. The whole housing policy of Medway Council is run by private building companies behind closed doors who do not care about the people or the lives of residents in Medway. The private building companies are driven purely by profit and keeping shareholders and banks happy. Behind executive office doors the building companies celebrate that Medway Council has no money to build houses as they are able to manipulate and maximise house profits by drip feeding properties onto the market for sale and ensuring that demand is never met and that ideally 20 people are chasing to buy or rent the same property. They make it perfectly clear that responsibility for helping people to find a homes to rent or buy is not their concern or responsibility . So who is going to build homes to rent or buy for Medway residents? Medway 30,000 new homes target set by the Government. Homes to be built on Medway green fields for

London Commuters Not Medway Residents The Local Plan target of 30,000 new homes is set by the **Government for Medway** Council will mean that large green fields in wonderful Medway will be concreted over as Medway Council has no land bank of its own and developers will choose greenfields sites to develop to maximise their profits. Those many brownfields sites in Medway that are community eyesores and communities are asking to be developed are more expensive to develop for housing and therefore not chosen for housing as they will substantially reduce the profits on each home built. London has run out of homes to rent or buy and Medway homes are being advertised with the New Rochester Station in the background on posters saying come and live in wonderful Medway - homes are cheap in Medway to rent or buy and only 30 minutes by fast trains to London. That is the reason why there are no homes to rent for Medway residents and house prices are increasing by over £15,000 per year. So who is going to build homes to rent or buy for Medway residents? Who is helping desperate families in Medway

The private building companies also make it clear that that they have no responsibility for families living in damp, overcrowded and unsatisfactory home conditions trying to pay ever increasing rents or saving for a new mortgage where house prices are increasing by £15,000 per year because private building companies are manipulating the number of new houses built to ensure shortages. They just consider it good business to ensure there is a stark imbalance between housing supply and demand which will continue to push houses to record highs and their profits. Additionally, they make it perfectly clear they are not responsible for providing any homes for essential workers and families in our society needing to rent homes and only earning a minimum

wage who will never get a mortgage. They are not concerned about communities, they are not concerned about the lack of decent properties to rent or hardship of families living in overcrowded house - the more people that are squash into our communities means greater profits on a simple demand far exceeds supply basis.

8 million people from europe and elsewhere have already been squashed into our communities. In my view it is inevitable residents will soon be living in UNICEF tents in Medway No one has answered the question on what benefits such mass immigration has added to our communities in Britain, Kent or Medway but we continue to see the consequences on our overstretched public services and ever increasing housing crisis in our communities. Why has the government not given money to Medway and other Councils to build 2 millions new homes from the £20 billions extra tax paid by the people who have made homes in Britain. The Office of National Statistics used by government and Medway Council for projecting housing need in the Local Plans are totally inaccurate and do not reflect the additional net 330,000 people currently coming from Europe and elsewhere to live in Britain per vear (3) million people squashed into our communities over the next 10 years). The government has no control over this and vet still continues to behave as if it did. Public services are being planned as if the population was not being boosted by migration, with continued huge and bursting pressures on schools, hospitals and other public services. Construction of new homes is not enough to cope with expansion of the existing population let alone with an extra 330,000 people per year. New countries wishing to join the EU have populations of over 72 million who will have the right to live in Britain, Kent and

Medway. How long will it be until Medway residents are having to live in warehouses or UNICEF tents in our wonderful Medway parks.

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Name: Cliff Thurlow

Reference 106

Organisation TBH Ltd

On Behalf Of

Type of Consultee

Developer/Consultant



Planning Policy	
Medway Council	
Gun Wharf	
Dock Road	
Chatham	
ME4 4TR	

29th February, 2016.

Dear Sir/Madam,

Medway Council local Plan Issues & Options 2012-2035.

Thank you for the opportunity to comment on the Council's new Local Plan Issues and Options report 2012-2035.

The Terance Butler Holdings (TBH) group of companies has its roots, and property investment and development interests in, a number of large sites in the Medway Towns.

Following the Council's e-mail "Consultation on Medway's new Local Plan" of 24th February, 2016, TBH wishes to make further and/or amended representations based on assessment of the just published SHENA information on future housing, employment, retail and leisure development by the deadline for such representations of 24th March, 2016. Consequently the representations set out below concentrate on the Issues and Options Report for the most part.

TBH asks that the following representation be considered by the Council:

i) the Issues and Options report states at paragraph 27.7 that "the new local plan must consider options for development should Lodge Hill not form part of Medway's growth strategy". TBH agrees this is the only realistic approach all the while significant uncertainty remains about whether the proposed new settlement will secure planning permission. A public inquiry has now been twice postponed and there can be no assurance that sufficient evidence will be available to enable one to commence later this year. Even if the public inquiry proceeds, there can be no certainty whether planning permission will subsequently be granted for the new settlement. The timing of delivery of that development must also be uncertain given that some as yet unspecified ecological mitigation works will be necessary prior to development commencing. In this latter respect, circumstances may dictate that Lodge Hill will only make a small contribution to meeting the Medway Towns development needs late in the new plan period up to 2035 which will, in turn, require a third variant of a growth strategy. As



matters stand, the Council's resolution to grant planning permission for the Lodge Hill new settlement appears premature because all that decision has achieved to date is to introduce uncertainty into the new local plan preparation process for both the Council and stakeholders. The Ministry of Defence as landowner has now announced an intention to dispose of the Lodge Hill site which introduces the potential for further delay in bringing the site forward for development even if the current planning application is found acceptable;

The Issues and Options report at paragraph 1.5 sets out the potential approaches that ii) could be taken to a development strategy for the new Local Plan. The matters addressed in that paragraph of the report and paragraph 27.7 referred to above are fundamental to determining the growth strategy for the new Local Plan. However, an important opportunity has been missed to link them together as the focus of the report. In consequence, the report focuses on too many detailed issues rather than concentrating on key issues raised by alternative development strategies for the new Local Plan;

The Council's approach to preparing its new Local Plan evidence base to date does not iii) reflect consideration for the need for alternative development strategies. There is no evidence of this approach in the Council's review of its Strategic Land Availability Assessment (SLAA) submissions or the SHENA, both of which appear to assume that the Lodge Hill new settlement will come forward for development. The Council needs to clarify for stakeholders how it intends to relate the evidence base prepared to date to identification and evaluation of alternative development strategies going forward;

Paragraph 1.5 of the Issues and Options Report invites stakeholders to consider a iv) number of potential approaches to a development strategy for the new Local Plan while the Development Strategy section of the report considers the development implications of some of these options. Whether or not Lodge Hill receives planning permission as a new settlement, in practice and given the scale of new development (particularly housing) that the evidence base to date identifies as being required, a combination of some, possibly all, these approaches will be needed to meet the Medway Towns development needs to 2035. Furthermore, several points arise with respect to the approaches:

NPPF para 22 states:

Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities. "

The Issues and Options report makes no reference to this very clear statement of national planning policy. Within the new Local Plan context, the priority is to allocate more land for residential development in the Medway Towns. There are allocated brownfield employment sites in the Medway Towns for which there is no current demand. The Issues and Options report should provide for identifying those employment land allocations as future residential land allocations;

- High density town centre and riverside development: this is considered a
 misleading title for an approach that must surely seek to focus on all previously
 developed land in urban and other built up areas that is suitable, available and
 viable for future residential development;
- Medway City Estate as a focus for mixed use development: this area is considered fundamentally unviable and undeliverable for residential development in the plan period given the pattern of existing land uses and ownerships and ground conditions and should be discounted as a realistic development option;
- the evidence base of the new Local Plan in association with the SLAA must include an urban capacity study to determine the scale of new residential development that is possible on available, deliverable and viable urban redevelopment sites, combined with an assessment of the feasibility and implications of maximising residential densities on town centre and other urban sites.
- The Medway Estuary Special Protection Area (SPA) is a potential constraint on achieving V) the scale of development and growth required in the Medway Towns to 2035. Paragraph 11.11 of the Issues and Options report deals with research that has "shown" that the wildlife within the SPA can be damaged by people visiting the area without being specific what that research comprises. This in turn appears as a constraint in the Council's assessment of many of the sites put forward for consideration as part of its SLAA exercise. There appears to be a major and unresolved question mark against the ability of the Medway Towns to provide for the growth of population that is forecast to occur there up to 2035 because of the potential for adverse impacts on the SPA of the scale of housing growth identified by the SHENA. The European Habitats Directive requires that an assessment be undertaken of the impact of development on SPA's. If this issue is not to constrain Medway Council, landowners and developers from achieving the scale of future housing development that is required, it is essential that the new Local Plan's Sustainability Appraisal carries out a Habitats Directive compliant assessment and identifies, if appropriate, mitigation for impacts on the SPA.

TBH requests that the above responses to the Issues and Options report be taken into account in drafting the Council's development strategies for the new Local Plan and looks forward to further opportunities to be involved in the emerging plan.

Yours faithfully,



Name: Cllr Stuart Tranter

Reference 107

Organisation

On Behalf Of

Type of Consultee Councillor/MP/Parish Council

maryott, kyle

From: Sent: To: Subject:

29 February 2016 16:56 policy, planning Local PLan comments

Follow Up Flag: Flag Status: Follow up Completed

Comments Below – do I get the prize for being last to submit? Regards Stuart Tranter

Local Plan Consultation - contribution

I would expect most contributors have already discussed infrastructure, and where or what to build. Instead I focus on what is not covered in the plan to any great depth.

The drivers of change

Throughout history change is not driven by politics or society, but technology, and the same is true today. Genetics, Chemical Engineering, Quantum processors, Artificial Intelligence, high speed lower cost high bandwidth communication, reduction in carbon emission are also the things which will directly or indirectly drive the shape of Medway. During the life of this plan we will see:

Town centre Retail and Leisure continuing to merge, serving local population for ad-hoc leisure, hobbies, last minute shopping and convenience. Out of town shopping will grow less slowly, relative to population. But ALL conventional retail will depend on linking via technology to market to the individual – eventually conventional market segmentation becomes almost redundant apart from broad strategic planning. This means you will look at a device at home or in your pocket which tells you what is happening locally of interest to you personally, and where you can find the best deals. Retailers will increasingly work together to attract people. Businesses will work on and off line; with physical sites becoming more like show rooms, demonstrations, and reasons to build relationships with customers.

It will be so easy to get whatever we want at the best price, the ONLY reason to go to the local town is because we want to enjoy the experience or it provides what we want more easily. This means Chatham town centre WILL be smaller, more focussed, but must be enjoyable as opposed to utilitarian. This changes the whole concept. Creating a 'City Centre' in any conventional sense will therefore become impossible except for places which have heritage or natural beauty. Otherwise it will never be able to compete. We would do better to concentrate on ensuring our key development areas are well served with high speed communications, and we might want to consider providing help and support to local businesses – perhaps providing portals and other innovative initiatives, as well as a pleasant environment.

Traditional working class jobs in decline: Medway has a fine tradition of a skilled workforce, not least due to the dockyard and military, but many excellent engineering firms during the 19th and 20th century. That is no longer the case, although much of the legacy is still available. Advanced technology and high minimum wages does not just mean Eastern Europeans wanting to be here (a temporary phenomenon as other countries develop), it means more will be built in developing countries. We urgently need to re-skill our people over the next 20 or so years, so that people can work in service industries, or in innovative niche markets, using technology to create whatever products meet business or consumer needs.

This underlines how right Medway Council has been to encourage high tech education and business start-ups. UTC and the airport project should just be a 'toe in the water'. We need far, far more – we need to have local opportunities for the thousands of university students in our towns. Where will this be?

People will continue to work in London: London is arguably the greatest city on earth, and it is less than 40 minutes away. It is strategically important globally and will continue to be so due to advances in technology mentioned earlier, and the fact British people are possibly the most inventive in the world.

We need to work with that opportunity; we offer great value living accommodation. It makes perfect sense that the best quality high density housing should be within easy reach of main line stations, and that each of those areas become great places to live and enjoy leisure time. Increasingly people will work flexible hours, with more time working from home, again made possible by technology. This re-enforces the point that town centres close to these populations need to be pleasant places for people to enjoy local leisure and basic retail. This needs to be for all ages and interests.

Medway in 2035

The local plan is responding primarily to population growth. I do not believe we can cope with inevitable social change driven by advances in technology and population growth without a bold planning initiative. If we allow 'ad-hoc' infill across the whole of Medway that will just put insurmountable pressure on all road systems and infrastructure.

It is also perfectly clear that Medway Maritime hospital will not cope.

I would suggest three areas of development:

- Create a new village/small town (15-20,000 homes) complete with everything needed to sustain it with shops, schools, leisure, roads, health, transport and so on. This must be far more cost effective than attempting (and failing) to create several 'lodge hill' type developments all over Medway. Section 106 agreements could be used to provide the infrastructure.
- 2. Chatham town centre retail and leisure to be focussed in a smaller area nearer the bus station and up towards the railway station, and near the river. Consider replacing the pumping station with lower profile solution (I am told it is possible) and embrace the river views far more. Allow more higher residential development, good quality apartments etc. in central parts within easy walking or cycling of the railway station. Higher density will increase the incentive for public transport operators to invest. Most of these markets will be for London commuters. I see no reason why the Rochester end of the Riverside development could not also be high quality apartments, similar to the docklands, for those who would enjoy river views and urban life, within a few minutes' walk of high speed travel to London and Historic Rochester for leisure.
- 3. There will still need to be developments in other parts for example take a strip down the side of Capstone Valley but protect once and for all what remains as valuable green area; this can be improved with section 106 agreements. The point is we must not allow never ending small developments spoil the whole of Medway and unbalance the community. The last thing we want is urban sprawl.

The other key is to identify where SME businesses can be developed; high tech and innovative businesses prefer being with other high tech businesses, and this also is greater economy of space.

Leisure

Historic Rochester and the Historic Dockyard are two quite different areas which must find ways to cope with larger visitor numbers; balancing day and night time economies. Night time economies needs to be encouraged away from residential areas. This will be a focus for consideration in the Rochester Neighbourhood plan.

We need to continue to re-engage with the river. For hundreds of years it was a place of work and transport, now it must be a focus for leisure.

Green spaces are essential parts of the mix; these must be preserved and (as far as possible) everyone in Medway should be able to walk to a green space for recreation.

I believe that by making walking and cycling easier, and 'joining the dots', people will be increasingly choosing these healthy and sociable forms of transport.

Summary

- Far more consideration to ensuring provision and use of technology especially high speed communications. These are the roads of tomorrow.
- Town Centres to be smaller, retail and leisure to merge.

- High quality, higher residential density near all stations
- Create a new small town/village to put all new major infrastructure in one place.
- Concentrate on technical education and SME markets built around niche markets and new technologies.
- Protect the balance of urban and green
- Develop our river and heritage site to cope with larger population

Cllr Stuart Tranter

Name: Sally Tagg

Reference 108

Organisation

Foxley Tagg Planning Ltd

On Behalf Of

National Custom & Self-build Association

Type of Consultee

Developer/Consultant

15.03.1040





Local Plan Team Medway Council Gun Wharf Dock Road Chatham ME4 4TR

29/02/2016

Dear Sir/Madam,

Medway Local Plan - Consultation Response NaSCBA

This letter includes the formal comments from the National Custom & Self Build Association (NaCSBA) to Medway Local Plan Issues & Options Consultation.

NaCSBA's mission is to substantially increase the number of people able to build or commission their own home and they believe that opportunities should arise for prospective self-builders through the Local Plan process.

Policy Requirements

Paragraph 50 of the National Planning Policy Framework (NPPF) sets out the requirement for Local Planning Authorities (LPAs) to plan for a wide choice of high quality homes to support sustainable communities and provide greater opportunities for home ownership. It goes on to state (underlining is our emphasis):

"Plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and <u>people wishing to build</u> <u>their own homes</u>)"

In addition to the above, paragraph 159 of the NPPF considers the requirement for LPAs to have a clear understanding of housing needs in their area. They should therefore ensure that their policy documents:

"Addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and <u>people wishing to build their own</u> <u>homes</u>)"

Brandon Lewis MP, in his role as Minister of State for Housing and Planning made the following comments in a letter sent to all Local Planning Authorities in March 2015:

"We all need to do more to <u>address the lack of suitable plots of land</u> being made available, and we believe that local planning authorities have a vital role to play.."

The letter went on to say:
"National planning policy and guidance is clear that <u>local planning authorities should</u> <u>identify and plan for local demand for custom and self build housing</u>. Planning inspectors will want to see evidence that consideration of demand for custom and self build housing has been taken into account when they examine Local Plans. <u>Failure to provide sufficient</u> <u>evidence may lead to plans being found unsound</u>."

This communiqué from the Department of Communities and Local Government could not be any more explicit in its requirements for LPAs to plan for the needs of those that wish to build their own home.

The Self-build and Custom Housebuilding Bill received Royal Assent on 26 March. The Bill is now an Act of Parliament. This Bill seeks to establish a register of prospective custom builders who are seeking a suitable serviced plot of land and requires LPAs to keep an up to date register of people within the plan area that wish to build their own home. It is understood that Medway Council has yet to comply with the legislation and keep a register of those in the plan area that wish to build their own home.

The above comments from the Planning Minister and the emerging *Right to Build* legislation clearly demonstrate how the government intended LPAs to respond to the requirements set out in the NPPF when drawing up new Local Plans. LPAs should take a proactive position to providing land and should undertake rigorous and effective evidence gathering to measure custom and self-build need in their districts. And LPAs that do not do so can expect their Local Plans to be found unsound at examination.

Recommendations

NaCSBA would like to make the following recommendations with links to the salient parts of our Custom & Self-Build Toolkit:

 The council should assess demand for custom- and self-build in the plan area. In order to comply with national policy the council needs to understand and plan for demand.
 Custom- and self-build demand within the plan area must be properly assessed so that policies within the local plan can reflect, and help to meet, demand. Medway Council should establish a self-build register and attempt to offer self-build plots to those on the register.

http://customandselfbuildtoolkit.org.uk/briefing-notes/registers-and-assessingdemand/#

 It is considered likely that an assessment of the demand for custom- and self-build in Medway would identify a significant demand. If so, it will be important that the emerging Medway Local Plan includes provision on large sites for self-builders.
 A requirement for large developments to include the provision of a percentage of selfbuild plots (perhaps 5%) should be considered for inclusion in the emerging plan.

http://customandselfbuildtoolkit.org.uk/briefing-notes/examples-of-how-councils-usethe-planning-system-to-encourage-opportunities/# 3. Medway's location in the south-east of the country means that the local housing market will have an issue with affordability. A policy should be considered which provides opportunities for those that are struggling with the high property prices in the area yet wish to build their own home. Such a policy would create a slew of self-build opportunities and add to the council's stock of affordable homes.

Consideration should be given to the development of an exception sites policy which would allow 'affordable self-build' developments on sites that would normally be contrary to policy. The plots could be made available at less than market value and any future dwelling on the site would have its resale value capped at around 60% of market value in perpetuity.

http://customandselfbuildtoolkit.org.uk/briefing-notes/examples-of-how-councils-usethe-planning-system-to-encourage-opportunities/#

4. The Government's new Starter Homes policy (announced 2 March 2015) provides further opportunities for private homebuilding. It is considered that an exception site policy allowing Starter Homes and self-build Starter Homes on exception sites would deliver much-needed homes for first time buyers and provide self-build opportunities.

Consideration should be given to the inclusion of an exception sites policy which would allow self-build Starter Homes on sites that would normally be contrary to policy. Plots would have to be provided at a minimum of 20% below open market price and available to first time buyers under 40 years old.

http://customandselfbuildtoolkit.org.uk/briefing-notes/how-the-planning-system-cangenerate-more-opportunities/#

Please contact me if you require any additional information on this and if any hearings on relevant matters are convened.

Kind regards,

Sally Tagg Technical Representative On behalf of NaCSBA

(Managing Director of Foxley Tagg Planning)

This representation has been prepared on behalf of NaCSBA and its supporters, who are listed overleaf and comprise business and in the custom- and self-build sector.







Name: Jo Male

Reference 109

Organisation Gregory Gray Associates

On Behalf Of Wyevale garden Centres Ltd

Type of Consultee

Developer/Consultant

Gregory Gray Associates

CHARTERED TOWN PLANNING CONSULTANTS Victoria House, 18-22, Albert Street, Fleet, Hampshire, GU51 3RJ.

E-Mail: info@ggassociates.co.uk

Planning Policy Regeneration, Community & Culture, Medway Council, Gun Wharf, Dock Road, Chatham, Kent, ME4 4TR

28th January 2016

Dear Sir/Madam

MEDWAY LOCAL PLAN CONSULTATION AND LAND AVAILABILITY

Gregory Gray Associates is instructed to write on behalf of Wyevale Garden Centres Ltd in response to your email of Wednesday 20th January 2016 which relates to both the publication of the Council's updated Strategic Land Availability Assessment (SLAA) Report and the Issues and Options Consultation for the new Local Plan.

Our clients have an interest in Elm Court Garden Centre, Capstone Road, Gillingham, which forms part of the Elm Court Estate, and Site No. 576 in the recently updated SLAA.

The Council are currently inviting comments on the Issues and Options document and confirm that these may include further information relating to individual potential development sites. The following comments are made within this context and relate to the specifics of my clients' site under the heading 'SLAA Report', and to the general principles that should be adopted for the Local Plan, under the heading 'Issues and Options Consultation'.

SLAA Report

The Council's assessment of the Elm Court Estate for economic development purposes states "Whilst the site is subject to some potential development constraints, it is considered that these could be resolved, subject to further assessment".

In light of the Council's recognition that any development constraints can be addressed, no further information in respect of the site's suitability for economic development is provided at this stage and it is requested that the site be allocated for employment purposes in the new Local Plan to meet the identified need as set out in the Issues and Options Consultation document referred to below.

Issues and Options Consultation

One of the key challenges set out in the Issues and Options consultation document is the need for the emerging Local Plan to balance the requirements for future growth within the District with safeguarding the area's valued environment and landscape.

In terms of employment development, the North Kent SHENA identifies a need for 49,943sq.m of office space, 155,748sq.m of industrial and 164,263 sq.m of warehousing over the Plan period to 2035.

It particularly notes that there is a current misalignment between the demand for office accommodation and that provided by the existing stock. Current office space provision is largely provided within buildings with large footprints which are difficult and expensive to convert into smaller units which are attractive to the SME's, a sector with high growth potential.

In order to support the economic development of the area it is considered vital that the economic potential of such SMEs be secured by providing suitable accommodation in a sustainable manner which does not exacerbate the need to travel or have a detrimental impact upon the quality of the natural environment.

This should be done by the provision of individual, well placed sites, close to existing centres of population. Priority should be given to previously developed 'brownfield' sites in order that their use reflects existing patterns of movement and their occupiers can access existing local facilities. Focusing such development on previously developed sites ensures that the economic need can be met, whilst safeguarding undeveloped parts of the area from further urban encroachment.

Such an approach is entirely consistent with national planning policy which makes clear that the effective use of land by reusing land that has previously been developed and which is not of high environmental value, should form one of the core principles of planning.

It is considered that this priority should be reflected within the emerging Medway Local Plan and that appropriate weight should be afforded the re-use of existing brownfield sites close to existing centres of population for economic purposes to provide small-scale flexible employment floorspace to meet identified needs.

It is requested that the above comments be taken into account in the Council's planned review of the SLAA sites and in the consideration of the Issues and Options Consultation responses.

Should you require any further information, please do not hesitate to contact me.

Yours faithfully

Joanna Male cc. Client

Name: Vaneesa Evans

Reference 110

Organisation Kent Wildlife Trust

On Behalf Of

Type of Consultee

Charity/Community/Faith Group

Your ref: issues and options 160216 My ref: issuesandoptions160216

16th February 2016

For the attention of Catherine Smith Planning Policy Manager Planning Policy Regeneration by email



Kent Wildlife Trust

Tyland Barn Sandling, Maidstone Kent ME14 3BD

info@kentwildlife.org.uk

www.kentwildlifetrust.org.uk

Dear Catherine

Medway Council Local Plan Issues and Options 2012- 2035 Consultation document January/February 2016

Thank you for inviting us to comment upon your proposed Issues and Options. Kent Wildlife Trust understands that this is early stages of consultation and welcomes the opportunity to contribute to the process. As the document does not at this stage include any detailed policy or site allocations, we would like to make some more general recommendations regarding biodiversity content. These are given below:

- Kent Wildlife Trust understands that a key driver to this plan is the projected significant increase in population of 21.8% in Medway during the timeframe for this plan, alongside economic growth. It is essential that in planning for this projected increase in population, the natural environment is not compromised, in accordance with the NPPF Core Planning Principles.ⁱ
- The consideration of Chattenden Woods and Lodge Hill Site of Scientific Interest as a development site is of extreme concern to Kent Wildlife Trust. Whilst we appreciate that the Council cannot pre-judge the outcome of the Public Inquiry into the Lodge Hill application, however, we feel it is important to state that we oppose this proposed development opportunity in the context of the Local Plan, considering its impact upon a nationally important designated site (SSSI).
- Kent Wildlife Trust welcomes the reference made to the North Kent Environmental Planning Group in the Strategic Issues section, paragraph 6.7. We would recommend that this continues to be supported at the next stage of plan preparation. At preferred options stage, this policy should clearly refer to the support for North Kent Marshes Strategic Access Management and Monitoring Strategy and its associated funding mechanism, which aims to reduce the negative impact of development upon the areas of international importance for nature conservation.
- Kent Wildlife Trust welcomes the overview of environmental significance and value provided in paragraph 11.2. This new plan should **protect and enhance spaces of**





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international and national importance. We would recommend that Medway's Local Plan should have a specific policy in relation to this. The NPPF does emphasise that the planning system should, "minimise impacts on biodiversity and provide *net gains* in biodiversity where possible."ⁱⁱⁱ

- We would also recommend that Medway should have a specific, separate policy in relation to the protection and enhancement of **sites of county importance, such as Local Wildlife Sites and Roadside Nature Reserves**. This would better support development management decision-making, where local sites in Kent are increasingly under threat, from both direct and indirect impacts of development, including increased recreational pressure. The importance of these are not emphasised in the current consultation document, although reference is made to the local importance of non-designated sites in paragraph 11.12.
- Kent Wildlife Trust commends Medway Council for the reference made in paragraph 11.8 to the importance of securing a wider green infrastructure network. National policy supports making local policy provision for wider green infrastructure and this should serve the function of maintaining connectivity and providing ecological resilience between protected spaces and the broader countryside at a landscape scaleⁱⁱⁱ. We encourage the Council to pro-actively plan for a Green Infrastructure network, and the next stage of preparation of the Local Plan should include a policy **clearly stating that Green Infrastructure will be provided**. It should also follow through on early work described in paragraph 11.9, by referring to a supporting Green Infrastructure Plan. Medway Council should ensure that an appropriate **financial mechanism** is provided, supported by measures such as section 106 legal agreements and Community Infrastructure Levy.
- The plan should also make policy provision for the protection and enhancement of biodiversity within its allocated sites. This should include clear "development principles" on sites of higher biodiversity value or adjacent to more sensitive sites for nature conservation. Reference should be made to county **Biodiversity Opportunity Areas** and Kent Wildlife Trust would recommend referring to these in the policy detail. Ashford's Local Development Framework and its Area Action Plans are a good example of where biodiversity objectives have been included within site-specific "development principles".

Thank you for involving us in the development of this Local Plan. We would be more than happy to contribute to any further detailed discussion or future stages that may follow as part of your Local Plan process.

Yours sincerely

Vanessa Evans Planning and Policy Officer

ⁱ NPPF reference, paragraph 17, Core Planning Principles "Planning should contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework".

ⁱⁱ NPPF, paragraph 109, page 25.

ⁱⁱⁱ The NPPF states in paragraph 117, that "planning policies should plan for biodiversity at a landscape-scale across local authority boundaries" and "identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation".

Name: Richard Cooke

Reference

Organisation

Early Years Medway Council

On Behalf Of

Type of Consultee

Government/Public Body

Medway Local Plan

Early Years Service Feedback

- 1. Early years education and childcare is a 'growth' area of public spending and is a priority for the present Government. All the main political parties have committed to expand the free childcare entitlement in one form or another, so it is likely that the growth will continue for the foreseeable future.
 - a. NB: Nursery education/childcare is not compulsory, but it is a statutory entitlement for each child. Consequently, all LAs are required by law to ensure there is enough nursery education / childcare available for each parent who wants to access their entitlement.
- 2. There are approx. 5000 3 and 4yo accessing their 15-hours per week free entitlement across a mixed economy of school nursery classes and private, voluntary and independent (PVI) day nurseries and preschools. This equates to approx. 98% of each year group and is line with national take up; there is no reason to believe this figure will change during the lifetime of the local plan.
 - a. NB: school nursery classes and preschools are usually only open during school term time; day nurseries are usually open all year round and for longer each day.
- 3. In addition there are approx. 1000 2yo children accessing a means-tested 15hour free entitlement which started a few years ago. Higher numbers of these children are concentrated in the more deprived areas – Chatham Central, Luton and Wayfield, Gillingham North, River, Strood South.
- 4. Spare capacity in the sector is very limited, and although the market is responding to this (new day nurseries have opened in Rainham and Chatham during the past 2 years) it is particularly difficult to find suitable property in the more deprived urban areas such as Chatham Central, Luton and Wayfield.
 - a. NB: A typical day nursery needs to accommodate at least 50 children to be economically viable, and this requires a building with at least 250m² of floorspace in order to meet DfE/Ofsted regulations and also provide office space, rest rooms etc. In addition, an outdoor play area is required there are no regulations defining how much space, but a figure of 50m² would be a minimum considered acceptable these days.
- 5. Based on the projected total population increase of 17.7% between 2014 and 2035, and assuming an even growth in age groups, we will have a further 1062 children (885 3 & 4yo, 177 2yo) requiring access to the current free entitlement.

- 6. However, from Sep 2017 approx. 60% of 3 & 4yo will be entitled to a total of 30 hours per week free entitlement this could equate to 3000 children depending on take-up by parents rising to 3500 children by 2035. At this stage we are assuming the % take-up rate will be in the high 90s in line with the current 15-hour offer. If this is the case, it in effect reduces the current capacity for all children by a similar number.
 - a. NB: we are assuming that nearly all these children will go to PVI day nurseries as very few schools are able to accommodate nursery-age children for a whole day.
- 7. Table below shows numbers between now and 2035 based on Government policy. 1 place = 15 hours.

	Current	2017	2035
3 & 4yo (15 hours)	5000 places	2000 places	2354 places
3 & 4yo (30 hours)	0 places	6000 places (30 hours = 2 places)	7062 places
2yo (15 hours)	1000 places	1000 places	1177 places
Total	6000 places	9000 places	10593 places
Difference vs notional 2016 capacity	0	-3000 places	-4593 places

If we assume that any new schools that are built will be able to accommodate all the 3 & 4yo only needing 15 hours (354 places) then the PVI sector will need to provide 4239 places by 2035. This equates to **84** 50-place nurseries.

This is a maximum figure and doesn't take into account any expansion of current PVI day nurseries and school nursey classes. In reality I estimate that 50 50-place nurseries would be required by 2035, and that 25-30 would be needed by 2020 to ensure the LA can meet its duty to provide enough places in the short / medium term.

Name: Paul Britten

Reference 112

Organisation Rochester Airport Limited

On Behalf Of

Type of Consultee Business



Medway Council Local Plan

Issues and Options 2012 – 2035

Please find below our response to some of the issues raised by the Consultation Document January/February 2016.

GENERAL

It was pleasing to learn that the Rochester Airport Masterplan site has been granted Enterprise Zone status in the Chancellor's autumn statement. As this has national prominence should form the backbone of the regeneration plans for Medway. The Thames Gateway remains a national priority and a successful outcome to the Rochester Airport regeneration could lead to further priority elsewhere in Medway. Para 4.4 should highlight Medway's strategic importance with its Enterprise Zone status in the Thames Gateway and not Paramount and Ebbsfleet (as important as they are.)

STRATEGIC ISSUES

Medway is well served by both road and rail. It is hoped that it will also, uniquely, have a small local airport to serve business and leisure needs. Two motorways are adjacent to Medway to its South; their junctions and routes to the heart of Medway are overladen. If Medway wishes to achieve the challenging targets its sets this must be revised. It is appreciated that the plan looks to decrease the use of cars, but to achieve economic regeneration businesses will expect ease of access for their staff, visitors and trade.

The motorway network and its junctions are outside of Medway Council's direct control. It is likely the Lower Thames Crossing will join the M2 at junction 1 and this will have a huge knock on effect to junctions further down this motorway where traffic will seek to join from the M20. It should be a priority for Medway to pressurise the appropriate agencies to ensure the junctions and road network accessing Medway have the correct capacity. The road network in Medway should be looked at critically and improvements made where appropriate in particular to speed up traffic at busy times.

ECONOMY

Medway now has the springboard to effect largescale local regeneration at Rochester Airport including the very successful Innovation Centre. This should be given top priority.

Medway has an expanding higher education sector. It is vital that partnerships are formed with local businesses to aid both the business and students. Projects undertaken at Rochester Airport have been disappointing due to the lack of continuity.

BUILT ENVIRONMENT

Medway has a huge aviation heritage which although acknowledged is not celebrated or displayed. The Medway Aircraft Preservation Society (MAPS) whose Patron is Camilla, Duchess



of Cornwall has been awarded the Queens Award for Voluntary Excellence. This little known group of highly skilled engineers have much to offer and have restored many aircraft now displayed at RAF Hendon. MAPS should be supported and will hopefully be moving to a new heritage centre on completion of the Rochester Airport redevelopment. There will be opportunities for them to expand with the possibility of a working museum and with their wealth of experience, potential for apprenticeships.

TRANSPORT

Aviation facilities are provided for in the Rochester Airport Masterplan together with ongoing planning permissions and government grants. The airspace around the revised airport footprint should remain protected.

Long term car parking remains an issue particularly on the closure of the park and ride at Marconi Way. Rochester Airport currently offers, as a service to the community, long term car parking for those taking coach trips around Medway and in some instances further, including holidays abroad. This may not be possible on airport reconfiguration.

Leisure microlight flying at Stoke should be supported as an alternative to a base at Rochester Airport where their use may be restricted.

Name: Stephen Hinsley

Reference 113

Organisation Tetlow King Planning

On Behalf Of

Rentplus

Type of Consultee

Developer/Consultant





32 High Street West Malling Kent ME19 6QR

E: info@tetlow-king.co.uk W: www.tetlow-king.co.uk

Date: 22 February 2016

Our Ref: JO M15/0715-31

Planning Policy Regeneration Community and Culture Medway Council Gun Wharf Dock Road Chatham Kent ME4 4TR

By email only: planning.policy@medway.gov.uk

Dear Sirs

RE: MEDWAY COUNCIL LOCAL PLAN ISSUES AND OPTION 2012-2035 CONSULTATION

We represent **Rentplus**, a company providing an innovative affordable housing model aimed at delivering discounted rented homes to buy for people who are unable to acquire a property on the open market but also trapped by ineligibility for existing affordable housing tenures.

Enclosed with this consultation response is an Affordable Housing Statement by Tetlow King Planning setting out the model's compliance with the NPPF definition of affordable housing and how this should be incorporated into local plans to boost supply and meet local needs. We ask that this be read alongside our representation so that the Council's strategic approach to housing delivery takes into account this innovative model which has the capacity to meet a significant level of need locally. Our comments are aimed at supporting the new Local Plan into reflecting the emerging national policy approach, to ensure it can be found sound at examination.

As set out in the accompanying Affordable Housing Statement, the Government has pledged to deliver 400,000 affordable houses by 2020-21, with a clear focus on low cost home ownership, including supply of *"10,000 homes that will allow a tenant to save for a deposit while they rent."* As a rent to buy model delivery of Rentplus will enhance the affordable housing mix in Medway. The Strategic Issues (**Question 2**) should reflect the need to deliver affordable housing to meet local needs and aspirations, reflecting the Government's focus on home ownership as well as traditional affordable housing.

In relation to **Question 3** it is important to note, as recognised by the Issues and Options document, the policy changes being proposed by the Government which should be taken into account in reviewing how local need for affordable housing and aspirations towards home ownership can be facilitated and encouraged. The Government's consultation on proposed changes to the NPPF proposes amendments to the affordable housing definition to incorporate innovative rent to buy housing. Though this consultation does not yet form part of Government policy, its contents will need to be thoroughly considered as these raise critical questions about the spectrum of products that can be considered as meeting needs for affordable housing and how these can be delivered as part of the overall housing mix.

We note that the Strategic Housing and Economic Needs Assessment has not yet been published. In light of this, it would be useful to notify those who have provided comment on the consultation document once this is published. Without this evidence, and an up to date viability assessment it has not been possible to respond to **Questions 4 - 6**.

The initial findings set out in the Issues document suggest, as in the 2010 SHMA, a significant local challenge to being able to provide the housing types and tenures to suit the changing needs of the Borough. Need for 17,112 affordable homes over the Plan period is not an insignificant challenge, particularly in the current financial climate with very limited public funding for affordable housing and the planned rent reductions for housing associations. As recognised at paragraph 7.11 of the Issues document, affordability is a critical issue, as many households are unable to access housing that

adequately meets their needs without some financial assistance. Rentplus homes could make a significant, valuable contribution to meeting those needs as part of the wider delivery of affordable housing. The model enables those households not currently able to save for a deposit to rent at an affordable level over a period of either 5, 10, 15 or 20 years before being able to buy their own home. This model will extend the opportunity of home ownership to those in Medway otherwise struggling to enter the housing market.

Given that the Council is at a very early stage of reconsidering its policies, and has not yet published the baseline evidence on affordable housing it is important to consider the delivery of new forms of affordable housing, including Rentplus rent to buy, which have the potential to improve overall development viability. As recognised by paragraph 7.12, development must be viable to deliver affordable housing; the delivery of rent to buy homes as part of the housing mix can improve overall scheme viability; due to the ready availability of private funding for Rentplus there is significant scope for early delivery on sites, including large-scale schemes where early delivery of Rent to Buy homes would both improve overall site viability and encourage quicker development. The delivery of Rentplus homes should be considered as part of a fresh whole-plan viability assessment. By planning for the inclusion of this new model the Council will ensure the Plan is developed to be in conformity with national planning policy, and plans more effectively and positively for sustainable development to meet the full range of its residents' needs.

This should be fully considered by the Council in relation to developing its new housing and affordable housing policies. We recommend the following policy be included in the new Local Plan to recognise the importance of Rent to Buy models which can make a valuable contribution across Medway:

Affordable housing in the Borough comprises affordable rented, intermediate and affordable rent to buy housing. The Council will:

- *i.* require residential developments on suitable sites to provide affordable housing which is accessible to local people in housing need;
- ii. state the threshold above which affordable housing is to be sought;
- *iii.* state the amount of affordable housing to be provided on suitable sites above the threshold;
- *iv.* state the target tenure split between affordable rented, intermediate and affordable rent to buy that will be sought;
- v. allow for the negotiation of points ii-iv where viability is compromised, with the aim of maximising the overall level of affordable housing to be delivered on individual sites.

These points would contribute towards boosting the Council's affordable housing provision, as well as supporting the Government's ambition to extend opportunities for affordable home ownership.

Should the Council consider it useful, a meeting between relevant officers and Rentplus would assist in discussing the practical implications of delivering Rentplus homes, in particular in relation to the ongoing assessment of affordable housing deliverability, and the use of a Memorandum of Understanding (MoU) to establish a working relationship to provide affordable homes across Medway.

We would like to be consulted on further stages of the above documents and other publications by Medway Council, by email only to <u>consultation@tetlow-king.co.uk</u>. Please ensure that **Rentplus** is retained on the consultation database, with **Tetlow King Planning** listed as their agents.

Yours faithfully



STEPHEN HINSLEY BA (Hons.) MRTPI SENIOR DIRECTOR For and On Behalf Of TETLOW KING PLANNING

- Enc.: Affordable Housing Statement (Tetlow King Planning) Rentplus Briefing Note Rentplus Model – Compliance (Ashfords) Rentplus Planning and Policy Review (Aecom)
- Cc: Richard Connolly Susan Coulson Anthony Eke Richard Pillar Yvonne Harrison

Name: Aaron Peate

Reference 114

Organisation

Indigo Planning

On Behalf Of

Columbia Threadneedle Property investment

Type of Consultee

Developer/Consultant



Planning Policy Department Medway Council Gun Wharf Dock Road Chatham Kent ME4 4TR

> By email Planning.policy@medway.gov.uk let.001.AP.SF.00030318

29 February 2016

Dear Sir/Madam

DRAFT LOCAL PLAN 2012-2035 - ISSUES AND OPTIONS CONSULTATION

Indigo Planning act on behalf of Columbia Threadneedle Property Investment (Columbia Threadneedle), the owner of Gillingham Business Park, who are submitting representations in response to the above consultation. These representations have particular focus on shaping proposed economic strategy and policies.

We understand that current policy restricts uses at Gillingham Business Park to B1 (business), B2 (industry) and B8 (storage/distribution) which is rigidly adhered to. Columbia Threadneedle requests that future policy relating to the business park allows for flexibility, so that businesses that are complementary to those already in the park are able to locate there. This would increase attractiveness and maximise potential of the business park, whilst ensuring that integrity and employment potential is not negatively affected.

The consultation is still over broad issues and challenges at this early stage, however our client makes this request to ensure that potential strategies safeguard the existing function of Gillingam Business Park, and do not jeopardise its future success in a local economic climate that is moving away from traditional industry.

The consultation document outlines that there has been a decline in traditional manufacturing/port industries, with the response being the intention to attract new employment sectors such as financial/business and software development. Paragraphs 8.3-8.5 state the intent to stimulate economic growth by capitalising on established employment locations and the proximity to large markets of London and the south east.

Paragraph 8.18 explains that to deliver this intent, the new Local Plan will seek to secure sustainable growth, offering flexibility to enable buildings and sites to deliver a mix of office, industry and storage space to meet changing occupier needs.



Indigo Planning Limited, Swan Court, Worple Road, London, SW19 4JS

• info@indigoplanning.com • indigoplanning.com

indigo

Due to changing nature of employment uses in the area, Columbia Threadneedle believes the business park should have the ability to adapt to capitalise on opportunities in order to remain successful. Future policy should allow scope for intensification of uses at the park and for flexibility on proposed uses, provided they are complementary to existing occupiers and do not have a detrimental impact on overarching integrity or employment potential. This will help increase the attraction of the business park and contribute to encouraging economic growth.

Gillingham Business Park is noted as being a good quality employment site. Allowing flexibility and complementary uses would provide an excellent opportunity to take advantage of such a site, helping to maximise the quality and attraction of the business park.

The consultation document also states that economic growth is hindered by a focus on lower value activities. Allowing flexibility at the business park would provide opportunities for tenants with greater value to occupy the park, whereas this may not currently be happening due to policy's stringent restriction on uses.

In light of the above, Columbia Threadneedle believe there is a strong need for flexibility on the uses permitted at Gillingham Business Park. This is so that opportunities can be taken to capitalise on and optimise the potential of an established, good quality employment site. This is in line with the council's vision of securing sustainable employment growth and would contribute to the economic development of Medway as a whole.

We trust that these representations will be given due regard in the progression of the Local Plan, however should you have any queries please do not hesitate to contact us.

Yours faithfully

Aaron Peate

Name:

Reference 115

Organisation Young Peoples Group

On Behalf Of

Type of Consultee

Government/Public Body

Local Plan discussion – care leavers and MSCB group 21st January 2016

Six members of the care leaving group and the MSCB group attended a discussion group to look at the Local Plan.

The group were asked what they thought the Local Plan was and what it included. The group then discussed what was working/not working in areas that they Local Plan covered. The group were then asked where they saw Medway in 20 years time

What is the Local Plan?

- Is it to do with housing and where to build?
- I don't know what this is
- I don't have a clue
- Is it about making Medway better?
- Is it to do with council/private housing
- What is the local plan?

What do you think is covered in the Local Plan?

- Housing
- I don't know what would be included as I don't know what the local plan is
- As I don't know what the local plan is, I would not know what is covered on it

Areas in the Local Plan

Housing

What is working	What is not working
Rainham is a nice area to live	Private housing is expensive
Rochester is a nice place to live	Refugees are being given houses
I got housed very quickly by the council when I had my child	When you go down to the council to say that you are homeless, they say that social service will get involved and your children will get taken into care and you can 'sofa surf'
The new housing at capstone look really nice	There was a case of someone who came out of the army and they were not helped

Solutions

- Knock down old pubs to build houses. There are lots of empty pubs around. They could also be converted into housing
- Shared housing would also help

- Build on the Great Lions there is lots of space there
- You could build houses on some of capstone park

Economy

- What does that mean
- I think it means about money

What is working	What is not working
Volunteering is good for your CV and	There are no jobs around
to give you experience	
	Employers say that they wont take
	you on as you have no experience
	but I cant get the experience.

Solutions

- There needs to be more apprenticeships and traineeships to help people get experience and learn about the job
- More volunteering opportunities

Town Centres

What is working	What is not working
Rainham is very clean	They are vial. They are dirty
	(Chatham, Gillingham) and there are
	drug addicts, alcoholics and groups of
	young people hanging around
Strood is clean	Young people ride the bikes up the
	high street and get in everyone's way
	Chatham and Rainham are really
	rough – they are vandalised and there
	are young people in groups
	I think Chatham could be intimidating
	for older people – especially with the
	groups of young people that hang
	around outside Mcdonalds
	People who cant be botherd to use
	the stairs use the lifts so that there is
	a que for those that need to use it
	(people in wheel chairs, those with
	buggies)

Solutions

• You should not be having a needle exchange bank as this is promoting the use of drugs

• Move the place where drug addicts get there methadone out of the town centre so that it does not cause disruption when they kick off (it is currently outside Boots in Chatham)

Environment

What is working	What is not working
There are lots of recycling banks in	People always steal the recycling
Medway	bags/boxes
	I don't have the time to recycle so I
	don't – I have children so its hard
	Fly tipping seams to be getting worse
	- round the garages in Castle Road,
	Chatham there is lots of fly-tipping of
	bulky waste items
	You are only allowed one bulky waste
	item collection a year before you have
	to pay. People don't want to pay so
	this contributes to fly-tipping
	Someone fly-tipped a sofa down my
	road and it took the council two
	weeks to remove it

Solutions

- Allow more free bulky waste collections. This would stop people fly-tipping
- Have more bins around so to stop people dropping litter.
- Have bigger bins for black sacks at the end of roads this will help people as some people forget to put their bins out and also the foxes can rip them open during the night on bin day

Rural issues

• What does this mean?

What is working	What is not working
	There are not many shops in Grain
	You can not get to Upnor easily
	There is only one bus an hour out to
	Grain
	If you go out to Grain, the bus
	company will not accept your Arriva
	Medway Day ticket

Solutions

• There needs to be regular buses out to Grain

Social and community

What is working	What is not working
I have used the community hub in	There is nothing for young people
Strood	(11-18 years) to do

Solutions

- There needs to be more community centres. You need to look at where they currently are so that the gaps can be identified
- More youth clubs you could use a closed pub and set one up there
- There needs to be fun days for children which don't cost a lot

Open spaces

What is working	What is not working
There are lots of parks – capstone,	Parks have needles in them
beechings green, Jacksons. Victoria	
park and the lions	
	Needles/Crack pipes are left in the
	parks. They are also around the play
	equipment
	The park in Twydall really needs
	updating
	The play equipment park at Bamorral
	is aimed at older children. There are
	no slides or swings

Solutions

- PCSOs need to patrol parks more to stop young people from smoking and people using drugs
- Parks should be closed after a certain times. People vandalise parks at night also drug addicts use the park at night
- There should be higher gates on parks that are locked. There is no point in locking a park with low gates as people will jump over the gates
- You should pay people to monitor the park all the time it is open. You could get young people to do this. This would give them experience and also a job
- Clean up the parks so that they are less messy. Maybe have more needle bins around (like the ones in Rochester car park)

Sports

What is working	What is not working
There is something on at Medway	There is no leisure centres in
Park it is £2.50 for three hours and	Chatham. Gillingham and Strood
they have trampolining, bouncy	have them but it seems Chatham has
castles and activities for children	been forgotten. You either have to
	travel to Gillingham/Strood to use
	facilities

Solutions

- There needs to be leisure facilities in Chatham which are accessible
- There should be things like summer schools run throughout the year and not just in the summer
- There needs to be things for younger children. You could have a hall where different activities such as basket ball could be held
- Run things like Medway Challengers but for younger children
- You need to prompt the leisure centres more- maybe by using the big screen in Chatham
- Run some free day sessions for children
- Make football grounds such as Chatham duel purpose

Transport

What is working	What is not working
	The buses are always late
	The bus has had to go on a diversion due to a fallen wall and the road it goes down means that there lots of traffic
	Access to the train station is really difficult if you have a buddy

Where do you see Medway in 20 years?

In a big hole, with lots of debt due to there being no jobs Better, cleaner and more modernised Having a better reputation Medway is going to be in more poverty I would like Medway to be better for my children

Name: Lionel Pearce

Reference 116

Organisation Hoo Parish

On Behalf Of

Type of Consultee

Councillor/MP/Parish Council



Hoo Saint Werburgh Parish Council

(Chairman: Cllr Lionel J Pearce)



Planning Policy Regeneration,

Community and Culture, Medway Council, Civic Headquarters, Gun Wharf, Dock Road, Chatham, Kent, ME4 4TR

Date: Feb 2016

Ref: New Local Plan Consultation Document

Hoo Saint Werburgh Par ish Council is taking an opportunity to lodge their comments in respect to the above Local Plan Issue and Options 2012-2035

VISION

1) The document mentions establishing a vision to drive economic success at the same time as addressing inequalities. Whilst not denying that careful planning may have to be sought to achieve that vision however accommodating sustainability of the Hoo Peninsula for example must avoid harm to its natural environment of which folk are attracted. It has to be acknowledged that protecting the best of Medway's heritage and its natural environment is of paramount importance to the people it attracts. The Peninsula is not such that major change can take place without some consequence for its historic character and the way that character benefits the folk it accommodates.

STRATEGIC ISSUES

- 2) An important strategic issue would be the provision of an additional hospital perhaps a cottage style hospital to the West of the river Medway to accommodate folk resident in the outlying parishes who sometimes find it a challenge and a concern accessing the only facility of its type at Medway Maritime.
- 3) No comment.

HOUSING

4) The increase and supply of suitable and affordable homes is believed to be too openended. More detailed information would be most welcome on how you define suitable and affordable. It is quite often mentioned that the cost of housing is unaffordable for many people and that there is a lower supply of social housing in Medway. Again please explain affordable housing and how is it proposed to achieve such?

- 5) No comment.
- 6) 25% does seem reasonable but a developer providing suitable affordable housing on a site of say 15 units or more is really down to the developer having the financial will in creating a sustainable site for the future and its pressures therein.
- 7) Given the choice older folk generally opt for **single storey or ground floor living** with easy access to transport, community facilities, surgeries and shops. Ideally they should not be too close to noise and children's recreation.
- 8) There are also needs for rural housing especially for the lower end of the market (starter homes) for **locally born** and/or **locally employed** younger people. Again suitable dwellings for the older or retired folk within rural parishes would also be most agreeable where those folk have been associated and are comfortable with.
- 9) Development can make a positive contribution by creating open **recreational space** not only for the younger element and family members but for **the older element** where it tends to get forgotten.
- 10) Any large potential development site could have an element of starter homes built as part of the planning application.
- 11) Infrastructure needs vary from urban and rural areas. Rural areas are in the main remote from most major social attractions so better easy and **reliable public transport** access to the towns where most facilities are situated is necessary especially during late evening and at weekends.
- 12) No comment.
- 13) As Students are generally without personal transport they perhaps need to be amongst amenities are easily accessible where they can congregate without feeling isolated or threatened. There is belief that town centres can accommodate this type of phenomenon.
- 14) No comment.

ECONOMY

- 15) There are many opportunities for employment within existing areas which allow for growth. Office accommodation ideally requires good access with easy access to local town centre facilities whether it is for local or commuted employees. Heavy industry has to be located where space is available but again must have good road or river access. Light industry also has to be located where space is available but again must have good road or river access. Light industry also has to be located where space is available but because of the nature of odd working patterns there must be allowances made for the use of private transport as public transport is generally not available during odd working hours. As a new employment site Lodge Hill was not the ideal area due to its rural remote situation which would have encouraged potential employees to commute by private transport leaving perhaps just service employees (shop staff etc due the nature of the work and poor pay) to live locally.
- 16) No comment.
- 17) All plans are only estimates and a very large crystal ball would be required to ascertain needs in 20 years time.
- 18) The creation of more local upmarket jobs emanating from **high-end employers** located in Medway may be attractive to those that already commute into London and the South-East or Maidstone.
- 19) Give employers an incentive to employ locally sourced college graduates.
- 20) The attraction to the high-end businesses must be achieved otherwise people live and work where it is financially practicable. These two do not necessarily go hand-inhand.
- 21) It is noticeable that the river and its **wharves are under-achieving** and must be addressed by enabling some businesses to be attracted to such. Unfortunately some wharves can be quite remote from urban areas so perhaps reductions in business rates or

other financial inducement might help with relocation. It also mentions large sites on the Hoo Peninsula being well positioned where it is assumed Thamesport and LNG fall into this category. There is an opinion and therefore an assumption that large-scale industry creating movement of either workers or goods or both are presently and generally transported by road vehicles. The railway system to Grain is noticeably under-used and could open up to all types of possibilities for movement of freight or even perhaps as a **passenger link to the main railway network**.

TOURISM

- 22) The major tourist attractions are well supported by various types of accommodation around the towns but smaller sized of the more genteel type guest accommodation could support those occasional tourists rather than the larger hotels. **Riverside accommodation** could be most attractive to some tourists.
- 23) The river has an appeal which is mostly under used either for commerce or for tourism. Possibly connecting the Medway via the Thames with perhaps 2 or 3 day events by way of Southend, Greenwich and the Tower all of which have piers and local accommodation may perhaps be attractive to some.
- 24) Developing the river for commerce will perhaps see tourism as a positive and natural progression to Medway's strength.

RETAIL

- 25) Chatham is still Medway's major retail centre but in some respects is rather tired with too many charity shops. The new bus station is a large improvement on the old but can be unpleasant to access from the Pentagon and High Street shops during inclement weather so perhaps a covered in walkway? Chatham needs an injection of major department stores to compete with out of area centres but unless it is financially viable for those stores there is doubt that it will happen. Perhaps a need is there for a tram service which could connect Rainham to Stood via Rochester, Chatham and Gillingham. This could take in Gillingham's centre and the University complex through to the Dockyard and its retail centre then through to Chatham town centre then on to Rochester's tourist attractions by day and its culinary attractions by night. Parking facilities could be made available at the Dockyard. Other parking facilities are already available at the Rochester and Strood ends whereby combined parking and travel tickets could be made easily and reasonably available.
- 26) See above.
- 27) See above.
- 28) No comment.
- 29) All of Medway's out-of-town **retail parks should be encouraged** to flourish as **online retail** with its recently improved sale figures suggests it is not going away.

ENVIRONMENT

- 30) The document mentions protection throughout the Hoo Peninsula for habitats and species together with the many protected areas of different guise. It even mentions the potential of a green infrastructure planning project. At this early stage it does seem rather disjointed especially when we need to avoid **inappropriate predatory development** into our pleasurable environment. Maybe now is the chance to pursue a policy to protect the Hoo Peninsula by pushing for **National Park Status** which on the face of it seems a way forward in protecting and developing a rare and historical area of national importance which in time would encourage more visitors onto the tourist trail.
- 31) Promoting the areas valued environment with possibly visual information display boards in public areas but more especially around the rural villages. Urban areas could have (if not already) changing information displays on bus information boards. At train stations a similar stance might be apt. Perhaps 'Medway Matters' but still retaining its

usual information could have a makeover with likely finance coming from independent advertisers would help pay for production. There are many free advertising magazines which abound in and around North and East Kent which convey much article interest for everyone. Why not Medway?

32) No comment.

BUILD ENVIRONMENT

- 33) A very careful approach is required to prevent mistakes being made which could become costly for future generations. If riverside locations are to be developed they must reflect the importance of its **historic significance**. Building high-rise buildings along or close to the river foreshore hides one of the pleasurable things that attract visitors but unfortunately high-rise living has already happened at the Gillingham Pier area. Infrastructure must also be sound and safe reflecting the way folk wish to live.
- 34) Homes with gardens perhaps suit most families and are preferable but homes without gardens require **communal recreational space** even more so. Having convenient and easy access to points of socialising interest could be an advantage.
- 35) All areas within Medway especially those that fall into 'of historic value' must be protected but not necessarily reflected within new development. Some run-down areas call for **improvement and revitalisation** but not to the extent of extending low-density suburbs closer to the many rural and semi-rural villages that have their own identity and as such form part of Medway's historic legacy.
- 36) No comment.
- 37) Developments need a distinct character for folk to be comfortable with however some developments are just a compromise. Land is at a premium so developers tend to squeeze in as many dwellings on a site as it is feasibly possible without trying to displease the planning process. It has been observed that some new developments within Medway are already becoming worse for wear such as the low-rise properties with **wooden cladding** that are situated to the rear of 'the Ship and Trades' hostelry beside the Dockyard Outlet. Is it perhaps ironic that most Architects do not reside in the properties they design?

RURAL ISSUES

- 38) Hoo Parish Council's Village Infrastructure Audit has already provided much information as to why Hoo St Werburgh cannot at present effectively act as a service centre for the wider Hoo Peninsula as there are many concerns that need to be addressed especially banking and better post office services, transport facilities, community amenities and not forgetting police contact points.
- 39) Additional leisure facilities in and around the Deangate complex could possibly bring office, retail and service employment. Hoo Marina Park and its peripheral marine activities has the space to expand its employment provision but although privately owned there may be a need for some guidance in how to achieve such. Again Kingsnorth Business Park has the potential to expand and is going ahead with expansion at present on 'Plot 4'. The whole site has 'railway network access' on its flank which for the site to be sustainable to transport needs there must be utilisation of every option open to it. On the wider aspect of the Peninsula alternative public transport provision must be made available. To compensate for the loss of jobs perhaps the site of the now non-operational Kingsnorth Power Station in conjunction with its German owners could be utilised for other employment need.
- 40) Access to services as already stated must either be with public transport or by private car. With the former, urban type public transport because of its operational limitations does not in some circumstances suit the rural area. The Hoo Peninsula as a rural remote area may benefit from a system similar to the '**Turkish Dolmus'** whereby a series of mini-buses could be utilised on a 'round-robin' single fare basis located/centred

in Hoo and used to access all areas of the Peninsula stopping and picking up on an adhoc basis. A small covered **transfer waiting area** in Hoo centre could possibly allow folk access to the normal public transport to the urban areas of Medway and beyond if required.

- 41) Areas of rural Medway have witnessed tremendous development during the last local plan period notwithstanding the Hoo Peninsula where it has seen more than its fair share. The parish of Hoo has always welcomed a certain amount of infill but not to the extent of what can only be classed as development over-kill as what is currently planned to the West and to the North of Hoo off the Peninsula Way (A228). Within rural villages certain types of infrastructure might well include nursing homes in addition to starter homes for young folk. These types of homes should unquestionably be prioritised to favour local residents.
- 42) Strategic and local needs being addressed within parish areas working towards Neighbourhood Plans with an aim to include a policy giving all parishes' comparable support is encouraged within the new plan.

INFRASTRUCTURE AND SERVICES

- 43) Not a change as such but an improvement on Medway's existing leisure services in particular the **Hoo Leisure Centre** is imperative because of its captive clientele. Whilst trying to create a healthier lifestyle choice any reduction or removal to this type of service would cause a **disservice** to those it facilitates.
- 44) Healthy food options and therefore food growing opportunities can be achieved by giving support and guidance to developers in creating **allotment facilities** especially on larger developments where 'garden' space is now generally at a premium.
- 45) Allotments can create a certain physical activity combined with in some cases enjoyable **social interaction**. Leisure centres can also provide physical activities for the older generation especially those which contain swimming pools and only if they are realistically priced and are welcoming.
- 46) Perhaps consideration could be given for **complementary healthcare facility provision** to the west of Medway as access to the Medway Maritime Hospital is time consuming for patients and visitors alike for those who are remotely placed to the west of rural Medway. The provision of a **cottage style Hospital** could perhaps alleviate those disadvantaged folk in remote rural areas by having a separate healthcare facility which can be easily accessed.

SOCIAL AND COMMUNITY INFRASRUCTURE

- 47) Schools or school places ideally have to keep up with new communities as soon as they are created not after. In the case of rural communities (with the aid of section 106s or CIL) those **school places** should preferably be ring-fenced for local children to prevent excessive and cross-travelling.
- 48) Community centres or village halls create health and social well-being across many facets of the community and therefore financial contributions could be included as part of the section 106 or CIL agreement. Some schools are already well used for extra-curriculum use but those that do not could be **tailored for community and social facilities**. To take pressure off major hospitals surgeries there is a need to keep up with new communities with perhaps hours of activity increased and weekend working. As mentioned in '46' a **supplementary healthcare facility/hospital** could also take the pressure away from the 'A&E' at Medway Maritime.

OPEN SPACE

49) If rationalisation meant that green buffer zones shall be reduced allowing development encroachment onto our rural villages beyond their present 'envelopes then

preservation of those open spaces are paramount to the multiple benefits that they offer to the present incumbents of Medway.

- 50) The document mentions that Medway has a low level of provision of open space compared with adjacent council areas. To sustain the present level or to rise above, it must surely be addressed as a policy alongside of any housing growth.
- 51) No comment.
- 52) All new development sites can incorporate **on-site open spaces** if the will of the developer is strong enough. Reliance and therefore contributions into existing open space is always a cheaper option for a developer.
- 53) Management of open space provision can generally be a better option if controlled by the authority even though this would have a cost whereby standards would be met and delivered hopefully in the best interest of the community it serves. The mention of a multi-functional model of open space provision seems unclear at this stage but rationalising the open space estate suggests using vacant sites for housing developments?

SPORTS FACILITIES

- 54) All types of sport indoor or outdoor can be encouraged by extra provision either through **increased use of school facilities** and existing facilities or from S106 monies generated from new developments for new additional or enhanced amenities.
- 55) A larger capacity **new stadium for the Gills** would be an asset to the Medway Towns as the only major football club in the southeast so a new location would be ideal but is there an area big enough for it to locate to? Redevelopment of the site could possibly go somewhere in rejuvenating Gillingham Town centre.

NATURAL RESOURCES

56) Medway has had a rich history of agriculture especially fruit and arable farming. Land over the years has fallen foul of unwarranted development on Greenfield sites even though the present local plan policies tended to protect such areas. Enormous weight must be given to the **retention of high quality land around Medway** where it must be protected against needless and predatory development especially on the Hoo Peninsula particularly around our rural villages. Once this land is concreted over it is lost forever.

AIR QUALITY

57) The document mentions 3 AQMA's within Medway. **Monitoring of air quality** seems minimal in comparison with the size of Medway. There is concern that additional monitoring ought to occur in and around Medway with two areas coming to mind – the tunnel area on the Frindsbury side and in and around Strood town centre. Another area of concern would be in and around the congested Wainscott area (A228/A289) and Brompton Farm Road. Any increase to traffic in particular HGV's having access to the Hoo Peninsula due to the prospect of more development may also exacerbate levels of nitrogen dioxide along the A228 corridor.

MINERALS

- 58) There is no denying that Minerals are a finite resource and are recognised as such but if they are to be excavated then every effort must be made to either transport those minerals wherever possible by the rail network or by wharfage. The Hoo Peninsula although surrounded by water has **access to the railway network** whereby it ought to be utilised. Any planning applications submitted must be conditional in prioritising mineral movement away from the road network onto alternative transport if practicable.
- 59) Again wharves and their suchlike are paramount in their importance of receiving and transporting heavy aggregate. Maintenance of wharves ought to continue to have adequate access and must **not** be allowed to be run down. The more minerals we import

creates an importance in the upkeep and enhancement of existing infrastructure thus sustaining safe movement of those minerals to their destination.

WASTE

60) There seems to a disparity between what Medway produces in household waste (120,000 tonnes – 2014) and what Medway handles in waste (650,000 tonnes – 2013). If this is the case should Medway handle its own waste therefore by processing its own waste that may perhaps go someway into reducing cross-border waste movements as the mention of an option in relocating waste transfer stations to the wider region is not a sustainable option. There would <u>not</u> be any mileage either in creating a waste to energy disposal facility as there are no guarantees that this 'Incinerator' would facilitate only Medway's waste.

SUSTAINABILITY AND CLIMATE CHANGE

- 61) Social sustainability has to start by giving access to services, something that has been an issue for some time. It is already mentioned that access from the Hoo Peninsula to Medway Hospital can be and generally is abysmal. Because of the time factor involved at present some folk are obliged to use private transport or Taxis. Both are expensive in their own way (Taxi fares or car-parking charges). Secondly a reliable broadband and mobile phone signal must also be available to all remote areas and not just for urban communities.
- 62) Inequalities exist not only in Medway but exist in other towns and other counties. Inequalities exist with crime levels but unfortunately the **level of visual policing** to tackle certain types of crime (anti-social behaviour) is governed by crime statistics. Employment also has its own inequalities as those folk who have easy access to faster transport (railway and commuter coaches) can often commute more easily and more quickly therefore obtaining access to better paid jobs.
- 63) There should be set standards with regard to **energy efficiency** whereby we agree that those standards could be reflected within planning applications on all new developments within the new plan.
- 64) We also agree to existing developments business or otherwise being encouraged to adapt to energy efficiency by way of useful and easily obtained information. Trees are a useful adaptation for heat loss so again support could be provided to obtain and grow. Everyone including children could be encouraged to **grow food at home** if a suitable space is available or if not obtaining where possible an allotment which could either be used solely or shared.
- 65) Again all new developments should be water friendly. Water is another finite commodity whereby new building regulations will be possibly imposed with regard to water usage. **Rainwater transfer facilities** as a matter of urgency must be incorporated not only on new sites but may well be encouraged on existing sites. Whether water metering is perhaps the best way forward in using less water the water utilities can and will increase the price of water as it suits but in practice does not generally restrict its use.

FLOOD RISK

66) There are many examples and in hindsight where SuDs have been incorporated on sites whereby some are adequate some are not but in general all drainage systems drain somewhere and with respect to the parish of Hoo that means the 'Brook'. Any increase to this natural drain has a potential for **flooding** elsewhere (downstream). All SuDs should be incorporated on new sites as conditional and not as an afterthought. It also mentioned flood defences on a site may create the risk of flooding elsewhere therefore certain areas at risk must be thoroughly investigated before any suggestion of development close to a flood plain or a flood risk area.
67) Certain areas in and around Medway must be identified, if not already as being at risk of flooding but within the Marsh areas of the Hoo Peninsula a compromise may have to be sought with regard to continually defending against flooding.

ENERGY

- 68) A substantial amount of productive agricultural land of Medway lies on or adjacent to the Hoo Peninsula. It would be foolish not to protect this once only asset by the **over-provision of wind farms.** Without subsidies wind farms are far less attractive. The now derelict River Medway's Islands could have potential for a wind farm lying just offshore between 'the Strand and Hoo Marina'.
- 69) Although Solar Farm technology is perhaps an alternative energy source it is also land hungry and as such cannot be afforded to dominate the Peninsula landscape. It deemed to be an attractive option but with Government subsidies now ending that now may be not so.
- 70) Taking advantage of waste heat from fossil fuel power stations is now history in relation to coal-fired Kingsnorth that only leaves gas-fired stations which have their limitations but whereby their waste heat perhaps could still be utilised to an advantage on small developments.

TRANSPORT

- 71) There are deficiencies in the transport network. At present bus services are without competition allowing one company to dictate. There perhaps is a possibility that the bus company could create selected routes to where its customers on the Peninsula desire to travel without having to interchange at Chatham? Those routes could include e.g. Hempstead Valley, Bluewater and more importantly Medway Hospital. Encouraging folk away from their vehicles only tends to alienate which gives an opposite response. To encourage people to use the towns firstly an alternative has to be applied, not less carparking spaces with increased charges.
- 72) It could be considered to increase public transport usage and convenience that a flat fare be introduced and associated with an **Oyster Card type system** something that has already been suggested. Those folk living in the extremities of the rural areas because of longer journeys they have to endure would not therefore feel penalised.
- 73) More expansion within the towns potentially creates more vehicle miles. Those vehicles need reasonable car-parking but perhaps with more **park and ride facilities** particularly to the west of town as what was promised on the Medway City Estate may go somewhere in reducing this phenomenon.
- 74) There has always been concern with non-use of waterfront activities. There is mention within the document of a reported demand for **river usage** of which it is believed encouragement should be given.
- 75) The two **aviation facilities** mentioned are surely poles apart but can both play a major part for Medway one in leisure and the other in leisure and commercial. The latter at Rochester could be encouraged as part of the towns integrated transport system to allow e.g. business people an alternative for faster travel. The other at Stoke although confined could be expanded for social and domestic pleasure.

DELIVERABILITY

- 76) Surely local plan policies can only remain deliverable and sustainable if new development infrastructure conditions and requirements are identified and made available as soon as planning applications with associated Section 106 or CIL agreements are finalised. This should be a foresight and not a hindsight requirement.
- 77) The move to CIL on the face of it can possibly have an advantage rather than collective Section 106's only if that CIL is ringfenced to the local area especially within

rural remote areas. We have seen in the past **piecemeal infrastructure** from various housing developments proving to be abysmal and fortuitous and not accommodating the local needs as one would expect.

- 78) As mentioned nearly all infrastructure has to be recognised and prioritised before the event and not afterwards principally those areas which would affect the **wellbeing of the community** such as surgeries, expanded health and hospital facilities, sufficient school places, sports facilities all with the potential for adequate access and public transport.
- 79) Unlocking development potential should not alienate the need of adequate planning process. There ought not to be any shortcuts to the planning process however attractive a site may look to a prospective developer or to the planning authority. There is still a need for public consultation on most important planning applications especially controversial sites. Public opinion must be taken into consideration and the time factor for consultation ought not to be reduced just to ease and speed up the planning process.

DEVELOPMENT STRATEGY

- 80) There are five development principles mentioned in the document. The first may be difficult to achieve. In an ideal world the permeability idea is perhaps workable but not all people are mobile although to have a vehicle free neighbourhood in a shopping area is a wonderful notion if it can be achieved. Of course bus-stops should be well planned and therefore accessible to most people but private cars are still required to carry anything larger than a carrier-bag from high street facilities. High density housing could be considered futuristic and trendy and maybe a way forward but high-rise development is not the way forward as the 1960's witnessed. Firstly why not take advantage of all rundown **empty property space** above shops in High Streets and shopping areas. With a bit of encouragement and financial support empty spaces could be developed into small compact apartments.
- 81) Again the development type options are fine as long as people can see the advantage of **shopping and socialising** close to where they reside. Although it may be the will of the authority it is the developer with the purse-strings that has to be convinced not the people.
- 82) Lodge Hill is mentioned that it was central to the Medway's development strategy but during the consultation process it was made guite clear from overwhelming public response it was not the right development for that site. If the site instead of being approved and then 'called in' had initially been compromised to accept a smaller development of say around 1000 dwellings but without its peripheral nonsense it is believed the site would have now been up and running and somewhere in achieving a useful asset for Medway to be proud of and would have therefore had the advantage of being close to larger existing free-standing settlements. Having said that it is clearly mentioned that the Hoo Peninsula needs consideration to secure the sustainability of all of its historic rural settlements which as suggested must be included within the new plan. There is mention that growth is incremental whereby it can be more difficult to plan for improvements e.g. roads. The only access and egress to the Hoo Peninsula the A228 at Four Elms Hill has not seen any improvement since it was duelled even though many hundreds of dwellings have been allowed to develop over the last few years on the Peninsula and especially in Hoo. Even the 'Sharnal Street Bypass' was privately funded by business. Four Elms Hill is the gateway to the Peninsula and when it is closed (which is guite often) the Peninsula is closed to the outside world. With regard to accommodating a level of future growth making Hoo into more of a 'Market Town' rather than a village may be a step too far. Again it is mentioned that a larger scale of planned growth would come with improvements to existing facilities and provision of new - that did not really happen during the old plan and our members are sceptical with the suggestion that it will happen within the new plan. There is also much concern where it is mentioned 'there is scope for freestanding settlements on the Hoo Peninsula'. We are incensed that

there is seemingly a determination to create at any cost free-standing settlements within the countryside. Protection of the countryside is crucial in Medway's vision of the future.

- 83) Redevelopment of existing employment areas for residential use is a radical step. Those employment areas then have to be moved – where?
- 84) If anything the **green belt boundary** needs to be extended to protect the over-spill of urban areas otherwise towns and their villages will lose their identity entirely.
- 85) Building high-rise/density developments on the riverside creates a **loss of a riverside vista** which is the attraction for tourists. A riverside landscape is something we need to develop and maximise if we are to build a high quality, urban style of living.
- 86) Creating apartments in and around Chatham and the Waterfront is fine but there must not be a **tendency to over-develop** to the extreme by perhaps creating areas that may be regretful in the future.
- 87) Again town centres other than Chatham possibly need a **complete makeover** so they can become more attractive to the larger retailer with less emphasis on charity shops which abound. Again as mentioned all the towns have similar problems as with some areas there is much empty space above retailers that could be tidied up and utilised for accommodation.

<End>

Signed Cllr Lionel Pearce for and on behalf of Hoo Parish Council

Name: Helle Dorrington

Reference 117

Organisation

Berkeley Homes (West London) Ltd

On Behalf Of

Type of Consultee

Developer/Consultant



Medway Council Local Plan

Issues and Options 2012 - 2035 (Consultation Document January/February 2016)

Comments on behalf of Berkeley Homes (West London) Ltd.

Berkeley Homes (West London) Ltd. (BHWL) welcomes the opportunity to comment on the most appropriate approaches and locations for supporting sustainable growth in Medway. Developing the large regeneration site of Victory Pier, fronting the River Medway, we feel we are well placed to make a contribution.

Berkeley Homes seek to create beautiful, successful places characterised by the quality of their design, external spaces, transport and access to jobs and amenities. These are places where people choose to live, work and spend their time and which directly encourage people's wellbeing and quality of life.

Housing

4) Do you agree with the approach and conclusions of the assessment of housing needs calculated for Medway over the plan period?

For Medway to prosper it must aim high and plan for a vibrant, diverse and successful borough. Working towards this goal must be an overarching aim in which good quality homes in the right locations plays an imperative role in delivering mixed and balanced communities.

The universities play an important role in attracting a highly qualified workforce to Medway which historically has had a low skills level. The retention of the students once they complete their education will be important for the prosperity of Medway. They will create demand for good quality housing in Medway form smaller apartments to larger family homes.

5) What do you consider to be the appropriate housing market area for Medway?

People from South East London and neighbouring councils are attracted to settle in Medway because house prices are cheapest in the region and rail links to London are excellent.

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5) What do you consider to be the appropriate housing market area for Medway?

People from South East London and neighbouring councils are attracted to settle in Medway because house prices are cheapest in the region and rail links to London are excellent.

BHWL have found that there is demand from private investors for good quality apartments at Victory Pier. However, in the future, this market is uncertain as it is subject to government reforms in terms of taxation, stamp duty or other restrictions.

6) Do you agree that 25% is an appropriate level for the requirement of affordable housing, and what threshold should be set for the scale of development that needs to provide affordable housing?

BHWL have found that build costs have risen much more sharply than house price at Victory Pier. In addition to rising material costs, we have also experienced difficulty in attracting a skilled workforce to Medway, as many commute to London where they can achieve higher wages for the same work.

Many of the suitable development sites in Medway are brown-field regeneration sites which require significant remediation to be suitable for residential development. In addition, these sites often involve significant infrastructure costs to get the site ready for development and potentially flood risk improvements if in close proximity to the River Medway.

To make these site viable it is therefore important that the level of affordable provision is assessed on a site by site basis and if necessary a viability assessment undertaken demonstrating the realistic level of affordable provision the site can carry to bring it forward for delivery.

BHWL suggests that **up-to** 25% provision to be an appropriate level of affordable housing, however we would promote a greater weighting of intermediate tenure housing.

The affordable threshold of site above 15 dwellings would seem reasonable.

7) What form of housing best meets the needs of Medway's growing population of older people?

Berkeley Homes are committed to developing in a sustainable manner. This is done through our company policies and "Our Vision" – our long term strategy to generate successful, sustainable places where people aspire to live. Part of that vision is to create flexible homes which conforms as far as possible to the Lifetime Homes Standards and which are able to be adaptable as changes occur in the household. This mean that older people are able to remain in their own home for longer.

BHWL have successfully completed an Extra Care complex at Victory Pier. It is very popular with residents and considered highly suitable for the older population which value their independence but has the reassurance of additional help should it be required.

8) What housing is needed for other specific groups in Medway?

Through selling the apartments in Victory Pier, we have found a high demand for smaller apartments. This is both for one-bedroom apartments and "Manhattans" (a large open plan studio apartment where the sleeping area can be partitioned off with sliding doors). These appeal as starter homes, students, single people and down sizers and private investors.

<u>9) How can development make a positive contribution to the health and wellbeing of Medway's communities?</u>

BHWL aspires to create great places where residents enjoy a good quality of life now and in the future. Our developments conforms as far as possible with the Building for Life standards which considers the external built environment. Our developments integrates with the existing area and builds connections through it. We provide good quality homes with well thought out layouts, access and beautifully landscaped external areas which are easy to maintain.

It is important that developers Section 106 contributions are utilised to improve the environment in the locality in which the development is undertaken. This way development will make a contribution to the health and wellbeing in the wider community.

10) Do you have suggestions for potential sites for starter home developments?

A diverse mix of dwelling sizes and tenures generally creates the most successful places. BHWL therefore thinks that the starter homes should be integrated within the proposed developments as far as practical.

<u>11) How do you consider the infrastructure needs of starter home and self and custom build developments should be addressed?</u>

If starter homes are within a larger development, infrastructure needs will be borne by the wider development site and be exempt from Section 106 contributions.

If the starter homes are on separate sites it is reasonable that the infrastructure costs are met or subsidised by grants from local and central government.

12) How should the council provide for the demand for land and self-build housing? For example, integrated with larger developments, on stand-alone sites, or linked to place making ambitions to deliver highly sustainable and innovative design quality.

Development of this type would be best on stand-alone sites. Medway Council will need to enforce strong control and ensure they are well managed. There could be a danger that plots may not be progressed diligently and within an agreed timeframe, leaving neighbouring sites and localities as blighted.

13) What is the demand for student housing and where would this be best located? For example, would dedicated student housing be appropriate in Medway's town centres?

BHWL built successful student accommodation as part of the Victory Pier development, ideally located close to the Universities and local amenities. There is also good transportation links in close proximity. With the proposed further expansion of the number of student intakes to the Medway University Campus there will be additional demand for good quality purpose built

student accommodation. Similar locations to Victory Pier would be best suited to purpose built student accommodation.

Dedicated student accommodation would potentially free up some of the traditional homes in Gillingham which have been converted into student accommodation.

14) What is the level and type of need for gypsy, traveller and travelling showpeople's accommodation in Medway, and what criteria should be used to identify appropriate sites?

No comments.

Affordable Housing

Berkeley are committed to deliver affordable homes within the policy framework of the Local Plan and Government legislation. To meet Medway's target we believe that many different types of affordable would be required. No two sites are the same and should not be treated identically.

Many of Medway Council's development sites are large brownfield sites next to the river. However, they are costly to bring forward as they usually require significant remediation, flood mitigation, new access arrangements and other utility and infrastructure costs. To be able to deliver these sites the viability for delivering the affordable provision is not always possible.

In Berkeley's experience of selling homes at Victory Pier we have found that the price of housing in Medway have a glass ceiling. This means that for certain site, values would not be achieved to be able to support the 25% level of affordable housing. It is therefore important that Medway's planning policy has the flexibility for assessing the affordable on a site by site basis and that the affordable level of provision should be **up-to** 25%.

There should also be flexibility within policy for affordable tenure split of 60% rented, 40% shared ownership and to consider other affordable models. We would welcome the principle starter homes as a type of affordable housing, however clear guidance from central government on this tenure is still unclear.

Medway should also consider the potential for exploring donor sites for affordable housing as well as off-site contributions to ensure the production of affordable housing is maximised within the borough and also delivered in the most suitable locations.

Development Strategy

80) Are the development principles right? Should other guiding principles be introduced?

Medway Council is likely to need to use all the outlined development approaches to deliver housing in Medway if demand is to be met; (high density town centre and riverside development; incremental suburban development; planned growth of existing settlements; freestanding settlements; urban extensions; role of custom and self-build housing and approaches to the town centres). To create prosperous and attractive areas in Medway in which people would like to live, work and spend time, it is important to make priorities and Berkeley thinks this should be done by promoting the town centre and large river fronted regeneration sites. It would open up attractive areas of the River Medway and mend connectivity in the urban fabric.

Medway has excellent rail connections which makes development in the borough attractive to developers and residents. However, the topography of Medway is such that the inadequate road network gets congested. This will be a deterrent for many developers. Medway Council should consider how the network could be improved to accommodate the additional homes required within the plan period and make funding available to achieve improvements. Unless a strategic framework to adequately access to the many riverside regeneration sites are considered, Medway's vision of a growing, prosperous, attractive town will be difficult to achieve.

81) Do you agree with the assessment of the advantages and disadvantages of the various development type options set out above? Are there other advantages and disadvantages that should be achieved?

Medway has a unique set of natural assets in the borough. It is important that they are retained and enhanced. These are finite resources and are in part what attracts developers and residents to Medway. However, there are opportunities in the borough which could include for extensions to the existing urban conurbations without harming the environment or the setting of the existing villages and they should be pursued. Developments should seek to integrate and enhance the existing fabric of Medway where possible.

82) Which development type (or combination of types) do you think best meets the identified growth requirements for Medway?

To achieve Medway's growth requirements, BHWL thinks that not one development type would be adequate. A combination of all the development types would be required. This would also attract a wider range of developers, increasing the level of delivery. However BHWL believes that sustainable development through the reuse of existing brownfield sites. should be prioritised but must include funding support for the larger riverside regeneration sites. Greenfield release in fringe locations should also be considered to support the growth of new and existing settlements.

83) Should we consider more radical approaches to meeting development needs, such as significant increases in density, or large scale redevelopment of existing employment areas for residential or mixed use?

The demand for accommodation for single and small households lends itself to higher density development. They would be suitable for sustainable locations close to town centres where transportations and local facilities are readily available and the need for car ownership less. However, there is a profound need to maintain a high quality of design when considering greater density larger schemes.

Planning policy should be flexible so existing employment areas could be reconsidered for residential or mixed use redevelopment, particularly in river fronting locations or locations in close proximity to major public transport links.

84) Should the green belt boundary be reviewed?

BHWL thinks it is a good idea to review the green belt boundary. However, it should not be a prerequisite that it is with the view of decreasing the green spaces. It is the quality of the green belt which is important and some areas within the current green belt is undoubtedly of such a poor standard that sensitive development would be preferable to the current state.

It is important to keep the strategic green buffers between the built fabric of the towns and villages. It retains the identity of the different villages and urban environments and contains urban sprawl. It provides a sense of place for the communities in each area. Furthermore it is of ecological value as green lungs and habitat corridors.

85) What provision should be made for mixed use in residential developments, both high density and low density?

In Medway, BHWL have experience of delivering ground floor commercial accommodation on the high density Victory Pier development. Despite the retail units having been available for several years we have had very limited interest from operators in occupying the units. Accommodation facing Gillingham Pier has remained empty since they were built. Demand for commercial space has been for locations next to road frontage with high levels of footfall. Where the commercial units are not visible from a main thoroughfare it is very hard to attract visitors to the destination.

BHWL proposes that mixed use schemes should only be a requirement in suitable town centre high density locations. We are not aware of any low density mixed use developments where the commercial elements have been considered successful.

86) What approach should be taken to future development opportunities and mix of uses in Chatham town centre and Waterfront?

The Issues and Options Consultation Document outlines three proposals for Chatham town centre. BHWL thinks it is a good idea to increase the number of residential homes in the town centre. The trend of retail decreasing has been seen over the last few decades and is unlikely to change. To make a large and thriving urban neighbourhood, high residential densities in Chatham town centre should be welcomed as sustainable development.

Sites looking on to the river would be especially attractive to developers provided it is not blighted by adjacent unsocial uses (bus station and water pumping station).

87) Do you agree that the town centres require improvement in their existing roles, or should we consider holistic review of any of them in conjunction with nearby waterfront regeneration sites?

For Medway to be a thriving, vibrant place in which people are attracted it is important the all of the town centres are reviewed holistically when new development is proposed. This is especially relevant in relation to the large waterfront regeneration sites which is such an asset and runs through the heart of the borough of Medway. Nevertheless, now is also the opportune time to review town centre vision and improvements of all the Medway towns.

We hope Medway Council find our comments and suggestions helpful and will inform the draft of the new Local Plan.

Yours Sincerely,

Helle Dorrington

Architect

Berkeley Homes (West London) Limited Chelsea Bridge Wharf | 380 Queenstown Road | London | SW8 4PE |

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Registered Office: Berkeley House, 19 Portsmouth Road, Cobham, Surrey, KT11 1JG

Name: Kelly Haynes

Reference

118

Organisation

Environmental Protection Medway Council

On Behalf Of

Type of Consultee

Government/Public Body

Environmental Health Comments on Medway Council's

Local Plan Issues and Options Consultation

February 2016

1. Air Quality

Currently, there is no statutory guidance on how to deal with air quality considerations through the planning system. Most guidance concerns itself with technical modelling of impacts with little information provided on how to mitigate against impacts. The Kent and Medway Air Quality Partnership has developed a supplementary planning document (SPD) which uses the approach developed by other councils in the West Midlands, Yorkshire and Sussex that both simplifies the assessment of air quality for development schemes while placing more emphasis on incorporating road transport emission mitigation as standard.

It is recognised that development will in the main inherently increase road transport emissions, both during the construction and operational phases. However, it is also recognised that sustainable development can be a positive force for change. The approach in the SPD seeks to minimise road transport emissions wherever practicable to sustainable levels, while also seeking to counter the cumulative impacts arising from all developments.

A key theme of the National Planning Policy Framework (NPPF) is that developments should enable future occupiers to make green vehicle choices and it explicitly states that low emission vehicle infrastructure, including electric vehicle re-charging, should be provided. The SPD seeks to develop consistent EV re-charging standards for new developments across Kent.

It is hoped that by securing reasonable emission mitigation on each scheme, where appropriate, cumulative impact effects, arising from overall development can be minimised.

This new approach will provide greater clarity and consistency for developers, which should help to speed up the planning process.

Medway's Air Quality SPD

The Air Quality SPD uses the Major sized category defined by the Department for Transport indicative thresholds for transport assessments to determine if a development should provide an emissions mitigation assessment which is less onerous than a full air quality assessment. The assessment uses a formula to calculate the emissions resulting from a development or change of development use and produces a cost for mitigation measures and/or compensation. Scheme mitigation equivalent to this cost would then be required to be provided within the design of the development where possible.

Example mitigation: -

- Electric vehicle charging points
- Low NOx boilers
- Cycle paths and cycle storage
- Green infrastructure
- Use of low emission commercial vehicles
- Public transport subsidies for employees

However, those developments which are close to or within an AQMA will also need to include a standard air quality assessment to determine the impact of the development on air quality and to determine if mitigation measures (such as ventilation) are required to reduce the impact on the health of the occupiers of the development.

For <u>all</u> developments that fall below the major sized category regardless of whether they are inside of an AQMA or not, standard mitigation of electric vehicle charging points and low NOx boilers will be required to make the development acceptable in terms of air quality.

Recommendations

Environmental Health recommends that a specific policy on air quality be included within the Local Plan which supports the use of the SPD.

2. Transport and Parking

An efficient transport system is vital to the success of future developments. The proposed high levels of growth in Medway should be supported by improved sustainable transport links including the provision of Park and Ride services and initiatives to encourage a modal shift towards more environmentally sustainable forms of transport, as well as encouraging more walking and cycling which will have environmental and health benefits.

The Local Plan should promote development that reduces the need to travel, especially by car and should promote sustainable travel by encouraging people to walk, cycle or use the bus or train. All developments should seek to reduce the number of vehicle trips and deliver appropriate mitigation measures to reduce congestion and improve air quality.

Higher density developments and those that generate significant traffic movements should be located in the parts of Medway that have the best access to public transport alternatives.

Controlling the level and location of car parking is crucial to ensuring more sustainable travel patterns whilst also increasing public health. There is currently a high provision of cheap car parking in Medway's town centres and without parking restraint the levels of growth predicted would lead to unacceptable levels of traffic congestion and air pollution. The provision of suitable Park and Ride sites would enable the levels of car parking within Medway's town centres to be reduced to reduce congestion and improve air quality.

3. Noise and Vibration

A noise and vibration SPD has been developed by the Kent Pollution Group and has been approved by the Kent Planning Officers Group. It seeks to ensure that there is sufficient mitigation for noise to prevent substantial loss of amenity at the development stage, and is based on existing practice carried out within Medway Council.

Recommendations

Environmental Health recommends that a specific policy on noise be included within the Local Plan which supports the use of the SPD.

4. Contaminated Land

A contaminated land SPD has been developed by the Kent Pollution Group and has been approved by the Kent Planning Officers Group. It seeks to ensure that there is appropriate protection from contamination at the development stage, and is based on existing practice carried out within Medway Council.

Recommendations

Environmental Health recommends that a specific policy on contaminated land be included within the Local Plan which supports the use of the SPD.

Name: Nicky Saynor

Reference 119

Organisation PHE South east

On Behalf Of

Type of Consultee

Government/Public Body

Medway Local Plan Consultation, PHE South East response, February 2016

Issues

• We would want to see the plan demonstrably link evidence of need in the JSNA and Health & Wellbeing Strategy to plans for development and adaptions to the built environment, services and facilities.

Housing

 It would be helpful to see evidence of data linking seasonal excess deaths in older people and respiratory conditions in infants and young children with plans to improve the quality of private and social housing stock – particularly addressing issues of damp and affordability.

Economy

• With regards to future proofing the Medway Local Plan, we would encourage consideration of the potential for local economic partnerships to build public health outcomes routinely into plans to foster economic growth.

Tourism

• We would welcome any actions which support opportunities for visitors and residents to be more physically active and to spend more time in the natural and built environment, in light of the evidence for benefits to physical and mental health this can bring.

Retail, commercial leisure & town centres

- We would encourage consideration of equitable access to commercial physical environments that facilitate walking, cycling and mobility.
- Consideration needs to be given to the impact of street furniture in such settings to enable older people and families with young children to safely navigate through the commercial space.
- Consideration should also be given to regular opportunities for older people, young families and people with disabilities to be able to sit safely in public spaces.
- Ensuring that there are regular opportunities for people to access clean, safe toilets, which is an important factor that can limit accessibility particularly for older people.
- We would applaud any additional opportunities to extend leisure facilities which encourage affordable active lifestyles, such as children's play areas and skate parks. This should be considered alongside opportunities through the build environment to increase walking and cycling.

Environment

• It is positive to see Medway's recognition of the need to protect and enhance the natural environment in light of the benefits it can provide in the form of providing open space to relax, exercise and learn. We would support the suggestion in s11.10 to consider opportunities to promote greater access to the river and would

encourage consideration of how to maximise opportunities for promoting active travel whether through walking or cycling and greater use more generally of open spaces by the whole population.

Build environment

- With regards the characteristics that make a place good to live, in addition to the promotion of active travel through enabling greater levels of walking and cycling and the additional points raised under 'Retail, commercial leisure & town centres' section above, we would note the importance of designing space that promotes social interaction, considers walkability, promotes active travel, ensures adequate street lighting to improve safety and the perceptions of safety and takes in to account the value of of green space and natural light in fostering mental wellbeing.
- New buildings should ensure public health considerations are born in mind such as through designs that promote the use of stairs rather than lifts through lay out and signage.

Rural issues

• A key issue is ensuring families and individuals are connected with communities, facilities and services. Therefore consideration should be given to supporting access to regular and affordable public transportation, integrated with opportunities for active travel elements where feasible.

Infrastructure and services

- We commend the inclusion as a key objective for the plan the promotion of a healthier Medway and opportunities to support healthier lifestyle choices through access to nutritious food, walking, cycling and exercise as engagement in community life.
- Similarly we commend the intentions to provide secondary care services in community and home settings and promote availability of telecare services. Consideration should be given to ensuring equitable access for the whole eligible community.

Social and community infrastructure

• We would emphasise the importance of the insights and recommendations within this section, particularly regarding the need to ensure plans take in to account changing demographics and the implications of this to community needs.

Open space

• It is positive to see Medway's recognition of the importance of open space as a community resources and the benefits that this can deliver and we would encourage full consideration of opportunities to maximise opportunities for this through the plan, for the benefit of local people's physical and mental health.

• Given the strong evidence of growing rates of childhood and adult overweight and obesity, we could strongly encourage Medway to secure existing facilities which support physical activity and to seek opportunities to address shortfalls.

Air Quality

• The plan should consider traffic management in the AQMA to reduce NOx, such as reduced speed areas, emission control for commercial vehicles, location of charging points for electric vehicles and/or other similar controls.

Waste

- We would support initiatives to increase the recycling rates both for household and commercial streams.
- We would encourage plans to manage the waste processing as close to its source as possible, and to explore all options of waste treatment as well as relocation of existing waste transfer stations

Sustainability and climate change/Flood risk

• We would encourage the plan to consider the effects of localised flooding, particularly surface water flooding.

Transport

- We would support plans to enable regular and safe walking and cycling for local people through development and adaption of pathways, cycle routes, signage and traffic management that supports safer cycling throughout Medway.
- We would also encourage plans which aim to reduce community severance through traffic calming, and redesign of road systems in and around neighbourhoods.

Name: Alister Henderson

Reference 120

Organisation Carter Jonas

On Behalf Of National Grid Property Holdings

Type of Consultee

Developer/Consultant

Carter Jonas

One Chapel Place London W1G 0BG

Planning Policy Regeneration Community and Culture Medway Council Gun Wharf Dock Road Chatham Kent ME4 4TR

Your ref: 3538295v1

26 February 2016

Dear Sir or Madam

MEDWAY COUNCIL LOCAL PLAN – ISSUES AND OPTIONS REPRESENTATIONS

I am writing on behalf of our client National Grid Property Holdings (NGPH) and these representations are written in the context of their substantial landholding at the Isle of Grain. The site is owned by Thamesport Interchange Limited, which is wholly owned and managed by NGPH.

I have previously written to the Council submitting the site, to the 'Call for Sites' process in May 2014. Previous submissions will have been received from Planning Perspectives LLP, please note Planning Perspectives was bought by Carter Jonas in December 2015, hence this letter is sent from Carter Jonas LLP.

The existing Medway Local Plan (2003) shows that the site is allocated for employment purposes and part of the landholding has planning permission (MC/09/1628) for:

"the development for up to 464,685 sqm of built employment space for (Use Classes B1(c), B2 and B8 – including open storage), and up to 245 sqm of floorspace for a business park management centre (Class B1(a) and retail unit(s) (Classes A1, A3 and A5), with associated infrastructure, landscaping, car parking and access."

In addition, the first phase reserved matters for this site (MC/15/1051) was approved in July 2015.

The site was previously an old oil refinery and the rich industrial heritage has been continued with a number of nationally significant energy users on the site. Two examples include National Grid Grain LNG, which has the ability to provide up to 20% of the UK's forecast gas demand and the BritNed interconnector, which operates the electricity link between the UK and the Netherlands.

Our representations below are made with the above context in mind. I have set out representations based on the Chapter Headings used in the Issues and Options Document.

Economy

On page 30 and 31 the document references Kingsnorth and the Isle of Grain on the Hoo Peninsula and confirms that these areas offer significant space for heavy industries, large-scale distribution and businesses reliant on wharfage. It confirms that there is significant potential for intensification and expansion, with

capacity to accommodate land-intensive and heavy industries that are less likely to be based in urban or urban fringe locations.

This approach is supported and these uses are supported by NGPH. However, it is important that any future allocation for this site does not just focus on B2 and B8 uses. As stated earlier in this letter, there are numerous nationally significant energy providers on the site and there is also huge potential for these types of uses to continue to be used and expanded on in this location.

The existing Medway Local Plan (2003) specifically identifies the site for a wide range of uses including B1(c), B2 and B8 uses, special industrial uses and industrial uses not in a use class. We believe that this broad range of uses should be retained in the new Local Plan, to maintain flexibility on this regionally and nationally significant site.

This flexibility will ensure that the site reaches its full development potential in terms of industry, energy provision, employment space and creation of jobs in the local area.

We agree and support comments at paragraph 8.22 of the Issue and Options document, which confirms that the large sites on the Hoo Peninsula are well positioned to compete within the regional market for large scale industrial and distribution activity, but are unlikely to be appropriate locations for office based or SME activity.

Question 21 of the document queries how the specific locational requirements of some businesses that require access to wharves can be catered for. In our view, flexible policies which encourage active use of the wharves would be suitable. The policy should not be too prescriptive in terms of the end users at the wharves. As long as the uses are compatible and relate to industrial, energy and employment based uses, then this is supported by NGPH.

Energy

Paragraph 24.1 recognises the substantial contribution that Medway makes towards energy supply, which is a helpful context for the remainder of this Chapter.

Question 69 queries what policies should be set for other forms of energy development? With the Isle of Grain site in mind, there are significant areas on the former oil refinery site that could be utilised for new sources of energy production and processing. Policies in this area should remain flexible to ensure that any future opportunities can be realised in this location.

Conclusions

Overall, it is vital that the strategic importance of the NGPH landholding at the Isle of Grain is recognised in the emerging Local Plan. We recognise that this is an early stage of the document, simply covering the 'Issues and Options' at this point in time. However, at this stage it does seem as though the most important issues are being considered as part of future policy.

I trust you find the above comments to be helpful at this stage. However, please do not hesitate to contact me should you wish to discuss further.

In the meantime, I would be grateful if you could continue to keep me informed of progress of the Local Plan.

Yours faithfully

Alister Henderson Partner

Carter Jonas

Cc Charles Connoly – National Grid Property Holdings

Name: Paul Sharpe

Reference 121

Organisation Paul Sharpe Associates

On Behalf Of Hillier Estates Limited

Type of Consultee

Developer/Consultant

maryott, kyle

From:	
Sent:	23 February 2016 15:58
То:	policy, planning
Cc:	
Subject:	MEDWAY COUNCIL ISSUES & OPTIONS CONSULTATION DOCUMENT
Follow Up Flag:	Follow up
Flag Status:	Completed

Dear Sir

We act for Hillier Estates Limited, the owner of SLAA site 0822 (Land at Robins & Day) Land at 197 High Street, Rochester. We comment selectively on Q80 – 87 in the context of seeking the most appropriate form of development for what must be one of the most important redevelopment sites in Rochester town centre identified in the Council's "Star Hill to Sun Pier Planning & Design Strategy SPD" as "Star Hill – Sun Pier Gateway".

Q80 – We have no fundamental objection to the identified development principles set out in para 27.8. However, we would comment that this list implies an attempt to return to the higher densities advocated by the last Labour Government and enshrined in, the (now superceded) PPG3 Housing. Generally, that experience shows that a blanket increase in density was not successful, particularly in suburban locations where family housing with gardens, are much preferred.

In or near urban centres however, higher development densities are accepted but with the relocation of industrial/employment uses to more peripheral locations and now the further decline of retailing generally as a town centre function, (having suffered from first out of town retailing and now internet retailing) the reintroduction of residential use should be further considered.

In Rochester town centre, the relatively limited development opportunity that site 0822 represents; its proximity to the railway station; its proximity to services and facilities and its heritage location between the two conservation areas all point to the need for an appropriate mix of uses for this site. We believe that a predominantly residential redevelopment scheme would fulfil the sustainable development potential of this site.

Q81 & Q83 – We agree with the advantages of high density town centre and riverside development. However, a further advantage displayed by site 0822 is the Thames Gateway role that could be fulfilled in providing residential accommodation for London. The proximity of the site to the railway station means that a predominantly residential redevelopment can also cater for that need, ie a strategic objective of housing provision in Medway.

In the same way as Rochester Riverside (not considered an obvious or traditional location for residential redevelopment) is now referred to as a potential location for such development, so too should this High Street site be similarly considered. Site 0822 is currently in industrial/quasi industrial use and its High Street and conservation area attributes mean that it presents a unique redevelopment opportunity. A large comprehensive planned new neighbourhood is not required but rather a sensitively designed sustainable development, enhancing the conservation area, improving urban design, High Street frontage and a sense of place at the junction of two conservation areas and providing residential accommodation that helps underpin existing services and facilities and thus the heritage fabric of the wider conservation areas.

Q86, Q87 & Q27 – In the two questions posed here, and in paras 27.35 – 27.49, we feel that the role of the town centres, other than Chatham, are being relegated. One size does not necessarily fit all and these centres have an important role to play in the development strategy for Medway.

As set out in para 27.50 a more detailed place by place analysis with an emphasis on finding the best mix of patterns of development is required. Importantly, this approach must apply to the town centre of Rochester.

Para 10.11 correctly identifies the specialist tourist role of Rochester town centre with limited convenience retailing. The general lack of a convenience store (rather than a supermarket) tends to confirm a lack of population/customers within close proximity. This observation tends to underpin the case for higher density residential development and convenience retail space within the centre of Rochester.

Historically, with urbanisation, the service function of town centres expanded, firstly by the conversion of residential property to shops etc and later to be replaced perhaps by purpose designed shops. With the advent of mass car ownership, out of town retailing and now internet shopping, town centres are contracting and it is only logical that vacated space be replaced by the return of residential uses in those town centres. In turn, the additional residential activity would bolster the remaining retail uses and commercial viability.

The overriding conclusion therefore is the need to regenerate town centres (particularly Rochester town centre) with mixed uses – with an emphasis on residential uses.

I would be grateful if you would kindly acknowledge receipt of these representations and please be in contact if there are any further queries.

Yours sincerely

Paul H Sharpe Paul Sharpe Associates LLP

The Old Rectory, Broad Blunsdon, Swindon SN26 7DQ

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Em17/23.2.16

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Reference 122

Organisation Nathaniel lichfield & Partners

On Behalf Of Peel Holdings Limited

Type of Consultee

Developer/Consultant





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Date 29 February 2016 Our ref 06715/NG/JHy/10850502v1 Your ref

Dear Sir/Madam

Representations to Medway Local Plan: Issues and Options

This letter has been prepared by Nathaniel Lichfield & Partners ("NLP") on behalf of our client, the Peel Group including 'Peel Holdings (Land and Property) Limited ("Peel").

Peel is a private real estate, media, transport and infrastructure investment company who are a major landowner in the Borough. Landholdings include the Port of Sheerness, 'Peel Energy' who are an investor and developer of low carbon energy sources in the UK, and 'Peel Ports Medway' who are the Statutory Harbour Authority for 27.3 nautical miles of the River Medway as well as the operator for the Port of Sheerness. Peel Land and Property Ltd owns Chatham Docks.

NLP have previously submitted representations on behalf of Peel in relation to their landholdings at Chatham Docks (SLAA Ref: 0824), Wooley's Orchard (SLAA Ref. 0749) and Land East of Seymour Road (SLAA Ref. 1047).

This letter comprises formal representations to the Issues and Options document in respect of the emerging Medway Local Plan. Peel has also submitted an additional representation to the Strategic Land Availability Assessment (SLAA) in respect of the Chatham Docks site.

Peel welcomes the opportunity to be involved in the creation of policies that will form part of the emerging Local Plan. These representations provide comment in relation to questions posed within the consultation document relating to housing and development strategy.

Peel's responses to questions 4 and 82 are set out below.

Nathaniel Lichfield & Partners Limited 14 Regent's Wharf All Saints Street London N1 9RL Registered in England No. 2778116 Regulated by the RICS

Offices also in Bristol Cardiff Edinburgh Leeds Manchester Newcastle Thames Valley



2) What do you think are the strategic issues that the Local Plan needs to address?

Give the current housing crisis in the South East a key priority must be to identify sufficient housing development land to identify the five year land supply in the short term and the OAN in the longer term. The plan must identify a broad range of sites in terms of location and the type of dwellings provided including high density flats and family housing.

3) How should the council respond to these issues?

The council needs to review all development opportunities identified in the call for sites and ensure that a broad mix of development opportunities are allocated.

Housing

4) Do you agree with the approach and conclusions of the assessment of housing needs calculated for Medway over the plan period?

5) What do you consider to be the appropriate housing market area for Medway?

The OAN is estimated to be 29,463 dwellings by 2035, however the Council's SHMA suggests the OAN is higher than this. The OAN adopts a ten year migration scenario and a 100% unattributable population change. The adoption of the un-attributable population change approach is not robust and is unsound, as indicated by the outcomes of number of recent Local Plan Examinations across the South East. As a result the demographic baseline for OAN in Medway will increase and the projections for Medway will increase accordingly.

The ONS national population 2014 projections indicate higher growth than the previous 2012 projections. The London Plan assumes an increase in out-migration and a decrease in inmigration, therefore the net outflow of population from London will increase the OAN in the South East and Medway.

The emerging plan must be based on a robust and sound OAN.

6) Do you agree that 25% is an appropriate level for the requirement of affordable housing, and what threshold should be set for the scale of development that needs to provide affordable housing?

The appropriate requirement for affordable housing needs to be kept under review and is inextricably linked to the OAN, the range of housing sites allocated and the appropriate density of development on these allocated sites. At this stage the proposed 25% appears to be a realistic maximum target. However the current need for affordable homes is 744 per annum. If the 25% applied then 2,976 dwellings would need to be delivered per annum, compared with the OAN estimate of only 1,281 per annum. Significantly increasing the affordable content will not be viable, therefore an increase in the OAN is required to deliver sufficient affordable homes. The SHMA recognises that the affordable housing needs cannot be realistically met in full within the OAN estimate and that this could justify an increase in the overall OAN.

7) What form of housing best meets the needs of Medway's growing population of older people?



As indicated in the responses to other housing related questions, the OAN needs to increase in order respond to the needs of the community as a whole. The plan must identify a broad range of sites in terms of location and the type of dwellings provided including high density development.

8) What housing is needed for other specific groups in Medway?

As indicated in the responses to other housing related questions, the OAN needs to increase in order respond to the needs of the community as a whole. The plan must identify a broad range of sites in terms of location and the type of dwellings provided including high density development.

10) Do you have suggestions for potential sites for starter home developments?

As indicated in the responses to other housing related questions, the OAN needs to increase in order respond to the needs of the community as a whole. The plan must identify opportunities where high density residential development will be appropriate. In appropriate location development densities can exceed 90 dph.

Economy

21) How should the plan address the specific locational requirements of some businesses, for example access to wharves?

Chatham Dock is currently designated as employment land, but the SHENA indicates there is a surplus of this type of land in the sub-region. The Port of Sheerness is the key deep water commercial port in the sub-region. Peel Ports is promoting and implementing a comprehensive masterplan to expand this port function, and this will adequately serve businesses within the Medway area. The emerging plan should not seek to safeguard the future of Chatham Dock as employment land or an operational commercial port facility.

Transport

74) What are the requirements for waterside infrastructure, such as docks, wharves, marinas, piers and berths, and their supporting landside facilities, to support commercial and leisure activities?

Chatham Dock is currently designated as employment land, but the SHENA indicates there is a surplus of this type of land in the sub-region. The Port of Sheerness is the key deep water commercial port in the sub-region. Peel Ports is promoting and implementing a comprehensive masterplan to expand this port function, and this will adequately serve businesses within the Medway area. The emerging plan should not seek to safeguard the future of Chatham Dock as employment land or an operational commercial port facility.

Development Strategy

81) Do you agree with the assessment of advantages and disadvantages of the various development type options set out above? Are there other advantages and disadvantages that should be considered?

The advantages of high density riverside development in meeting new lifestyle trends is clear and this type of development will have an important role in meeting the OAN. We do not accept that Medway cannot achieve high-density development approaching the densities achieved in London.



Riverside locations in particular provide opportunities to achieve higher densities and critical mass, without adverse impacts from higher buildings.

The call for sites has identified a number of opportunities for appropriate incremental suburban development that does not involve the loss of green belt land or environmentally sensitive areas. The advantages of development in these types of location are clear, but we do not accept that this approach will lead to "very substantial new housing estates added to all or most of its current edges". This incremental approach is appropriate provided that each site is considered on its merits.

The issues and options document fails to differentiate between types of incremental suburban development. Suburban development can involve an acceptable infilling of the built-up area, whilst other development could encroach into the open countryside or reduce the gap between settlements. The impacts of these two types of development would be very different.

Peel also does not accept that this form of development is more difficult in terms of planning for improvements to roads and community facilities, and has a more significant impact on the countryside than other options identified i.e. significant planned growth of existing settlements or freestanding settlements.

Whilst significant planned growth of existing settlements and freestanding settlements may provide an opportunity to improve shops, schools and community facilities the provision, these benefits need to be weighed against other harmful impacts. The issues and options document does not fully reflect the environmental harm that could be caused by these approaches, particularly when compared with the other options identified. The harm to the environment and the countryside could prove to be far more significant.

82) Which development type (or combination of types) do you think best meets the identified growth requirements for Medway.

Notwithstanding other responses relating to an increase in the OAN, the OAN is a significant target and therefore more than one growth option will be required to meet the target year on year. In order to meet the OAN in the short, medium and long term a combination of approaches is required.

Peel considers that the significant planned growth of existing settlements and freestanding settlements options present the highest risk in terms of delivery and environmental impacts (see response to Question 82)

Peel considers that a key priority that should be progressed is high-density town centre and riverside development. This development option provides opportunity to rejuvenate underused brownfield sites in central areas to create sustainable communities and make a meaningful contribution towards Medway Council's identified housing need. An example of the positive contribution this development option can make is the Chatham Waters Development which has outline approval for 950 residential units on 14.6ha (Ref. MC/11/2756), which by itself will provide 74.2% of Medway Council's annual OAN.

High density town centre and riverside development will not only provide a significant supply of housing, it maximises space, sustains local services and meets an identified need. The Medway Strategic Housing Market Assessment (SHMA) (November 2015) identifies that the number of households in the 15-24 and 25-34 age groups will increase by 5% and 13% respectively from



2013-2033. High density town centre and riverside development predominantly comprises smaller housing units, typically 1 to 2 beds, and as such can help to meet this future need.

It is recognised that high-density development will not support the housing requirements of everyone; and as such, should be supplemented by additional growth options of which incremental suburban development is considered most appropriate. This has the potential to utilise sustainable and well connected infill plots on the edge of existing settlements to meet the housing requirements for families. Furthermore, the land is often available for development in a timely manner and as such can help to contribute towards the Council's immediate housing need.

In addition to high density development, incremental suburban development can make a contribution in suitable locations. In particular for much needed family housing.

83) Should we consider more radical approaches to meeting development needs, such as significant increases in density, or large-scale redevelopment of existing employment areas for residential or mixed use?

The SHENA indicates there is a surplus of employment land in the sub-region. Some of this land including Chatham Docks should be released for high density residential led development. As indicated in the responses to other housing related questions, the OAN needs to increase in order respond to the needs of the community as a whole. The plan must identify opportunities where high density residential development will be appropriate. In appropriate location development densities can exceed 90 dph

84) Should the green belt boundary be reviewed?

Peel believes the green belt boundary may need to be reviewed once a robust OAN figure has been established and an appropriate appraisal of development sites has been undertaken. The first priority for development should be non-green belt land, in particular brownfield land and appropriate suburban development.

We consider that the suggestions set out within these representations are appropriate and will assist in ensuring sustainable, viable and deliverable development within Medway.

Please contact Peter Wilks or myself should you have any queries or require any further information.

Yours faithfully

Joshua Hymer Planner

Сору

Philip Rothwell Sheila Wright Warren Marshall Peel Holdings (Land and Property) Limited Peel Holdings (Land and Property) Limited Peel Holdings (Land and Property) Limited

Name: Mat Evans

Reference 123

Organisation Gladman

On Behalf Of

Type of Consultee

Developer/Consultant

Gladman Development Ltd

Medway Council Local Plan Issues and Options 2012-2035



February 2016

CONTENTS

Exec	utive Summary	3
Conte	ext	.3
Policy	y Options	.3
1	Introduction	4
1.1	Context	.4
2	National Planning Policy	5
2.1	National Planning Policy Framework and Planning Practice Guidance	5
3	Legal Compliance	7
3.1	Duty to Cooperate	.7
3.2	Sustainability Appraisal	.8
4	Objectively Assessed Housing Need	9
4.1	Background	.9
4.2	Objectively Assessed Need for Medway1	1
5	Medway Issues and Options1	2
5.1	Questions 2 & 3 – Strategic Issues1	2
5.2	Questions 4 – 14 – Housing1	2
5.3	Questions 15 – 21 – Economy1	2
5.4	Questions 30 – 32 – Environment1	3
5.5	Questions 38 – 42 – Rural1	3
5.6	Question 56 – Natural Resources1	4
5.7	Question 76 – 79 – Deliverability1	4
5.8	Questions 80 – 87 – Development Strategy1	4
6	Site Submissions 1	6
6.1	Introduction1	6
6.2	Moor Street, Rainham1	7
6.3	Land off Stoke Road, Hoo St Werburgh1	8
6.4	Chattenden Lane, Chattenden1	9
6.5	Town Road, Cliffe Woods	20
7	Conclusions 2	2 :2

APPENDICES

Appendix 1 Urban Extensions – Assessment of Delivery Rates - Savills
EXECUTIVE SUMMARY

Context

- i. Gladman Developments specialise in the promotion of strategic land for residential development with associated community infrastructure. This submission provides Gladman Development's representation to the Medway Local Plan Issues and Options.
- ii. Gladman intend to continue to keep abreast of the Local Plan preparation process and submit further representations at the later stages of public consultation.

Policy Options

- iii. The representation contains our views on a wide range of issues which are starting to emerge at this early stage of the plan preparation process. These include comments in relation to OAN, Sustainability Appraisal and Duty to Cooperate. It is noted that the OAN consultation period has been extended for a period of 4 weeks and Gladman will be making a separate representation on this issue.
- iv. We also consider the proposed strategies for meeting the housing need within Medway, and some of the policy areas which are beginning to emerge. Given our interests our comments largely relate to how the plan can help Medway meets its housing needs.
- v. Our representation also includes a number of sites, which Gladman are currently promoting, and to which we believe can sustainably help meet the emerging needs of Medway and as such should be allocated in the emerging plan.

1 INTRODUCTION

1.1 Context

- 1.1.1 Gladman Developments specialise in the promotion of strategic land for residential development with associated community infrastructure. This submission provides Gladman Developments' representations on the Medway Local Plan Issues and Options 2012-2035.
- 1.1.2 Through this submission Gladman will highlight a number of areas of support for the Councils proposed approach as well as highlighting some issues which give us concern moving forward, and to which we would wish to highlight at this early stage in order to allow the Council to prepare a sound plan. Given the nature of our interest our comments relate largely to the ability of the plan to sustainably meet its full objectively assessed needs for housing (OAN) and the implications this has on the emerging policies and goals of the plan.
- 1.1.3 Even at this early stage of the plan making process it is imperative that the document is setting the foundations to meet the National Planning Policy Frameworks (NPPF) four tests for Local Plans to be considered sound:
 - Positively Prepared
 - Justified
 - Effective
 - Consistent with National Policy

2 NATIONAL PLANNING POLICY

2.1 National Planning Policy Framework and Planning Practice Guidance

2.1.1 The National Planning Policy Framework has been with us now for over three years and the development industry has experience with its application and the fundamental changes it has brought about in relation to the way the planning system functions. The Framework sets out the Government's goal to 'significantly boost the supply of housing' and how this should be reflected through the preparation of Local Plans. In this regard it sets out specific guidance that local planning authorities must take into account when identifying and meeting their objectively assessed housing needs:

"To boost significantly the supply of housing, local planning authorities should:

- Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area
- Identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements..."
- Identify a supply of specific, developable sites or broad locations for growth, for years 6-10, and where possible for years 11-15" (Paragraph 47)"
- 2.1.2 The starting point of identifying objectively assessed housing needs is set out in paragraph 159 of the NPPF, which requires local planning authorities to prepare a Strategic Housing Market Assessment, working with neighbouring authorities where housing market areas cross administrative boundaries. It is clear from the Framework that the objective assessment of housing needs should take full account of up-to-date and relevant evidence about the economic and social characteristics and prospects of the area, with local planning authorities ensuring that their assessment of and strategies for housing and employment are integrated and take full account of relevant market and economic signals (paragraph 158).
- 2.1.3 Once a local authority has identified its objectively assessed needs for housing these needs should be met in full, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so (paragraph 14). Local planning authorities should seek to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Adverse impacts on any of these dimensions should be avoided. Where adverse impacts are unavoidable, mitigation or compensatory measures may be appropriate (paragraph 152).
- 2.1.4 As the Council will be aware the Government published its final suite of Planning Practice Guidance (PPG) on the 6th March 2014, clarifying how specific elements of the Framework should be

interpreted when preparing their Local Plans. The PPG on the Housing and Economic Development Needs in particular provides a clear indication of how the Government expects the Framework to be taken into account when Councils are identifying their objectively assessed housing needs. Key points from this document include:

- Household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need
- Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic underperformance, infrastructure or environmental constraints.
- Household projection based estimates of housing need may need adjusting to reflect factors affecting local demography and household formation rates which are not captured by past trends, for example historic suppression by under supply and worsening affordability of housing. The assessment will need to reflect the consequences of past under delivery and the extent to which household formation rates have been constrained by supply.
- Plan makers need to consider increasing their housing numbers where the supply of working age population is less than projected job growth, to prevent unsustainable commuting patterns and reduced local business resilience.
- Housing needs indicated by household projections should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings.
- The more significant the affordability constraints (as reflected in rising prices and rents, and worsening affordability ratio) and the stronger other indicators of high demand (e.g. the differential between land prices), the larger the improvement in affordability needed, and the larger the additional supply response should be.
- The total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the local plan should be considered where it could help to deliver the required number of affordable homes.

6

3 LEGAL COMPLIANCE

3.1 Duty to Cooperate

- 3.1.1 The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. As demonstrated through the outcome of the 2012 Coventry Core Strategy Examination and the 2013 Mid Sussex Core Strategy Examination, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend nonadoption of the Plan.
- 3.1.2 Whilst Gladman recognise that the Duty to Cooperate is a process of ongoing engagement and collaboration¹, as set out in the PPG it is clear that it is intended to produce effective policies on cross-boundary strategic matters. In this regard the Medway Local Plan must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross boundary strategic issues, and the requirement to meet any unmet housing needs. This is not simply an issue of consultation but a question of effective cooperation.
- 3.1.3 Medway sits in close proximity to a number of adjoining authorities within the south east, all of which are under significant pressure to deliver housing. Medway must ensure that ongoing and effective cooperation is undertaken with all districts. It is essential that these relationships are explored through the Duty to Cooperate and that any discussions are meaningful and lead to real outcomes in addressing the strategic issues identified.
- 3.1.4 One particularly important issue which Medway will need to factor into its ongoing Duty to Cooperate discussions will be consideration of the unmet housing needs of London, and as such cooperation and discussion with the Mayor of London. The Mayor is a prescribed body under the PPG² and as such will be an important consultee as the plan moves forward. The Issues and Options document notes in paragraphs 4.7, 6.2, 8.5, and 9.2 the influence of London on a range of factors including housing, jobs, the economy and tourism. Given that the levels of unmet need in London are currently at least 6,600 per annum³ and could in reality be as high as 13.000 per annum, it is inevitable that some surrounding districts within the south east will be called upon to take pressure and housing growth from London. Given the strong links, identified by the Council, and the presence of key infrastructure, such as HS1, Medway could be a key location for accommodating such growth, and the plan through the Duty to Cooperate will need to explore these issues with the Mayor of London.

¹ PPG Reference ID. 9-011-2014036

² PPG Reference ID. 9-005-20150402

³ Para 31 – Report on the examination in public into the further alterations to the London Plan

3.1.5 Further the PPG reflects on the public bodies which are subject to the duty to cooperate. It contains a list of the prescribed bodies. The PPG then goes on to state that:

"These bodies play a key role in delivering local aspirations, and cooperation between them and local planning authorities is vital to make Local Plans as effective as possible on strategic cross boundary matters."

3.2 Sustainability Appraisal

- 3.2.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.
- 3.2.2 To our knowledge the current Issues and Options document has not been subject to sustainability appraisal, we would urge the Council to ensure that the document is subject to SA, and that this SA is in itself made available for public comment. As discussed above the SA process should be iterative with the development of a plan, it should be available at all stages of plan development clearly indicating how policy choices are informed by the SA process. Gladman are concerned that the lack of SA at this stage of the process could be a significant early failing in the plan making process. We would urge the Council to consider this in moving forward with the plans development.

4 OBJECTIVELY ASSESSED HOUSING NEED

4.1 Background

- 4.1.1 The process of undertaking an OAN is clearly set out in the Framework principally in §14, §47, §152 and §159 and should be undertaken in a systematic and transparent way to ensure that the plan is based on a robust evidence base.
- 4.1.2 The starting point for this assessment requires local planning authorities to have a clear understanding of housing needs in their area. This involves the preparation of a Strategic Housing Market Assessment (SHMA) working with neighbouring authorities where housing market areas cross administrative areas as detailed in §159 of the Framework. The Framework goes on to set out the factors that should be included in a SHMA including identifying

"the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:

- *Meets household and population projections taking account of migration and demographic change;*
- Addresses the need for all types of housing including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and
- Caters for housing demand and the scale of housing supply necessary to meet this demand."
- 4.1.3 Key points that are worth noting from the above is that the objective assessment should identify the full need for housing **before** the Council consider undertaking any process of assessing the ability to deliver this figure. In addition, §159 specifically relates to catering for both housing need and housing demand within the authority area. It is worth pointing out that any assessment of housing need and demand within a SHMA must also consider the following factors; falling household formation rates, net inward migration, the need to address the under provision of housing from the previous local plan period, the results of the Census 2011, housing warancy rates including the need to factor in a housing vacancy rate for churn in the housing market, economic factors to ensure that the economic forecasts for an area are supported by sufficient housing to deliver economic growth, off-setting a falling working age population by providing enough housing to ensure retiring workers can be replaced by incoming residents, addressing affordability and delivering the full need for affordable housing in an area.
- 4.1.4 The need to identify the full OAN before considering any issues with the ability of a Local Planning Authority to accommodate that level of development has been confirmed in the High Court. Most notably in *Solihull Metropolitan Borough Council* v (1) *Gallagher Homes Limited* (2) *Lioncourt Homes*

Limited where it was considered that arriving at a housing requirement was a two stage process and that first the unconstrained OAN must be arrived at. In the judgement it was stated:

"The NPPF indeed effected a radical change. It consisted in the two-step approach which paragraph 47 enjoined. The previous policy's methodology was essentially the striking of a balance. By contrast paragraph 47 required the OAN [objectively assessed need] to be made first, and to be given effect in the Local Plan save only to the extent that that would be inconsistent with other NPPF policies. [...] The twostep approach is by no means barren or technical. It means that housing need is clearly and cleanly ascertained. And as the judge said at paragraph 94, "[h]ere, numbers matter; because the larger the need, the more pressure will or might be applied to [impinge] on other inconsistent policies".

4.1.5 Therefore following the exercise to identify the full, OAN for housing in an area,

"Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate." (NPPF §152)

- 4.1.6 This statement clearly sets out that local planning authorities should seek to deliver the full OAN and that this should be tested through the evidence base. Only where the evidence shows that this is not achievable should they then test other options to see if any significant adverse impacts could be reduced or eliminated by pursuing these options. If this is not possible then they should test if the significant adverse impacts could be mitigated and where this is not possible, where compensatory measures may be appropriate.
- 4.1.7 The final stage of the process is outlined in §14 and involves a planning judgement as to whether, following all of the stages of the process outlined above,

"Local Plans should meet OAN, with sufficient flexibility to adapt to rapid change, unless:

- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole; or
- specific policies in this Framework indicate development should be restricted."

4.1.8 It is also worth noting that the final part of this sentence refers to footnote 9 of the Framework which sets out the types of policies that the Government consider to be restrictive. These include:

"sites protected under the Birds and Habitat Directive (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion".

- 4.1.9 Although this list is not exhaustive it is clear that local landscape designations, intrinsic value of the countryside, the character of areas, green gaps etc. are not specifically mentioned as constraints by the Framework.
- 4.1.10 The National Planning Practice Guidance (NPPG) contains guidance to support local authorities in objectively assessing and evidencing development needs for housing (both market and affordable) and economic development. This document supports and provides further guidance on the process of undertaking such assessments, in addition to what is set out in the Framework.

4.2 Objectively Assessed Need for Medway

4.2.1 The North Kent Strategic Housing and Economic Needs Assessment – Strategic Housing Market Assessments was published by the Council in late February, and is now the subject of a separate consultation. Gladman will be making separate representations into this consultation, this will provide an update and critique on the Barton Willmore OAN already submitted to the Council.

5 MEDWAY ISSUES AND OPTIONS

5.1 Questions 2 & 3 – Strategic Issues

- 5.1.1 Given the context of the NPPF and the PPG, it is clear that the key aim from government is the delivery of sustainable development. This is in the context of both housing and economic development. The delivery therefore of the full OAN for Medway should be a key strategic issue for the plan to deal with. We note that the council currently states that it is the intention of the district to meet fully its OAN, Gladman support the council in its decision to proactively seek to meet its own needs.
- 5.1.2 It will further be vital for the council to consider the strategic cross boundary issue of London's unmet need. This will need to be done through the Duty to Cooperate but we would envisage that there will be a substantial amount of housing need arising in London which will need to be met in surrounding districts, and in the wider south east authorities beyond the metropolitan green belt. The council acknowledged the strong relationship between Medway and London and it must respond positively in helping address these issues.

5.2 Questions 4 – 14 – Housing

5.2.1 Gladman will provide a response to these questions as part of a separate representation to be submitted as part of the consultation into the recently published SHENA.

5.3 Questions 15 – 21 – Economy

- 5.3.1 Similarly to the points made above with regard to the evidence relating to housing, the economic needs assessment is subject to a separate consultation, to which we will provide a response, accordingly the comments provided here will be supplemented as part of that consultation.
- 5.3.2 The Council correctly outline a number of issues within the economy chapter which will be important to the delivery of the Local Plan. Establishing realistic views on the levels of job growth in the district and ensuring that sufficient land is available to capture the required economic growth will be vital to the production of a sound plan.
- 5.3.3 What the council must not forget in its desires to boost economic growth is the close relationship between economic growth and the provision of housing. The Councils aims to capitalise on the wider south east and London growth and to respond to the growth of the further education sector in Medway is laudable and supported, provided it is balanced with the consequential growth in housing needed to support it.
- 5.3.4 Question 20 considers the feasibility in reducing the levels of out commuting from Medway, we would urge caution on the council putting weight in any likely change in commuting patterns. Such changes can be used by Councils to justify changes in housing and economic needs, but to do so requires significant levels of evidence. Medway benefits from numerous and frequent rail connections to London using both regular and high speed rail, the likelihood in these commuting

patterns significantly changing seems remote. It is more likely that areas such as Medway will be more attractive to people using rail to access London.

5.4 Questions 30 – 32 – Environment

- 5.4.1 It is noted from paragraph 11.5 that the council relies on a Landscape Character Assessment undertaken in 2011 as part of its evidence base for the formulation of the new Local Plan. This document was prepared prior to the adoption of the NPPF and the publication of the PPG. Whilst this may not automatically render the document out of date given the scale of the new housing requirement emerging as part of the Local Plan the Council should acknowledge that it may be necessary to look again at such pieces of evidence and consider it, and the formulation of any associated policy, in accordance with the NPPF, particularly paragraph 113.
- 5.4.2 We would also encourage the Council not to forget that well designed development can have a positive impact on the environment, as well as providing funding to secure improvements to environmental infrastructure.

5.5 Questions 38 – 42 – Rural

- 5.5.1 Gladman are pleased to note that in paragraph 13.1 the council recognise the challenges that many rural areas are facing through ageing populations. Such demographic changes can often have a negative impact on the delivery and retention of key services, the provision of suitable new housing development can provide much needed new market and affordable housing to address these issues. Providing new housing can provide new population to use, and keep economically viable, a range of services from schools, doctors, community facilities to shops and pubs. This can provide a sizeable benefit to existing residents and can ensure the continued vitality and sustainability of rural settlements. These factors will be an important consideration when the council begins to develop policy around its sites allocations and development strategy.
- 5.5.2 We are also pleased to note that the Council recognise the role that large rural settlements serve for small rural settlements as service centres, as outlined in paragraph 13.3. It is also noted that a Village Infrastructure Study has been undertaken to assess the range of services offered by rural settlements, whilst this document has not yet been published it will be an important piece of evidence in formulating the development strategy for Medway and as such Gladman would welcome the opportunity to comment on it upon its release.
- 5.5.3 Gladman would content that the one of the key ways to maintain and improve access to services in rural areas is through the addition of new housing in sustainable locations. As outlined above addressing ageing demographics and providing housing suitable, and affordable, to people from younger demographics is vital to supporting services. Gladman have worked with a range of partners who specialise in the assessment and impact of development in and on rural areas and can provide a variety of evidence to the Council to illustrate the benefits of development in rural areas as the plan progresses.

5.6 Question 56 – Natural Resources

5.6.1 It is important that any policy proposed, in relation to agricultural land, in the emerging Local Plan is done so in accordance with the relevant extracts of the NPPF, in this case paragraph 112. What is clear from reading the NPPF is that agricultural land is not considered a blanket constraint as are listed in footnote 9 to paragraph 14. Accordingly when considering the potential loss of such land a balance must be struck between what the loss of such land could mean and the benefits of the development overall. Furthermore any such policy will need to recognise the circumstances of a particular local authority, for example if the only such land developable within the district is all high grade agricultural land is it a reasonable conclusions to preclude development on the loss of such agricultural land, as to do so would effectively been a blanket restriction on development within an authority. It is our view that to meet the needs of Medway the loss of some best and most versatile agricultural land is inevitable.

5.7 Question 76 – 79 – Deliverability

- 5.7.1 Deliverability is a key component to the emerging Local Plan, to ensure delivery robust testing of development sites, particularly brownfield sites, will be important. It is noted that some work has been done as part of the SHENA and that further work will be produced as the plan progresses. Gladman support the council's acknowledgement of the importance of this evidence and the need to continue to update it.
- 5.7.2 We also welcome the Council's acknowledgement in para 26.10 that a high reliance on urban brownfield development could leave the Council in a vulnerable position in relation to delivery. It will be important for the Council as it develops the plan to ensure that there is sufficient evidence to justify the deliverability of any such sites and that meaningful timescales are factored into their delivery given the issues acknowledged.
- 5.7.3 The best way for the Council to ensure the delivery of such sites is to ensure that the Local Plan is not entirely reliant on them. A range of sites will not only help the Council meets its development targets in a sustainable way, but will also potentially bring in funding through development contributions to help pay for infrastructure and community facilities. However the Council must also be realistic, if there is no evidence that development sites will come forward without significant subsidy or changes in market conditions, this must be explicitly stated and factored into any allocation or decision making.

5.8 Questions 80 – 87 – Development Strategy

5.8.1 Gladman welcome the Council's commitment to significant growth in the Medway area through its Local Plan and are supportive of the Councils decision to consider a wider range of development options to meeting its need. We also note the Councils caution in planning for options in the event that the development at Lodge Hill does not move forward, given that the proposed developer has walked away from the site and the recent announcement from the Planning Inspectorate that the public inquiry will be further delayed we believe that it is essential that other options are thoroughly examined.

- 5.8.2 The Council note the various types of residential development patterns which could support growth and help meet the councils OAN. It is our experience that too often local authorities focus growth almost entirely through sustainable urban extensions (SUE), Gladman recognise the importance of such developments in helping deliver major pieces of infrastructure, however if they are put in place it is essential that realistic time scales for their implementation and build out are built into local plans and 5 year land supply calculations. Such sites often involve multiple land owners and developers and require coordination of a wide range of statutory bodies and infrastructure providers, there lead in times and implementation should be seen in years not months. For that reason we are pleased to see the note in paragraph 27.19 and 27.20, which outlines the benefits of smaller scale developments, often on the edge of settlements, these can help councils meet their OAN in sustainable locations and can supplement the delivery of major SUEs. In order to illustrate this point Gladman have included a copy of a Savills report on SUEs as Appendix 1 to this representation.
- 5.8.3 Similarly we would support the Council in its position that growth cannot simply be apportioned to the existing conurbation of Medway towns, whilst these locations such as Rainham and Chattendon will require development, this will need to not be at the expense of smaller rural settlements and service centres, which will all require a sustainable level of growth to help them sustain services and facilitates. The Council's acknowledgement of this in paragraph 27.23 is a positive step and is welcomed.
- 5.8.4 A further potential for locating new housing is through new settlements, again Gladman would support this proposal. We particularly welcome the Councils consideration that new settlements should not only include major new settlements, which as we discuss above with relation to SUEs are fraught with difficulty and delays, but would also include smaller new sustainable villages which have the potential to be delivered quicker, with less problems with site assembly and less onerous requirements for new infrastructure.
- 5.8.5 We therefore believe that to meet the needs of Medway the Council will need to ensure a blend of the various development options is taken forward. No doubt major allocations and or new settlements will be required in order to plan for large scale housing, but this must be done using realistic lead in times and delivery rates. This will need to be supplemented by smaller scale sites which can come forward quickly to meet identified needs. It is also important for the council to be realistic with what it can deliver on brownfield sites, it is inevitable that the Council will need to release sustainable green field sites to meet its needs. In the next section Gladman put forward a range of sustainable sites, which fit in with the council's development strategy considerations, which can help meet the needs of Medway.

6 SITE SUBMISSIONS

6.1 Introduction

- 6.1.1 Gladman would like to promote the following sites for inclusion within the Medway Local Plan.
 - Moor Street, Rainham
 - Land off Stoke Road, Hoo St Werburgh
 - Chattenden Lane, Chattenden
 - Town Road, Cliffe Woods
- 6.1.2 We believe all of the sites to be sustainable and capable of helping meet Medway's housing growth needs. Some sites have been previously submitted or considered by the Council within the SLAA, or are known to the Council through the submission of planning applications. Should the council wish any further information relating to any of the sites discussed below Gladman would be happy to discuss them in further detail.

6.2 Moor Street, Rainham

- 6.2.1 Gladman have submitted an application for a site at Moor Street, Rainham to the Council for circa 190 units, the application is currently subject to appeal. In light of the Councils emerging plan, and the housing requirements it outlines, we would like to put forward the site for allocation within the emerging plan.
- 6.2.2 We note that within the SLAA the site is scored as not suitable due to poor access to services and facilities, poor access to public transport, landscape impact, heritage impact and loss of agricultural land. Gladman have prepared comprehensive evidence addressing the Councils concerns through both the planning application process and as part of the planning appeal. Gladman are confident that these issues have been addressed through the provision of the additional evidence and revisions to the outline scheme, we therefore consider that the site should be reassessed in the SLAA and allocated within the emerging plan.





6.3 Land off Stoke Road, Hoo St Werburgh

- 6.3.1 We would also wish to propose the allocation of land off Stoke Road, Hoo St Werburgh for circa 130 dwellings. Gladman are currently preparing detailed studies to accompany a proposed planning application on the site, and will be shortly requesting pre application discussions with the Council regarding development of the site. The site is highly sustainable, in line with the Councils emerging strategy and capable of helping meet the housing needs of Medway. We note that the SLAA has not assessed the site.
- 6.3.2 A red edged site location plan is contained below for reference.



6.4 Chattenden Lane, Chattenden

- 6.4.1 Gladman would like to promote land at Chattenden Lane, Chattenden for residential development. We consider that the site could deliver circa 650 homes. The site to the south of the land edged red in the below plan has been granted planning consent for 131units, subject to the signing of a S106 agreement under application MC/15/0864. We also note that the site has been considered in the SLAA under reference 714 as not being suitable due to landscape restrictions. It is noted that the SLAA considers landscape to be the only issue with the site and that otherwise it is suitable and available.
- 6.4.2 Having considered the site in detail as part of our site selection process we believe that any potential issues with landscape can be overcome as part of the consideration of the development of the site. Given the scale of housing needs that Medway is seeking to meet through its Local Plan we believe that this is a suitable and sustainable site which can actively help meet these needs. Gladman have successfully demonstrated to the Council the suitability and deliverability of the southern part of the site for 131 units and believe that the same can be achieved on this larger parcel. We would be happy to discuss further with the Council how we see the site being developed to support its allocation in the emerging plan.



6.5 Town Road, Cliffe Woods

- 6.5.1 Gladman would like to promote a site at Town Road, Cliffe Woods for development of circa 300 dwellings plus associated infrastructure. We note that the site is considered in the SLAA under a variety of appraisals including those referenced 1070, 1071 and 1082. The main concerns of the Council seem to relate to the access to services and public transport opportunities, as well as the potential impact on landscape and loss of best and most versatile agricultural land.
- 6.5.2 We note that from the assessment in reference 1070 the council believe that the access to services and public transport can be overcome with a development of over 500 units. Gladman have extensive experience of assessing sites of this nature and are confident that a development of a scale of circa 300 units would make a positive impact on local services and public transport. These are issues to which Gladman will be considering in detail as we further develop proposals for the site. We would welcome the opportunity to discuss these details further with the Council in order to address the concerns relating to access to services and public transport.
- 6.5.3 With regard to landscape and issues surround best and most versatile agricultural land, Gladman have made comments on the emerging policies with regard to these issues. We believe that a scheme can be implemented which integrates the development successfully into the surrounding landscape. Furthermore we believe that the loss of best and most versatile agricultural land should not be a reason, in itself, for the rejection of a site. The loss of a proportion of best and most versatile land is likely to be inevitable for Medway to meets its OAN. We would also note that the settlement is limited as to potential directions of growth, and that development in this location is likely to be most deliverable.
- 6.5.4 A red edged plan of the potential site is included below.



7 CONCLUSIONS

- 7.1.1 Gladman have considered in depth the Council's issues and options document, and at this early stage would support the Council in the options it is considering and in that it is proactively seeking to delivery its OAN. The themes outlined by the Council are generally supported by Gladman particularly with relation to the options being considered in terms of how housing can be delivered. To support our views we have attached a number of sites we believe can help the council meet its needs. In the interest of helping the council prepare a robust plan we would welcome the opportunity to be further involved in the plan preparation process.
- 7.1.2 We have expressed concern relating to the lack of a SA of the work undertaken so far. Whilst we acknowledge that this is an early stage, given the iterative process that both plan preparation and SA should be, we would expect to see even this issues and options stage be accompanied by an SA. This may be a point the council wishes to consider before developing the plan further.
- 7.1.3 That said Gladman are pleased to note that the Council is considering a range of options to deliver its growth needs. It is important that a balance of site types are included in the emerging plan and that the needs of rural settlements are not ignored. We are pleased that, given the late publication of the SHENA, it is now the subject of a separate consultation. We would encourage the Council to follow this approach in relation to other important evidence base documents not currently available, as they emerge.
- 7.1.4 Gladman are therefore supportive of the Council's policy development such far, and subject to the changes and considerations outlined above, consider it to be a positive start to the plan making process.

APPENDIX 1 - URBAN EXTENSIONS – ASSESSMENT OF DELIVERY RATES - SAVILLS

Assessment of Delivery Rates



savills.co.uk

Assessment of Delivery Rates



Contents

1.	Summary and Conclusions							
2.	Introduction							
	2.1.	Methodology	3					
3.	The Planning Process							
	3.1.	Infrastructure Requirements	6					
	3.2.	Site Size	6					
	3.3.	Recent Trends	9					
4.	Housing Delivery Rates							
	4.1.	Housing Market Strength	11					
Impor	tant No	te	13					

Assessment of Delivery Rates



1. Summary and Conclusions

This report assesses the pace of delivery of large scale development in order to establish how these sites contribute to five year housing land supply and the implementation of development plans. It considers firstly how long it takes for an urban extension to progress through the planning system, and once construction has started, the rate at which new housing units are delivered.

The report tracks the progress of 84 urban extensions through the planning system over the last 25 years. On average across all sites analysed, an urban extension site starts construction on the first phase of housing more than four years after the submission of an outline application. There are however many exceptions to this timescale. Whilst it is not unusual for sites to take much longer, in recent years urban extension sites have tended to progress more quickly. Considering only sites coming forward since 2010, the average time taken to start on site drops to under three years after the submission of an outline application.



Nevertheless, there are clearly significant risks of longer timeframes on these large complex sites. Delays can occur at any stage of the process, and can be due to many factors such as problems with funding, infrastructure requirements or local objections. However, the individual nature of these sites means it is difficult to identify absolute trends.

Some urban extensions have progressed through the planning process **more quickly in established growth areas**, suggesting that the appetite of the local authority for development and the resource available for progressing major planning applications plays a crucial role. Analysis of the the sites in the sample indicates that, once construction starts and in a strong market, annual delivery can be anticipated to be around **60 units in first year of construction, picking up to more than 100 units per annum in subsequent years and increasing to around 120 units**. The build out rate of each site will depend on the disposal strategy of each developer, but the presence of multiple developers on site helps to drive higher annual completion

Assessment of Delivery Rates



rates. We are aware of many urban extensions in the south of England where recent delivery rates have been substantially in excess of 120 units per annum.

It should be noted that the above timescales do not take into account:

- a) Time taken between the allocation of the site and starting preparation of the planning application
- b) Pre application discussions/negotiations and preparation of the outline planning application
- c) The period between starting construction and delivering the first residential unit.

This study has not provided evidence in relation to these time periods. Whilst previous research estimated b) and c) at 2.5 years, it is also the case that outline applications can be made very soon after allocation, where local planning authorities and a developer are working together to bring forward sites, allowing processes to run in parallel.

In simple terms the data reviewed for the study points to the following indicative timescales.

	All sites	Post 2010 sites
Not reviewed in this study		
Allocation to first completions (years) ¹	6.8	Data not
Allocation to start on site (years) ¹	5.3	available
Reviewed in this study		
Outline application to start on site (years)	4.3	2.8
Build rate first year (homes per annum)	65	Not
Build rate after first year (homes per annum) ²	110	analysed separately

(1) According to earlier study by Hourigan Connelly for Gladman Developments.

(2) This rose to 120 per annum in 2013. Observed build rates in the south of England can be significantly higher.

The study indicates that, whilst many urban extensions have taken longer than four years to progress from outline application to a start on site, it appears that these timeframes have compressed more recently, to less than three years on average. This suggests that, if pre-application timeframes can be accelerated, it has become more likely that these sites can start to deliver housing within the lifetime of a five year housing land supply plan.

Assessment of Delivery Rates



2. Introduction

Barratt Homes are seeking to understand the pace of delivery of large scale development in order to establish how these sites contribute to five year housing land supply and the implementation of development plans. This report will be used as evidence for planning applications and Development Plan submissions.

The report references a study by Hourigan Connolly on behalf of Gladman Developments Limited, *A Report into the Delivery of Urban Extensions*, published in February 2014, to provide case studies of sites of over 500 units that have been brought forward in the last 25 years. These case studies have been analysed to determine the timescales involved for these sites to progress through the planning system and start on site, and thereafter the rate at which housing units are delivered.

2.1. Methodology

The Gladman study was supported by evidence provided by local authorities on 78 sites via a site specific proforma. We have updated the study by reviewing recent planning activity recorded by Glenigan, adding in a further six sites for which an application has been made since 2010. All sites in the sample are urban extensions, predominantly on greenfield land. For the most part, the responses did not include sites on previously developed land which may require extensive remediation before houses are completed, new settlements which may require significant infrastructure work, or sites which have received government funding.

The regional spread of the sites is as follows:

Region	Number of Sites
South East	27
South West	12
East of England	6
East Midlands	14
West Midlands	5
Yorkshire and Humber	6
North East	1
Scotland	11
Wales	2

Of the sites in the sample, 64% are under construction, 6% have been built out, and 30% are yet to commence on site.

This data has been analysed in two stages. Firstly, we have examined how long it takes for a site to progress through each stage of the planning system, from the submission of an outline application to beginning construction of the first housing units, and sought to establish whether the size or location of the site influences this process.

The second part of the study examines the rate of delivery of units once construction has started, assesses how many units are deliverable from these sites per annum, and investigates the relationship between delivery and housing market strength.

Assessment of Delivery Rates



3. The Planning Process

To establish the length of time for a site to progress through planning, we have broken down the process into 5 stages: submission of outline application to resolution to grant, negotiation of section 106 leading to the grant of outline permission, preparation of first reserved matters application, consideration of reserved matters application, and discharging the pre commencement conditions prior to the start on the first housing units. This study does not account for time spent on pre application discussions.

We have used the dates provided for each stage in the site proforma, supplemented by data from Glenigan Planning Database and local authority planning archives to establish when applications were submitted and determined for each site, and calculated the time period between each month. Taking the median time period for each stage indicates that **commencement on the first phase of housing delivery is likely to be in the fifth year following the submission of the outline application**. This is shorter timescale than the seven years detailed in the Gladman report, which accounts for additional stages, such as the preparation of the outline application (1 year) and the period between starting on site and delivering the first residential units (1.5 years). We do not have data covering these stages so have relied on the elapsed times of the schemes in question.

	Year 1			Year 2			Year 3				Year 4				Year 5		
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1
Outline Application Consideration																	
Section 106 Negotiations																	
Preparation of 1 st Reserved Matters Application																	
Reserved Matters Consideration																	
Site Preparation including discharging pre commencement conditions																	
Start on Site (Housing)																	

Table 1 – Median time taken from submission of outline application to start on site

Source: Savills using data from Gladman, Hourigan Connolly, Glenigan and local authorities

Assessment of Delivery Rates



Within the sample however, there are significant variations from this timescale. Figure 1 shows the maximum, minimum, median and lower and upper quartiles of the time taken to progress through each stage.





There are outliers over long time periods at each stage of the process, which highlights the complexity of bringing this type of site forward. The **median time for a site to gain a resolution to grant permission is just over one year**, but the sample also includes eight sites which took over 3 years to reach the same stage. Within each category there are also sites which are yet to reach the end of that stage. Among these sites are Bronham Road in Bedford, Ladygrove East in South Oxfordshire and Shawfair in Midlothian. All these sites are at the Agreement of Section 106 stage, having gained a resolution to grant in 2003, 2005 and 2006 respectively. The amount of time taken to agree the Section 106 or Section 75 agreement on these sites has already far exceeded the current maximum in the sample of 71 months, likely due to the changing housing market affecting viability following the economic downturn in 2008.

Each site has unique circumstances that may hamper its progress, from local opposition, statutory challenges, a call in for determination by central government, to the strength of local housing market. This can be simply due to the complexity of the application, as the size of these schemes often means there are multiple development partners involved. At Cranbrook in Devon, the Section 106 took over 64 months to agree, well above the median time of 14 months, as multi-agency agreements and clawback clauses, combined with difficult market conditions caused significant delay. Initial delays can also result in further complications; Outline Permission was granted in 1991 for the 660 unit site at Branston, East Staffordshire, and although several reserved matters applications were approved between 1994 and 2004, only 50 units were ever built. The site was sold in 2010, and rather than continue to submit reserved matters applications for the 1991 permission, the new developer instead submitted a revised outline application to reflect the changed housing market conditions in October 2011. The new application has progressed much more quickly, gaining Outline Permission in 2013.

Source: Gladman & Hourigan Connolly

Assessment of Delivery Rates



3.1. Infrastructure Requirements

A recurring hindrance to quick progress is the provision of infrastructure. This tends to slow down the delivery of urban extensions at two key points, firstly in agreeing the Section 106, and secondly between approval of reserved matters and starting on the first housing units. It took three years for the Section 106 for the 1,284 unit site at Sharp Lane, Leeds to be agreed, as it was complicated by requirement for off-site highway works.

The timing of the infrastructure works is also key. Where is it planned to be delivered in line with the phasing of housing delivery, the potential for problems is limited. At Hunts Grove, Gloucester, major off-site works have been scheduled in line with delivery of later phases, allowing construction to start on housing four years after the submission of the outline application, and the site to deliver 400 units since construction started in 2010. However, if the infrastructure works are not phased alongside the housing delivery, it can pose problems; the site at Melton Road, Rushcliffe made smooth progress through the planning system. The outline permission was granted a year after submission, and approval of the first reserved matters application followed 18 months later. Three years later however, construction is yet to start on site as major off site infrastructure is still required. Similarly, the North Colchester urban extension gained a resolution to grant subject to the agreement of the Section 106 in September 2013, but improvements to the Northern Access road are required before development can get underway and consequently timescales for the submission of reserved matters and subsequent delivery of housing is undetermined at present.

3.2. Site Size

There is little correlation between the size of the urban extension and how long it takes to progress through the planning process. The median for 3000+ unit sites is slightly higher at 79 months compared to 50 – 60 months for the other size bands. However, the maximum time taken for the 3000+ unit sites is lower than the maximum in all other site size bands.





Source: Gladman & Hourigan Connolly

Assessment of Delivery Rates



There is however some indication that sites are more likely to progress quickly through the system in local authorities with high housing growth. Plotting the total time taken for construction to begin from the submission of an outline application against the increase in dwelling stock in each local authority over the last decade shows rapid progression of sites of over 3000 units in the established growth areas of Milton Keynes and Corby.





Source: Savills using DCLG, Scottish Neighbourhood Statistics, Gladman & Hourigan Connolly

Assessment of Delivery Rates



In these two local authorities, which have respectively seen a 16% and 18% growth in dwellings since 2004, construction began within three years of an outline application being submitted. Conversely in the local authorities which have seen less than 10% growth, all but two of the 3000+ unit sites took longer than the 5 year average outlined in Table 1.





Source: Savills using DCLG, Scottish Neighbourhood Statistics, Gladman & Hourigan Connolly

The rapid progress of these sites through the planning process in local authorities which were already delivering high numbers of new dwellings suggests that the appetite for development and resource for dealing with major applications within the local authority plays just as important role in bringing forward urban extensions as the characteristics of the site itself. Corby and Milton Keynes were both recipients of funding through the 2003 Sustainable Communities Plan, which included grants totalling £350 million across the country for Planning Delivery, enabling them to progress major development sites more rapidly.

Assessment of Delivery Rates



3.3. Recent Trends

The sites sampled in Gladman's report have come forward over a thirty year period, reflecting a variety of market conditions. To gain a clearer understanding of the progression of urban extension sites in the current climate, we have identified 24 sites for which an outline application was submitted after 2010, 18 of which were identified in the original Gladman report. Compared with the overall sample, these sites have progressed much more quickly, taking an **average of 33 months from the submission of the outline application to start on site, against the average of the whole sample of 60 months**. This suggests that it has become more likely that large sites will progress through the planning system quickly enough to begin delivering housing units within the lifetime of a five year housing land supply plan.





Source: Savills plus Gladman & Hourigan Connolly

Assessment of Delivery Rates



4. Housing Delivery Rates

The site proforma in the Gladman study detail the number of units delivered per annum on sites where construction has started. Data is provided for 43 sites. **On average, sites delivered 65 units in the first year of construction**, although again there is a wide variation in the numbers delivered.





Source: Savills using Hometrack, Gladman & Hourigan Connolly

The sites which delivered high numbers in the first year generally did so due to their funding arrangements. The Lyde Road site in Yeovil which delivered 226 units had a high completion rate as the majority of the units were affordable homes and had to be completed within that financial year as a condition of government funding. The second highest delivery in the first year of construction was 200 units at Cranbrook in Devon. This site benefitted from strategic restrictions on development elsewhere in the borough, creating a positive climate for investment in the scheme, and competition between multiple developers on the site has led to high build rates.

After the first year of completions, the number of houses delivered by a site **rises to an average of 110 units, and remains at or above that level until year six of delivery**. After that point, delivery rates on sites in the 500 – 1000 unit band taper as they near completion. We do not have sufficient data to comment on delivery rates on larger sites in the later years of development.

Assessment of Delivery Rates



4.1. Housing Market Strength

To study the relationship between delivery rates and housing market strength, we have plotted the number of units delivered three years after construction commenced against Hometrack house price data for the site's local authority.



Figure 7 – Impact of site size and housing market strength on rates of delivery in three years following start on site

This demonstrates that sites that struggle to deliver at high volumes tend to be in lower value areas. Every site that had not delivered 200 units or more after three years of construction is located in a local authority where the upper quartile sales value was less than £250 per sqft in 2013.

There is no overall trend of higher levels of delivery on the larger sites. There are very high rates on Eastern Development Area at Milton Keynes (capacity 4,000 units) where 791 units were delivered after three years of construction. This is in an established growth area, and was associated with high levels of competition between multiple developers on site. However, volumes have been much lower on other sites of a similar size. Conversely, the Ravenscraig site (capacity 3,500 units) has only delivered 116 units over the same period. Factors contributing to this include a weaker housing market, with upper quartile sales values of £126 per sq ft, and only having one developer active on site.

Source: Savills using Hometrack, Gladman & Hourigan Connolly

Assessment of Delivery Rates



The influence of the strength of the housing market on delivery from urban extensions is further shown by looking at the average total number of units, including affordable, delivered from the sites in the sample each year since 2002. In the years prior to the economic downturn, average delivery never dropped below 100 units a year. The weaker market from 2008 resulted in reduced delivery of fewer than 80 units a year from 2008 to 2011. As the housing market has strengthened in the last two years, delivery from the sites in the sample has increased sharply to an average of 120 units in 2013.





At these rates, it takes a significant period to build out an urban extension to reach site capacity, but will see steady supply and high numbers of delivery, over the build out period, especially when building out in a robust housing market. The sites in the sample that have reached their first allocated capacity are:

- Cortonwood Colliery, Rotherham 529 units, eight years from construction start, 17 years from submission of the outline application
- Former Brymbo Steelworks, Wrexham 700 units, seven years from construction start, 17 years from the submission
 of the outline application
- Marks Farm, Braintree 1000 units, twelve years from construction start, 14 years from submission of the outline application
- North East Caterton, West Oxfordshire 1500 units, twelve years from construction start, 15 years from submission of the outline application
- Queen Elizabeth Park, Guildford 500 units, seven years from construction start, 8 years from the submission of the outline application.

We are aware of many urban extensions in the south of England where recent delivery rates have been substantially in excess of the 120 units per annum shown in the chart for 2013.

Source: Gladman & Hourigan Connolly
Name: David Tough

Reference 124

Organisation

On Behalf Of

Type of Consultee Member of the public

maryott, kyle

From: Sent: To: Subject:

24 February 2016 15:05 policy, planning Medway council local plan

Follow Up Flag: Flag Status:

Follow up Completed

Ref para 17.3

I would like to comment on Golf which is very close to my heart

Needless to say Deangate is at present my home club.

Deangate could be a gold mine if its present facilities updated and those under construction ie Par 3 course, new bunker

facilities be completed.

Drainage is a problem during winter months the course is closed and have been so except for 2 days since xmas.

More housing around the local area would increase possible members, providing the course was kept better maintained.

Many visitors comment on a lovely course but could be better maintained .

When is the Par 3 course going to open for golf

yours faithfully David Tough

Name: Kay Hutchfield

Reference 125

Organisation

On Behalf Of

Type of Consultee Member of the public Questions and Responses

- 1. What do you think should be the key components of ambitions of and ambitions for the Local Plan's Vision from Medway?
- 2. 2. What do you think are the strategic issues that the Local Plan needs to address?

Any vision for Medway must begin with a strategic plan that ensures the infrastructure is in place to support the development of housing, retail, business and tourism. For example, proposed and potential housing developments along the A228, the opening of Peters Bridge and the proposed Lower Thames Crossing will have a significant effect on those living on the A228. Medway Council's own traffic survey states that this road is already over capacity and Highways England state that there is no possibility of adding more lanes to Bluebell Hill to relieve congestion. Medway Council should be working with KCC campaigning for Highways England to create a motorway link between the M2 and M20 that will link directly with the Lower Thames crossing. Such a motorway link has the potential to reduce traffic congestions on local road and air pollution caused by queuing traffic.

3. How should the Council respond to these issues?

Where communities are impacted by developments they must be compensated with more of the monies secured through 106 agreements and not see large sums syphoned off to support Medway Council projects such as Medway Park.

4-14 Housing

In the context of Cuxton and the demographics of its population housing should focus on starter homes/flats for young people and flats/bungalow suitable for older residents, especially those needing supported housing. In terms of affordable housing 25% is too low and in some ways the context (nature of site and local need) should dictate the nature of the housing.

The areas identified as potential development sites have included the flood plain opposite Station Road, which seems totally inappropriate given issues surrounding building on flood plains.

The development of Cuxton station car park in to a housing development site seems sensible, especially if it includes the restoration of the grade 2 listed station house and signal box and incorporates a riverside walk from Station Road through to Medway Valley Park. This type of development could be seen as making a positive contribution to the health of Cuxton community. The proposed site at the top of Sundridge Hill would need careful consideration regarding its access to A228 as traffic already exceeds capacity at peak times.

Cuxton already has a traveller site and so assume that this will not be expanded, especially as the site seems to be a 'no go area' for police unless it is part of a large police action. Oher issues

Developing dedicated housing for students within Medway would encourage students from outside Medway to attend the Universities at Medway Campus BUT it would need to be secure and within an area where sports and recreational activities are good. Medway faces significant challenges here and the best advice on how to proceed will be best gained from university students who do not come from Medway. The student union would be a good starting place.

15-21 Economy

This is not an area in which I have expertise so my observations may be simplistic. From my perspective the closure of the Dockyard had a significant impact on employment prospects for those who seek employment as manual workers, engineers and draftsman.

Attracting businesses that will provide this type of employment should be a focus, and existing businesses in this field supported in further development.

The expansion of Higher Education in Medway is exciting BUT in itself will not transform Medway unless the progra

The Industrial estate behind the railway in Station Road needs improved access to expand. 22-24 Tourism

The suggestion of using the river to enhance tourist experiences seems sound.

25-29 Retail commercial leisure & town centres

I have not used Chatham for shopping for15 years or more and I'm not sure what would ever tempt me back. Perhaps a greater emphasis on office space, small apartment accommodation and sports/leisure activities would be better use than trying to fill empty retail space with more retail.

30-32 Environment

Would like to see Medway Council support the re-routing of footpath RS206 to enable a walk to be established between Cuxton Station and Medway Valley Park and beyond. Residents could then cycle or walk into Strood and Rochester rather than drive.

Where is Medway's voice in the Lower Thames Crossing? If the Southern Eastern link is the chosen route the traffic load will inevitably be on A228 and A229 that are already over saturation level at peak times. There needs to be a motorway linking the LTC to the M20. Just emptying on to the A2/M2 will have a significant impact on the environment adjacent to Junction1 of M2. Did any money come to Medway Council from Peters Village? If not why not?

38-42 Build Environment

Would like to see Cuxton Station and signal box rescued and put to use within a development. The architecture in Chatham is harsh and grim. The Pentagon is such an unattractive building it needs to be demolished- sorry.

43-46 Infrastructure and Services

An application for a pharmacy in Cuxton has been refused despite current advice to consult your pharmacist to reduce demand on Medway A&E and GPs.

47-48 Social and Community Infrastructure

Cuxton has limited GP provision and no village hall. The school is popular but this has caused problems with traffic congestion and inconsiderate driving and parking in the village at school opening and closing times. Removing the requirement for Academies to have a traffic management plan is not a good idea.

49-53 Open Space

If the 'multifunctional hub model' means money from all 106 monies goes to Medway Park the answer is no. Money obtained from developers should ALL go to the area effected. An example of this is the 106 agreement at St Andrews Place Halling where a large amount went to Medway Valley Park that should have gone to Cuxton Community as compensation for increased traffic flow through the village.

Medway officers are being very helpful in helping defend Church Hill from development.

54-55 Sports Facility

Supporting small local sports facilities would help promote local sport that does not involve travelling to a specific centre.

66-67 Flood Risk

On the plans made available at an information event the flood plain adjacent to Station Road was clearly identified, yet it was identified as an area for building development.

71-75 Transport

We have a village bus service but are in danger of losing it because of inconsiderate parking making it difficult/impossible for buses to complete the route around the village. This raises the issue of new housing developments having sufficient off road parking. In my experience garages are seldom used for cars.

Developing footpaths and cycle ways mentioned elsewhere.

76-79 Deliverability

I have real concerns if CIL will see less money coming to mitigate the impact on local Communities. Cuxton faces several new developments along the A228 and if CIL monies do not come to residents but go to a general Medway Council 'pot' I anticipate significant resistance from the community to these planned developments.

80-87 Development Strategy

Don't believe there is a future for Chatham as a retail and civic heart, and believe that reducing the scale of the retail and maximising the opportunity for residential development is the way forward. I would also like to see investment in advice and informal education opportunities to tap in to residents who might not otherwise engage in education or sport/health activities. For example, walk in health centre, cooking demonstrations of easy everyday cooking and activities to support seeking a job/careers advice.

Name: Jorn Peters

Reference 126

Organisation

Mayor Of London

On Behalf Of

Type of Consultee

Government/Public Body

GREATER **LONDON** AUTHORITY

Development, Enterprise and Environment

Catherine Smith Planning Manager (Policy) Medway Council Gun Wharf, Dock Road Chatham Kent ME4 4TR

Date: 3 March 2016 Our ref: LP/JP01

Dear Ms Smith,

Issues and Options – Local Plan Consultation

Thank you for giving the Mayor of London the opportunity to comment on your Local Plan Issues and Options Consultation.

Your consultation raises a range of strategic issues, some of which may bear on the relationship between London, the wider South East and Medway in particular. This response focuses on specific issues arising from your consultation, which you may wish to consider further during the development of your Local Plan.

The significant proportion of migration from London into Medway (one third of total migration) and the significant proportion of commuting from Medway into London (also one third of total commuting) underscore the importance of collaboration and the Duty to Co-operate.

The Mayor welcomes the Council's approach to housing need set out in your Strategic Housing Market Assessment and the intention to meet the objectively assessed need.

The Council's employment land requirements have been identified within your Employment Land Needs Assessment. In terms of land for industry and warehousing, given Medway's good access to the transport network (M2/A2 in particular), it would be useful to understand better your initial thoughts on future policy considerations for these land uses specifically.

From a transport perspective proposals for the Lower Thames Crossing are strategically important for Medway and London. In terms of public transport the HS1 route through Medway as well as the proposed extension of Crossrail 1 into north Kent provide connectivity and capacity improvements of the strategic transport links into London, and the Council may wish to consider related development opportunities during the further preparation of the Local Plan.

I am pleased to work closely with the Council on the Thames Gateway Strategic Group promoting the benefits of development and investment across the Gateway.

If you would like to discuss the matters raised above further, please contact Jorn Peters

Yours sincerely



Stewart Murray Assistant Director – Planning

cc: National Planning Casework Unit, DCLG Alex Williams, TfL

Name: Kevin Fraser

Reference 127

Organisation

Essex County Council

On Behalf Of

Type of Consultee

Government/Public Body

Medway Council Local Plan Issues and options (2012 – 2035)

Introduction

ECC welcomes the opportunity to comment on the Consultation on a New Plan for Medway. Whilst Essex County Council is not an immediate neighbouring authority to Medway Council it is important that we are consulted on stages of the emerging Local Plan to ensure that we can consider any potential common strategic issues that may arise during plan preparation.

ECC notes that Medway Council is preparing a new Local Plan to set out a strategy for Medway's development up to 2035. This Issues and Options consultation document represents the first formal stage in preparing a new Local Plan for Medway. The Local Plan considers the development needed in the area, and sets out a framework for directing sustainable development. ECC supports the aim of seeking to secure a balance between meeting needs for housing and jobs, infrastructure and services, and protecting and enhancing the natural and historic environment.

ECC Response

Please find below officer comments that you may wish to consider in preparing future stages of the Medway Local Plan. These comments are intended to be informative and will need to be interpreted in relation to local circumstances within the plan area.

Question 2 - What do you think are the strategic issues that the Local Plan needs to address? (Page 17)

Lower Thames Crossing

ECC supports the statement in paragraph 6.1 in that preparing the Local Plan Medway will consider the wider context, to ensure that its policies align with strategic plans and are coordinated with those of neighbouring areas. ECC acknowledges reference to the capacity for a Lower Thames Crossing as a strategic issue. ECC will need to consider a range of potential Implications / Opportunities following the recent Highways England consultation containing three possible routes within "Option C, which commenced on 26 January 2016 for 8 weeks to 24 March 2016. The next stage will be a ministerial announcement in late 2016. All three proposals include a new junction on the A13, however;

- routes 2 and 3 proposed a new direct connection to the M25, between junctions 29 and 30;
- route 4 proposed a north-south route to connect to the A127 in the vicinity of the A127/A128 (Halfway House) with A127 improvements between the M25 and A127/A128.

In respect of modelling Highways England, acknowledge within their consultation that further modelling is required.

The impacts of the solutions of the Lower Thames Crossing (LTC) proposals will need to be assessed and factored in to the further modelling of relevant emerging Local Plans, in Essex and Kent, regardless of the LTC route to be announced by Ministers later this year. It is considered the LTC would have an impact / and opportunities on the immediate local authorities of any selected route as well as the wider transport network across South Essex and beyond. Regardless of the selected route, a new Lower Thames Crossing will fundamentally change the dynamic of strategic transport movements within and across neighbouring authorities and the wider south east.

London Paramount Resort

This proposal is also identified as a potential strategic issue in the consultation document. It is considered that the proposal supports the case for investment in additional crossing capacity across the Thames and strengthens the case for the provision of a new strategic crossing, notably Lower Thames Crossing Option C (as proposed by Government consultation) rather than additional capacity at the current crossing (Option A) as both London Paramount and Option C focus investment to the east. ECC and Kent County Council have provided its support for Option C. London Paramount should emphasise the need for this connection through the application process as the development could bring forward the need for the new Lower Thames Crossing from its current delivery date of 2025/6. Traffic modelling may mean that the benefits from free-flow tolling may not be as long lived as envisaged and the need for extra capacity is generated much earlier.

Name: Raakhee Patel

Reference 128

Organisation

Sports England

On Behalf Of

Type of Consultee

Government/Public Body

maryott, kyle

From:	
Sent:	22 January 2016 14:17
То:	policy, planning
Subject:	Medway Council Local Plan_Issues and Options (2012-2035)
Follow Up Flag:	Follow up
Flag Status:	Completed

Dear Sir/Madam,

Thank you for consulting Sport England on the above named document.

Sport England has an established role within the planning system which includes providing advice and guidance on all relevant areas of national, regional and local policy as well as supporting local authorities in developing the evidence base for sport. The Government's National Planning Policy Framework (NPPF) is clear about the role that sport plays in delivering sustainable communities through promoting health and well-being. As such, Sport England wishes to see local planning policies that seek to protect, enhance and provide for sports facilities based on robust and up-to-date assessments of need in accordance with paragraphs 73 and 74 pf the NPPF.

Sound policy can only be developed in the context of objectively assessed needs, in turn used to inform the development of a strategy for sport and recreation. Policies which protect, enhance and provide for sports facilities should reflect this work, and be the basis for consistent application through development management. Sport England is not prescriptive on the precise form and wording of policies, but advises that a stronger plan will result from attention to taking a clearly justified and positive approach to planning for sport. In this way, planning authorities will be able to demonstrate that their plan has been positively prepared (based on objectively assessed needs in accordance with paragraph 73 of the NPPF), is consistent with national policy (reflecting the NPPF), is justified (having considered alternatives) and effective (being deliverable). Without such attention there is a risk that a local plan or other policy document could be considered unsound.

For more information on how to forward planning for sport please see: Sport England's Planning for Sport Forward Planning Guidance - <u>http://www.sportengland.org/media/351266/planning-for-sport-forward-planning-guide-july-2014-.pdf</u>

Additionally, please note that Sport England along with Public Health England have recently launched our revised guidance 'Active Design' has considerable synergy with Policy D20: Green Infrastructure and D21: Community and Cultural Facilities. It may therefore be useful to provide a cross-reference (and perhaps a hyperlink) to <u>www.sportengland.org/activedesign</u>. Sport England believes that being active should be an intrinsic part of everyone's life pattern. As such, Sport England would expect to see the principles on Active Design embedded in any subsequent Local Plan policy.

Lastly, as you may be aware, Sport England will oppose development resulting in the loss of playing field land or formal built sports facilities unless its loss is justified by a robust and up-to-date assessments of need. Any loss of sports provision should be incorporated into formal policy such that it may be considered through the policy making process and scrutinised at Examination in Public. As such, should any policy seek to allocate any existing playing field land or formal built sports facilities for redevelopment, we would strongly urge the Council to discuss this directly with Sport England.

If you would like to discuss any of the above comments further or require any additional information or advice please contact me via the details below.

Yours sincerely,

Raakhee Patel Interim Planning Manager



Creating a sporting habit for life

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Name: Phillip Stanely

Reference 129

Organisation

On Behalf Of

Type of Consultee Member of the public Medway Local Plan (2012-2035)

Issues and Options

1) What do you think should be the key components of and ambitions for the Local Plan's vision for Medway in 2035?

The key components are: The environment, Health & welfare, Road Infrastructure & Public Transport

2) What do you think are the strategic issues that the Local Plan needs to address?

Road Infrastructure, transport issues. Building more commercial units will help improve on the local economy.

3) How should the council respond to these issues?

Consultations are paramount. Communicate with employers, listen to their needs.

4) Do you agree with the approach and conclusions of the assessment of housing needs calculated for Medway over the plan period?

I agree in principal, we have 19 years to complete this task. In 2011 a nationwide census was held looking at all areas and what changes are taking place with regards to the demographics of the area. We should act upon the statistics the census provides accordingly. There will be a further two census survey's taking place (2021 & 20131) by the time that the Medway Plan is complete. Act upon them accordingly (are we going in the right direction)?

5) What do you consider to be the appropriate housing market area for Medway?

Each town/village of Medway is unique, with different population requirements; we need to act accordingly to that environment. If on the whole we are to introduce 30,000 houses by 2035 we must consider the impact it will have on families, roads, schools and employment. An average household today has 2 to 3 vehicles, parking is a serious issue! Therefore we are looking at a minimum of 70 to 90 thousand modes of transport being brought into the area.

6) Do you agree that 25% is an appropriate level for the requirement of affordable housing, and what threshold should be set for the scale of development that needs to provide affordable housing?

I do agree that 25% is appropriate for affordable housing as to the threshold we need to continuously look at the demographics of each area in Medway.

7) What form of housing best meets the needs of Medway's growing population of older people?

It is recognised as a whole the UK has an ageing population. Throughout their lives they have been paying their dues this should be reflected by putting back something to help towards their welfare & care. More care & nursing homes are tantamount to help give them stability in their quality of life during their twilight years.

8) What housing is needed for other specific groups in Medway?

Affordable housing is a priority. It is recognised that Medway is lagging behind other counties with regards to the economy, the main reason being lack of skills, employment etc. All of these needs to addressed if we want to bring Medway in line with others.

9) How can development make a positive contribution to the health and wellbeing of Medway's communities?

What is paramount is health centres, Doctors surgeries. We need to consider the number of houses required for each development and the number of families and people that will live there.

10) Do you have suggestions for potential sites for starter home developments?

This is not an area where I am able to make comment as I have no experience in this field.

11) How do you consider the infrastructure needs of starter home and self and custom build developments should be addressed?

Page 21 (7.13 and its bullet points) cater in this area.

12) How should the council provide for the demand for land for self and custom build housing? For example, integrated with larger developments, on standalone sites, or linked to placemaking ambitions to deliver highly sustainable and innovative design quality.

Page 22 (7.19) Answers this quite admirably.

13) What is the demand for student housing and where would this be best located? For example, would dedicated student housing be appropriate in Medway's town centres?

Students should be catered for by the size of colleges and universities! Vital public transport links are required, moreover suitable accommodation provided close-by to the locations themselves.

14) What is the level and type of need for gypsy, traveller and travelling showpeople's accommodation in Medway, and what criteria should be used to identify appropriate sites?

As some of us more experienced members of society know. Gypsy travellers are a close-knit community and don't like to be dispersed. Capacity of land should be taken into consideration to cater for their needs.

15) Where should such sites be located, considering opportunities in existing employment areas, and potential new sites such as Lodge Hill or other developments?

We need to consider as to what employment there is available. The priority is the carbon footprint of the community commuting to and from work each day. The main reason why such an exodus takes place by commuting each day in Medway is because the skillset and type of employment is not yet available in Medway nor for that matter the type of salary available to provide a reasonable quality of life.

16) What are the opportunities for further business growth in and close to town centres in Medway?

In my view this is very limited! The current economic climate has had a dramatic impact in Medway with jobs available being very scarce and the number of people applying for the same job.

If by 2035 there will be an increase in housing then employment needs to be reflected in the equation.

17) Do you agree with scale of jobs and employment land needs identified for Medway over the plan period?

Yes, I certainly do "absolutely"!

18) How can Medway realise opportunities to capitalise on growth in the wider area, including London?

By attracting "new" employers to the area and providing the right accommodation to suit their needs as well as "low" overheads suitable to the market of the economy.

19) How should the plan respond to opportunities arising from the expansion of higher and further education in Medway?

In 2011 a nationwide census took place and statistics were made available. These should be analysed and reflected upon. By the year 2035 a further two census surveys will take place (both 2021 and 2031), if we are cater for the needs of the Medway population we should be able to see as to whether the targets are being met and if not amend accordingly.

20) Is it feasible to reduce the amount of out-commuting from Medway, and what would be required to achieve this?

Yes, it can be feasible, provided you have the right infrastructure in place. Local employers need to be supported and allowed to expand and "new" employers welcomed. This cannot happen if high council tax rates and property rents are in place, which make their business uneconomical.

21) How should the plan address the specific locational requirements of some businesses, for example access to wharves?

Road communication and infrastructure is paramount.

22) What scale and form of additional visitor accommodation is needed to support and develop a successful tourism sector in Medway?

If tourism were to increase with visitors coming from afar, in particular with a new and "major" entertainment resort being planned on the Swanscombe Peninsular, we need to attract these visitors into Medway. Accommodations like small hotels, B&B's, self-catering holiday apartments need to be in place. It's fairly obvious that costs to visit and to stay in accommodation at "Swanscombe" will be far higher than that of Medway and this could be an attraction in itself to bring more tourism to Medway.

23) What are the opportunities for extending tourism in Medway beyond day trips to the main attractions and events?

Tourist Information Centres are vital to assist the public and help them to decide as to what would be attractive.

24) What role does the river and Medway's countryside have to play in developing tourism locally?

The river Medway already has some attractions ie., Upnor Castle, The Waverley Steam Paddle ship and of course Chatham Dockyard, which is not only historical in itself but is also a backdrop for many Films and TV programs.

25) Should we focus investment & retail capacity on Chatham to consolidate its position as Medway's highest order centre?

Yes, but it will need to be brought into the 21st Century if we are to attract both public & tourism.

26) Should we seek to facilitate development in Chatham of sufficient critical mass to improve market share, or plan for investment to meet currently identified capacity only?

I believe the former should be in place to facilitate development.

27) What should the mix be in Medway's town centres between retail and other supporting uses, including food and drink, commercial leisure, employment and residential?

Rely on the census surveys to ensure you are meeting the targets and the needs of the local population (see answer to question 19).

28) Should we consider making provision for a new or replacement supermarket in Gillingham town centre? If so, where should this go?

I have little or no knowledge of Gillingham Town Centre so unable to answer.

29) What should our approach be to proposals for new or enhanced out of town retail?

Be open-minded and consider the implications. Is it viable? If so will it have the right infrastructure in place bearing in mind the carbon footprint getting to and from the location? Taking into consideration the increase in traffic at certain times of the year i.e., Christmas shopping.

30) What are the most effective means to secure and strengthen Medway's environment, in the context of the area's development needs?

Page 44 (11.8 and its bullet points) of the Medway Council Plan answers this quite admirably.

31) What opportunities should be pursued in the Local Plan to extend connectivity for wildlife and people throughout urban and rural parts of Medway?

Page 45 (both 11.11 & 11.12) of the Medway Council Plan answers this quite admirably.

32) What approach should be taken to determining the role of landscape in producing a spatial strategy for the new Local Plan, and development management policies?

Page 44 (11.10) of the Medway Council Plan answers this quite admirably.

33) What approach should we take to managing Medway's heritage assets, particularly in the context of bringing forward regeneration?

Please refer to page 47 (both 12.5 & 12.6) of the Medway Council Plan. Old historic buildings that are no longer in use, should be regenerated and converted into flats (as they were in London).

34) What characteristics do you think makes a good place to live?

It should be in keeping with its historical past and topography of the landscape, clean air, a healthy environment and of course most vital, communication by both road and rail.

Mr P Stanley

35) What areas or characteristics of Medway are most distinctive? How should these be protected, enhanced or reflected in new development?

The main historic City of Rochester and Chatham Dockyard are most distinctive, the heritage of these two sites I'm sure will be kept in place as they support the local economy, any new development should be in keeping with the local landscape giving an impression that it is still of historical importance.

36) What areas of Medway have weaker character and what are the opportunities for improvements?

Strood, Luton, Lordswood are classic examples of deterioration with a decaying and crumbling infrastructure. These are (in my view) considered to be blights of the land and should be brought into the 21st century. In particular if we want to attract more people to the area.

37) What requirements should be sought of new developments in Medway to give them a distinct character and ensure they function well, in both central areas (including brownfield sites) and suburban areas?

Page 48 (12.9) of the Medway Council Plan answers this quite admirably

38) How should the role of Hoo St Werburgh as a service centre be developed?

The building of more houses will have a massive impact on local amenities and services. The local demographics of the population should be considered to accommodate accordingly.

39) What provision needs to be made for employment in rural Medway?40) How should the Local Plan address the need to maintain and improve access to services in rural areas?

Good road communication and infrastructure is vital if we are to improve services to rural areas.

41) What consideration should be given to strategic infrastructure and development in rural Medway?

Environmental impact is extremely important. Consideration needs to be given to areas of special scientific interest, wildlife and the landscape as a whole. We need to keep areas open of natural beauty for the people of Medway to visit and enjoy.

42) How can the Local Plan ensure that strategic and local needs are satisfactorily addressed in areas working towards production of a Neighbourhood Plan?

At the moment Neighbourhood Planning is only in operation in one parish. I have learned that this can be of prime importance when communicating to the main *Mr P Stanley*

council and that it helps towards issues of environmental impact with the local community. It also relieves pressure from main council by having the neighbourhood plan in place so that council can discuss matters in hand to those involved.

43) What changes to the built environment could facilitate healthier communities?

One of the biggest is our local hospital... Medway Maritime struggles to cope with Medway's current demand. I was recently hospitalised and was shocked to find that I woke up in a Victorian ward. Parts of Medway have a crumbling infrastructure & the hospital is a classic example of this. If we have to accommodate an increase in population and housing then this is a prime example of what a community should have in place. The same applies also for GP surgeries, there needs to be an increase to cope with demand.

44) How can the Local Plan encourage access to healthy food options and growing opportunities?

I believe you already recognise this on Page 53 (14.2) of the Medway Council plan (issues and options).

45) How can the Local Plan most effectively promote greater physical activity in Medway?

(Again) I believe you already recognise this on Page 53 (14.2 & 14.3) of the Medway Council plan (issues and options).

46) What changes to the current siting of healthcare facilities should be considered in the Local Plan? Are there opportunities to provide new sites, and/or to integrate health services in local communities?

Page 54 (14.5 & 14.6) have covered this quite admirably.

47) How best can the Local Plan secure the provision of new and expanded schools to meet the needs of Medway's communities and ensure that such infrastructure is delivered in a timely manner and located appropriately as a key element of sustainable development?

Refer to the census which took place in 2011. The statistic should be analysed and reflected upon. By the year 2035 a further two census surveys will take place (both in 2021 and 2031), if we are to cater for the needs of the Medway population we should be able to see as to whether the targets are being met and if not amend accordingly.

48) What community facilities are needed by Medway's population over the plan period, and how should they be delivered and managed?

Schools and academies are of extreme importance. We know that the population is ever increasing and this is reflected in the report. Schools currently are bursting to capacity; therefore new schools will need to be built at appropriate sites where there is new housing. Page 57 (15.4, 15.5 & 15.6) reflect as to how they should be managed.



49) Is it an appropriate ambition to preserve the integrity of the open space estate, or should we be seeking to rationalise the estate?

I believe it would be an appropriate ambition to preserve the integrity of the open space estate.

50) Should we continue to set a local space standard and seek to address shortfalls by new provision, and if so is the current level of 3.25ha per 1,000 population appropriate?

At this stage I would agree

51) Should we move to a multi-functional hub model of provision, and what might this look like in practice?

Page 60 (16.8) of the Medway Council plan covers this approach.

52) Should new development provide on-site open space, investment into the existing estate, or a balance of the two approaches?

A balance of the two approaches.

53) What management models and priorities should we consider? Should we seek to increase community involvement in open space provision and how might this be accomplished?

It is recognised on page 60 (16.9) in terms of management that open space tends to be delivered privately. If this is the case then this should be kept under constant review if the Councils ambition of preserving the estate is to be achieved. Perhaps other management models should be considered?

54) What provision should be made for sport in the Local Plan, including in relation to population growth and new developments?

This is an area of which I have little or no knowledge as I do not follow sport. Perhaps other constituents who hopefully complete this questionnaire will answer this accordingly?

55) How should the Local Plan address the aspirations for a new stadium for Gillingham FC?

As I am not directly affected by the aspirations of a new stadium I believe the people of Gillingham should answer this. Perhaps a consultation with the personnel and fans of Gillingham FC would best serve this purpose?

56) What weight should be given to the protection of the best and most versatile agricultural land, in the context of considering sustainable locations to accommodate growth in Medway?

In my constituent of Cliffe I have concerns about road infrastructure and in particular with regards to sites of special scientific interest, the marshes and the RSPB reservation of which people visit from all parts of the UK to visit. This in my view should remain in place. Limitations on new housing should be kept to a minimum as any changes would be detriment to the local environment.

57) How should the Local Plan address the AQMAs and the potential development sites that could be affected by pollutants in these areas?

Air quality is of particular concern to me as I have (all my life) suffered with Asthma. I moved here from south east London to improve my quality of life 22 Years ago. I am very pleased I did so as there has been a remarked improvement. It is recognised recently that NO2 particles are having adverse effects in health, mainly caused by the use of Diesel vehicles, the public (and businesses) as a whole need to be educated in this area. We are as a nation gradually taking on board this particular problem with green energy; however we must also put in place an infrastructure like vehicle charging points in and around Medway to help service the needs of a greener environment.

58) What approach should be taken to planning for land won minerals in Medway?

This should be supported if we are to continue to improve the local economy.

59) What are the requirements for wharves and their supporting land-side infrastructure in Medway over the plan period?

We recognise the importance of Medway's Wharves; however there are limitations with access to some sites. The B2000 is a classic example of poor road infrastructure and is unable to cope with demand by heavy Lorries. We must consider the local environment as well as the health and wellbeing of the local community which may have a detriment affect. Therefore should we look at alternatives to road communication? Cliffe does have in place a rail infrastructure that is not fully utilised; perhaps this should be enhanced upon for Cliffe, Eurowharf and Isle of Grain?

60) What provision should the Local Plan make for waste management and disposal in Medway, for both household and commercial streams?

One of the major problems that Medway experiences is domestic "Fly-tipping". Domestic waste management should not be just for small vehicles like passenger cars to use. Small commercial vehicles should be allowed access too! I find it strange that a people carrier such as a 7 seater Ford "S" Max which equates to the size of a Ford transit should be allowed, yet these smaller vans are excluded! The council needs to think outside the box.

Commercial streams should have their own facilities which are charged accordingly to the type of waste.

61) What should sustainable development look like for Medway? What plans and policies should we put into place to achieve this?

Pages 77 of the Medway Plan (22.15, 22.16 & 22.17) cover this quite admirably.

62) How can Medway ensure that all communities share in the benefits of growth, in order to reduce the significant inequalities across the area?

This can be done by introducing an education program, through media (both social and through public relations), helping to mitigate the various inequalities and how the public can help to improve their quality of life by living in the Medway towns.

63) What measures should new development take to mitigate and adapt to the risks posed by climate change?

Page 77 of the Medway Plan (22.17) and its bullet points cover this quite admirably.

64) How can existing development and communities mitigate and adapt to the risks posed by climate change?

Again page 77 of the Medway Plan (22.17) and its bullet points cover this quite admirably.

65) Should Medway adopt the optional national standards for water efficiency? What local evidence would we need to underpin this?

I believe Medway should adopt the optional national standards in particular to new buildings. An analysis of the local climate change can be obtained with the help of the Met Office (a government run body).

66) How should flood risk and SuDs be taken into account in planning for growth in Medway?

Flood defences are paramount if we are to tackle climate change and rising tide, in particular the Thames Estuary.

67) What safeguards should be put in place to ensure future requirements for improved flood defences are not compromised?

Safeguards need to be analysed by weather warnings & climate change. Would our defences cope if in fact a Tsunami took place? We need to think outside the box.

68) Should we allocate sites or zones for wind energy development?

This indeed is very controversial and if it were sited in Medway the community most affected needs to be consulted.

69) What policies should we set for other forms of energy development?

For new housing developments solar PV's need to be installed, along with thermodynamic or solar powered water heating. Solar farms should also be supported which would be far more energy efficient than wind farms.

70) How should we take advantage of opportunities for use of waste heat from the largescale energy generation on the Peninsula?

A few countries, especially Scandinavia have introduced pipelines for waste heat; some of these are actually installed under roads. Perhaps this needs to be considered to heat large housing?

71) What infrastructure is required to support Medway's growth over the plan period?

I believe Medway Council recognises this already! Road infrastructure is of prime importance.

72) What measures should be considered to increase public transport usage and rates of walking and cycling in Medway?

Public transport is an absolute priority; The council recognises the implications on page 87 (25.7, 25.8, 25.9 & 25.10) of the Medway Council Plan and what needs to be done.

73) What provision should be made for car parking?

This is a prime concern, but should not be implemented as a "cash cow" to improve the council's budget. We must consider the needs of the local population.

74) What are the requirements for waterside infrastructure, such as docks, wharves, marinas, piers and berths, and their supporting landside facilities, to support commercial and leisure activities?

Page 87 (25.6) of the Medway Council Plan covers this this admirably.

75) How should the aviation facilities at Rochester Airport and Stoke be considered in the Local Plan?

The facilities of both Rochester and Stoke should be fully supported and kept in place

76) How can the Council ensure that the Local Plan and its policies remain deliverable while seeking to ensure that development in the area is high quality and sustainable?

As previously stated; we have 19 years to complete this task. In 2011 a nationwide census was held looking at all areas and what changes are taking place with regards to the demographics of the area. We should act upon the statistics the census provides accordingly. There will be a further two census survey's taking place (2021 & 20131) by the time that the Medway Plan is complete. Act upon them accordingly

77) Should we consider setting different rates of affordable housing and CIL contributions to take account of differing viability between areas of Medway?

Absolutely!

78) How can we ensure timely and appropriate delivery of infrastructure to meet the needs of new and existing communities? What infrastructure types or projects should be prioritised where funding is limited?

It should be managed properly and in a timely fashion according to the budget made available.

79) What use should be made of new methods of delivery to help speed up the planning process, and how can we ensure that quality is not compromised in favour of speed?

As is usual with Council's and the planning office, each should be considered on its own merits. Consulting with local parish councils should also help in speeding up the process.

80) Are the development principles right? Should other guiding principles be introduced?

As in all development plans, they are subject to change but the principles are right. If for any reason changes are needed to be implemented then guiding principles need to be invoked.

81) Do you agree with the assessment of advantages and disadvantages of the various development type options set out above? Are there other advantages and disadvantages that should be considered?

I agree in principle with the assessment.

82) Which development type (or combination of types) do you think best meets the identified growth requirements for Medway?

Page 96 (27.8) of the Medway Council Plan recognises the development principles along with patterns of residential development.

83) Should we consider more radical approaches to meeting development needs, such as significant increases in density, or large-scale redevelopment of existing employment areas for residential or mixed use?

Yes, on both counts.

84) Should the green belt boundary be reviewed?

Absolutely not, green belt should be maintained wherever possible! We should consider the use and fully utilise the use of brownfield sites as a priority.

85) What provision should be made for mixed use in residential developments, both high density and lower density?

These should be considered on their own individual merits and according to the demographic changes within Medway.

86) What approach should be taken to future development opportunities and mix of uses in Chatham town centre and Waterfront?

Both Pages 100 & 101 of the Medway Council Plan cover this quite admirably.

87) Do you agree that the other town centres require improvement in their existing roles, or should we consider holistic review of any of them in conjunction with nearby waterfront regeneration sites?

(LODGE HILL/EXPANSION OF VILLAGE)

I think we should consider a holistic as well as a mixed approach and keep it under review. Stood is a classic example of being under developed and in need of improvement on many counts.



Name: Alan Byrne

Reference 130

Organisation

Historic England

On Behalf Of

Type of Consultee

Government/Public Body

Medway Local Plan Issues and Options Consultation Document 2012-2035

Historic England welcomes the opportunity to comment on the emerging local plan at this early stage, especially in the context of the very high significance of the historic environment and the wealth of heritage assets in Medway. We set out below a range of issues and matters that we would expect the plan to address in order to be found sound at examination. Local policies need to be appropriate in relation to national policies and based upon robust evidence. The plan should seek to ensure the significance of the historic environment and its potential contribution to achieving the whole range of objectives of the plan are woven throughout all appropriate sections of the plan and not necessarily limited to a heritage chapter or section.

We would recommend that you review the issues and options in the light of the points set out below as we believe it will help to strengthen the local plan by underpinning an approach that will lead to the formulation of sound policies.

Requirements of the NPPF

In broad terms, the Council should be cognisant of the requirements of the National Planning Policy Framework in preparing its local plan. The NPPF sets out in various different places a number of requirements for Local Plans in respect of the historic environment. Local Plans need to:

- be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area – which would include the historic environment. In particular this up-to-date evidence should be used to assess the significance of heritage assets and the contribution they make to the environment (NPPF Paragraphs 158 and 169)
- set out a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment (NPPF, Paragraphs 126 and 157)
- contain strategic policies to deliver the conservation and enhancement of the historic environment (NPPF, Paragraph 156), and
- identify land where development would be inappropriate because of its (environmental or) historic significance (NPPF, Paragraph 157).

Evidence Base

As with all policies in the plan, those relating to the historic environment should be based on a robust evidence base. When gathering evidence, it is important to bear in mind that this is not simply an exercise in setting out known sites but, rather, in understanding the value to society (ie the significance) of sites both known (such as those on the National Heritage List for England, see <u>www.HistoricEngland.org.uk/listing/the-list</u>) and potential, without which an understanding of the sometimes subtle qualities of the local distinctiveness and character of the local area may be easily lost. In particular:

• In some cases, it might be necessary to identify heritage assets outside a local authority area, eg where there are likely to be setting impacts caused by potential development proposals within that area

• Some asset types are not currently well-recorded. The Register of Parks and Gardens of Historic Interest in England, for example, is thought to represent only around two-thirds of sites potentially deserving inclusion

•Evidence gathering can help identify parts of a locality that may be worthy of designation as a Conservation Area, or may merit local listing

•Assessing the likelihood of currently unidentified heritage assets being discovered, particularly sites of historic and/or archaeological interest, will help to future proof the plan.

It may be helpful to collate this information within a Heritage Topic Paper to draw together the evidence prepared and the subsequent implications and actions required.

There are numerous sources of evidence to assist in gathering information include:

•the National Heritage List for England: www.HistoricEngland.org.uk/listing/the-list

•the Heritage Gateway: www.heritagegateway.org.uk/gateway/

•Historic Environment Record (HER): local planning authorities should either maintain or have access to a Historic Environment Record (NPPF, Paragraph 169)

- Conservation Area Appraisals and Management Plans
- Local Lists
- National and local 'Heritage at Risk' registers: www.HistoricEngland.org.uk/ advice/heritage-at-risk
- Historic characterisation assessments
- World Heritage Site Management Plans

• In-house and local knowledge and other expertise (i.e. civic societies, local history groups, neighbourhood consultations, the Civic Voice: www.civicvoice.org.uk/)

Where the evidence base for the historic environment is weak, local planning authorities may need to commission proportionate research, for example:

• detailed historic characterisation work assessing the impact of a proposal for a major urban extension or rural development

•visual impact assessments, considering the potential impact of allocations upon the setting of important heritage assets

•seeking the views of the local community about what they value about the historic environment of their local area (NPPF, Paragraph 155)

•an appropriate archaeological assessment to consider whether heritage assets with archaeological potential are likely to be present in areas where the HER indicates that there has been little or no previous investigation.

Work in putting together Local Plans will often generate new evidence of the state and significance of the historic environment. Documents, such as historic landscape characterisations, strategic environmental assessments, conservation area appraisals, economic development studies and those supporting supplementary planning documents and local listing assessments, will often contain new evidence. Local planning authorities will find it useful to collect this information and make it publicly available, including through the Historic Environment Record. The information can be invaluable in improving plan-making and decision-making in the future and is of significant public benefit in furthering the understanding of our surroundings and our past.

The evidence base for the historic environment may also assist with the preparation of the following:

• assessments developed to meet the goal of achieving economic, social and environmental gains jointly and simultaneously, ie through land availability, etc (NPPF, Paragraph 8)

- the Sustainability Appraisal which accompanies the Local Plan, and
- appropriate indicators for monitoring the delivery of the plan

A positive strategy for conservation and enjoyment of the historic environment

A positive strategy in the terms of NPPF paragraphs 9 and 126 is not a passive exercise but requires a plan for the maintenance and use of heritage assets and for the delivery of development including within their setting that will afford appropriate protection for the asset(s) and make a positive contribution to local character and distinctiveness.

This strategic approach can inform all aspects of the planning system by recognising and reinforcing the historic significance of places. As part of a sound conservation strategy, policies for local housing, retail and transport, for example, may need to be tailored to achieve the positive improvements in the historic environment that the NPPF expects (NPPF, Paragraph 8). Conservation is certainly not a stand-alone exercise satisfied by stand-alone policies that repeat the NPPF objectives.

Consequently, the Local Plan might need to consider the inter-relationship of the objectives for the historic environment with the following:

- Building a strong, competitive economy How might the plan conserve and enhance the quality of the historic environment in order to encourage tourism, help create successful places for businesses to locate and attract inward investment? What opportunities are there for heritage-led regeneration?
- Ensuring the vitality of town centres What role can the historic environment play in increasing the vitality and attractiveness of town and village centres?

- Supporting a prosperous rural economy What opportunities does the reuse or adaptation of traditional buildings provide for supporting the rural economy or providing homes for local people? What potential is there for new heritage-led tourism initiatives?
- Promoting sustainable transport How might new roads and other transport infrastructure be delivered in a manner which also conserves the historic environment of the area? Could the introduction of sustainable transport initiatives offer related opportunities for heritage through improving street/ traffic management or public realm enhancement at the same time?
- Delivering a wide choice of high quality homes How might the plan encourage adaptive reuse of historic buildings? How might new residential developments best be integrated into historic areas?
- Requiring good design How might the defining characteristics of each part of the plan area be reinforced in the approach to design?
- Protecting Green Belt land How might the policies for the Green Belt and the definition of its boundaries be tailored to protect the special character and setting of a historic town?
- Meeting the challenge of climate change, flooding and coastal change How might flood prevention measures be provided which also safeguard the heritage assets in the area? How might the strategy for renewable energy developments and associated infrastructure reduce the potential harm to the historic environment?
- Conserving and enhancing the natural environment How might the plan best identify, protect and enhance important historic landscapes? What contribution might the strategy for improving the Green Infrastructure network also make to the enhancement of the area's heritage assets?
- Facilitating the sustainable use of minerals (see box) How might any impacts of mineral development on an area's heritage assets be controlled to acceptable levels? How might the plan safeguard potential sources of building and roofing stone, or improve archaeological knowledge through approved mineral operations?

In formulating the strategy it is advisable and often necessary to consider the following factors:

- How the historic environment can assist the delivery of the positive strategy and the economic, social and environmental objectives for the plan area (NPPF, Paragraphs 126 and 132 and Sections 66 and 72 of the Planning (Listed Buildings & Conservation Areas) Act 1990)
- How the plan will address particular issues identified during the development of the evidence base, including heritage at risk and the reuse of buildings
- The location, design and use of future development and how it can contribute to local identity and distinctiveness

- The interrelationship between conservation of heritage assets and green infrastructure, landscape, regeneration, economic development, transport works, infrastructure planning, tourism, social and cultural assets, town centres and climate change mitigation/adaptation (NPPF, Paragraph 126)
- The means by which new development in and around World Heritage Sites and other designated heritage assets might enhance or better reveal their Outstanding Universal Value and significance (NPPF, Paragraph 137)
- The means by which new development in Conservation Areas and within the setting of heritage assets might enhance or better reveal their significance (NPPF, Paragraph 137)
- How Article 4 Directions may be employed to provide an additional conservation mechanism
- How HERs and local lists might assist in identifying and managing the conservation of nondesignated heritage assets
- How the archaeology of the plan area might be managed
- The possible role for CIL and/or s106 in delivery of required infrastructure
- Whether master plans or design briefs need to be prepared for significant sites where major change is proposed
- What implementation partners need to be identified in order to deliver the positive strategy
- What indicators should be used to monitor the heritage strategy's effectiveness
- In order to deliver an effective strategy for the conservation of the historic environment, is there a need for the plan to include Development Management Policies and where appropriate specific policies for specific assets or specific areas within the plan area?

Strategic policies for the conservation of the historic environment

The plan will be the starting point for decisions on planning applications and neighbourhood plans are only required to be in general conformity with the strategic policies of the Local Plan (NPPF, Paragraph 184). Consequently, sustainably managing the historic environment is best achieved by identifying clear strategic policies for heritage, in order to assist those preparing neighbourhood plans.

Identifying inappropriate development

The local plan needs to assess whether or not it should identify any areas where certain types of development might need to be limited or would be inappropriate due to the impact that they might have upon the historic environment (NPPF, Paragraph 157). This might include, for example, tall buildings within identified view corridors.

Development Management Policies for the historic environment

16 Specific Development Management Policies may be needed in order for decision-takers to determine how they should react to an application affecting a heritage asset. Such circumstances could include the following:

Those areas where Development Management Policies are necessary to amplify a general, overarching, Strategic Policy for the historic environment within a Core Strategy of the Local Plan – for instance, to deal with particularly distinctive or important historic environment features or significance

Those areas where further clarity would be useful – for instance, how local planning authorities determine applications affecting archaeological remains of less than national importance

Those areas where Development Management Policies may be necessary to address the local circumstances of the Plan area - for example, to clarify the approach to development within an Area of Archaeological Importance (see box), or to protect or enhance important views and vistas

Those circumstances where Development Management Policies are needed to address particular cross-boundary issues – such as World Heritage Sites, National Parks and Areas of Outstanding Natural Beauty whose management is carried out by joint working between several local planning authorities or the management of those extensive historic landscapes which run across a number of authority areas.

Site allocations

A conservation strategy can help with site allocations in terms of considering environmental and policy constraints against the evidence in the relevant Strategic Housing Market Assessment (Planning Minister's letter to Chief Planners 19 December 2014 www.gov.uk/government/ publications/strategic-housing-marketassessments).

It can identify opportunities to conserve the historic environment, such as site allocations positively addressing heritage assets at risk, and can help to ensure that site allocations avoid harming the significance of heritage assets (including effects on their setting). The strategy can also be used to inform the nature of allocations so development responds to and reflects local character. Site allocations should be informed by an evidence base and an analysis of potential effects on heritage assets. Further advice will be available in the forthcoming Historic England Advice Note on heritage considerations for site allocations in local plans.

Planning across boundaries

Conservation of the historic environment may involve cross-boundary issues, where development proposals near the boundary of one local authority area potentially affect the setting of heritage assets in another. In such cases in exercising the Duty to Cooperate both authorities need to take into account the impact on the conservation and enhancement of the historic environment as one of the strategic priorities (NPPF, Paragraphs 156 and 178).

Cumulative impact
Historic England Comments – 29 February 2016

The cumulative impact of incremental small-scale changes may have as great an effect on the significance of a heritage asset as a larger scale development. Consequently LPAs may consider covering this issue in a specific Local Plan historic environment policy. In appropriate circumstances this policy could be delivered via an Article 4 Direction in a conservation area.

Nationally SignificantInfrastructure Projects

There is a separate planning regime for Nationally Significant Infrastructure Projects (NSIPs) under the Planning Act 2008. See http://infrastructure.planningportal.gov.uk/ for further details.

Conclusion

Historic England welcomes the preparation of a new local plan for Medway, an area with a great deal of heritage significance. While the present draft Issues and Options document represents a good starting point for addressing the many and various needs of the historic environment of the district we feel there is still work to be done to build of firm evidence base for policies, and for a refinement of the approach taken to presenting them to better reflect the requirements of the NPPF. A sound understanding and recognition of the importance to the future direction of development of Medway of its heritage assets, and the opportunities they present for high quality and distinctive development should be integrated into the approach to growth advocated in the local plan. We believe this is achievable on the basis of the draft policies in the current consultation document and would like to work with the Council to achieve the best possible outcome for the historic environment of Medway and the local plan as a whole.

Name: Simon Slatford

Reference

131

Organisation

Nathaniel Lichfield & Partners

On Behalf Of

The Church Commissioners of England

Type of Consultee

Developer/Consultant





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 Date
 29 February 2016

 Our ref
 13786/SSL/MCM/10849458v1

Dear Sir/Madam

Representations to Medway Local Plan: Issues and Options

This letter has been prepared by Nathaniel Lichfield & Partners (NLP) on behalf of our client, the Church Commissioners of England.

The Church Commissioners of England (CCE) manage the historic property assets of the Church of England. Their Strategic Land Portfolio currently comprises circa 6,000 acres, with sites located nationwide. CCE seek to promote their landholding, where suitable, for development through the Local Plan process and work closely with LPA's to demonstrate site deliverability.

The CCE own significant areas of land within Medway, including land east of Hoo St Werburgh, centred on Ordnance Survey Grid Reference TQ787730. The site is approximately 76 hectares in size and comprises land in agricultural use. The site is bounded to the west by the settlement edge of Hoo St Werburgh, including residential development and a recreation ground, and to the north, east and south by roads and associated soft landscaping. There are two buildings centrally located within the site, forming Angels Farm and in close proximity to this, to the south, a small scale reservoir.

This letter comprises formal representations to the Issues and Options document in respect of the emerging Medway Local Plan.

CCE welcomes the opportunity to be involved in the creation of policies that will form part of the emerging Local Plan. These representations provide comment in relation to a number of the questions posed within the consultation document. However, they are predominantly focused on policies relating to housing, agricultural land, and sustainable development.

In overall terms, CCE consider that the Plan, which will set land use policy up to 2035, needs to be ambitious, yet fully deliverable. It needs to ensure that the housing needs of the Borough can be

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met with clear guidance as to the most appropriate and sustainable sites to accommodate the required housing.

<u>General</u>

1) What do you think should be the key components of and ambitions for the Local Plan's vision for Medway in 2035?

As stated within the Consultation Document, since the Unitary Development Plan was published there has been considerable change to national policy since the public of the National Planning Policy Framework (NPPF, 2012). At the heart of the NPPF is a 'presumption in favour of sustainable development' and the requirement for local authorities to "boost significantly the supply of housing" (paragraph 47).

Further to the changes to national policy, there has also been considerable growth and change within Medway. As set out within the consultation document, the "scale of change and projected growth mean that the new Local Plan must look at new approaches and locations for delivering the housing, jobs and services that the area needs".

In light of the above policy change and the changing environment in which the emerging Plan is being drafted, which both place a greater emphasis on the delivery of new homes, it is considered that Medway need to adequately plan for the associated increased demand for housing, jobs, services, and infrastructure required by the projected increase in population.

In order to ensure that the above is fulfilled within the plan period there needs to be specific, achievable and deliverable growth in planned, sustainable locations. To ensure that development is sustainable and supports local communities, meaningful extensions to existing settlements should form the core basis of the ambitions for the Local Plan's vision.

2) What do you think are the strategic issues that the Local Plan needs to address?

The most significant challenge associated with planning for Medway is the need to address, and plan for, the Objectively Assessed Housing Need (discussed further below). In light of the need to make provision for the increased population and therefore housing need, it is crucial that housing development in Medway is delivered and this needs to be recognised in the emerging Local Plan.

It is important not only to provide the total number of new houses required over the plan period to meet the objectively assessed need, but for these to be in locations where the balance of beneficial and adverse effects is most acceptable. Sites allocated for housing need to be supported by adequate transport and social infrastructure, including provision for access to jobs. Both existing and emerging communities should be able to access the opportunities that arise through Medway's growth.

One of the key strategic issues is to ensure that the land allocated is sustainable and deliverable; in particular, with regards to housing and that there is a balanced distribution of new housing growth. As such, sites should be available and offer a suitable location for development now and also be achievable, where there is a reasonable prospect that housing will be delivered on the site viably. It is critical that Medway Council work in collaboration with landowners to ensure that they have undertaken the necessary technical work to have the evidence base to support sites taken forward in the next stage of the Local Plan.



3) How should the Council respond to these issues?

The new Local Plan must identify sufficient new housing land for future sustainable growth within the plan period. This requires consideration through appropriate strategic site allocations.

CCE consider that planned growth of existing settlements, such as at Hoo St Werburgh, will have a substantial positive effect on realising the opportunities that come with growth, whilst mitigating the associated threats. They will allow for significant housing to be delivered whilst ensuring that new development is properly integrated with existing communities and meets the needs of future residents. Such locations, which are in close proximity to current communities, would support improvements to existing facilities and services, as well as making new provision for new facilities that are required as part of the development.

Housing

4) Do you agree with the approach and conclusions of the assessment of housing needs calculated for Medway over the plan period? And 5) What do you consider to be the appropriate housing market area for Medway?

The North Kent Strategic Housing Market Assessment (SHMA) (November 2015) identifies an objective assessment of housing need (OAN) for Medway of 1,281 dwellings per annum over the period 2012 to 2037. However, NLP considers that some analysis in the SHMA indicates that OAN is in fact greater than that and, furthermore, there will be a need for a housing requirement which is significantly greater than OAN to aid in the delivery of affordable housing.

The demographic baseline of the OAN is calculated by choosing a mid-point between a ten year migration scenario and a ten year migration scenario which includes 100% un-attributable population change (UPC) between 2004 and 2011. However, a number of Inspector's findings at Local Plan Examinations including Aylesbury Vale, Eastleigh and more recently in February 2016 Arun, have identified that UPC should not be used in the calculation of OAN.

One of the reasons for this is that ONS national population projections in 2014 indicate faster growth in the population than the 2012 projections. Furthermore, the work underpinning the London Plan (which assumes an increase in out-migration and a decrease in in-migration) indicates that net population outflows from London into the wider South East, which includes Medway, will increase.

Excluding UPC (in line with ONS) in the demographic baseline for OAN in Medway would increase the demographic starting point. Therefore, the application of any uplifts for economic factors and negatively performing market signals would be applied to this higher demographic baseline, which would increase the overall OAN figure for Medway.

Although it is identified at paragraph 9.34 of the SHMA that affordable housing needs could not realistically be met in full within the OAN figure of 1,281 per annum and that this "could justify the consideration to increase the housing requirement", the scale of increase needed to meet affordable housing needs should not be underestimated. To meet the current need of 744 affordable homes per annum at the Council's current housing policy target of 25-30%, a housing requirement of 2,480 to 2,976 would be needed. Although this scale of growth may not be realistic, there is clearly a need to make an uplift to OAN for a housing requirement which makes a meaningful contribution to these needs.



6) Do you agree that 25% is an appropriate level for the requirement of affordable housing, and what threshold should be set for the scale of development that needs to provide affordable housing?

In principle, it is acceptable to have a broad Borough wide target for the provision of affordable housing. However, it is also important to recognise that this will vary at different locations and sites due to viability. For example, relative sales values together with the requirements to enhance access and provide suitable physical and social infrastructure will have an impact on viability.

Specific strategic sites that have the ability to deliver a considerable amount of housing towards the Council's target, and may have significant infrastructure requirements, should be given greater flexibility, to ensure that sustainable housing-led scheme can, most importantly, be delivered.

The National Planning Policy Framework says that plans should be deliverable and that the sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. The NPPG goes on to add that Understanding Local Plan viability is critical to the overall assessment of deliverability. Local Plans should present visions for an area in the context of an understanding of local economic conditions and market realities. This should not undermine ambition for high quality design and wider social and environmental benefit but such ambition should be tested against the realistic likelihood of delivery. Importantly the NPPG states that:

Local Plans and neighbourhood plans should be based on <u>a clear and deliverable vision</u> of the area. Viability assessment should be considered as a tool that can assist with the development of plans and plan policies. It should not compromise the quality of development but should ensure that the <u>Local Plan vision and policies are realistic</u> and provide high level assurance that plan policies are viable.

9) How can development make a positive contribution to the health and wellbeing of Medway's communities?

Housebuilding is widely acknowledged to bring about significant economic and community benefits through capital investment, jobs creation, household expenditure, local authority revenue and community infrastructure provision. Throughout the construction phase, housebuilding can stimulate the local economy by providing jobs, both directly and throughout the supply chain, which can help to boost wages and reduce unemployment. Schemes can also help to raise local skill levels by providing specialised training, for example through apprenticeships.

Once occupied, residents of new housing will help to support shops and services in the local area through expenditure, which will in turn help to support businesses and jobs. New development also brings local authority revenues through Council Tax payments (which will be ongoing) and New Homes Bonus payments (which are not ring-fenced and can be used by local authorities in the most beneficial way). In addition, developments provide planning contributions to the local area through Section 106 and/or CIL, which can contribute to the maintenance and/or improvement to local infrastructure needed as a result of development. This can include spending on transport infrastructure, schools, healthcare, public open space and other community services. Housing developments can also improve the overall quality of place within a settlement by providing open space to benefit the wider community which can be used for recreation and fostering social inclusion, as well we contributing to overall improved health and wellbeing.



Economy

17) Do you agree with the scale of jobs and employment land needs identified for Medway over the plan period?

In addition to identifying land specifically for employment, it should be recognised that residential development also brings associated jobs and employment. This includes jobs generated during the construction period of the residential development. Further, additional spending by new residents will support the vitality and viability of local firms in existing communities, and could encourage other businesses to move to the local market, enhancing the range of services on offer in existing communities. The quantifiable economic benefits associated with new residential development are also important, to consider in addition to identifying land specifically for employment.

Environment

32) What approach should be taken to determining the role of landscape in producing a spatial strategy for the new Local Plan, and development management policies?

It is considered that the Medway Landscape Character Assessment (2011) Document provides an adequate assessment of the condition and sensitivity of the landscape. With regards to the Hoo Peninsula Farmland, it is concluded that the area contains many detracting features and a weak landscape structure. There is potential to strengthen the landscape structure and for new development to enhance biodiversity and local distinctiveness. These conclusions can be taken forward to support site allocations in the Local Plan.

The role of the landscape in providing settings for towns and villages needs to be balanced against the need to plan for a significant number of new homes and the inherent sustainability of locating these nearby to existing settlements. As such, it is important to take into account the benefits that new development can make when designed to support an effective green infrastructure network, and the role of this in strengthening and enhancing access opportunities to better quality open space in such areas for existing and new communities.

The Local Plan should consider the scope to locate development where it can enhance landscapes as against detract from them. There are areas within the Borough that are more sensitive in landscape terms and these should be protected where possible.

Built Environment

34) What characteristics do you think makes a good place to live?

A good place to live is one which promotes the principles of sustainability and has a variety of functional attributes that contribute to day-to-day living. This includes opportunities to strengthen existing communities and links between them and new development through access to employment, shops and services, social infrastructure such as schools and health care and public transport. New homes in the right places, can help to support and sustain existing services.

Places should promote community involvement and maintain a secure environment. New places should be integrated with the existing and meet the identified needs of future residents to avoid adverse impacts on the existing infrastructure. It is considered that planned growth to existing settlements would allow for the above objectives to be met, for both existing and incoming residents.



35) What areas or characteristics of Medway are most distinctive? How should these be protected, enhanced or reflected in new development? And 36) What areas of Medway have weaker character and what are the opportunities for improvements?

The Consultation Document recognises that low-density suburbs spread out towards the countryside and surround the older cores of many villages in Medway. This applies to the development of Hoo St Werburgh from the 1950s onwards. There is an opportunity for such suburban areas on the edges of villages to be strengthened by planned future development. High quality, design-led residential development would create more distinctive gateway approaches, improve access to hinterland and circular walks and would better integrate villages within their wider landscape setting.

37) What requirements should be sought of new developments in Medway to give them a distinctive character and ensure they function well, in both central areas (including brownfield sites) and suburban areas?

CCE would agree with the consultation document where it recognises that where service centres already exist, that provide for sustainable communities, it is not considered necessary for new development to provide for anything new, necessarily, as these areas will continue to function well, if not better due to the associated increase in expenditure from additional residents.

In this regard, it is noted that the State of Medway Report Built Environment (January 2009) states that Hoo St Werburgh performs the role of a rural service centre for a number of settlements, benefitting from a wide range of facilities and services to meet local demands. The Report refers to Hoo St Werburgh (in combination with Halling) as the "most sustainable of the rural communities".

CCE recognise that it may be appropriate for a strategic development to provide for additional social infrastructure to meet the needs of the new population. However, this should be assessed on an individual site basis and determined through discussions during the Local Plan process having regard to existing facilities and services and how these can best be supported and enhanced.

Rural Issues

CCE would welcome the Village Infrastructure Audit (2015) being made publicly available, in order to be able to provide more informed comments on the conclusions outlined in the Consultation Document.

38) How should the role of Hoo St Werburgh as a service centre be developed? And 40) How should the Local Plan address the need to maintain and improve access to services in rural areas?

CCE believe that the role of Hoo St Werburgh as a service centre should be strengthened and enhanced.

The Consultation Document recognises that Hoo St Werburgh "acts a service centre for the wider Hoo Peninsula". As outlined in the 'State of Medway Report' (January 2009), Hoo St Werburgh already benefits from a wide range of services and facilities. Shopping is focused around Church Street and along the Main Road, there are two recreation grounds, two sports grounds, a swimming pool, a primary and secondary school and it is well served by buses. However, there is



the scope to add to and enhance these existing facilities to make the centre more viable, robust and sustainable thereby better able to support the local rural communities.

The provision of new homes would support and strengthen Hoo St Werburgh's existing role as a service centre and, as such, a planned extension to the existing settlement for new housing would be highly sustainable. Existing facilities in Hoo St Werburgh would benefit from an increase in population, helping to support their continuing viability.

CCE have control of land which is located adjacent to the western boundary of Hoo St Werburgh. There is scope for housing development on this site to also provide for such new facilities within the development.

It is unlikely that the cumulative residual effects of a housing development on services would be significant. In any event, this can be mitigated by new development providing for services, where there is an identified demand.

39) What provision needs to be made for employment in rural Medway?

As recognised within the Consultation Document, the large sites on Hoo Peninsula are well suited for large scale industrial and distribution activity. Offices would be better located in the main town centres.

It is considered appropriate to consider the market scope and viability for some small scale employment provision to be made as part of mixed use developments. This is because the delivery of high quality new homes would help to attract and retain skilled workers locally. In turn, this would allow for businesses to be located close to town centres and to access the range of amenities they provide.

In addition, it is noted that housing development in rural Medway would result in economic benefits in terms of providing direct employment during the construction phase and through the spending of residents which would indirectly support employment locally.

Social and Community Infrastructure

46) How best can the Local Plan secure the provision of new and expanded schools to meet the needs of Medway's communities and ensure that such infrastructure is delivered in a timely manner and located approximately as a key element of sustainable development?

The Council, following the identification of their objectively assessed need, should assess what the Borough's education infrastructure requirements will be and plan accordingly. There is the opportunity for large scale development and planned extensions, to be able to assist in the delivery of new social and community facilities, where necessary. This would help reduce the identified funding gap for primary schools in Medway ('Growth and Infrastructure Framework', 2015) and help to deliver primary school places.

47) What community facilities are needed by Medway's population over the plan period, and how should they be delivered and managed?

NLP has undertaken research into the existing community facilities in the borough. Hoo St Werburgh has a range of shops and services, including two small foodstores, opticians, cafes and takeaways, post office and local library and a recently refurbished sports centre with a gym. This is the main leisure centre serving Hoo and the rest of the peninsula. The local village hall is located in



the west of the village, near the local schools. On weekday mornings it provides the facilities for a local pre-school, as well as other parent and toddler groups, fitness classes and coffee mornings.

Hoo acts as a local centre for residents within the village and provides local services for the other more rural villages on the peninsula, which can have difficulty with access to services. The village has seen some closures of local services in recent years, in turn having a knock on effect on the services available to the communities in the wider area, making growth and development an even more important consideration to ensure local businesses are maintained and boosted. Hoo's position as a key service centre for the peninsula means that future housing development will be key to ensuring the sustainability of both the village and wider locality.

Open Space

49) Should we continue to set a local space standard and seek to address shortfalls by new provision, and if so is the current level of 3.25ha per 1,000 population appropriate? And 51) Should new development provide on-site open space, investment into the existing estate, or a balance of the two approaches?

The current level of 3.25ha per 1,000 population is considered to be extremely onerous and unnecessary and it may be difficult to achieve across a variety of different sites. Requiring such a significant proportion of open space may have an impact on viability and therefore the ability to maximise housing delivery.

A balance of the two approaches is therefore considered appropriate. Overall, open space should be planned strategically and standards should be applied flexibly on a site by site basis and through discussions during the Local Plan process.

Agricultural Land

55) What weight should be given to the protection of the best and most versatile agricultural land, in the context of considering sustainable locations to accommodate growth in Medway?

It is noted that Medway has a significant amount of Grade 1 agricultural land, currently comprising 23% as opposed to the England average of 2.7%. It is important to recognise that the loss of high quality agricultural land may be necessary in order to deliver the Council's identified growth requirements.

As set out above, Medway have an objectively assessed housing need of circa 1,281 houses per annum across the Plan period. This, combined with the fact that there are not enough suitable or sustainable urban sites available for development, indicates that the Council will need to release some agricultural land in locations that could deliver sustainable housing growth. When assessing sites for release, weight should be attributed less to sustainable urban extensions and more for remote sites.



Sustainability

60) What should sustainable development look like for Medway? What plans and policies should we put into place to achieve this?

New development should be integrated with existing development and provide for a mix of uses, depending on location, in proximity to a range services and facilities and be located with good access to public transport.

As set out above, it is considered that Medway should utilise planned growth of existing settlements to achieve this, as it will assist in supporting and enhancing existing facilities and communities. This would allow for the most truly sustainable developments to come forward.

Paragraph 55 of the NPPF states that:

To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby.

61) How can Medway ensure that all communities share in the benefits of growth, in order to reduce the significant inequalities across the area?

Communities in Medway can best share in the benefits of growth when new development comes forward as extensions to existing settlements as this will support existing shops, services and public transport, as well as potentially providing new facilities.

Paragraph 28 of the NPPF states that, inter alia, to promote a strong rural economy, local and neighbourhood plans should promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship. This can best be achieved by providing an increased population and as such additional expenditure and patronage. Paragraph 52 of the NPPF confirms that:

The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns ..

Transport

70) What infrastructure is required to support Medway's growth over the plan period?

WYG is retained by CCE to provide transport and highways services relating to their site in Hoo, and have undertaken a review to assess the baseline transport conditions of Hoo. Their assessment confirms that there is sufficient existing highway capacity for residential development to come forward in Hoo.

The report confirms that the CCE site is well connected to the existing primary local road and strategic road networks. The site is also reasonably well served by local bus and rail services during peak hours. Depending on the level of growth in Hoo, there would be some potential for improvements to bus services.

As set out above, CCE consider that Hoo is suitably located for a sustainable extension for a mixed-use residential development. WYG confirm that any new or diverted bus routes needed to serve the CCE site could do so directly, by making a loop within the internal roads and using the two vehicle accesses from Ropers Lane.

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It is understood that there may be development traffic impacts at the Four Elms Roundabout. However, WYG have assessed this and concluded that there are suitable means by which a phased approach to mitigation of these impacts can be implemented.

WYG have not undertaken a detailed capacity assessment to date, however they confirm that there are no readily apparent physical impediments to the delivery of an improvement scheme in Hoo that would result in an operable junction, when including both the potential development at Lodge Hill and the CCE site.

Deliverability

In respect of CIL contributions and affordable housing, a single rate for the whole borough would not be suitable or pragmatic to ensuring viable developments are delivered. As stated within the consultation document, land values within the Borough vary significantly. Therefore, Medway must ensure that policies are not overly restrictive to the point that they will impact on delivery.

CCE consider that it would be suitable for specific strategic sites, particularly those required to deliver infrastructure or new local community services, to be given greater flexibility in respect of contributions and this in turn would ensure that schemes come forward that create high quality, sustainable but, importantly, deliverable housing that meets the needs of the borough.

Paragraph 173 of the NPPF states that:

Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.

Development Strategy

81) Which development type (or combination of types) do you think best meets the identified growth requirements for Medway?

It is recognised that there is uncertainty regarding the Lodge Hill application, however the Local Plan should continue to plan positively regardless of the outcome.

It is acknowledged that when growth is incremental, rather than planned on a strategic basis, it is harder to ensure that infrastructure is planned alongside to support growth. The objectively assessed housing need for Medway is 1,281 per annum. This is a considerable target and, therefore, not just one of the growth options set out within the consultation document will be suitable or enable the Council to meet their target year on year. Due to the scale of the objectively assessed housing needs in the Borough, it is likely that there will be a need for a combination of approaches.

CCE consider that one option that should be progressed is large scale housing development to the east of Hoo St Werburgh. This site will provide a sustainable and suitable urban extension to the existing settlement. This has the advantages of being able to deliver a significant amount of housing, circa 1,500 new homes, whilst also ensuring that the development is planned for and that adequate infrastructure, including improvements to the road network, provision of shops and



services can be delivered if required. However, importantly, it would also support and enhance the existing community and services.

The CCE site is available and could assist in providing a strategic, sustainable and deliverable site to contribute towards the Council's housing supply.

Overview

In summary, CCE seek to encourage Medway to ensure that emerging policy creates a positive vision for the Borough, is consistent with the NPPF and allocates sustainable sites for housing, in line with the established need.

CCE consider that their site in Hoo is a suitable for providing 1,5000 dwellings as a sustainable urban extension. This will help the borough to meet their housing requirement and ensure that development is focused in an accessible location that supports and enhance the local community and existing services.

We consider that the suggestions set out within these representations are appropriate and will assist in ensuring sustainable, viable and deliverable development within Medway.

Please contact us if you have any queries regarding these representations. Due to the complexities and potential of our client's site, we would welcome the opportunity to meet with you to discuss this site and the emerging Plan further.

Yours faithfully

Simon Slatford Senior Director

Name: Oscar Wong

Reference 132

Organisation

Transport for London

On Behalf Of

Type of Consultee

Government/Public Body

maryott, kyle

From: Sent: To: Cc: Subject:	29 February 2016 16:49 policy, planning Medway Issues and Options Local Plan consultation - TfL comments
Follow Up Flag:	Follow up
Flag Status:	Completed

Dear Sir/ Madam,

Medway Issues and Options consultation

Thank you for your letter dated 26th Jan 2016 seeking comment from Transport for London (TfL) on the above mentioned consultation documents.

TfL has no specific comments in the consultation document, but would support your proposed transport policies that seek to seek to support and improve facilities for, and access to public transport, walking and cycling through development, for example through the extension of bus network (paragraph 25.4).

It is understood that there is growing overcrowding on peak train services, Southeastern services in particular. In planning for the growth in Medway, TfL has identified some future opportunities in the East and Southeast sub-regional Transport Plan 2014 (https://tfl.gov.uk/cdn/static/cms/documents/east-south-east-poster-2014.pdf) including the Crossrail extension to Gravesend. TfL will continue to investigate these future opportunities and liaise with various local councils, involving those outside London. London Boroughs in East and Southeast region are invited to regular panel meetings alongside with the GLA, and the promotion of growth and development outside London has always been taken into our consideration. Additionally, the council should make the most of capacity offered by HS1 services in order to support additional growth in Medway region.

In terms of the Lower Thames Crossing (paragraph 25.8), given it is outside London, TfL has no comments at this stage but will engage with the Council if there is further updates.

Please feel free to contact me if I can be of any further assistance in providing information.

Kind regards, Oscar Wong | Assistant Planner Borough Planning, TfL Planning, Transport for London

A: 10R1, 10th Floor, Windsor House, 42-50 Victoria Street, London SW1H 0TL

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Name: Vince Maple

Reference 133

Organisation Labour Group

On Behalf Of

Type of Consultee

Councillor/MP/Parish Council

This submission is made on behalf of the Labour Group at the issues and options stage of the local plan consultation process.

We agree the indicative new housing unit numbers and employment land identified by the technical SHENA (Strategic Housing and Economic Needs Assessment) process.

We wholeheartedly support the use of brownfield sites as the first call for development (for either housing or employment purposes).

We support the use of high density & high rise housing development in appropriate locations (such as some riverside sites) where their scale can be an advantage.

We recognise the complex nature of the huge deficit in the housing stock across Medway and subsequently support the development of homes of differing sizes to meet the needs of Medway's population for the next generation - it must be that housing is affordable and accessible.

In supporting the SHENA process there is recognition that there will be a need for greenfield sites to be identified for housing (and possibly for employment) purposes.

Following the analysis of the Issues and Options process we call on the Council to be explicit in how it identifies the sites it wishes to retain in their current use and those it wishes to redesignate and the rationale (such as SSSI; AOB; RAMSAR; grade of agricultural land, public park or open space, urban lung, etc).

It is essential that the council seek to ensure that new developments, including where aggregated, generate sufficient funds to meet all of their immediate and wider infrastructure needs including transport, education, health, leisure and open space.

Take a realistic view of the commercial potential of each of the town centres and look to increase housing units - thereby increasing the potential footfall of each High Street - ensuring that each has the right mix of shops to make a comprehensive offer for those wishing to shop there.

We support the wider use of the Rochester Airfield site to increase the potential size of the business park, along with public open space provision

Consideration should be given of the suitability of the NHS offer and its current locations such that Medway is well provided for with easy to access facilities as its population grows substantially

With the much recognised population growth and older demographic there should be specific focus on the need to develop extra care / lifetime housing alongside any improvements in use of technology during the span of the local plan.

With the increase in wanting to tackle social isolation it is important to get strong options in the plan which aid in that from good quality open spaces to a suitable number of community centres and other buildings for social interaction.

We call on the Government to reintroduce regulated bus services - such that public transport becomes a realistic offer for many who currently choose to travel by car - thereby allowing for a reduction in the steady rise in car ownership and usage and its consequent impact on public infrastructure (eg roads and parking). Alongside this due consideration should be given for combined public transport smart ticking for Medway Bus & Train travel.

As the main opposition group we look forward to continuing to play our part in bringing forward a Local Plan for Medway.

Name: Chris Fribbins

Reference 134

Organisation Allhallows Parish Council

Allianows Farish Coun

On Behalf Of

Type of Consultee

Councillor/MP/Parish Council

Medway Local Plan (2012-2035)

Issues and Options

Allhallows Parish Council Response

The response from the Allhallows Parish Council attempts to provide input to the majority of the questions posed by the Issues and Options consultation. There does appear to be some gaps in the consultation – especially the proposal to review village boundaries and how the needs of the local areas can be assessed and delivered.

DEVELOPING A VISION FOR MEDWAY IN 2035

1) What do you think should be the key components of and ambitions for the Local Plan's vision for Medway in 2035?

The Medway area is one of the largest conurbations in the South East outside of London, although this is often not recognized. Growth in recent decades has brought some improvements but overall the infrastructure and services have not kept pace. Further economic pressures have had an impact on issues such as Policing, Fire Service, Hospital and Health Care. The rural divide has meant greater reliance on the car and traffic levels, especially at peak times, have caused congestion for all. Residents (and businesses) will want improvements to support the growth projected and necessary economic investment.

STRATEGIC ISSUES

2) What do you think are the strategic issues that the Local Plan needs to address?

a) The environment

There has been a growing recognition of the part a healthy environment plays in the vitality of the area. Green space provides a lung for the towns and protection needs to be maintained and enhanced where necessary (within the urban core and at a large scale in the rural areas)

- b) Local employment
 It has always been relatively easy to provide additional housing, but
 large areas allocated for industrial and economic development
 remain underused (empty properties on existing business estates and
 areas such as Grain and Kingsnorth).
- c) Housing

The case for additional housing has not changed for several decades – the majority driven by the needs of the local population, but the area still remains a major attraction from London (especially South East) where property prices continue to grow and a move to the Medway Towns becomes very attractive financially, but leaves the core local issue unresolved.

3) How should the council respond to these issues?

Where do we go from here? 2035 seems a way off but is easily within the life of current under 60s. There will be even more pressure on land supply in 2035 so there is a need to maximise the contribution that developments in this plan make to the infrastructure of the area. (e.g. roads, rail, health care, local jobs)

HOUSING

4) Do you agree with the approach and conclusions of the assessment of housing needs calculated for Medway over the plan period?

Without the detailed understanding of the evidence base it is difficult to comment, however there is a concern that housing take-up from outside the area, especially South East London, will put further pressure on the needs of local residents.

5) What do you consider to be the appropriate housing market area for Medway?

There appears to be a priority for development of homes for sale (although providing a step-up for some local residents, it provides a magnet for people from other areas). With the reduced affordability of these homes, further initiatives are needed for keeping these costs down. There is also a need to provide quality, affordable homes for rent.

6) Do you agree that 25% is an appropriate level for the requirement of affordable housing, and what threshold should be set for the scale of development that needs to provide affordable housing?

The quality affordable housing % should be higher if local needs are to be met (40%).

7) What form of housing best meets the needs of Medway's growing population of older people?

There is a natural desire for older people to remain where they are. They have usually invested significantly in their property, both financially and personally, however it is recognised that this means a significant part of Medway's housing could be under occupied (and with a growing population this may grow). There does not appear to be a suitable model for older people currently and there needs to be a range of low cost purchase and/or rent options to enable older people to benefit from their past investment – with a range of down-sizing options. Quality/Affordable Bungalows and retirement homes can also increase the options for older people.

8) What housing is needed for other specific groups in Medway?

Ground floor properties will continue to be needed for a wide range of disabilities (both visible and invisible). Care in the community housing units.

9) How can development make a positive contribution to the health and wellbeing of Medway's communities?

There needs to be a contribution from all new developments (residential and business) ear-marked for health care. The population projections may also require an additional hospital to the west of the area.

Green spaces, play areas and pedestrian and cycle paths will also aid health and well being.

10) Do you have suggestions for potential sites for starter home developments?

No suggestions for sites, starter homes will be required in all developments, and integrated.

11) How do you consider the infrastructure needs of starter home and self and custom build developments should be addressed?

A flexible mixture of development types should be required in all developments of 20 or more homes – flexibility based on an overall Medway need.

12) How should the council provide for the demand for land for self and custom build housing? For example, integrated with larger developments, on standalone sites, or linked to placemaking ambitions to deliver highly sustainable and innovative design quality.

These should normally be integrated with larger developments, although smaller sites could also be considered (but not specifically allocated).

13) What is the demand for student housing and where would this be best located? For example, would dedicated student housing be appropriate in Medway's town centres?

Student housing should be located close to further education sites or on cheap/reliable/extended hours' public transport routes, however this demand should not be concentrated on a small number of sites.

14) What is the level and type of need for gypsy, traveller and travelling showpeople's accommodation in Medway, and what criteria should be used to identify appropriate sites?

We welcome the government's latest consultation and directives about the definition of this group. We have been concerned at their ability to bypass planning rules that apply to everybody else and have seen developments in areas where this would not normally be allowed. A 'real' traveller site may need to be self-sufficient and 'remote' although more permanent accommodation needs to be part of the general built environment.

ECONOMY

15) Where should such sites be located, considering opportunities in existing employment areas, and potential new sites such as Lodge Hill or other developments?

There is significant land around Kingsnorth (Hoo) and Grain for potential employment areas but it has proved to be difficult to develop these. Employment could be considered if environmental issues at Lodge Hill can be overcome – but a key issue remains with the relatively poor transport infrastructure in the area – and the impact on residential communities of heavy traffic (especially HGVs).

There have been key road improvements – A228 between Chattenden and Ropers Lane (and recent changes to the lane itself), and the road to Grain remains single carriageway from Sharnal Street, however the main issue remains that these feed into one route and especially the Four Elms Roundabout – with growing use throughout the day, and major issues at peak times for all traffic.

Road traffic reduction should be encouraged through use of the Peninsula railway for passenger and freight services and something major will be required at the Four Elms Roundabout (traffic light signalling falls well short of the requirements here). Residential and employment expansion will need to restricted until this (and other) issues are addressed.

The contribution that 'work from home' contributes should also be recognised and supported where possible.

16) What are the opportunities for further business growth in and close to town centres in Medway?

There are already sites such as Knights Road/Medway City Estate/Chatham Dockyard close to town centres that require better access.. There does need to be encouragement for the consideration of travel plans and positive encouragement (Incentives) to use public transport for access and for public transport operators to provide services.

17) Do you agree with scale of jobs and employment land needs identified for Medway over the plan period?

There does need to be an encouragement to use local employment land already allocated – and positive encouragement and support. Too much of the current allocation is underused.

18) How can Medway realise opportunities to capitalise on growth in the wider area, including London?

There will be pressure on both road and rail connections towards London, and the only 'spare' capacity is contra-peak travel which should be encouraged.

19) How should the plan respond to opportunities arising from the expansion of higher and further education in Medway?

Support to encourage both the students and qualified students to locate locally should be provided.

20) Is it feasible to reduce the amount of out-commuting from Medway, and what would be required to achieve this?

Local business should be encouraged (also contra-peak).

21) How should the plan address the specific locational requirements of some businesses, for example access to wharves?

Locational requirements should be considered and supported where the road (and rail) infrastructure has the capacity and environmental impact in the area (to residents and the natural environment) can be prevented.

TOURISM

22) What scale and form of additional visitor accommodation is needed to support and develop a successful tourism sector in Medway?

The area has a lot to offer currently and that needs to be maximised to encourage tourism – especially the countryside.

Quality touring camp sites are also required to help promote tourism.

23) What are the opportunities for extending tourism in Medway beyond day trips to the main attractions and events?

Better use of the countryside for 'green tourism'.

The tourism offer has to be more joined up if longer visits are to be encouraged. Recognition of Allhallows Leisure Park required (and access to the wider Medway offer provided).

24) What role does the river and Medway's countryside have to play in developing tourism locally?

Public access to the river and countryside needs to be both expanded and controlled. There is potential for greater tourism, but impact needs to be considered as well.

RETAIL, COMMERCIAL, LEISURE & TOWN CENTRES

25) Should we focus investment & retail capacity on Chatham to consolidate its position as Medway's highest order centre?

Chatham and Hempstead Valley provide little to the local area.

26) Should we seek to facilitate development in Chatham of sufficient critical mass to improve market share, or plan for investment to meet currently identified capacity only?

We appreciate the problems of trying to maintain multiple town centres, however Chatham is not heavily used by peninsula residents – by the time residents travel (by car) more additional locations are open to them (e.g. Gravesend/Bluewater). Public transport tends to encourage the use of Strood as a destination – better public transport and car parking, to an improved offer in Chatham, may encourage its use.

27) What should the mix be in Medway's town centres between retail and other supporting uses, including food and drink, commercial leisure, employment and residential?

There is now an opportunity for more residential properties in the town centre (and with a suitable public transport offer, and suitable development local car usage could be limited) – this would help to drive a more attractive offer.

28) Should we consider making provision for a new or replacement supermarket in Gillingham town centre? If so, where should this go?

This would be very unlikely to be used by our local residents so no comment.

29) What should our approach be to proposals for new or enhanced out of town retail?

Road traffic implications will be the main issue – and availability of car parking – although there might be well intentioned aims to encourage access via public transport.

ENVIRONMENT

30) What are the most effective means to secure and strengthen Medway's environment, in the context of the area's development needs?

Support for existing environment designations is key (and provides an attractive local offer for residents, business and tourism). Further areas should be designated, especially local amenity space. Opportunities to expand or join up areas should be considered.

31) What opportunities should be pursued in the Local Plan to extend connectivity for wildlife and people throughout urban and rural parts of Medway?

Connectivity needs to be improved (but also managed). Key routes need to be established and maintained. Expansion to fill in 'gaps' in the public footpath network and cycle paths need to be carried out. Footpaths/cycle paths between villages and also to and from the urban environment should be developed where possible.

Rail access in the Medway Valley should be encouraged, opening up the Hoo Peninsula railway for passenger use would also provide access for people.

In general railways do provide a wildlife corridor both in the urban area and countryside.

32) What approach should be taken to determining the role of landscape in producing a spatial strategy for the new Local Plan, and development management policies?

Key landscape should be protected from development – issues of setting need to be considered if developments are considered.

BUILT ENVIRONMENT

33) What approach should we take to managing Medway's heritage assets, particularly in the context of bringing forward regeneration?

Consideration to the role of Conservation Areas is required to strike a balance between protection and positive enhancement. More areas could be considered for designation and boundaries could be extended to include the 'setting' of the area not just the area itself.

34) What characteristics do you think makes a good place to live?

A good balance between homes and environment. Good transport access is a major issue. Local amenity areas, local parks, larger areas of green space.

35) What areas or characteristics of Medway are most distinctive? How should these be protected, enhanced or reflected in new development?

The green spaces of Medway provide a key counter to a densely developed centre. In many cases these also provide a valuable green wedge into some of this areas.

36) What areas of Medway have weaker character and what are the opportunities for improvements?

Dense development in the town centres have led to issues with parking and contributed to traffic congestion. New developments do need wider roads (but perhaps with traffic calming).

37) What requirements should be sought of new developments in Medway to give them a distinct character and ensure they function well, in both central areas (including brownfield sites) and suburban areas?

Local amenity space, road widths do need to be provided in larger scale developments. Segregated routes for pedestrians and cyclists need to be provided and maintained.

RURAL ISSUES

38) How should the role of Hoo St Werburgh as a service centre be developed?

Hoo is a local destination but public transport links from there to Allhallows are very poor, especially in the mornings. A wider range of retail and services would reduce the need to travel into congested town centres.

39) What provision needs to be made for employment in rural Medway?

There are significant distances travelled to work by many each day from the rural parish areas, but there are large designated employment areas on the Hoo peninsula in particular. There are still a significant number of local residents who came to the area to help build and run the oil refinery at Grain and local power stations. Local employment is key to reducing the need and cost of travelling to work and encourage a counter-peak flow of traffic.

40) How should the Local Plan address the need to maintain and improve access to services in rural areas?

Services are under considerable pressure and need to be supported financially and given the opportunity to expand their service provision where practical.

41) What consideration should be given to strategic infrastructure and development in rural Medway?

There is over-reliance on the car and the A228 in particular. There are major problems if these are blocked by accidents and there are some pinch-points that need to be addressed. Contingency arrangements also need further investment.

A freight railway exists on the peninsula and could be converted at minimal cost to provide an hourly or half-hourly service into Higham and Strood (with later electrification to extend services). This could serve all the villages through strategically placed stations.

Public transport provision is poor outside of a very few core routes in the urban area and needs to be improved.

42) How can the Local Plan ensure that strategic and local needs are satisfactorily addressed in areas working towards production of a Neighbourhood Plan?

INFRASTRUCTURE AND SERVICES

43) What changes to the built environment could facilitate healthier communities?

The maintenance of local amenity space, larger areas and the green lung that is provided by our rural areas.

44) How can the Local Plan encourage access to healthy food options and growing opportunities?

There are large areas of good quality agricultural land in the area and connection to local markets is required. Allotment space should also be protected and enhanced if rural areas are built on.

45) How can the Local Plan most effectively promote greater physical activity in Medway?

A good selection of footpaths and cycle routes to connect out of the more urban areas to connect the more urban areas to key rural routes through the countryside and to the Thames and Medway rivers.

46) What changes to the current siting of healthcare facilities should be considered in the Local Plan? Are there opportunities to provide new sites, and/or to integrate health services in local communities?

Access to the main hospital at Gillingham is a problem for many of the western and Hoo peninsula residents. More provision is required locally through 'cottage hospitals/health centres'.

SOCIAL AND COMMUNITY INFRASTRUCTURE

47) How best can the Local Plan secure the provision of new and expanded schools to meet the needs of Medway's communities and ensure that such infrastructure is delivered in a timely manner and located appropriately as a key element of sustainable development?

Housing developments need to fund additional spaces, however there needs to be a full audit of local provision to limit the need for temporary classrooms and new schools may be a better solution in some cases.

48) What community facilities are needed by Medway's population over the plan period, and how should they be delivered and managed?

A full audit/appraisal is required to identify the state of local facilities and requirements,

OPEN SPACE

49) Is it an appropriate ambition to preserve the integrity of the open space estate, or should we be seeking to rationalise the estate?

Even small green spaces help contribute to the wellness of an area and should be protected. "Friends of groups" should be encouraged.

50) Should we continue to set a local space standard and seek to address shortfalls by new provision, and if so is the current level of 3.25ha per 1,000 population appropriate?

Our standards are too low and need to be increased. Even in the rural areas there is often limited access to the majority of the area.

51) Should we move to a multi-functional hub model of provision, and what might this look like in practice?

Multi-functional/connected hubs should be developed.

52) Should new development provide on-site open space, investment into the existing estate, or a balance of the two approaches?

We would support a balance of provision between protecting the existing spaces and developing new areas.

53) What management models and priorities should we consider? Should we seek to increase community involvement in open space provision and how might this be accomplished?

An umbrella group that includes paid professionals should be established, so that local smaller groups can tap-in to support (both managerial and practical) so that resources can be shared efficiently rather than each group requiring its own.

SPORT FACILITIES

54) What provision should be made for sport in the Local Plan, including in relation to population growth and new developments?

Additional land is required to expand sporting provision. Changing rooms and other club facilities could be developed in partnership with current community run assets.

55) How should the Local Plan address the aspirations for a new stadium for Gillingham FC?

Provision for Gillingham FC has been a long running theme in past local plans. A multi-use stadium could enhance culture, entertainment and sporting facilities.

NATURAL RESOURCES

56) What weight should be given to the protection of the best and most versatile agricultural land, in the context of considering sustainable locations to accommodate growth in Medway?

Agricultural land could provide local quality food and provide some employment opportunities for local residents if farmers could be encouraged to try harder to engage with local residents rather than taking easy (lower paid?) alternatives.

AIR QUALITY

57) How should the Local Plan address the AQMAs and the potential development sites that could be affected by pollutants in these areas?

There have been air quality issues reported in the past, even in rural areas. With prevailing winds from London, green belt protection is vital.

Suitable planting and ongoing maintenance should also be a key policy to help cleanse the areas.

MINERALS

58) What approach should be taken to planning for land won minerals in Medway?

River and rail connected sites need to be prioritised and the use of the road network reduced or eliminated.

59) What are the requirements for wharves and their supporting land-side infrastructure in Medway over the plan period?

Wharves should be used to move heavy goods both in and out of the area, reducing road traffic, although road access to wharves need to be managed.

WASTE

60) What provision should the Local Plan make for waste management and disposal in Medway, for both household and commercial streams?

Medway does need to provide for its own waste and disposal, but not arising from other areas. More needs to be done to reduce waste, then encourage re-use and recycle.

SUSTAINABILITY AND CLIMATE CHANGE

61) What should sustainable development look like for Medway? What plans and policies should we put into place to achieve this?

Objective assessment of all developments should be calculated and published.

62) How can Medway ensure that all communities share in the benefits of growth, in order to reduce the significant inequalities across the area?

Local groups need to be involved in discussions leading to any new developments and planning gain benefits should be provided these groups for identified needs.
63) What measures should new development take to mitigate and adapt to the risks posed by climate change?

The impact of new development needs to be calculated, published and monitored.

64) How can existing development and communities mitigate and adapt to the risks posed by climate change?

The impact of changes should be reported and local initiatives to support any mitigation should be rewarded.

65) Should Medway adopt the optional national standards for water efficiency? What local evidence would we need to underpin this?

New developments should be making better use of rain water as well as grey water.

FLOOD RISK

66) How should flood risk and SuDs be taken into account in planning for growth in Medway?

Flood risk areas should be avoided without wider mitigation/minimisation of the local risk.

67) What safeguards should be put in place to ensure future requirements for improved flood defences are not compromised? See 66.

ENERGY

68) Should we allocate sites or zones for wind energy development?

Wind power has the potential for a very limited contribution to energy development, but large scale development would not be appropriate.

69) What policies should we set for other forms of energy development?

The use of solar cell needs to be monitored closely (see Stoke Solar Farm).

70) How should we take advantage of opportunities for use of waste heat from the large-scale energy generation on the Peninsula?

Existing power stations are remote from large residential areas so potential is very limited.

TRANSPORT

71) What infrastructure is required to support Medway's growth over the plan period?

There is very limited scope for further large scale road development, although some pinch points do need to be addressed and further improvements to the A228 are required before further developments are considered.

The railway does need to be exploited more, especially off-peak between villages and towns - Medway Valley Line, Strood to Rainham etc, as well as development of the Hoo peninsula freight line.

72) What measures should be considered to increase public transport usage and rates of walking and cycling in Medway?

As mention previously, a comprehensive network of segregated routes needs to be developed connecting urban and rural areas.

73) What provision should be made for car parking?

The growth of car ownership in recent decades has been significant and now many areas are suffering from in-street parking that have not suffered before. More parking provision is required in new developments.

74) What are the requirements for waterside infrastructure, such as docks, wharves, marinas, piers and berths, and their supporting landside facilities, to support commercial and leisure activities?

Access to the riverside is key and this should override any private development on the riverside or public access along the river enhanced and clearly signed.

75) How should the aviation facilities at Rochester Airport and Stoke be considered in the Local Plan?

There is little to support expansion of flying element of these facilities, however suitable employment opportunities could be encouraged.

DELIVERABILITY

76) How can the Council ensure that the Local Plan and its policies remain deliverable while seeking to ensure that development in the area is high quality and sustainable?

The impact of developments need to be analysed before and monitored.

77) Should we consider setting different rates of affordable housing and CIL contributions to take account of differing viability between areas of Medway?

This approach would need further justification and monitoring and used in limited areas initially.

78) How can we ensure timely and appropriate delivery of infrastructure to meet the needs of new and existing communities? What infrastructure types or projects should be prioritised where funding is limited?

Infrastructure delivery will be key and this does need to be front-loaded in any development to ensure delivery and not allow developments to avoid these commitments.

79) What use should be made of new methods of delivery to help speed up the planning process, and how can we ensure that quality is not compromised in favour of speed?

Care needs to be taken with this approach - a development brief needs to include infrastrucure requirements and phasing, quality of design and environmental issues considered and mitigated.

DEVELOPMENT STRATEGY

80) Are the development principles right? Should other guiding principles be introduced?

Environmental protection should be key to any development principles, with proven prevention and mitigation where appropriate.

81) Do you agree with the assessment of advantages and disadvantages of the various development type options set out above? Are there other advantages and disadvantages that should be considered?

Stronger environmental protection required.

82) Which development type (or combination of types) do you think best meets the identified growth requirements for Medway?

No comment

83) Should we consider more radical approaches to meeting development needs, such as significant increases in density, or large-scale redevelopment of existing employment areas for residential or mixed use?

A mixture of approaches will be required although radical approaches on individual sites may be appropriate if justified.

84) Should the green belt boundary be reviewed?

Green belt is very limited and should be maintained wherever possible to avoid erosion of gaps between settlements.

85) What provision should be made for mixed use in residential developments, both high density and lower density?

A mixed approach may be appropriate where justified.

86) What approach should be taken to future development opportunities and mix of uses in Chatham town centre and Waterfront?

A mixed approach may be appropriate where justified.

87) Do you agree that the other town centres require improvement in their existing roles, or should we consider holistic review of any of them in conjunction with nearby waterfront

Strood Town Centre is isolated from the river and its railway station and could be better connected and enhanced. Rochester now has a relocated station, but could still be better connected to the river to both the north and west.

Name: Dalia Halpern-Matthews

Reference 135

Organisation Nucleus Arts

On Behalf Of

Type of Consultee

Charity/Community/Faith Group

Medway Council Local Plan- developing a Vision for Medway in 2035

Comments from Nucleus Arts

Introduction

Nucleus Arts welcomes the progress demonstrated by the Issues and Options consultation document relating to the Local Plan.

Nucleus Arts

Medway needs the extra certainty, which a successful Local Plan will bring.

We feel it should be noted that Nucleus Arts hosts around 60 artists and creatives at any one time across its 5 sites in Medway; shows the work of over 100 artists at any one time; holds up to 30 exhibitions each year; runs educational programmes of many types from professional development through to programmes for people at risk of social isolation (Art Inclusive and Hard to Hear); and holds many free community arts festivals.

Strategic issues

6.1 Road and public transport infrastructure are key- what will be the effect of Paramount, Lower Thames crossing, increased number of homes and jobs. The effect of these on the Chatham area needs to be assessed and any adverse effects counteracted.

6.2 If Medway is projected to grow at this rate, what about London - and the effect of further eastward drift to Medway from there?

6.6 Hospital facilities and school places need to be adequate for the population as it grows.

Economy

8.1 The Creative economy in Medway is going from strength to strength.8.9 Long term sick levels are high in Medway. Nucleus Arts believe that we should look at ways of improving health and wellbeing to improve the economic workforce e.g. through MARC, Art Inclusive or similar projects.

Tourism

Nucleus Arts has become a destination in itself; together with the critical mass being reached across the creative sector; this should be looked at as a new way to entice tourists into Medway.

Retail, commercial leisure & town centres

Chatham town centre is in need of assistance.

There are some very good examples of organisations and retailers there, but there are many empty shops and development sites, which break up the town and give it a feel of a lack of economic prosperity. Considerable investment needs to be made in order to overcome these obstacles. There is considerable scope available in terms of areas of residential development, although this must not substantially reduce the parking available. Underground car parks/ buildings over existing car parks are possible.

Consideration should be given to the burgeoning Creative economy in Medway, in Chatham in particular; this could be



exploited to make this a greater destination in itself, akin to Brighton. Nucleus Arts already hosts around 60 artists in studios, workshops and creative office spaces; this, in addition to other providers such as at the Historic Dockyard, Joiner's Shop, West End studios, SPH, the Featherstone studios and Intra show an increasing need in the area for this type of workspace.

Built Environment

Nucleus Arts recognises the unique historical environment and heritage of Medway, together with its estuarine landscape, within this context we are keen to see design maintained at a high standard. We would welcome the opportunity to involve the artistic and creative communities within this design framework. We believe in developing a Modern Medway- via quality through regeneration while protecting the past and the natural environment.

Nucleus Arts

Infrastructure and Services

14.2 Nucleus Arts is keen to promote healthier lifestyle choices.

Social and Community Infrastructure

15.4 The community facilities at Nucleus Arts are well-used and play an essential role in fostering community in both the Medway Arts and Health and Wellbeing communities.

The community settings and facilities which Nucleus Arts provides are considered by many to be at the heart of the creative and wellbeing communities.

Open Space

16.1 The open spaces at the Nucleus Arts sites at 272, High Street, Chatham and 75, High Street, Rochester are considered "oases" by many.

Sustainability and climate change

Existing provision of broadband requires upgrading in the main to ensure that we are able to meet the needs of the population both in their work and private lives.

An improved public transport infrastructure is needed to cope with the increasing population, and to minimise the necessity of all adults owning cars to get to work.

Access to green spaces is essential for a healthy and happy population. Nucleus Arts has supported this with the creation of its courtyard gardens, which are all well used facilities.

Environmental sustainability - Nucleus Arts is looking at green infrastructure and technologies, in order to maximise our sustainability.

Energy

Nucleus Arts wholeheartedly supports policies which would make greater use of renewable energy sources.

Transport

25.4 The new bus station in Chatham town centre is of a high standard. We would like to see continued improvements to bus infrastructure and services. We also have concern that, while the bus network extends between Medway and Kent, Kent bus passes are not accepted in Medwaythis restricts travel and so reduces opportunities.

Deliverability

26.11 Nucleus Arts firmly believe that good design is crucial in the deliverability of an effective local plan.

Development Strategy

We must be careful to weigh up the issues around creating too high-density an area which could create its own problems once established. We should also take care not to "throw the baby out with the bathwater"- by reducing green belt areas we could remove one of the qualities which make Medway, as a place, so good to live and work in.

Nucleus Arts

Chatham town centre is certainly in need of assistance, and we believe that this would be well suited to a mixed-use centre. There are some very good examples of organisations and retailers there, but there are many empty shops and development sites which break up the town and give it a feel of a lack of economic prosperity. Considerable investment needs to be made in order to overcome these obstacles. There is considerable scope available in terms of areas of residential development, although this must not substantially reduce the parking available. Underground car parks/ buildings over existing car parks are of course possible.

Consideration should be given to the burgeoning Creative economy in Medway, in Chatham in particular; this could be exploited to make this a greater destination in itself, akin to Brighton. Nucleus Arts already hosts around 60 artists in studios, workshops and creative office spaces; this, in addition to other providers such as at the Historic Dockyard, Joiner's Shop, West End studios, SPH, the Featherstone studios and Intra show an increasing need in the area for this type of workspace.

Answers to questions raised throughout the issues and options consultation document.

2/The plan should not be designed in isolation. Road and Public Transport infrastructure is key in addition to sufficient healthcare and school capacity.

3/ Road and public transport infrastructure- Paramount, Lower Thames crossing, increased number of homes and jobs all need to be considered.

7 & 8/Thought also needs to be given in terms of provision for people with other needs, e.g. the "Halpern Model" housing at Maidstone Road, Chatham, Maidstone Road, Rochester and Boundary Road, Chatham.

9/The experiences of groups such as Nucleus Arts, MARC, and other eminent establishments has shown that there are various ways where development and communities can make a positive contribution to the health and wellbeing of communities. We believe that Medway Council should work with us and other organisations to harness the empirative research which has been and still needs to be done to maximise the positive impact on Medway's communities. It is imperative that appropriate road and

public transport infrastructure is put in, and that this should be in place by the time people move in to developments. 12/ Nucleus Arts believe that placemaking is crucial to successful communities, but flexibility is always essential. 13/ There is a high demand for student housing. Existing developments around Chatham Maritime and Gillingham are crucial, but there are interesting possibilities around student housing in Chatham town centre which would further improve circulation around the towns and between Universities.

19/ Nucleus Arts believe that Medway could consider greater communication between businesses and the universities to ensure that the courses reflect genuine business needs, and thus to retain graduating students. In the same way, the educational establishments should be communicating effectively with outside developers e.g. Paramount, to ensure that we are able to create jobs for the population if not in Medway then in the immediate vicinity.

23/ It is important to look at all aspects of the areas surrounding the major tourist attractions in order to prolong the stay of tourists. We believe that Nucleus Arts and other creative organisations in Medway are "unsung" benefits which will assist with this, and we would be happy to work with Medway Council in this regard.

24/The river Medway is a great asset to Medway, and one which we help to celebrate at the annual River Festival. We would welcome greater use of this asset.

25/ Chatham centre clearly needs a great deal of investment in order to consolidate its position.

27/ While it is reasonable that some areas are particularly known for, say, food and drink or retail, there should be a reasonable mix of all types across each centre. 29/ When we have acknowledged Bluewater as a substantial draw, we do

not believe that there is call for creating additional large out of town retail in Medway; rather it is better to concentrate on the amazing diversity here already,

and potentially possibly in the future.

34/ Good design combined with an interesting and culturally diverse environment creates a good place to live; we would support poly which encourages this standpoint.

Nucleus Arts

45/ Extending the cycle paths and ensuring that people feel safe when walking will help encourage greater physical activity this should combined with ensuring that road and public transport infrastructure in sufficiently robust to allow people to reach all locations.

48/ Good community facilities which are fit for the purpose are essential in building sustainable and healthy communities. We believe that these should be run with the expectation that they are not commercial ventures, but should be cost neutral. It may well be that organisations already running such facilities should take over Council centres in order to ensure good governance and efficiency. 49/ Nucleus Arts believes that, wherever possible, the integrity of open space should largely be preserved.

52/ Nucleus Arts considers that inclusion of open space within the development is a good way forward, and that Public Art should be included within this wherever possible.

53/ Community involvement is a great way for people to feel a sense of pride and ownership in their area; however it may not always be relied upon as volunteers and community champions may be hard to find. Organisations such as ourselves and Medway Plus are working in these fields already and may be able to give further guidance.

61/ Sustainable development in Medway should show a good proportion of green space and trees, good access to healthcare and to public transport. Plans should be put in place to encourage green technologies.

62/ Good public transport is essential to reducing the inequalities to allow access for all to all spaces.

63, 64/ New developments should be encouraged to use green technologies wherever possible, going beyond the scope of just solar panels. Parking and garden areas should be designed to deal effectively with water retention issues. Existing developments should allow the alterations required, and there should be measures in place to prevent the whole-scale uprooting of trees and landscaping in developments to save funds.

72/ Consideration should be given to extending the Kent Freedom Pass scheme and similar schemes across Medway- this is a very effective tool in persuading people from a young age to use public transport effectively.

74/ Nucleus Arts would support the suggestion of using the river more effectively, and would welcome discussion as to how this could be achieved across Medway.

76/ Nucleus Arts believe that the plan must be deliverable, and that as part of this it must be of high quality and sustainable.

78/ Infrastructure must be in place by the time people move into the developments- not be delivered a year or two after.

79/ It is sensible to designate certain areas for specific uses within reason, but a set design standard must be in place and be seen to be maintained- e.g. the Restrictive Covenants at Chatham Maritime based on "street scene".

80/ Nucleus Arts supports these development principles, but considers good design and renewable energies should also be included in this area.

83/ Nucleus Arts considers that caution should be exercised when looking at redeveloping existing commercial spaces into residential areas in order to minimise the reduction in work opportunities to the population of Medway.

84/ While the green belt land could be reviewed, Nucleus Arts recognises the positive effect of such land, and would not want to see substantial reduction in these areas.

86/ Chatham town centre is certainly in need of assistance, and we believe that this would be well suited to a mixed-use centre. There are some very good examples of organisations and retailers there, but there are many empty shops and development sites which break up the town and give it a feel of a lack of economic prosperity. Considerable investment needs to be made in order to overcome these obstacles. There is considerable scope available in terms of areas of residential development, although this must not substantially reduce the parking available. Underground car parks/ buildings over existing car parks are of course possible.

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Dalia Halpern-Matthews

Director

February 2016

Name: R Morrad

Reference 136

Organisation Stoke Parish Council

On Behalf Of

Type of Consultee

Councillor/MP/Parish Council

STOKE PARISH COUNCIL

Mr R. Morrad. (CiLCA) Parish Clerk.





Web site stokeparishcouncil.org.uk

Date 8/02/2016

Our Ref: Local Plan 2016 Your Ref: Matthew Pinder.

Matthew Pinder Planner Development Management/Planning Policy Medway Council Gun Wharf Dock Road Chatham Kent ME4 4TR

LOCAL PLAN COMMENTS

Dear Mr Pinder.

Please find Stoke Parish Councils comments/views on the issues and options document which will form the first formal stage of the local plan process.

The Parish Council supports the idea of allowing houses at Middle Stoke and Upper Stoke sites, but does not support the sites at Lower Stoke i.e. to the rear of Burney's Cottages and the allotments rear of Sycamore house site. The proposed development of allotments on Allhallows Road is most undesirable. They are well used and attractive for the communities of Allhallows and Stoke and provide a desirable green space for recreation and food production. Although it is recognised the development of the farm yard at Burney's Cottage would be an improvement on the current status it could lead to back-fill of houses up to the allotments if any development of the allotments were allowed. This would be most undesirable and would overwhelm the services and infrastructure of the village. Indeed it would change the nature of the village life itself. This would be back development which may lead to future developments being earmarked for the village.

However the Parish Council has real concerns regarding the peninsula as a whole. The present infrastructure falls far short of supporting the proposed plan. This is particularly so regarding the roads off the peninsular and those serving the industrial/commercial areas of Kingsnorth and especially Grain. The roads are coping at normal times but first thing in the morning it is difficult to leave the peninsula at four elms roundabout and with the proposed development of lodge hill this can only increase. Any further development will bring major problems. The proposals also need strengthening in respect of making the Peninsula pleasant and desirable to attract doctors, teachers and other support professionals. There is already a problem in this respect.

Yours sincerely

Chairman Cllr B Stone,

Mr R Morrad (CiLCA).Clerk & RFO to Stoke Parish Council.

Name: Sue Saunders

Reference 137

Organisation

On Behalf Of

Type of Consultee Member of the public

maryott, kyle

From: Sent: To: Subject:

27 February 2016 08:32 policy, planning Medway Local Plan

Follow Up Flag: Flag Status: Follow up Completed

Dear Sir

I would like to make the following comments with regard to equestrian within the local plan

As equestrians in the very densely populated south east, we are so poorly served with regard to the provision to safe off road riding opportunities, Kent including Medway has a third less than the national average provision for equestrians

So we have to work very hard to keep routes especially where the route are within new developments this also affects the quality of the routes and we rarely have the opportunity to extend equine provision due to the total reluctance of land owners highway authority and local authorities to dedicate new routes even where its short stretches are needed to join up existing route .

As Medway moves through with it new plan PLEASE remember bridleways offer good value for money as walkers cyclist and horse riders are legally able to use them. Regards Sue Saunders British horse society

Name: Chris Fribbins

Reference 138

Organisation

Dickens' Country Protection Society

On Behalf Of

Type of Consultee

Charity/Community/Faith Group

Medway Local Plan (2012-2035)

Issues and Options

Dickens' Country Protection Society Response

The response from the Dickens' Country Protection Society (DCPS) attempts to provide input to the majority of the questions posed by the Issues and Options consultation. Our area of benefit includes the wards of Cuxton and Halling, Strood Rural and Peninsula as well as the former Strood Rural District Council areas now in Gravesham (Higham, Cobham, Shorne, Meopham etc.) There does appear to be some gaps in the consultation – especially the proposal to review village boundaries and how the needs of the local areas can be assessed and delivered. The impact of the Lower Thames Crossing (Option C) on local road networks will also need to be assessed (both the westerly and eastern approach).

DEVELOPING A VISION FOR MEDWAY IN 2035

1) What do you think should be the key components of and ambitions for the Local Plan's vision for Medway in 2035?

The Medway area is one of the largest conurbations in the South East outside of London, although this is often not recognized. Growth in recent decades has brought some improvements but overall the infrastructure and services have not kept pace. Further economic pressures have had an impact on issues such as Policing, Fire Service, Hospital and Health Care. The rural divide has meant greater reliance on the car and traffic levels, especially at peak times, have caused congestion for all. Residents (and businesses) will want improvements to support the growth projected and necessary economic investment.

STRATEGIC ISSUES

2) What do you think are the strategic issues that the Local Plan needs to address?

a) The environment

There has been a growing recognition of the part a healthy environment plays in the vitality of the area. Green space provides a lung for the towns and protection needs to be maintained and enhanced where necessary (within the urban core and at a large scale in the rural areas)

b) Local employment

It has always been relatively easy to provide additional housing, but large areas allocated for industrial and economic development remain underused (empty properties on existing business estates and areas such as Grain and Kingsnorth).

c) Housing

The case for additional housing has not changed for several decades – the majority driven by the needs of the local population, but the area still remains a major attraction from London (especially South East) where property prices continue to grow and a move to the Medway Towns becomes very attractive financially, but leaves the core local issue unresolved.

3) How should the council respond to these issues?

Where do we go from here? 2035 seems a way off but is easily within the life of current under 60s. There will be even more pressure on land supply in 2035 so there is a need to maximise the contribution that developments in this plan make to the infrastructure of the area. (e.g. roads, rail, health care, local jobs)

HOUSING

4) Do you agree with the approach and conclusions of the assessment of housing needs calculated for Medway over the plan period?

Without the detailed understanding of the evidence base it is difficult to comment, however there is a concern that housing take-up from outside the area, especially South East London, will put further pressure on the needs of local residents.

5) What do you consider to be the appropriate housing market area for Medway?

There appears to be a priority for development of homes for sale (although providing a step-up for some local residents, it provides a magnet for people from other areas). With the reduced affordability of these homes, further initiatives are needed for keeping these costs down. There is also a need to provide quality, affordable homes for rent.

6) Do you agree that 25% is an appropriate level for the requirement of affordable housing, and what threshold should be set for the scale of development that needs to provide affordable housing?

The quality affordable housing % should be higher if local needs are to be met (40%).

7) What form of housing best meets the needs of Medway's growing population of older people?

There is a natural desire for older people to remain where they are. They have usually invested significantly in their property, both financially and personally, however it is recognised that this means a significant part of Medway's housing could be under occupied (and with a growing population this may grow). There does not appear to be a suitable model for older people currently and there needs to be a range of low cost purchase and/or rent options to enable older people to benefit from their past investment – with a range of down-sizing options. Quality/Affordable Bungalows and retirement homes can also increase the options for older people.

8) What housing is needed for other specific groups in Medway?

Ground floor properties will continue to be needed for a wide range of disabilities (both visible and invisible).

Care in the community housing units.

9) How can development make a positive contribution to the health and wellbeing of Medway's communities?

There needs to be a contribution from all new developments (residential and business) ear-marked for health care. The population projections may also require an additional hospital to the west of the area.

Green spaces, play areas and pedestrian and cycle paths will also aid health and well being.

10) Do you have suggestions for potential sites for starter home developments?

No suggestions for sites, starter homes will be required in all developments, and integrated.

11) How do you consider the infrastructure needs of starter home and self and custom build developments should be addressed?

A flexible mixture of development types should be required in all developments of 20 or more homes – flexibility based on an overall Medway need.

12) How should the council provide for the demand for land for self and custom build housing? For example, integrated with larger developments, on standalone sites, or linked to placemaking ambitions to deliver highly sustainable and innovative design quality.

These should normally be integrated with larger developments, although smaller sites could also be considered (but not specifically allocated).

13) What is the demand for student housing and where would this be best located? For example, would dedicated student housing be appropriate in Medway's town centres?

Student housing should be located close to further education sites or on

cheap/reliable/extended hours' public transport routes, however this demand should not be concentrated on a small number of sites.

14) What is the level and type of need for gypsy, traveller and travelling showpeople's accommodation in Medway, and what criteria should be used to identify appropriate sites?

We welcome the government's latest consultation and directives about the definition of this group. We have been concerned at their ability to bypass planning rules that apply to everybody else and have seen developments in areas where this would not normally be allowed. A 'real' traveller site may need to be self-sufficient and 'remote' although more permanent accommodation needs to be part of the general built environment.

ECONOMY

15) Where should such sites be located, considering opportunities in existing employment areas, and potential new sites such as Lodge Hill or other developments?

There is significant land around Kingsnorth (Hoo) and Grain for potential employment areas but it has proved to be difficult to develop these. Employment could be considered if environmental issues at Lodge Hill can be overcome – but a key issue remains with the relatively poor transport infrastructure in the area – and the impact on residential communities of heavy traffic (especially HGVs).

There have been key road improvements – A228 between Chattenden and Ropers Lane (and recent changes to the lane itself), and the road to Grain remains single carriageway from Sharnal Street, however the main issue remains that these feed into one route and especially the Four Elms Roundabout – with growing use throughout the day, and major issues at peak times for all traffic.

Road traffic reduction should be encouraged through use of the Peninsula railway for passenger and freight services and something major will be required at the Four Elms Roundabout (traffic light signalling falls well short of the requirements here). Residential and employment expansion will need to restricted until this (and other) issues are addressed. The contribution that 'work from home' provides should also be recognised and supported where possible.

16) What are the opportunities for further business growth in and close to town centres in Medway?

There are already sites such as Knights Road/Medway City Estate/Chatham Dockyard relatively close to town centres that require better access. There does need to be encouragement for the consideration of travel plans and positive encouragement (incentives) to use public transport for access and for public transport operators to provide services.

17) Do you agree with scale of jobs and employment land needs identified for Medway over the plan period?

There does need to be an encouragement to use local employment land already allocated – and positive encouragement and support. Too much of the current allocation is underused.

18) How can Medway realise opportunities to capitalise on growth in the wider area, including London?

There will be pressure on both road and rail connections towards London, and the only 'spare' capacity is contra-peak travel which should be encouraged.

19) How should the plan respond to opportunities arising from the expansion of higher and further education in Medway?

Support to encourage both the students and qualified students to locate locally should be provided.

20) Is it feasible to reduce the amount of out-commuting from Medway, and what would be required to achieve this?

Local business should be encouraged (also contra-peak).

21) How should the plan address the specific locational requirements of some businesses, for example access to wharves?

Locational requirements should be considered and supported where the road (and rail) infrastructure has the capacity and environmental impact in the area (to residents and the natural environment) can be prevented.

TOURISM

22) What scale and form of additional visitor accommodation is needed to support and develop a successful tourism sector in Medway?

The area has a lot to offer currently and that needs to be maximised to encourage tourism – especially the countryside.

Quality touring camp sites are also required to help promote tourism.

23) What are the opportunities for extending tourism in Medway beyond day trips to the main attractions and events?

Better use of the countryside for 'green tourism'.

The tourism offer has to be more joined up if longer visits are to be encouraged. Recognition of Allhallows Leisure Park required (and access to the wider Medway offer provided).

24) What role does the river and Medway's countryside have to play in developing tourism locally?

Public access to the river and countryside needs to be both expanded and controlled. There is potential for greater tourism, but impact needs to be considered as well.

RETAIL, COMMERCIAL, LEISURE & TOWN CENTRES

25) Should we focus investment & retail capacity on Chatham to consolidate its position as Medway's highest order centre?

Chatham (and also Hempstead Valley which is not considered) provide little to our local area.

26) Should we seek to facilitate development in Chatham of sufficient critical mass to improve market share, or plan for investment to meet currently identified capacity only?

We appreciate the problems of trying to maintain multiple town centres, however Chatham is not heavily used by peninsula residents – by the time residents travel (by car) more additional locations are open to them (e.g. Gravesend/Bluewater). Public transport tends to encourage the use of Strood as a destination – better public transport and car parking, to an improved offer in Chatham, may encourage its use.

27) What should the mix be in Medway's town centres between retail and other supporting uses, including food and drink, commercial leisure, employment and residential?

There is now an opportunity for more residential properties in the town centre (and with a suitable public transport offer, and suitable development local car usage could be limited) – this would help to drive a more attractive offer.

28) Should we consider making provision for a new or replacement supermarket in Gillingham town centre? If so, where should this go?

This would be very unlikely to be used by our local residents so no comment.

29) What should our approach be to proposals for new or enhanced out of town retail?

Road traffic implications will be the main issue – and availability of car parking – although there might be well intentioned aims to encourage access via public transport.

ENVIRONMENT

30) What are the most effective means to secure and strengthen Medway's environment, in the context of the area's development needs?

Support for existing environment designations is key (and provides an attractive local offer for residents, business and tourism). Further areas should be designated, especially local amenity space. Opportunities to expand or join up environmental areas should be considered.

31) What opportunities should be pursued in the Local Plan to extend connectivity for wildlife and people throughout urban and rural parts of Medway?

Connectivity needs to be improved (but also managed). Key routes need to be established and maintained. Expansion to fill in 'gaps' in the public footpath network and cycle paths need to be carried out. Footpaths/cycle paths between villages and also to and from the urban environment should be developed where possible.

Rail access in the Medway Valley should be encouraged, opening up the Hoo Peninsula railway for passenger use would also provide access for people.

In general railways do provide a wildlife corridor both in the urban area and countryside.

32) What approach should be taken to determining the role of landscape in producing a spatial strategy for the new Local Plan, and development management policies?

Key landscape should be protected from development – issues of setting of existing properties, especially important historic buildings, need to be considered if developments are considered.

BUILT ENVIRONMENT

33) What approach should we take to managing Medway's heritage assets, particularly in the context of bringing forward regeneration?

Consideration to the role of Conservation Areas is required to strike a balance between protection and positive enhancement. More areas could be considered for designation and boundaries could be extended to include the 'setting' of the area not just the area itself.

34) What characteristics do you think makes a good place to live?

A good balance between homes and environment. Good transport access is a major issue. Local amenity areas, local parks, larger areas of green space.

35) What areas or characteristics of Medway are most distinctive? How should these be protected, enhanced or reflected in new development?

The green spaces of Medway provide a key counter to a densely developed centre. In many cases these also provide a valuable green wedge into some of this areas.

36) What areas of Medway have weaker character and what are the opportunities for improvements?

Dense development in the town centres have led to issues with parking and contributed to traffic congestion. New developments do need wider roads (but perhaps with traffic calming).

37) What requirements should be sought of new developments in Medway to give them a distinct character and ensure they function well, in both central areas (including brownfield sites) and suburban areas?

Local amenity space, road widths do need to be provided in larger scale developments. Segregated routes for pedestrians and cyclists need to be provided and maintained.

RURAL ISSUES

38) How should the role of Hoo St Werburgh as a service centre be developed?

Hoo is a local destination but public transport links are very poor, especially in the mornings. A wider range of retail and services would reduce the need to travel into congested town centres.

39) What provision needs to be made for employment in rural Medway?

There are significant distances travelled to work by many each day from the rural parish areas, but there are large designated employment areas on the Hoo peninsula in particular. There are still a significant number of local residents who came to the area to help build and run the oil refinery at Grain and local power stations. Local employment is key to reducing the need and cost of travelling to work and encourage a counter-peak flow of traffic.

40) How should the Local Plan address the need to maintain and improve access to services in rural areas?

Services are under considerable pressure and need to be supported financially and given the opportunity to expand their service provision where practical.

41) What consideration should be given to strategic infrastructure and development in rural Medway?

There is over-reliance on the car and the A228 in particular. There are major problems if these are blocked by accidents and there are some pinch-points that need to be addressed. Contingency arrangements also need further investment.

A freight railway exists on the peninsula and could be converted at minimal cost to provide an hourly or half-hourly service into Higham and Strood (with

later electrification to extend services). This could serve all the villages through strategically placed stations.

Public transport provision is poor outside of a very few core routes in the urban area and needs to be improved.

42) How can the Local Plan ensure that strategic and local needs are satisfactorily addressed in areas working towards production of a Neighbourhood Plan?

INFRASTRUCTURE AND SERVICES

43) What changes to the built environment could facilitate healthier communities?

The maintenance of local amenity space, larger areas and the green lung that is provided by our rural areas.

44) How can the Local Plan encourage access to healthy food options and growing opportunities?

There are large areas of good quality agricultural land in the area and connection to local markets is required. Allotment space should also be protected and enhanced if rural areas are built on.

45) How can the Local Plan most effectively promote greater physical activity in Medway?

A good selection of footpaths and cycle routes to connect out of the more urban areas to connect the more urban areas to key rural routes through the countryside and to the Thames and Medway rivers.

46) What changes to the current siting of healthcare facilities should be considered in the Local Plan? Are there opportunities to provide new sites, and/or to integrate health services in local communities?

Access to the main hospital at Gillingham is a problem for many of the western and rural residents. More provision is required locally through 'cottage hospitals/health centres'.

SOCIAL AND COMMUNITY INFRASTRUCTURE

47) How best can the Local Plan secure the provision of new and expanded schools to meet the needs of Medway's communities and ensure that such infrastructure is delivered in a timely manner and located appropriately as a key element of sustainable development?

Housing developments need to fund additional spaces, however there needs to be a full audit of local provision to limit the need for temporary classrooms and new schools may be a better solution in some cases.

48) What community facilities are needed by Medway's population over the plan period, and how should they be delivered and managed?

A full audit/appraisal is required to identify the state of local facilities and requirements.

OPEN SPACE

49) Is it an appropriate ambition to preserve the integrity of the open space estate, or should we be seeking to rationalise the estate?

Even small green spaces help contribute to the wellness of an area and should be protected. "Friends of groups" should be encouraged.

50) Should we continue to set a local space standard and seek to address shortfalls by new provision, and if so is the current level of 3.25ha per 1,000 population appropriate?

Our standards are too low and need to be increased. Even in the rural areas there is often limited access to the majority of the area.

51) Should we move to a multi-functional hub model of provision, and what might this look like in practice?

Multi-functional/connected hubs should be developed.

52) Should new development provide on-site open space, investment into the existing estate, or a balance of the two approaches?

We would support a balance of provision between protecting the existing spaces and developing new areas.

53) What management models and priorities should we consider? Should we seek to increase community involvement in open space provision and how might this be accomplished?

An umbrella group that includes paid professionals should be established, so that local smaller groups can tap-in to support (both managerial and practical) so that resources can be shared efficiently rather than each group requiring its own.

SPORT FACILITIES

54) What provision should be made for sport in the Local Plan, including in relation to population growth and new developments?

Additional land is required to expand sporting provision. Changing rooms and other club facilities could be developed in partnership with current community run assets.

55) How should the Local Plan address the aspirations for a new stadium for Gillingham FC?

Provision for Gillingham FC has been a long running theme in past local plans. A multi-use stadium could enhance culture, entertainment and sporting facilities.

NATURAL RESOURCES

56) What weight should be given to the protection of the best and most versatile agricultural land, in the context of considering sustainable locations to accommodate growth in Medway?

Agricultural land could provide local quality food and provide some employment opportunities for local residents if farmers could be encouraged to try harder to engage with local residents rather than taking easy (lower paid?) alternatives.

AIR QUALITY

57) How should the Local Plan address the AQMAs and the potential development sites that could be affected by pollutants in these areas?

There have been air quality issues reported in the past, even in rural areas. With prevailing winds from London, green belt protection is vital.

Suitable planting and ongoing maintenance should also be a key policy to help cleanse the areas.

MINERALS

58) What approach should be taken to planning for land won minerals in Medway?

River and rail connected sites need to be prioritised and the use of the road network reduced or eliminated.

59) What are the requirements for wharves and their supporting land-side infrastructure in Medway over the plan period?

Wharves should be used to move heavy goods both in and out of the area, reducing road traffic, although road access to wharves need to be managed.

WASTE

60) What provision should the Local Plan make for waste management and disposal in Medway, for both household and commercial streams?

Medway does need to provide for its own waste and disposal, but not arising from other areas. More needs to be done to reduce waste, then encourage re-use and recycle.

SUSTAINABILITY AND CLIMATE CHANGE

61) What should sustainable development look like for Medway? What plans and policies should we put into place to achieve this?

Objective assessment of all developments should be calculated and published.

62) How can Medway ensure that all communities share in the benefits of growth, in order to reduce the significant inequalities across the area?

Local groups need to be involved in discussions leading to any new developments and planning gain benefits should be provided these groups for identified needs.

63) What measures should new development take to mitigate and adapt to the risks posed by climate change?

The impact of new development needs to be calculated, published and monitored.

64) How can existing development and communities mitigate and adapt to the risks posed by climate change?

The impact of changes should be reported and local initiatives to support any mitigation should be rewarded.

65) Should Medway adopt the optional national standards for water efficiency? What local evidence would we need to underpin this?

New developments should be making better use of rain water as well as grey water.

FLOOD RISK

66) How should flood risk and SuDs be taken into account in planning for growth in Medway?

Flood risk areas should be avoided without wider mitigation/minimisation of the local risk.

67) What safeguards should be put in place to ensure future requirements for improved flood defences are not compromised? See 66.

ENERGY

68) Should we allocate sites or zones for wind energy development?

Wind power has the potential for a very limited contribution to energy development, but large scale development would not be appropriate.

69) What policies should we set for other forms of energy development?

The use of solar cell needs to be monitored closely (see Stoke Solar Farm).

70) How should we take advantage of opportunities for use of waste heat from the large-scale energy generation on the Peninsula?

Existing power stations are remote from large residential areas so potential is very limited.

TRANSPORT

71) What infrastructure is required to support Medway's growth over the plan period?

There is very limited scope for further large scale road development, although some pinch points do need to be addressed and further improvements to the A228 are required before further developments are considered.

The railway does need to be exploited more, especially off-peak between villages and towns - Medway Valley Line, Strood to Rainham etc, as well as development of the Hoo peninsula freight line.

72) What measures should be considered to increase public transport usage and rates of walking and cycling in Medway?

As mention previously, a comprehensive network of segregated routes needs to be developed connecting urban and rural areas.

73) What provision should be made for car parking?

The growth of car ownership in recent decades has been significant and now many areas are suffering from on-street parking that have not suffered before. More parking provision is required in new developments.

74) What are the requirements for waterside infrastructure, such as docks, wharves, marinas, piers and berths, and their supporting landside facilities, to support commercial and leisure activities?

Access to the riverside is key and this should override any private development on the riverside or public access along the river enhanced and clearly signed.

75) How should the aviation facilities at Rochester Airport and Stoke be considered in the Local Plan?

There is little to support expansion of flying element of these facilities, however suitable employment opportunities could be encouraged.

DELIVERABILITY

76) How can the Council ensure that the Local Plan and its policies remain deliverable while seeking to ensure that development in the area is high quality and sustainable?

The impact of developments need to be analysed before and monitored.

77) Should we consider setting different rates of affordable housing and CIL contributions to take account of differing viability between areas of Medway?

This approach would need further justification and monitoring and used in limited areas initially.
78) How can we ensure timely and appropriate delivery of infrastructure to meet the needs of new and existing communities? What infrastructure types or projects should be prioritised where funding is limited?

Infrastructure delivery will be key and this does need to be front-loaded in any development to ensure delivery and not allow developments to avoid these commitments.

79) What use should be made of new methods of delivery to help speed up the planning process, and how can we ensure that quality is not compromised in favour of speed?

Care needs to be taken with this approach - a development brief needs to include infrastrucure requirements and phasing, quality of design and environmental issues considered and mitigated.

DEVELOPMENT STRATEGY

80) Are the development principles right? Should other guiding principles be introduced?

Environmental protection should be key to any development principles, with proven prevention and mitigation where appropriate.

81) Do you agree with the assessment of advantages and disadvantages of the various development type options set out above? Are there other advantages and disadvantages that should be considered?

Stronger environmental protection required.

82) Which development type (or combination of types) do you think best meets the identified growth requirements for Medway?

No comment

83) Should we consider more radical approaches to meeting development needs, such as significant increases in density, or large-scale redevelopment of existing employment areas for residential or mixed use?

A mixture of approaches will be required although radical approaches on individual sites may be appropriate if justified.

84) Should the green belt boundary be reviewed?

Green belt is very limited and should be maintained wherever possible to avoid erosion of gaps between settlements.

85) What provision should be made for mixed use in residential developments, both high density and lower density?

A mixed approach may be appropriate where justified.

86) What approach should be taken to future development opportunities and mix of uses in Chatham town centre and Waterfront?

A mixed approach may be appropriate where justified.

87) Do you agree that the other town centres require improvement in their existing roles, or should we consider holistic review of any of them in conjunction with nearby waterfront?

Strood Town Centre is isolated from the river and its railway station and could be better connected and enhanced. Rochester now has a relocated station, but could still be better connected to the river to both the north and west.

Name: Roger Birtles

Reference 139

Organisation

SimplyPlanning

On Behalf Of Location 3 Properties Limited

Type of Consultee

Developer/Consultant

simplyplanning

25 Manchester Square, London. W1U 3PY.

Planning Policy Regeneration, Community & Culture Medway Council Gun Wharf Dock Road Chatham Kent ME4 4TR

29th February 2016

Dear Sirs,

Medway Local Plan – Issues and Options Consultation January/February 2016

We act for Location 3 Properties Limited and on their behalf we soon will be submitting a planning application for a retail development on Plot 1, Anthony's Way, Medway City Estate, Frindsbury. That site benefits from an extant retail consent, however, on behalf of our clients, we are instructed to make the following representations/observations in response to your Issues and Options Document for the Medway Local Plan. Our comments relate to the Retail, Commercial, Leisure and Town Centres chapter of the Document and respond, where appropriate, to the questions raised at the end of that chapter.

We set our comments by reference to paragraphs of the document.

Retail Capacity – Paragraph 10.12

Whilst we note the indicative of retail floorspace capacity figures set out at paragraph 10.12, which in turn are drawn from the SHENA, it is obviously critical that the new Local Plan is underpinned by a thorough updated retail capacity analysis. This is, we understand, being undertaken by GVA and that document will no doubt be subject to its own period of public consultation. Any capacity analysis should have regard to the most up-to-date data sources and include an allowance for existing commitments such as our clients' site, which has an extant consent for 9,354m² (GIA) retail floorspace which is unrestricted in terms of the Class A1 goods that may be sold.

If the new retail study is to put forward retail capacity floorspace estimates it should recognise that different forms of retailing can have markedly different turnover rates and therefore it may be appropriate to undertake sensitivity testing across a range of turnover rates (for example discount food retail versus traditional supermarket retail) to come forward with a range of potential floorspace requirements. Similarly, there can be significant variations across the comparison sector between, for example, bulky goods retail and fashion retailers. Accordingly, the retail study should recognise, in putting forward floorspace capacity estimates, that they can only ever be broad guideline figures and not rigid targets or limits.

Paragraph 10.17

We agree that increasing the residential population within town centres can help to maintain and improve vitality and viability and, in particular, help to foster and support the evening economy. There should, we would suggest, be a strong emphasis in the Local Plan on seeking to increase the residential population of Chatham Town Centre. Increasing Chatham town centre's population would serve to both improve its attractiveness as a potential retail investment location and enhance its overall vibrancy including activity in the evenings. It is, we believe, one of the keys to enhancing the role of Chatham Town Centre.

Question 25

Whilst we agree that Chatham should be the first focus for retail investment it should not, and cannot, be at the exclusion of retail development across the whole of the Medway Towns including the other centres and indeed out-of-centre locations

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where shown to be appropriate. Whilst it would be appropriate for the Local Plan to establish a policy preference for retail investment in Chatham Town Centre it should be recognised that retailing is a dynamic industry and that retailers will only invest at locations that they believe are profitable and where they can deliver a successful retail model. As the NPPG accepts, there are some forms of retailing that find it difficult to locate within town centres and any policy preference for retail investment to be directed to Chatham, should not be at the cost of precluding other forms of retailing including at out-of-centre locations. Such a policy approach would only serve to dissuade retail investment from locating in the Medway Towns which would be to the area's disbenefit. If Chatham, and therein the Medway Towns, are to compete with the likes of Bluewater they need to be able to provide modern retail floorspace of the type, quality and size demanded by today's retailers. Not all of that floorspace is likely to be capable of being accommodated within Chatham Town Centre.

Question 27

We consider that strong encouragement should be given through the Local Plan to increasing the diversity of uses within Chatham Town Centre with particular emphasis on enhancing the town centre's food and drink and leisure offer. These, as the Issues and Options Paper notes, are under-represented in the town centre and, if enhanced, could be a key contributor, together with increased residential development, to delivering an enhanced overall town centre offer. Chatham should distinguish itself as the preeminent leisure and food and drink destination for the Medway Towns; something it currently fails to do. Given its existing provision including, for example, the Central Theatre, it is the logical focus for further development of Medway's night-time economy.

Consideration should also be given to the extent of the defined town centre. At present, retail units along the High Street to the west of Waterfront Way feel divorced from the main retail centre of Chatham and this area has potential to provide a vibrant mixed-use area focused on leisure and food and drink uses with residential uses above.

Question 29

Proposals for new or enhanced out-of-centre retail provision should be considered against the tests of the NPPF (namely the sequential approach and impact) and no more. Consistent with the NPPG it should be recognised that there is a role for out-of-centre retailing and that there are retailers who, because of their retail model, find it difficult to locate within town centres or indeed on their edge. Such retailers form a legitimate part of the retail hierarchy and failure to continue to provide for them within the Medway Towns, either through new floorspace or through enhanced existing facilities, will merely drive residents of the town to visit such retailers at more distant locations be they Gravesend, Maidstone or elsewhere. If the Medway Towns are to retain as many residents within Medway for their shopping purposes it needs to meet all retail needs. This can and does include an element of out-of-centre provision.

We obviously hope that these comments are helpful in your consideration of the new Local Plan and should be grateful if you could ensure that we are kept up-to-date on its progress. Obviously should you wish to discuss these submissions in any way, we would be happy to do so.

Yours faithfully,



Roger Birtles Director

Name: Susan Simpkin

Reference 140

Organisation Graham Simpkin Planning

On Behalf Of

SJP group

Type of Consultee

Developer/Consultant

OUR REF: 2180

MEDWAY COUNCIL LOCAL PLAN – ISSUES AND OPTIONS - RESPONSE LAND AT VIEW ROAD, CLIFFE WOODS

Question 1

One of the key components of the Local Plan vision should be to ensure that there is provision made for specific accommodation for older people to reflect the changing demographics of the population of Medway.

Question 2

The strategic issues that the Local Plan needs to address are amongst other issues the need to provide specific accommodation for older residents within the communities where they already live.

Question 3

The Council needs to respond to this issue by allowing for the provision of specific housing accommodation for older people either in specific allocations or alternatively to allow exceptions to enable such provision to be made within local communities to cater for the needs of their older residents.

Question 8

Previous studies have identified the need for accommodation specifically for older residents in Medway and it is important that this can be brought forward by specific policies in the new Local Plan.

It is sometimes difficult for the Local Planning Authority to identify specific sites for particular types of housing accommodation and therefore it is considered that broad policies that allow for the provision of specific accommodation for older residents of particular parts of the Medway area are brought forward in the Local Plan.

Question 9

It is considered that the provision of suitable housing for older residents will make a positive contribution to the health and well being of Medway's communities because on the one hand, it enables older people to move into accommodation that is specifically designed to meet their needs and enables them to live independently for a longer period of their lives. It has been found elsewhere that the lack of availability of specific accommodation for older residents has acted as a bar preventing people moving from their existing family homes into more suitable accommodation. This has a knock on effect of restricting the availability of family homes for younger people and creates a log-jam in the availability of housing to meet particular needs.

It is therefore considered to be most important that specific provision is made for older people to move on into specially designed accommodation to meet their particular needs.

Name: James Cogan

Reference 141

141

Organisation

Trustees of the Hempstead Valley Shopping Centre

On Behalf Of

Type of Consultee Business



Medway Council Local Plan

Representations on behalf of the Trustees of Hempstead Valley Shopping Centre

Hempstead Valley Shopping Centre Gillingham Kent ME7 3PD

February 2016

Prepared by

GL Hearn Limited 280 High Holborn London WC1V 7EE

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Medway Council Local Plan, February 2016

Representations on behalf of the Trustees of Hempstead Valley Shopping Centre, Hempstead Valley Shopping Centre, Gillingham ME7 3PD

Contents

Section		Page
1	PREAMBLE	4
2	HEMPSTEAD VALLEY SHOPPING CENTRE	6
3	EVIDENCE BASE	7
4	RETAIL, COMMERICAL LEISURE & TOWN CENTRES	11
5	CONCLUSIONS	17

List of Tables

TABLE 1:	PROJECTED RETAIL FLOORSPACE	ERROR! BOOKMARK NOT DEFINED.
TABLE 2:	PROJECTED CAPACITY IN LEISURE SPENDERROR! BOOKMARK NOT DEFINED	

Medway Council Local Plan, February 2016

Representations on behalf of the Trustees of Hempstead Valley Shopping Centre, Hempstead Valley Shopping Centre, Gillingham ME7 3PD

Quality Standards Control

The signatories below verify that this document has been prepared in accordance with our quality control requirements. These procedures do not affect the content and views expressed by the originator.

This document must only be treated as a draft unless it is has been signed by the Originators and approved by a Business or Associate Director.

DATE 25 February 2016 ORIGINATORS James Cogan Planner APPROVED Nick Diment Development Planning Director

Limitations

This document has been prepared for the stated objective and should not be used for any other purpose without the prior written authority of GL Hearn; we accept no responsibility or liability for the consequences of this document being used for a purpose other than for which it was commissioned.

1 PREAMBLE

- 1.1 This report has been produced by GL Hearn on behalf of the Trustees of the Hempstead Valley Shopping Centre (hereafter "the Trustees") and forms their response to Medway Council's emerging Medway Local Plan (2012-2035). Those representations and recommendations contained within this report have been submitted on behalf of the Trustees in their capacity as investors and managers of the Hempstead Valley Shopping Centre ("HVSC"). Representations have previously been submitted on behalf of the Trustees in response to Medway Council's consultation(s) on the Draft Core Strategy (2011).
- 1.2 As you may be aware the Trustees have invested in the HVSC for over 30 years. The existing HVSC reflects the Trustees' commitment to, and investment in, Hempstead Valley, indeed the HVSC is a popular, sustainable and well managed allocated District Centre which is highly regarded by the local population it serves.
- 1.3 The Trustees ongoing commitment to the HVSC is evident in the recent expansion and enhancement of the retail and leisure provision within the district centre. This illustrates the Trustees continuing commitment to Medway's local economy, as well as the enduring need to invest in the HVSC in the light of changing retail patterns and competition from other centres outside of the borough, notwithstanding the extremely challenging market conditions for retail development in the UK that persist.
- 1.4 As reflected through the ongoing investment and improvements at the HVSC, the Trustees remain committed to maintaining and improving the retail and leisure offer within Medway. They therefore welcome the Council's preparation of the emerging Medway Local Plan, and the opportunity to engage in its preparation at this early stage.
- 1.5 Those policies and objectives contained within the emerging Medway Local Plan will ensure that Medway Council are able to plan proactively to meet the development needs of the borough over the plan period in full. Consequently, the accurate identification of those development needs in the borough over the plan period are critical if the emerging Medway Local Plan is to successfully manage the future development of the borough. Therefore, the strength and robustness of the evidence base in identifying the development needs (including retail and leisure), is fundamental in the preparation of the emerging Medway Local Plan.
- 1.6 Whilst the Medway Local Plan 'Issues and Options' document ("Consultation Document") does not set out specific policies or allocate sites for future development, the purpose of this stage in the preparation of the emerging Local Plan is to present key contextual matters that drive the new Local Plan, and identify a range of options for how these matters can be addressed.

- 1.7 Consequently, although the Consultation Document represents the initial stage in the preparation of the emerging Medway Local Plan, the options identified within the Consultation Document must reflect those overarching objectives and policies of the National Planning Policy Framework ("NPPF").
- 1.8 Therefore, in accordance with the provisions of the NPPF the Consultation Document should be based upon an up-to-date evidence base that identifies development needs within the borough over the plan period, and plan proactively to meet these needs in full. The Consultation Document should therefore seek to identify the most appropriate approaches to meet this need, including the identification of locations for future development to support sustainable growth in Medway.
- 1.9 Indeed, the Council will prepare the draft Local Plan, which will identify the options for the development of the borough up to 2035, on the basis of the responses received in relation to the Consultation Document. Consequently, those initial 'options' that are identified within the Consultation Document are considered to represent the Council's preliminary objectives for the future development of the borough.
- 1.10 The representations and recommendations provided within this report therefore reflect the Trustees' key observations with regards to the development needs, in particular retail and leisure need, and the Council's preliminary objectives for the future development of the borough to meet this need in full.
- 1.11 Given the Trustees interest in the HVSC, the representation and recommendations provided in this report are focused on the identification of retail and leisure needs, and the emerging strategy to meet these needs as set out in the *'Retail, commercial leisure and town centres'* chapter of the Consultation Document.

2 HEMPSTEAD VALLEY SHOPPING CENTRE

- 2.1 The Trustees of the HVSC have submitted these representations to the Consultation Document in their capacity as investors in the Hempstead Valley Shopping Centre ("HVSC").
- 2.2 The HVSC is situated to the south of Hempstead and lies within the administrative boundary of Medway Council. The existing HVSC is located between Hempstead Valley Drive (west) and Sharsted Way (east), and encompasses the purpose-built indoor shopping centre, associated petrol filling station and access roads and surface level car parks.
- 2.3 Since opening in 1979, the HVSC has undergone a number of renovations and extensions, including recent expansion of, and improvements to, the leisure uses within the HVSC. Recent improvements to the Hempstead Valley Shopping Centre further enhance the traditional comparison and convenience retail offer provided within the centre, supplementing the existing retail offer with complementary restaurants.
- 2.4 The existing HVSC provides for approx. 79 retail units, including two anchor stores (Sainsbury's and Marks & Spencer) as well as a range of national multiple retailers including Argos, Boots, and Clarks, this represents approx. 44,749sq.m. On the basis of the high quality retail and leisure offer provided, the HVSC continues to function as a district centre and represents popular destination for consumers and retailers alike.
- 2.5 The HVSC represents one of the key retail destinations within the borough, making a significant contribution towards meeting demand for comparison and convenience retail and leisure floor space within the borough. Indeed, whilst those other centres within the borough struggle to maintain market share, with consumers choosing to shop outside of the borough, the HVSC continues to maintain its market share and attracts visitors from outside the borough.
- 2.6 Responding to the continued success of the HVSC, the existing Medway Local Plan acknowledges the important role of the HVSC in the retail and leisure provision of the borough, identifying the HVSC as a 'District Centre' within the hierarchy of retail centres.
- 2.7 As a 'District Centre' the HVSC is considered second only to Chatham Town Centre which is the principle 'Town Centre' within the borough. The Proposals Map which accompanies the existing Medway Local Plan (2003) identifies the HVSC 'District Centre' allocation as covering the full extent of the existing centre and associated surface level car parks. The existing allocation therefore includes those 'free standing' units located within the wider HVSC site.

Medway Council Local Plan, February 2016

Representations on behalf of the Trustees of Hempstead Valley Shopping Centre, Hempstead Valley Shopping Centre, Gillingham ME7 3PD

3 EVIDENCE BASE

- 3.1 Under the provisions of the National Planning Policy Framework ("NPPF"), Local Plans must be based upon an up-to-date evidence base that identifies development needs within the borough, with those policies and objectives contained within Local Plans meeting this identified need in full.
- 3.2 Consequently the emerging Medway Local Plan must plan proactively to meet fully the objectively assessed economic development needs of the borough as identified through the evidence base upon which it is based. Indeed, under the provisions of paragraph 14 of the NPPF, meeting these development needs in full through the emerging Local Plan is fundamental in achieving sustainable development.

'At the heart of the National Planning Policy Framework is a **presumption in favour of sustainable development**, which should be seen as a golden thread running through both plan-making and decision-taking.

For plan-making this means that:

- local planning authorities should positively seek opportunities to meet the development needs of their area;
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
 - o specific policies in this Framework indicate development should be restricted.'
- 3.3 Existing town centres, such as the HVSC, perform an important role in sustainably meeting the development needs of their area. Indeed, paragraph 23 of the NPPF states that, '*In drawing up Local Plans, local planning authorities should: recognise town centres as the heart of their communities and pursue policies to support their viability and vitality*'. Local planning authorities should therefore seek to maximise opportunities to meet identified development needs within existing town centres.
- 3.4 Achieving sustainable development, which under the provisions of the NPPF should be seen as the *'golden thread'* that runs through plan-making, is intrinsically linked to the identification of development needs, and the adoption of positive policies and objectives to meet this need in full. The identification of development needs is therefore at the heart of the preparation of Local Plans.
- 3.5 Paragraph 158 of the National Planning Policy Framework states;

'Each local planning authority should ensure that the Local Plan is based on adequate, up-todate and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.'

3.6 Furthermore, paragraph 161 of the NPPF states;

'Local planning authorities should use this evidence base to assess:

- the needs for land or floorspace for economic development, including both the quantitative and qualitative needs for all foreseeable types of economic activity over the plan period, including for retail and leisure development;
- the role and function of town centres and the relationship between them, including any trends in the performance of centres;
- the capacity of existing centres to accommodate new town centre development'
- 3.7 Consequently, under the provisions of the NPPF, the emerging Medway Local Plan must be based upon a robust, and up-to-date, evidence base that identifies the quantitative and qualitative economic needs within the borough (including need for retail and other town centre uses).
- 3.8 Whilst the Consultation Document represents the initial stage of the preparation of the emerging Medway Local Plan, those options for the future development of the borough identified must plan proactively to meet the objectively assessed development needs in full. Any failure to do so would raise significant concerns regarding the soundness of the Consultation Document.
- 3.9 Although the Trustees welcome the Council's desire to 'consult widely to gather further information to help it define the best options for new development locations; the role of our towns, neighbourhoods and villages; looking after the environment and historic features; and securing the infrastructure needed to support growth and effective policies to deliver quality development in a timely manner' (paragraph 2.5), the support of the Trustees for those options identified in the Consultation Document is dependent upon the identification of development need/capacity. Consequently, the Consultation Document must be supported by a robust and up-to-date evidence base that identifies fully the development needs (including retail and leisure) within the borough.
- 3.10 In this regard it is contended that the evidence base that has been prepared in support of those options to-date is incomplete and fails to identify the full development needs of the borough. Indeed, whilst the Consultation Document suggests that an assessment of future retail and leisure growth capacity in Medway has been undertaken as part of the Strategic Housing and Economic Needs Assessment (SHENA) 2015, the findings of this assessment are not sufficiently robust to support the objectives of the emerging Medway Local Plan or facilitate informed debate.
- 3.11 In particular, whereas the previous Draft Core Strategy (2011) was supported by the Retail Needs Assessment (2009) prepared by NLP which identified retail and leisure needs within the borough based upon a thorough assessment of consumer behaviour and the health and function of all existing centres within the borough and wider sub-region, the SHENA has sought only to identify retail and leisure capacity based on spending assumptions and population/demographic trends.

The authenticity of those brief findings of the retail and leisure capacity studies that are included in the Consultation Document cannot therefore be established or verified.

3.12 Indeed, those brief findings expressed within the Consultation Document do not comply with the requirements of either the NPPF or National Planning Practice Guidance ("PPG"). In this regard paragraph 014 (Ref: 12-014-20140306) of the PPG states:

'Appropriate and proportionate evidence is essential for producing a sound Local Plan... The evidence needs to inform what is in the plan and shape its development rather than being collected retrospectively... Local planning authorities should publish documents that form part of the evidence base as they are completed, rather than waiting until options are published or a Local Plan is published for representations. This will help local communities and other interests consider the issues and engage with the authority at an early stage in developing the Local Plan.'

3.13 Furthermore, although the emerging Medway Local Plan is to extend until 2035, the evidence base that is presented within the Consultation Document provides only projected Retail and Leisure Capacity up to 2031. Consequently, the evidence base that is provided at this stage does not meet the requirements as set out in the PPG, paragraph 003 (Ref: 2b-003-20140306) which states:

'Any strategy should be based on evidence of the current state of town centres and opportunities to meet development needs and support their viability and vitality. Strategies should answer the following questions:

- what is the appropriate and realistic role, function and hierarchy of town centres in the area over the plan period? This will involve auditing existing centres to assess their role, vitality, viability and potential to accommodate new development and different types of development. <u>This</u> <u>assessment should cover a three-five year period, but should also take the lifetime of the</u> <u>Local Plan into account</u> and be regularly reviewed.' (Our <u>emphasis</u>)
- 3.14 The absence of an assessment of either current (2016) retail and leisure capacity, or expected capacity at the end of the plan period (2035) is therefore contrary to the requirements of the PPG, and will not enable the emerging Medway Local Plan to meet development needs throughout the plan period.
- 3.15 On the basis that an insufficient evidence base (in particular with regards to retail and leisure needs) has been published in support of the Consultation Document, it is contended that the Council is unable to demonstrate that those 'Options' for the future development of the borough will meet the objectively assessed development needs in full. Consequently, should the Council identify the 'preferred option' on the basis of the findings of the Consultation Document; the conclusions drawn from this consultation will be contrary to the objectives of the NPPF and PPG.
- 3.16 It is therefore suggested that, due to the absence of sufficient evidence, the local community and interested stakeholders (including the Trustees) are unable to consider fully those issues and options presented within the Consultation Document at this stage.

- 3.17 On this basis the Trustees express significant concerns regarding both the evidence base presented to-date, and those initial 'options' for the future development of the borough identified through the Consultation Document.
- 3.18 The Trustees therefore look forward to the opportunity to make further representations to the Consultation Document once those 'issues' and 'options' included within the Consultation Document are supported by a robust assessment of development needs, and plan proactively to meet these needs in full. Whilst the Trustees wish to assist the Council in formulating policy that will shape Medway, until these short comings are resolved the scope of the representation and recommendations provided, and the conclusions drawn, are restricted.
- 3.19 Nonetheless, the Trustees provide the following representations and recommendations to the Consultation Document, which should be read in conjunction with their concerns regarding the failings and inadequacies of the evidence base.

4 RETAIL, COMMERICAL LEISURE & TOWN CENTRES

- 4.1 The Trustees of the HVSC welcome Medway Council's acknowledgement of the improving economic climate and associated increases in consumer spending. This improving consumer climate is reflected within the continued success of the Hempstead Valley Shopping Centre, including the recent expansion and enhancement of the retail and leisure offer provided at the Hempstead Valley Shopping Centre.
- 4.2 The opportunities presented by an improving economic climate and increased consumer confidence must be embraced through the emerging Medway Local Plan, with those policies and objectives of the Local Plan harnessing this growth to support sustainable development within the borough.
- 4.3 Indeed, 'securing economic growth in order to create jobs and prosperity' (paragraph 18, NPPF) is at the heart of the overarching objectives of the NPPF. Under the provisions of both the National Planning Policy Framework ("NPPF") and National Planning Practice Guidance ("PPG"), this overarching objective of securing economic growth and delivering sustainable development, must be reflected through those policies relating to town centres.
- 4.4 In this regard Section 2 of the NPPF relates to *'Ensuring the vitality of town centres'*, and sets out those overarching objectives that should be reflected within the emerging Medway Local Plan. In this regard paragraph 23 of the NPPF states:

Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. In drawing up Local Plans, local planning authorities should:

- Recognise town centres as the heart of their communities and pursue policies to support their viability and vitality;
- Define a network and hierarchy of centres that is resilient to anticipated future economic changes;
- Define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations;
- Promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres;
- Retain and enhance existing markets and, where appropriate, re-introduce or create new ones, ensuring that markets remain attractive and competitive;
- Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. It is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites;
- Allocation appropriate edge of centre sites for main town centre uses that are well connected to the town centre where suitable and viable town centre sites are not available. If sufficient edge

of centre sites cannot be identified, set policies for meeting the identified needs in other accessible locations that are well connected to the town centre;

- Set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres;
- Recognise that residential development can plan an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites; and
- Where town centres are in decline, local planning authorities should plan positively for their future to encourage economic activity.
- 4.5 In accordance with the provisions of the NPPF, the sustainable delivery of retail and leisure needs within the borough will be successfully delivered through a functioning hierarchy of retail centres which includes the HVSC. In this regard the existing Medway Local Plan (2003) identifies a hierarchy of centres within the borough based upon their role, vitality, viability and potential to accommodate future development. Within the existing Medway Local Plan (2003), the Hempstead Valley Shopping Centre is identified as a 'District Centre' within the adopted hierarchy of town centres. As a 'District Centre' the HVSC is acknowledged to be one of the principal retail centres within the borough alongside, Rainham, Strood, Gilligham, and Rochester, while Chatham Town Centre is identified as the 'Main Retail / City Centre'.
- 4.6 Therefore to comply with the provisions of the NPPF, the emerging Medway Local Plan must continue to identify a hierarchy of town centres and unless evidence is presented to the contrary the hierarchy will remain unchanged. In this regard the HVSC continues to perform a significant role in meeting the existing retail needs of the borough, as well as providing opportunities to meet future need through expansion of the existing successful 'District Centre'. The HVSC should therefore continue to be identified as a 'District Centre' through the emerging Medway Local Plan.
- 4.7 The Trustees therefore object to the assertion within the Consultation Document that the Hempstead Valley Shopping Centre 'does not perform the same role as the town centres' and that 'the success of this centre may have come at the expense of the tradition centres'. The assertion that the success enjoyed by the HVSC has arisen at the expense of the traditional centres in particular Chatham Town Centre fails to acknowledge either the demonstrable interest in the HVSC shown by national and local retailers and leisure providers (including many national retails whose only presence within the borough is at the HVSC), nor the shortfalls of these 'traditional' centres and the physical barriers to these centres meeting the objectively assessed needs in full.
- 4.8 Furthermore, the NPPF does not provide a definition of the function or role of District Centres. Consequently the suggestion that the HVSC does not perform the same role as the 'traditional' town centres that is included within the Consultation Documents is inconsistent with the provisions of the National Planning Policy Framework.

Medway Council Local Plan, February 2016

Representations on behalf of the Trustees of Hempstead Valley Shopping Centre, Hempstead Valley Shopping Centre, Gillingham ME7 3PD

- 4.9 It is understood that there is a projected capacity for 34,900sq.m (Comparison) and 10,500sq.m (Convenience) floorspace within the borough by 2031. Although the accuracy of this projected capacity cannot be guaranteed due to the incomplete evidence base that has been provided at this stage, meeting this need in full can only be achieved through future development at all those existing 'District Centres' (including the HVSC) ensuring the hierarchy continues to function and consumer choice is maintained. Consequently, the suggested approach for the focus of future retail and leisure development within Chatham Town Centre and those 'traditional' town centres (excluding HVSC) will not meet this wider policy objective.
- 4.10 The completion of a robust and thorough retail needs assessment, which in addition to identifying development need, will provide an understanding of the consumer behaviour, will not only indicate retail and leisure capacity in the borough, but also in which town centres this capacity is most prevalent. The preparation of the evidence base will therefore assist greatly in developing the Local Plan's strategy.
- 4.11 The Trustees provide the following responses to those questions posed by the Consultation Document in relation to retail, commercial leisure and town centres.

Should we focus investment & retail capacity on Chatham to consolidate its position as Medway's highest order centre?

- 4.12 The National Planning Policy Framework states that 'In drawing up Local Plans, local planning authorities should... define a network and hierarchy of centres that is resilient to anticipated future economic changes' and 'promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres'. On this basis it is suggested that the emerging Medway Local Plan must incorporate a hierarchy of retail centres (including the HVSC), and that all those identified centres should perform a role in meeting the objectively assessed retail need in full. The Trustees therefore object to any policy that will focus retail and leisure development on Chatham, which would consequently be contrary to the overarching objectives and policies of the NPPF.
- 4.13 Furthermore, as with those representations submitted on behalf of the Trustees in relation to the Core Strategy (2011), the Trustees also express significant concerns with any proposed strategy that seeks to focus retail development solely on Chatham Town Centre as such a strategy is dependent on whether it is commercially realistic that major new retail development can be delivered in Chatham, which to date has, despite policy support, struggled to deliver such development.

- 4.14 Given the short comings of the Council's evidence base and in this instance the lack of a sequential assessment the Trustees question the appropriateness of progressing with such a Chatham focused objective.
- 4.15 Not only would the adoption of such as strategy be high risk given its dependence upon securing major new retail development in Chatham, a policy that restricts the delivery of leisure and retail development within other defined centres would be contrary to the policies and objectives of the NPPF.
- 4.16 The concerns of the Trustees are all the more pronounced as the aspiration for major comparison retail development in Chatham Town Centre is long standing but undelivered despite the provisions of the existing Medway Local Plan (2003).
- 4.17 As such we question whether the retail strategy is sound in the terms set out within the NPPF. Moreover, it is questionable whether the strategy (i.e. major new retail development in Chatham) is deliverable, certainly in a time frame which would affect the desired change.
- 4.18 It is therefore concluded that the adoption of a strategy to focus future retail and leisure development within Chatham Town Centre, without support of an up-to-date evidence base, is unlikely to meet the objectively assessed development need in full, as required under the provisions of the NPPF.

Should we seek to facilitate development in Chatham of sufficient critical mass to improve market share, or plan for investment to meet currently identified capacity only?

- 4.19 On the basis of the historic failings of Chatham Town Centre to attract significant high quality retail development, which has been further compounded by the recent departure of a number of national retailers from Chatham Town Centre, the Trustees question the adoption of a strategy that is dependent not only on maintaining existing market share in Chatham, but increasing this market share to sufficiently develop critical mass.
- 4.20 Indeed, whilst the Council's objectives to enhance the retail and leisure offer provided within Chatham Town Centre is welcomed, it is again suggested that a strategy based on utilising the diversity of the combined Town and District Centres within the borough will provide the most effective strategy to maintain the market share of the borough as a whole. It is the Trustees view that any strategy that places unrealistic assumptions on growth in one Town/District Centre will come at the expense of other established centres and the borough as a whole.
- 4.21 As with the Trustees wider concerns with the emerging Medway Local Plan, the lack of an up-todate evidence base, and in particular evidence of Chatham's market share, raises significant

concerns regarding any policy objectives relating to increasing market share of Chatham. Indeed, without benefiting from an understanding of current market share and recent trends, the Trustees question the ability of the emerging Medway Local Plan to improve market share.

What should the mix be in Medway's town centres between retail and other supporting uses, including food and drink, commercial leisure, employment and residential?

- 4.22 Despite an improving economic climate and growing consumer confidence, existing retail centres continue to face significant challenges, namely the persistent growth in on-line shopping and the increased market share enjoyed by discount retailers who often favour out-of-centre locations. Consequently, the future success of those existing town centres in Medway is dependent on their ability to generate increased footfall and spending by visitors.
- 4.23 The NPPF recognises the importance of ensuring the vitality and vibrancy of existing town centres, and the role of sufficient flexibility in the planning system in enabling town centres to respond to the challenges that they continue to face.
- 4.24 A key strategy in ensuring the vitality and vibrancy of existing centres, such as the HVSC, is the encouragement of a mix of uses which allow these centres to diversify from their traditional retail base. Indeed the inclusion of, leisure, cultural, residential and community uses within existing centres is critical in ensuring their survival. In this regard paragraph 23 of the NPPF states that In drawing up Local Plans, local planning authorities should:
 - promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres;
 - recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites;
- 4.25 It is on this basis that the Trustees have significantly enhanced those leisure facilities within the HVSC, with these expanded and enhanced leisure uses complimenting the traditional retail uses and contributing towards to continued success of the HVSC. Whilst the significant investment in leisure and other complimentary uses at HVSC has contributed to the continued success of the 'District Centre', the NPPF recognises that the success of retail centres is often the result of their individuality and the unique mix of uses provided within each centre. Consequently, it is suggested that the adoption of an approach that seeks to mimic the success experienced at one centre would likely result in the homogenisation of those other centres within the borough, likely to the detriment of these centres.
- 4.26 Therefore whilst the Trustees welcome the Council's acknowledgement of the role that leisure and other complementary town centre uses perform in increasing the vitality of town centres, the Trustees recommend that the emerging Medway Local Plan does not restrict the flexibility enjoyed

by those existing town centres through the imposition of policies requiring a certain combination of uses.

What should our approach be to proposals for new or enhanced out of town retail?

- 4.27 At the heart of the Government's commitment to ensuring the vitality of town centres is the 'Town Centres First' approach, the purpose of which is to guard against in appropriate development of main town centre uses.
- 4.28 The Trustees welcome the Government's commitment in this regard, and the provisions of the National Planning Policy Framework, which promote the delivery of future retail and leisure uses within existing defined centres such as the Hempstead Valley Shopping Centre.
- 4.29 On this basis the Trustees suggest that those policies of the emerging Medway Local Plan should reflect the provisions of the NPPF in supporting a 'Town Centre First' approach, including establishing policies that require application for main town centre uses that are not in an existing centre and in an updated plan to be supported by a thorough and robust sequential and impact assessment to consider the impact of any such proposed uses on those existing centres.
- 4.30 It is the view of the Trustees that the adoption of such an approach will safeguard those existing centres within the borough, including Chatham Town Centre and the Hempstead Valley Shopping Centre from inappropriate out-of-centre development.
- 4.31 Furthermore, no evidence has been provided that demonstrates that the retail and leisure uses within the borough cannot be met in full in more sequentially preferable sites that out of centre retail development.

Medway Council Local Plan, February 2016

Representations on behalf of the Trustees of Hempstead Valley Shopping Centre, Hempstead Valley Shopping Centre, Gillingham ME7 3PD

5 CONCLUSIONS

- 5.1 In conclusion whilst the Trustees of the Hempstead Valley Shopping Centre welcome the Council's preparation of the emerging Medway Local Plan and the subsequent replacement of those existing out-of-date policies of the Medway Local Plan (2003). The Trustees express a number of concerns regarding both the process that has been adopted by the Council in the preparation of the emerging Medway Local Plan, as well as those options for the future development of the borough that are presented within the Consultation Document.
- 5.2 Firstly, due to the failure of the Council to provide an up-to-date and robust evidence base in support of the Consultation Document, the Trustees question the ability of the Council to identify those initial options for the future development of the borough. Indeed, given the absence of the identified development needs, those initial options presented within the Consultation Document do not meet the objectively assessed needs in full as required under the provisions of the NPPF.
- 5.3 The Trustees also wish to take this opportunity to express their serious concerns with the Council's proposed spatial strategy for the distribution of future retail and leisure development within the borough.
- 5.4 In particular the Trustees object to the Council's assertions regarding the current and future role of the Hempstead Valley Shopping Centre. Indeed, the Trustees object to the Council's suggestion that the HVSC does not perform the role of a District Centre, and proposition that the HVSC should not perform any function in meeting the future retail and leisure needs of the borough. It is strongly contended that such approach not only fails to acknowledge the significant role that the HVSC performs in meeting retail and leisure need within the borough, but also jeopardises the ability of the development needs of the borough to be met in full. Any such approach is also considered to be contrary to those overarching objectives of the National Planning Policy Framework.
- 5.5 We therefore consider the Council needs to give consideration to a greater level of investment into Hempstead Valley than that set out in the Consultation Document. The acknowledgement of the role performed by the HVSC and the continued success of the HVSC, would not threaten the regeneration of Chatham Town Centre.
- 5.6 Hempstead Valley is a designated District Centre as opposed to a primary centre; it is considerably below Chatham in the NLP national rankings, is substantially smaller and has a much more localised catchment than Chatham. We also consider it significant to note that from the NLP survey that Chatham loses comparatively little expenditure to Hempstead Valley.
- 5.7 By encouraging more retail and associated investment at Hempstead Valley, Medway would benefit from a centre which is capable of helping deliver on the ground some of the quantitative and

qualitative needs of the borough in the early part of the plan period. Indeed, the emerging Medway Local Plan should acknowledge that the HVSC benefits from significant capacity for additional retail/leisure floorspace.

- 5.8 Given Hempstead Valley's location in the south east of the district, additional capacity at HVSC would not only serve Medway itself, but would claw back trade being lost to Medway's largest competitor, namely Maidstone. This would still leave more than sufficient identified need for the redevelopment and regeneration of Chatham, nor would it adversely impact on the investment prospects of the other centres.
- 5.9 We consider that without a flexible and deliverable policy response to meeting retail and leisure needs within the borough, there is a real concern that Medway's shoppers will continue to vote with their feet and take their expenditure out of the borough. If this were to happen then the prospect of any major comparison retail in Chatham at any point in the plan period will significantly recede.
- 5.10 On the basis of these concerns and objections, the Trustees of the Hempstead Valley Shopping Centre look forward to the opportunity make future representations and recommendations to the emerging Medway Local Plan.
- 5.11 We therefore take this opportunity to request that we are kept fully informed of the progress of the emerging Medway Local Plan, including the publication of the evidence base upon which it is to be based.

Name: Chris Fribbins

Reference

142

Organisation

Cliffe and Cliffe Woods Parish Council

On Behalf Of

Type of Consultee

Councillor/MP/Parish Council

Medway Local Plan (2012-2035)

Issues and Options

Cliffe & Cliffe Woods Parish Council Response

The response from the Cliffe and Cliffe Woods Parish Council attempts to provide input to the majority of the questions posed by the Issues and Options consultation. There does appear to be some gaps in the consultation – especially the proposal to review village boundaries and how the needs of the local areas can be assessed and delivered.

DEVELOPING A VISION FOR MEDWAY IN 2035

1) What do you think should be the key components of and ambitions for the Local Plan's vision for Medway in 2035?

The Medway area is one of the largest conurbations in the South East outside of London, although this is often not recognized. Growth in recent decades has brought some improvements but overall the infrastructure and services have not kept pace. Further economic pressures have had an impact on issues such as Policing, Fire Service, Hospital and Health Care. The rural divide has meant greater reliance on the car and traffic levels, especially at peak times, have caused congestion for all. Residents (and businesses) will want improvements to support the growth projected and necessary economic investment.

STRATEGIC ISSUES

2) What do you think are the strategic issues that the Local Plan needs to address?

a) The environment

There has been a growing recognition of the part a healthy environment plays in the vitality of the area. Green space provides a lung for the towns and protection needs to be maintained and enhanced where necessary (within the urban core and at a large scale in the rural areas).

b) Local employment

It has always been relatively easy to provide additional housing, but large areas allocated for industrial and economic development remain underused (empty properties on existing business estates and areas such as Grain and Kingsnorth).

c) Housing

The case for additional housing has not changed for several decades – the majority driven by the needs of the local population, but the area still remains a major attraction from London (especially South East) where property prices continue to grow and a move to the Medway Towns becomes very attractive financially, but leaves the core local issue unresolved.

3) How should the council respond to these issues?

Where do we go from here? 2035 seems a way off but is easily within the life of current under 60s. There will be even more pressure on land supply in 2035 so there is a need to maximise the contribution that developments in this plan make to the infrastructure of the area. (e.g. roads, rail, health care, local jobs).

HOUSING

4) Do you agree with the approach and conclusions of the assessment of housing needs calculated for Medway over the plan period?

Without the detailed understanding of the evidence base it is difficult to comment, however there is a concern that housing take-up from outside the area, especially South East London, will put further pressure on the needs of local residents. The market review indicates that the majority does come from local boroughs/districts, but with clear recognition of a significant number from London (especially the South Eastern Boroughs).

5) What do you consider to be the appropriate housing market area for Medway?

There appears to be a priority for development of homes for sale (although providing a step-up for some local residents, it provides a magnet for people from other areas). With the reduced affordability of these homes, further initiatives are needed for keeping these costs down. There is also a need to provide quality, affordable homes for rent.

6) Do you agree that 25% is an appropriate level for the requirement of affordable housing, and what threshold should be set for the scale of development that needs to provide affordable housing?

The quality affordable housing % should be higher if local needs are to be met (40%).

7) What form of housing best meets the needs of Medway's growing population of older people?

There is a natural desire for older people to remain where they are. They have usually invested significantly in their property, both financially and personally, however it is recognised that this means a significant part of Medway's housing could be under occupied (and with a growing population this may grow). There does not appear to be a suitable model for older people currently and there needs to be a range of low cost purchase and/or rent options to enable older people to benefit from their past investment – with a range of down-sizing options. Quality/Affordable Bungalows and retirement homes can also increase the options for older people.

8) What housing is needed for other specific groups in Medway?

Ground floor properties will continue to be needed for a wide range of disabilities (both visible and invisible). Care in the community housing units.

9) How can development make a positive contribution to the health and wellbeing of Medway's communities?

There needs to be a contribution from all new developments (residential and business) ear-marked for health care. The population projections may also require an additional hospital to the west of the area.

Green spaces, play areas and pedestrian and cycle paths will also aid health and wellbeing.

10) Do you have suggestions for potential sites for starter home developments?

No suggestions for sites, starter homes will be required in all developments, and integrated.

11) How do you consider the infrastructure needs of starter home and self and custom build developments should be addressed?

A flexible mixture of development types should be required in all developments of 20 or more homes – flexibility based on an overall Medway need.

12) How should the council provide for the demand for land for self and custom build housing? For example, integrated with larger developments, on standalone sites, or linked to placemaking ambitions to deliver highly sustainable and innovative design quality.

These should normally be integrated with larger developments, although smaller sites could also be considered (but not specifically allocated).

13) What is the demand for student housing and where would this be best located? For example, would dedicated student housing be appropriate in Medway's town centres?

Student housing should be located close to further education sites or on cheap/reliable/extended hours' public transport routes, however this demand should not be concentrated on a small number of sites.

14) What is the level and type of need for gypsy, traveller and travelling showpeople's accommodation in Medway, and what criteria should be used to identify appropriate sites?

We welcome the government's latest consultation and directives about the definition of this group. We have been concerned at their ability to bypass planning rules that apply to everybody else and have seen developments in areas where this would not normally be allowed. A 'real' traveller site may need to be self-sufficient and 'remote' although more permanent accommodation needs to be part of the general built environment.

ECONOMY

15) Where should such sites be located, considering opportunities in existing employment areas, and potential new sites such as Lodge Hill or other developments?

There is significant land around Kingsnorth (Hoo) and Grain for potential employment areas but it has proved to be difficult to develop these. Employment could be considered if environmental issues at Lodge Hill can be overcome – but a key issue remains with the relatively poor transport infrastructure in the area – and the impact on residential communities of heavy traffic (especially HGVs).

There have been key road improvements – A228 between Chattenden and Ropers Lane (and recent changes to the lane itself), and the road to Grain remains single carriageway from Sharnal Street, however the main issue remains that these feed into one route and especially the Four Elms Roundabout – with growing use throughout the day, and major issues at peak times for all traffic.

Locally there is a concern that the B2000 is unsuitable for today's traffic (with significant pinch points that do not allow lorries/buses/coaches to pass each other). Volume and speed of traffic was the number one concern in a recent resident's survey and a repeated concern with regards to the Cliffe and Cliffe Woods Neighbourhood Plan.

Road traffic reduction should be encouraged through use of the Peninsula railway for passenger and freight services and something major will be required at the Four Elms Roundabout (traffic light signalling falls well short of the requirements here). The junction of the B2000 with the bypass (A289) is also of concern and a better design (potentially with links to the north) needs to be provided to remove rat-running through Wainscott/Frindsbury Extra and access to the Medway Tunnel and the peninsula. Residential and employment expansion will need to restricted until this (and other) issues are addressed.

The contribution that 'work from home' contributes should also be recognised and supported where possible.

16) What are the opportunities for further business growth in and close to town centres in Medway?

There are already sites such as Knights Road/Medway City Estate/Chatham Dockyard close to town centres that require better access. There does need to be encouragement for the consideration of travel plans and positive encouragement (Incentives) to use public transport for access and for public transport operators to provide services.

17) Do you agree with scale of jobs and employment land needs identified for Medway over the plan period?

There does need to be an encouragement to use local employment land already allocated – and positive encouragement and support. Too much of the current allocation is underused.

18) How can Medway realise opportunities to capitalise on growth in the wider area, including London?

There will be pressure on both road and rail connections towards London, and the only 'spare' capacity is contra-peak travel which should be encouraged.

19) How should the plan respond to opportunities arising from the expansion of higher and further education in Medway?

Support to encourage both the students and qualified students to locate locally should be provided.

20) Is it feasible to reduce the amount of out-commuting from Medway, and what would be required to achieve this?

Local business should be encouraged (also contra-peak).

21) How should the plan address the specific locational requirements of some businesses, for example access to wharves?

Locational requirements should be considered and supported where the road (and rail) infrastructure has the capacity and environmental impact in the area (to residents and the natural environment) can be prevented.

TOURISM

22) What scale and form of additional visitor accommodation is needed to support and develop a successful tourism sector in Medway?

The area has a lot to offer currently and that needs to be maximised to encourage tourism – especially the countryside.

Quality touring camp sites are also required to help promote tourism.

23) What are the opportunities for extending tourism in Medway beyond day trips to the main attractions and events?

Better use of the countryside for 'green tourism'.

The tourism offer has to be more joined up if longer visits are to be encouraged. Recognition of Allhallows Leisure Park required (and access to the wider Medway offer provided).

24) What role does the river and Medway's countryside have to play in developing tourism locally?

Public access to the river and countryside needs to be both expanded and controlled. There is potential for greater tourism, but impact needs to be considered as well. Remember there are TWO rivers, with access to the Thames important as well.

RETAIL, COMMERCIAL, LEISURE & TOWN CENTRES

25) Should we focus investment & retail capacity on Chatham to consolidate its position as Medway's highest order centre?

Chatham and Hempstead Valley provide little to the local area.

26) Should we seek to facilitate development in Chatham of sufficient critical mass to improve market share, or plan for investment to meet currently identified capacity only?

We appreciate the problems of trying to maintain multiple town centres, however Chatham is not heavily used by peninsula residents – by the time residents travel (by car) more additional locations are open to them (e.g. Gravesend/Bluewater). Public transport tends to encourage the use of Strood as a destination – better public transport and car parking, to an improved offer in Chatham, may encourage its use.

27) What should the mix be in Medway's town centres between retail and other supporting uses, including food and drink, commercial leisure, employment and residential?

There is now an opportunity for more residential properties in the town centre (and with a suitable public transport offer, and suitable development local car usage could be limited) – this would help to drive a more attractive offer.

28) Should we consider making provision for a new or replacement supermarket in Gillingham town centre? If so, where should this go?

This would be very unlikely to be used by our local residents so no comment.

29) What should our approach be to proposals for new or enhanced out of town retail?

Road traffic implications will be the main issue – and availability of car parking – although there might be well intentioned aims to encourage access via public transport.

ENVIRONMENT

30) What are the most effective means to secure and strengthen Medway's environment, in the context of the area's development needs?

Support for existing environment designations is key (and provides an attractive local offer for residents, business and tourism). Further areas should be designated, especially local amenity space. Opportunities to expand or join up areas should be considered.

31) What opportunities should be pursued in the Local Plan to extend connectivity for wildlife and people throughout urban and rural parts of Medway?

Connectivity needs to be improved (but also managed). Key routes need to be established and maintained. Expansion to fill in 'gaps' in the public footpath network and cycle paths need to be carried out. Footpaths/cycle paths between villages and also to and from the urban environment should be developed where possible.

Rail access in the Medway Valley should be encouraged, opening up the Hoo Peninsula railway for passenger use would also provide access for people.

In general railways do provide a wildlife corridor both in the urban area and countryside.

32) What approach should be taken to determining the role of landscape in producing a spatial strategy for the new Local Plan, and development management policies?
Key landscape should be protected from development – issues of setting need to be considered if developments are considered. We have seen unsuitable developments in our parish – especially affecting the setting of St Helen's Church and the view to and from the marshes. Enforcement of issues at Thameside Terminal have also been protracted.

BUILT ENVIRONMENT

33) What approach should we take to managing Medway's heritage assets, particularly in the context of bringing forward regeneration?

Consideration to the role of Conservation Areas is required to strike a balance between protection and positive enhancement. More areas could be considered for designation and boundaries could be extended to include the 'setting' of the area not just the area itself.

The local Neighbourhood Plan will help identify the rich historic environment locally and these need to be protected and enhanced.

34) What characteristics do you think makes a good place to live?

A good balance between homes and environment. Good transport access is a major issue. Local amenity areas, local parks, larger areas of green space. Walking and cycling connectivity to and around the countryside and rivers.

35) What areas or characteristics of Medway are most distinctive? How should these be protected, enhanced or reflected in new development?

The green spaces of Medway provide a key counter to a densely developed centre. In many cases these also provide a valuable green wedge into some of this areas. The two rivers are also a major characteristic that should be managed.

36) What areas of Medway have weaker character and what are the opportunities for improvements?

Dense development in the town centres have led to issues with parking and contributed to traffic congestion. New developments do need wider roads (but perhaps with traffic calming). Local rural areas are now suffering from a major increase in parking.

37) What requirements should be sought of new developments in Medway to give them a distinct character and ensure they function well, in both central areas (including brownfield sites) and suburban areas?

Local amenity space, road widths do need to be provided in larger scale developments. Segregated routes for pedestrians and cyclists need to be provided and maintained.

RURAL ISSUES

38) How should the role of Hoo St Werburgh as a service centre be developed?

Hoo is a local destination but public transport links from the parish is very poor and its use is not significant locally. A wider range of retail and services would reduce the need to travel into congested town centres, but road access and public transport would need to be improved.

39) What provision needs to be made for employment in rural Medway?

There are significant distances travelled to work by many each day from the rural parish areas, but there are large designated employment areas on the Hoo peninsula in particular. There are still a significant number of local residents who came to the area to help build and run the oil refinery at Grain and local power stations. Local employment is key to reducing the need and cost of travelling to work and encourage a counter-peak flow of traffic.

Green tourism and local 'environmental' employment would help protect and enhance the area.

40) How should the Local Plan address the need to maintain and improve access to services in rural areas?

Services are under considerable pressure and need to be supported financially and given the opportunity to expand their service provision where practical.

41) What consideration should be given to strategic infrastructure and development in rural Medway?

There is over-reliance on the car and the A228/B2000 in particular. There are major problems if these are blocked by accidents and there are some pinch-points that need to be addressed. Contingency arrangements also need further investment.

A freight railway exists on the peninsula and could be converted at minimal cost to provide an hourly or half-hourly service into Higham and Strood (with later electrification to extend services). This could serve all the villages through strategically placed stations.

Public transport provision is poor outside of a very few core routes in the urban area and needs to be improved.

42) How can the Local Plan ensure that strategic and local needs are satisfactorily addressed in areas working towards production of a Neighbourhood Plan?

The Cliffe and Cliffe Woods Neighbourhood Plan is working with the Local Plan. It is clear that local resident's welcome the rural nature and village scale and scope for development is limited, however there are shortcomings in local service provision and not everybody has good access to the towns and access to Hoo is very poor.

Access to information on the demographics of the area will help. Specific reference (chapter?) on the Cliffe and Cliffe Woods Neighbourhood Plan would be useful as well as (technical) assistance in producing the Draft Plan.

INFRASTRUCTURE AND SERVICES

43) What changes to the built environment could facilitate healthier communities?

The maintenance of local amenity space, larger areas and the green lung that is provided by our rural areas.

44) How can the Local Plan encourage access to healthy food options and growing opportunities?

There are large areas of good quality agricultural land in the area and connection to local markets is required. Allotment space should also be protected and enhanced if rural areas are built on.

45) How can the Local Plan most effectively promote greater physical activity in Medway?

A good selection of footpaths and cycle routes to connect out of the more urban areas to connect the more urban areas to key rural routes through the countryside and to the Thames and Medway rivers.

46) What changes to the current siting of healthcare facilities should be considered in the Local Plan? Are there opportunities to provide new sites, and/or to integrate health services in local communities?

Access to the main hospital at Gillingham is a problem for many of the western and Hoo peninsula residents. More provision is required locally through 'cottage hospitals/health centres'.

SOCIAL AND COMMUNITY INFRASTRUCTURE

47) How best can the Local Plan secure the provision of new and expanded schools to meet the needs of Medway's communities and ensure that such infrastructure is delivered in a timely manner and located appropriately as a key element of sustainable development?

Housing developments need to fund additional spaces, however there needs to be a full audit of local provision to limit the need for temporary classrooms and new schools may be a better solution in some cases.

48) What community facilities are needed by Medway's population over the plan period, and how should they be delivered and managed?

A full audit/appraisal is required to identify the state of local facilities and requirements.

OPEN SPACE

49) Is it an appropriate ambition to preserve the integrity of the open space estate, or should we be seeking to rationalise the estate?

Even small green spaces help contribute to the wellness of an area and should be protected. "Friends of groups" should be encouraged.

50) Should we continue to set a local space standard and seek to address shortfalls by new provision, and if so is the current level of 3.25ha per 1,000 population appropriate?

Our standards are too low and need to be increased. Even in the rural areas there is often limited access to the majority of the area.

51) Should we move to a multi-functional hub model of provision, and what might this look like in practice?

Multi-functional/connected hubs should be developed.

52) Should new development provide on-site open space, investment into the existing estate, or a balance of the two approaches?

We would support a balance of provision between protecting the existing spaces and developing new areas.

53) What management models and priorities should we consider? Should we seek to increase community involvement in open space provision and how might this be accomplished?

An umbrella group that includes paid professionals should be established, so that local smaller groups can tap-in to support (both managerial and practical) so that resources can be shared efficiently rather than each group requiring its own.

SPORT FACILITIES

54) What provision should be made for sport in the Local Plan, including in relation to population growth and new developments?

Additional land is required to expand sporting provision. Changing rooms and other club facilities could be developed in partnership with current community run assets.

55) How should the Local Plan address the aspirations for a new stadium for Gillingham FC?

Provision for Gillingham FC has been a long running theme in past local plans. A multi-use stadium could enhance culture, entertainment and sporting facilities.

NATURAL RESOURCES

56) What weight should be given to the protection of the best and most versatile agricultural land, in the context of considering sustainable locations to accommodate growth in Medway?

Agricultural land could provide local quality food and provide some employment opportunities for local residents if farmers could be encouraged to try harder to engage with local residents rather than taking easy (lower paid?) alternatives.

AIR QUALITY

57) How should the Local Plan address the AQMAs and the potential development sites that could be affected by pollutants in these areas?

There have been air quality issues reported in the past, even in rural areas. With prevailing winds from London, green belt protection is vital.

Suitable planting and ongoing maintenance should also be a key policy to help cleanse the areas.

MINERALS

58) What approach should be taken to planning for land won minerals in Medway?

River and rail connected sites need to be prioritised and the use of the road network reduced or eliminated.

59) What are the requirements for wharves and their supporting land-side infrastructure in Medway over the plan period?

Wharves should be used to move heavy goods both in and out of the area, reducing road traffic, although road access to wharves need to be managed.

WASTE

60) What provision should the Local Plan make for waste management and disposal in Medway, for both household and commercial streams?

Medway does need to provide for its own waste and disposal, but not arising from other areas. More needs to be done to reduce waste, then encourage re-use and recycle.

SUSTAINABILITY AND CLIMATE CHANGE

61) What should sustainable development look like for Medway? What plans and policies should we put into place to achieve this?

Objective assessment of all developments should be calculated and published.

62) How can Medway ensure that all communities share in the benefits of growth, in order to reduce the significant inequalities across the area?

Local groups need to be involved in discussions leading to any new developments and planning gain benefits should be provided these groups for identified needs.

63) What measures should new development take to mitigate and adapt to the risks posed by climate change?

The impact of new development needs to be calculated, published and monitored.

64) How can existing development and communities mitigate and adapt to the risks posed by climate change?

The impact of changes should be reported and local initiatives to support any mitigation should be rewarded.

65) Should Medway adopt the optional national standards for water efficiency? What local evidence would we need to underpin this?

New developments should be making better use of rain water as well as grey water.

FLOOD RISK

66) How should flood risk and SuDs be taken into account in planning for growth in Medway?

Flood risk areas should be avoided without wider mitigation/minimisation of the local risk.

67) What safeguards should be put in place to ensure future requirements for improved flood defences are not compromised? See 66.

ENERGY

68) Should we allocate sites or zones for wind energy development?

Wind power has the potential for a very limited contribution to energy development, but large scale development would not be appropriate.

69) What policies should we set for other forms of energy development?

The use of solar cell needs to be monitored closely (see Stoke Solar Farm).

70) How should we take advantage of opportunities for use of waste heat from the large-scale energy generation on the Peninsula?

Existing power stations are remote from large residential areas so potential is very limited.

TRANSPORT

71) What infrastructure is required to support Medway's growth over the plan period?

There is very limited scope for further large scale road development, although some pinch points do need to be addressed and further improvements to the B2000 are required before further developments are considered.

The railway does need to be exploited more, especially off-peak between villages and towns - Medway Valley Line, Strood to Rainham etc, as well as development of the Hoo peninsula freight line.

72) What measures should be considered to increase public transport usage and rates of walking and cycling in Medway?

As mention previously, a comprehensive network of segregated routes needs to be developed connecting urban and rural areas.

73) What provision should be made for car parking?

The growth of car ownership in recent decades has been significant and now many areas are suffering from in-street parking that have not suffered before. More parking provision is required in new developments.

74) What are the requirements for waterside infrastructure, such as docks, wharves, marinas, piers and berths, and their supporting landside facilities, to support commercial and leisure activities?

Access to the riverside is key and this should override any private development on the riverside or public access along the river enhanced and clearly signed.

75) How should the aviation facilities at Rochester Airport and Stoke be considered in the Local Plan?

There is little to support expansion of flying element of these facilities, however suitable employment opportunities could be encouraged.

DELIVERABILITY

76) How can the Council ensure that the Local Plan and its policies remain deliverable while seeking to ensure that development in the area is high quality and sustainable?

The impact of developments need to be analysed before and monitored.

77) Should we consider setting different rates of affordable housing and CIL contributions to take account of differing viability between areas of Medway?

This approach would need further justification and monitoring and used in limited areas initially.

78) How can we ensure timely and appropriate delivery of infrastructure to meet the needs of new and existing communities? What infrastructure types or projects should be prioritised where funding is limited?

Infrastructure delivery will be key and this does need to be front-loaded in any development to ensure delivery and not allow developments to avoid these commitments.

79) What use should be made of new methods of delivery to help speed up the planning process, and how can we ensure that quality is not compromised in favour of speed?

Care needs to be taken with this approach - a development brief needs to include infrastrucure requirements and phasing, quality of design and environmental issues considered and mitigated.

DEVELOPMENT STRATEGY

80) Are the development principles right? Should other guiding principles be introduced?

Environmental protection should be key to any development principles, with proven prevention and mitigation where appropriate.

81) Do you agree with the assessment of advantages and disadvantages of the various development type options set out above? Are there other advantages and disadvantages that should be considered?

Stronger environmental protection required.

82) Which development type (or combination of types) do you think best meets the identified growth requirements for Medway?

No comment

83) Should we consider more radical approaches to meeting development needs, such as significant increases in density, or large-scale redevelopment of existing employment areas for residential or mixed use?

A mixture of approaches will be required although radical approaches on individual sites may be appropriate if justified.

84) Should the green belt boundary be reviewed?

Green belt is very limited and should be maintained wherever possible to avoid erosion of gaps between settlements.

85) What provision should be made for mixed use in residential developments, both high density and lower density?

A mixed approach may be appropriate where justified.

86) What approach should be taken to future development opportunities and mix of uses in Chatham town centre and Waterfront?

A mixed approach may be appropriate where justified.

87) Do you agree that the other town centres require improvement in their existing roles, or should we consider holistic review of any of them in conjunction with nearby waterfront?

Strood Town Centre is isolated from the river and its railway station and could be better connected and enhanced. Rochester now has a relocated station, but could still be better connected to the river to both the north and west.

Name: Mark Aplin

Reference 143

Organisation Dartford Council

On Behalf Of

Type of Consultee

Government/Public Body

maryott, kyle

From: Sent: To: Cc:	03 March 2016 11:58 policy, planning Teresa Ryszkowska
Subject:	Medway Local Plan I&O / SHENA
Follow Up Flag:	Follow up
Flag Status:	Flagged

Dear Medway colleagues

I understand this consultation is still open with respect to the SHENA. Therefore please accept these comments from Dartford officers.

Thank you for the first chance to comment on your new Plan, and for the recent event you held in relation to the Duty to Cooperate. Dartford Borough Council is keen to maintain a dialogue with all relevant authorities in the area, and looks forward to further cooperation, particularly - from our perspective - towards 2017 and onwards when we foresee reviewing our Core Strategy position.

If you envisage substantive strategic issues for discussion with Dartford, then please consult our 'Protocol' we are seeking to use to help guide discussions. This (along with an explanatory note) is an appendix to our Jan 2016 Cooperation Statement which can be found on our website. This links direct to the Protocol. <u>http://www.dartford.gov.uk/___data/assets/pdf__file/0019/210475/10-Protocol-for-action-and-communication-Nov15.pdf</u> We would welcome any comments in this respect.

You consultation document at para 6.2 and Question 18 inter alia correctly notes the strategic issue of London. There are opportunities for officers at Medway to participate in the formal process that will inform the next London Plan (you may wish to join Dartford as a county representative of the "SPPOLG" forum).

In any event, I would strongly encourage direct liaison between Medway and the GLA. Medway should take full account of both housing and economic development issues arising from London's development. Indeed there may well be clear mutual benefits on subjects such as industrial land that can be explored through economic development officers and planning policy to the benefit of the region.

I raise no objection to the approach of the Issues and Options consultation. However I feel future consultation documents may benefit from some additional perspective on strategic/ retail matters. I understand information from the SHENA to still be unavailable which is unfortunate.

If retail is considered a major strategic issue from your perspective, then some of the context in section 10 of the consultation document should be considered amongst the strategic issues covered in section 6. Namely the overriding issue of national retail transformation and restructuring of property investment strategies.

Bluewater is a specialist regional level function self-evidently and in terms Borough Local Plans, and presumably only an alternative regional scale function would compete so implications for town centre strategies at Medway are discrete (your document para 10.15). It is not surprising that a regional function has a catchment that includes nearby areas, but I consider it is harder to simply claim that it now has "major impact" in terms of your current strategic options.

In terms of local context, it would be more insightful to focus on the change (increase or decrease) in the comparison trade draw to Bluewater. Completed in the 1990s, it has seen no substantial retail expansion. Has its role in accounting for Medway's retail expenditure decreased? What are the implications of more recent developments at Maidstone, Westwood Cross, Ashford(?) and in particular Stratford (para 10.17 consultation

document recognises the degree of connection afforded to your town centres by HS1 services)? Hopefully the SHENA can shed some light on the current dynamics of retail expenditure in Medway.

If you would like to explore major retail development in the region further, consideration is currently being given to a strategic retail group for duty to cooperate purposes to include Dartford, Thurrock and Gravesham. I am sure you would be most welcome, please contact me for further details.

I trust this is of assistance, and we look forwards to further contact as Plans evolve.

Regards Mark.

Planning Policy Manager Regeneration Services Dartford Borough Council Civic Centre, Home Gardens, Dartford, Kent DA1 1DR



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Name: Paul Cronk

Reference 144

Organisation JB Planning Associates

On Behalf Of Permission Homes South East

Type of Consultee

Developer/Consultant



Q1 Vision and Objectives

The new vision must provide clarity in relation to how Medway will grow and change over the period up to 2035. It will need to set out how, and where, new development will be focused. Clearly identifying opportunities and aspirations throughout the whole Local Authority area.

We consider that the draft vision and objectives should be positively worded with respect to meeting housing needs. The NPPF definition of housing need, set out in para 159, includes not only the need for different types of housing, such as affordable and family housing, but also the overriding necessity of meeting housing demand.

The new Local Plan must be prepared with the aim of substantially boosting the supply of housing across the Borough, and aiming to meet housing need, including the demands of the market, as far as possible across the whole of the Borough consistent with the requirements of paragraph 47 of the NPPF.

The new Vision should make specific reference to housing and jobs provision. It should seek to ensure that there is well planned growth at existing sustainable locations delivering the homes and jobs needed.

Settlements beyond the boundaries of the main urban towns within Medway have largely been subjected to a policy over many years of significant housing restraint, with very limited growth in the rural areas across the rest of the Borough. Given the high housing target, the current backlog in delivery, and the fact that the Plan period runs to 2035, means that the Council will need to look at possible urban extensions and sustainable sites on the edge of the urban area. Our client's 10.75 ha site at Otterham Quay Lane, on the eastern edge of Rainham, is one such site. It is capable of delivering up to 300 dwellings in the short-term. Given the Council's current 5-year housing land supply deficit, sites such as this will need to be brought forward quickly if the Council is going to overcome this deficiency.

The Council will also need to give major consideration as to how significant levels of sustainable development can occur within the villages in the rural area, which have largely been ignored in recent years as housing development was restricted to Medway's urban areas.

In the context of paragraphs 47, 50 and 159 of the NPPF, the new Local Plan should include an Objective that seeks to:

"Deliver a wide choice of high quality homes and meet the full objectively assessed need for market and affordable housing in the housing market area over the lifetime of the Plan".

Q's 2 & 3 Strategic Issues: Population Growth, In-migration & Green Belt

The Council will need to make a clear decision regarding the precise status to be given to Lodge Hill. It will be aware that reliance on Lodge Hill as a potential new settlement ultimately resulted in the withdrawal of the last Draft Core Strategy as a result of Natural England's designation of much of the site as a SSSI. Even if the Secretary of State eventually determines that planning permission should be granted for the scheme, there



would appear to be a high likelihood that environmental groups opposed to the proposed development will carry on fighting the matter all the way up to the European Courts. Therefore, housing delivery in relation to this site is likely to remain very uncertain for a long time to come.

The Government has recently made an announcement concerning the provision of a further Lower Thames Crossing. It is has completed its evaluation and is recommending a new road crossing through a bored tunnel at Location C. The proposed scheme would be a dual carriageway connecting junction 1 of the M2 to the M25 between junctions 29 and 30. This crosses under the River Thames just east of Gravesend and Tilbury. The Government stated that of the potential options, this route would provide a 70mph motorway to-motorway connection with the greatest improvement in journey times and a modern, high quality road along its entire length.

In addition to easing congestion and providing an alternative to the existing crossing, a new road and crossing at Location C would also offer wider economic benefits. The economic assessment indicates that it could add over £7 billion to the economy by stimulating investment and business opportunities, and create over 5,000 new jobs nationally.

Estimated costs are between £4.3 and £5.9 billion (including allowances for inflation). User charges would be applied, in line with current government policy. Subject to the necessary funding and planning approvals, the Government anticipate that the new crossing would be open in 2025, if publicly funded. If private funding is also used to meet the costs of the project, it anticipates the crossing being open by 2027.

In either case, the opening date would be well within the new Local Plan period. Given the location of the new crossing, it is highly likely to act as an important additional economic driver that will increase development pressures upon Medway.

The proposed London Paramount Theme Park at Swanscombe is a £3.2 billion development that will be located in close proximity to Medway. The Entertainment Resort has been accepted by the UK Government as the first 'Business or Commercial Project' to be considered a Nationally Significant Infrastructure Project (NSIP). The promoters expect the theme park to open in spring / summer 2021.

London Paramount will be the first of its kind in the UK and is expected to attract on average 40,000 visitors on a typical day, with a wide range of attractions and entertainment. The proposed scheme includes:

- A world-class theme park
- A theatre with regular 'West End Quality' shows
- Indoor event space to host conferences and exhibitions, but also with potential for musical and sporting events
- A range of hotels
- An art-house style cinema and nightclubs
- Food and beverage outlets and retail
- One of the largest indoor water parks in Europe
- · Back of house and guest service facilities
- Opportunities for the creative business industry
- Transport improvements including a new dual carriageway access road between the A2 and the Entertainment Resort

jb planning associates representations



- A green network to include areas of environmental enhancement and wildlife habitat creation beside the River Thames
- A range of connectivity improvements including public footpaths and cycle routes along the River Thames and enhancements to the existing jetty on the river to facilitate access by boat
- Thousands of onsite car park spaces
- Enhancements to flood defence works
- Landscaping including water features such as ponds and canals
- Waste management and power generation facilities
- Emergency and security features

The applicants have suggested that the job benefits are likely to be as follows:

- 6,700 full time jobs at the Entertainment Resort
- 1,800 full time jobs in Entertainment Resort hotels
- Potential for approximately 15,700 indirect jobs through the supply chain and growth from spending in the local area
- Peak on site construction employment of up to 6,300 jobs, during the construction period

Medway Council will need to fully consider the potential housing and employment implications of the proposed London Paramount development, the new Lower Thames Crossing, and Bluewater expansion on the Borough, and ensure that appropriate provision is made to take account of these. We welcome the fact that the North Kent Strategic Housing and Economic Needs Assessment (SHENA) produced by GVA for Medway and Gravesham Borough Councils assesses the potential impact of London Paramount on Medway.

Like other local authorities located across the wider South East (SE), Medway Council will also need to closely liaise with the Mayor's office in order to ensure that appropriate provision is made to meet unmet housing needs arising from London, and potentially also an increase of out-migration from London as residents there are forced to relocate further out due to the capital's house prices becoming more and more unaffordable for much of the general population. Given that in comparison with many other local authorities across the SE, Medway remains relatively affordable in terms of property prices.

Furthermore, Medway is also able to offer rapid and frequent access to London via High Speed 1 (HS1). As a consequence, it is likely to see an accelerated rate of in-migration from London in future years. The Council needs to closely monitor this trend, and make suitable provision for it in its new Draft Local Plan.

Q4 Housing Needs

We note that paragraph 5.132 of the GVA SHENA identifies a new **OAN of 1,281 dwellings per annum** (over the 25 year projection period from 2012 – 2037). This is clearly a significant increase over the Council's current interim housing target of 1,000 dpa, and its previous housing target of 815 dpa contained in its Submission Draft Core Strategy, which was withdrawn from Examination in November 2013.

However, we note that paragraph 9.31 of the SHENA Report states that allowing for Medway's 3.2% vacancy rate (which adequately facilitates housing market churn) identifies an **affordable requirement of 18,592 dwellings** over the projection period

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Medway Council Local Plan Issues and Options 2012 - 2035 Representations on behalf of Persimmon Homes South East

(2012 – 2037), 13,387 dwellings over the potential future Local Plan period (2017 – 2035), and 744 dwellings annually. Paragraph 9.34 goes on to state that on the basis of the Council's current affordable housing policy target of 25 - 30% the OAN of 1,281 dwellings per annum would be insufficient to deliver the identified affordable housing need of 744 dwellings per annum, and that this could justify the consideration to increase the housing requirement.

This reflects Paragraph: 029 (Reference ID: 2a-029-20140306) of the Planning Practice Guidance (PPG) which states that:

"What is the total need for affordable housing?

The total need for affordable housing should be converted into annual flows by calculating the total net need (subtract total available stock from total gross need) and converting total net need into an annual flow.

The total affordable housing need should then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes".

It is not apparent why no adjustment has been made to the OAN requirement figure to reflect the fact that Medway has been identified as having a very high affordable housing need. Neither is it apparent whether sufficient provision has been made to address the increasing outflow of residents from London to the Borough.

Paragraph 2.23 of the SHENA refers to the fact that four of the top ten authorities in terms of total flows into Medway are London Boroughs, which demonstrates the strength of London's influence on Medway in relation to migration contribution. This is considered to reflect the affordability pressures in the capital, which are seeing people move eastwards along the Thames Corridor. If grouping all London Boroughs together, this is said to have constituted 33% of total flows into Medway in 2014. Paragraph 2.28 of the SHENA goes on to refer to strong trends in terms of people relocating out of the capital to the Authority, which is likely to be driven particularly by London's increasing affordability pressures which are squeezing many households out of London.

We note that the Council's website states that the Council's new Strategic Land Availability Assessment (SLAA) Main Report has assessed 425 sites, and that of these 425 sites assessed, 336 sites have been assessed as being unsuitable for development. A total of only 89 sites have been identified as being suitable for accommodating housing development, with an approximate capacity of 12,708 units, of which 11,381 do not currently benefit from an extant permission (5000 of these units are accommodated on the Lodge Hill site). The website also states that it is anticipated that an update to the SLAA will be undertaken to identify further suitable land for housing as part of the ongoing Local Plan process.

However, from reading the Issues & Options consultation document it is unclear as to how the Council will be moving forward to identify sufficient land to meet its OAN. It would seem to us that the Council will need to now reassess the SLAA sites in order that a more realistic level of potential housing supply is identified. This action would accord with the Planning Practice Guidance (PPG), which states that in such instances, may be



concluded that insufficient sites/broad locations have been identified against objectively assessed needs. Plan makers will need to revisit the assessment, for example changing the assumptions on the development potential on particular sites (including physical and policy constraints) including sites for possible new settlements.

We note that the overall conclusion for rejecting SLAA sites is often listed as being:

"The site is considered unsuitable for development unless identified constraints can be addressed".

In the case of our client's site at Otterham Quay Lane, Rainham (SLAA Ref: 0825), which is the subject of a planning application (MC/15/0761) and appeal for 300 dwellings. The reason given for rejecting our client's site in the SLAA is that it is situated on the best and most versatile agricultural land. We consider that the SLAA needs to be more realistic in terms of site assessments, and focussing on physical constraints, rather than policy designations / constraints which could be overcome if the Council chose to. Indeed, the PPG states that an important part of the desktop review is to test again the appropriateness of other previously defined constraints, rather than simply to accept them.

The NPPF is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or specific policies in the Framework indicate development should be restricted. Such policies include those relating to sites protected under the Birds and Habitats Directives, and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park or the Broads; designated heritage assets; and locations at risk of flooding or coastal erosion. We note that there is no reference to agricultural land.

Q5 Housing Market Area

Paragraph 2.103 of the SHENA Report states that in considering all the dynamics and indicators in the round, there is clearly a consistently strong relationship between Medway, Gravesham, Swale, Maidstone and Tonbridge and Malling which suggests these should form the Housing Market Area. We do not disagree with this finding.

However, we note that the report is unclear and silent with regard to the OAN requirements for other members of the HMA, and whether there are outstanding needs which are not being fully provided for across the wider HMA. This is an important omission.

Q6 Affordable Housing

We consider that 25% affordable housing provision to be a reasonable affordable housing threshold. However, it will be important that the Council ensures that its whole Local Plan is fully assessed for its overall viability, in accordance with national policy. This will be especially important if the Council decides to proceed with the introduction of a Community Infrastructure Levy (CIL).



The Council acknowledges that viability remains a serious issue in a number of areas of the borough. Consequently, it will be important to ensure that any level of affordable housing provision sought does not make development unviable.

The Housing and Planning Bill currently before Parliament will introduce further important changes, including in relation to the definition of 'affordable housing'. In order to comply with national policy, future policy should be drafted to accord with this, and make reference to viability and the cascade mechanism.

Q7 Form of Housing

In terms of what form of housing best meets the needs of Medway's growing population of older people, the answer is likely to be a variety of different forms and types of development. Some older people will want to carry on remaining in their own homes (even if their housing no longer suits their current needs), others will want to downsize, live in sheltered housing or require more specialist accommodation and care.

It will be important that the Local Plan makes adequate provision to allow the different types and forms of older person's accommodation to come forward within the Local Plan period. However, the Council must ensure that it does not become overly prescriptive or inflexible with regard to specific local sites. Instead, it should be seeking to ensure that Medway's overall needs are addressed within the borough.

It is important that the Council either takes account of older persons accommodation directly within its Objectively Assessed Need (OAN), or makes separate provision on top of its OAN in order to ensure that this particular need will be properly provided for in the Plan period. Therefore, further clarity is required in order to clearly demonstrate whether Older Persons Housing Needs are being addressed separately and in addition to the OAN figures for both Medway and the wider HMA. It is necessary to count the number of bedspaces per year to account for the projected increase of older persons living in Class C2 usage dwellings who are not included in the household projections.

Whilst the SHENA report identifies that Medway possesses over 500 houseboats, it does not identify the future requirement, or the adjustment that would be necessary to the OAN to accommodate this.

Q12 Self-build (on larger sites)

In terms of land for self and custom build housing, we would be very cautious regarding their integration within larger developments. Developers and potential new occupants are likely to be wary if they do know what types of housing are likely to be built in close proximity to mainstream developer housing. This could deter housebuilders from going ahead with developments. Furthermore, those interested in self and custom build properties may well not wish to live on part of a mainstream housing estate. Consequently, provision on standalone sites is likely to prove more appropriate and acceptable to the key stakeholders who will be involved in site delivery.

Q13 Student Housing

Clearly, the Universities at Medway are best able to advise regarding likely levels of future demand for additional student housing provision, and the locations where these are most likely to be needed. Whilst, dedicated student housing might be appropriate in Medway's town centres, it might be the case, that apart from Gillingham, the other town **jb** planning associates representations Page 6 of 9



centres are located too far away from the Universities to be desirable places where students would wish to live.

The PPG states that all student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can be included towards the housing requirement, based on the amount of accommodation it releases in the housing market. It will be very important that any assumptions that the Council makes regarding this are clear, realistic and transparent. The Council will need to work very carefully in order that it avoids any double-counting occurring.

Q14 Gypsy, Traveller and Travelling Showpeople's Accommodation

In terms of Gypsy, Traveller and Travelling Showpeople's Accommodation the Council will need to update its recent GTAA Assessment to take account of the government's change in definition.

In comparison with other neighbouring local authorities such as Swale and Maidstone, Medway's overall GTAA requirement is much lower. The Medway GTAA (September 2013) concluded that the level of demand within Medway for the Plan period was only 22 gypsy and traveller pitches. The Council should use the template produced for it by independent consultants to assess the suitability of potential sites.

Given that the Council will only need to identify a handful of individual sites in order to satisfy this overall requirement, we do not consider that it would be appropriate to seek to address this demand by requiring delivery by developers as part of general housing allocations. We are aware that this has been attempted elsewhere (particularly when the GTAA requirement is much higher). However, such an approach has often been found to be problematic as it is not popular with developers or residents of new housing developments, nor is it popular with gypsies and travellers who do not want to be physically located within new housing estates.

Q32 Landscape Protection

The Council's Landscape Character Assessment (2011) identifies the borough's landscape character areas and informs landscape planning policies. It will assist the Council in considering suitable housing site allocations. However, the Council will need to ensure that it has sufficient sites identified to meet its OAN requirement. Whilst it is entirely appropriate to seek to protect valuable landscapes, it is not appropriate to carry on protecting sites of much lesser landscape value from development, when a serious housing undersupply exists. We consider that our client's site at Otterham Quay Lane, Rainham to be one such site that now lacks any merit for continued landscape protection. The Council needs to completely re-evaluate existing landscape protection designations in order to test whether they are still merited or needed.

Q56 Agricultural Land Protection

In terms of sustainability, the Council will seek to take into account the economic and other benefits of the Best and Most Versatile agricultural land and, in general terms, seek to use areas of poorer quality land in preference to that of higher quality.

The Council acknowledges that much agricultural land is located close to existing settlements, but that in some areas, the high quality land is not being used productively

for agriculture, and that the landscape has become degraded, with equine and urban fringe uses predominating.

It will be important that the Council takers a pragmatic approach to this issue in the new Local Plan. Any policy seeking to protect the best and most versatile agricultural land should take full and proper account of its current condition and use. It should also recognise that some smaller self-contained sites may have ceased to be commercially viable to carry on farming. In which case, a continued blanket restriction preventing agricultural land from being released for development, regardless of its condition and need, is totally inappropriate. Particularly in the context of a substantial housing requirement that needs to be satisfied.

Furthermore, the Council will need to recognise that in order to satisfy its overall housing requirement may well necessitate the loss of some of its best and most versatile agricultural land. Appeal decisions from elsewhere in the country have supported such loss where it has been demonstrated that other alternative sites would also involve a similar loss. In such instances, the loss of best and most versatile agricultural land would not therefore be unwarranted.

We consider that our client's site is a useful example of such an agricultural landholding that is no longer required for agricultural use, and is well located adjacent to the urban area.

Q77 Viability

The Council will be aware that viability remains a serious issue in a number of areas of the borough. Therefore, it may well be appropriate for the Council to seek to set different rates of affordable housing and CIL contributions to reflect differing levels of viability across Medway. As we have already mentioned further above, it will be important to ensure that any affordable housing provision sought does not make development unviable. Consequently, the Council must ensure that when it is considers viability, it examines and takes full account of all likely Local Plan and CIL costs. It must not just consider affordable housing and CIL in isolation. It will also be important to ensure that there is an element of flexibility built into any viability assumptions, it must be recognised that costs and market forces will vary over time. Therefore, it will be important to ensure that any future changes to overall development costs do not make sites suddenly unviable to develop.

Q81 Development Options Q82 Meeting Medway's Growth Requirements Q83 Radical Approaches to meeting Housing Needs

Freestanding settlements are clearly an option that the Council will want to consider. However, it must recognise that these take a very long time period to deliver. It will also be aware that despite strong support for the Lodge Hill proposal for 5,000 dwellings by the MoD and Land Securities over a lengthy period of years, with numerous consultants reports being produced, there is currently little more certainty regarding likely deliverability now than there was back at the very start of the process all those years ago. We are not aware that there are any consortiums with the weight, finance and influence required, that are promoting new settlements.

The Council must also recognise that a strategy based upon new freestanding settlements is likely to result in housing delivery being focussed towards the latter part of jb planning associates representations Page 8 of 9

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Medway Council Local Plan Issues and Options 2012 - 2035 Representations on behalf of Persimmon Homes South East

the Plan period (and beyond). It will also be aware that In the meantime, the Council's existing housing supply backlog, which is already very significant, will carry on growing.

We consider that there are opportunities for significant growth of existing settlements in Medway. In particular, in relation to the main towns; Chatham, Rochester, Gillingham, Strood and Rainham. In the case of the latter, we would point to our client's 10 ha site at Otterham Quay Lane as being a good example of a site capable of early delivery in a sustainable location.

It will also be important to ensure that proposed housing provision occurs where market demand exists, and reflects the needs and aspirations of potential occupiers in terms of design, density and layout. Regard will also need to be had to the character of the local area.

Q84 Reviewing the Green Belt

Given the extent, of the increase in the Council's Objectively Assessed need (OAN) and the strong development pressures being exerted (as discussed above), the Council will need to undertake a fundamental Green Belt Review to assess whether currently designated Green Belt sites still satisfy the Green Belt tests. This should be undertaken in liaison with neighbouring local authorities such as Gravesham Borough Council.

Q85 Mixed Use

Whilst it is entirely appropriate to seek to promote housing provision within Chatham and other town centres, and also within Medway's large waterside regeneration areas it will be important to ensure that any assumptions regarding such future allocations are realistic in terms of market demand and likely delivery timescales.

PC/1279 29 February 2016

Name: Susie Stephen

Reference 145

Organisation

Turley

On Behalf Of Ropemaker Properties Limited

Type of Consultee

Developer/Consultant

Turley

26 February 2016 **Delivered by email**

Planning Policy Regeneration, Community & Culture Medway Council, Gun Wharf Dock Road Chatham Kent ME4 4TR

Dear Sir/Madam

MEDWAY COUNCIL LOCAL PLAN ISSUES AND OPTIONS 2012-2035 REPRESENTATIONS ON BEHALF OF ROPEMAKER PROPERTIES LIMITED

We are writing on behalf of our client, Ropemaker Properties Limited, to submit the following representations in response to the Medway Council Local Plan Issues and Options 2012-2035 consultation taking place between 4th January and 29th February 2016.

Our client is the freehold owner of Strood Retail Park, which lies within Strood town centre, and therefore has a vested interest in the Council's policy approach to protecting its town centres and planning for future retail development over the forthcoming plan period. Our client is committed to investing in and improving the town centre and has recently secured planning permission for the redevelopment of the former B&Q unit which will deliver several, new modern retail unit aimed at attracting a range of new retailers to the area. As part of this, new public realm improvements will also be delivered aimed at improving the connectivity between the retail park and the high street, to the overall benefit of the town centre.

We have reviewed the Issues and Options document and relevant supporting information including Strategic Housing and Economic Needs Assessment (SHENA). At the time of writing, further information on retail needs is still pending publication. We therefore reserve the right to submit additional comments once this is available and note that there has been an extension to the consultation deadline (until 24th March 2016) for this purpose.

Section 10 - Retail, commercial leisure and town centres

We welcome the acknowledgment that structural changes in the retail market has led to certain town centres being increasingly vulnerable, as evidenced under the National Trends sub-heading in Section 10 of the consultation document. The effects of Online shopping, amongst other factors, has reduced the need for many retailers to maintain such an extensive portfolio of stores to secure the same levels of coverage, with many now focussing on prime locations in fewer, major retail shopping destinations,

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turley.co.uk



thereby reinforcing the trend towards polarisation. Many centres which do not fall within the 'prime' category for certain retailers are therefore marginalised as a result. This is noted in the SHENA which also recognises that the role of the traditional high streets is changing, with a greater demand for resident services, leisure, community activities and local workspace.

The SHENA also indicates that this fragile position is particularly prevalent in Medway, where its various town centres are under-performing and losing trade to other major shopping destinations, such as Bluewater. By inference, there is no capacity to support additional comparison goods floorspace in the District over the short-term, before 2020. Whilst we note that there is an identified short-term need for additional convenience goods floorspace (in the order to 6,000 sqm net), it has not been possible to review and interpret the evidence underlying this.

In respect of Strood, the SHENA identifies a limited comparison shopping offer within the high street which is generally low grade and orientated towards meeting everyday shopping needs. In addition, the centre has an above average vacancy rate and the overall quality of the environmental is judged to be poor. In contrast, Strood Retail Park is performing significantly better, but poor linkages limit the extent to which the wider town centre benefits from these higher levels of trade. It is specifically noted that *'the presence of Strood Retail Park in such close proximity to the town centre could be better realised, in order to benefit the wider vitality and viability of the centre'*.

Our client is committed to delivering the aforementioned improvements to the public realm which will help to realise the above objectives. In turn, further improvements to the retail park and its overall offer over time should be encouraged on the basis that this will, by association, positively benefit the wider town centre. In this context, the Council should adopt a policy approach which seeks to proactively support improvements at Strood Retail Park, recognising the important role it plays in drawing trade to the town centre. This role should also be recognised where proposals for out of centre retail, particularly in the form of large format units which would directly compete with the retail park, come forward as any impact on the retail park would similarly, by association, adversely impact the wider town centre. This would be assisted by ensuring the retail park remains within the town centre boundary and the defined Primary Shopping Area (PSA) within the emerging Local Plan.

Question 29: What should our approach be to proposals for new or enhanced out of town retail?

In the context of the above, the Council should seek to resist proposals for new or enhanced out of centre/town retail development over the plan period. In accordance with the sequential approach advocated by national policy (paragraph 24), local policy should seek to focus new retail development (and that for other main town centre uses) within or on the edge of existing centres in the first instance.

The Council, in planning to meet its needs over the plan period, should resist allocating sites in out of centre or out of town locations which could adversely impact on existing centres and intensify what is already considered a 'fragile' position in terms of the performance of the District's centres. In addition, the Council should also consider applying an appropriate local threshold to proposals for new retail development in out of centre locations, above which an impact assessment is required in accordance with paragraph 26 of the NPPF.

Conclusion

It is difficult to predict the continually changing trends in the retail sector. However the resilience of town centres can only be improved by establishing a strong policy position which encourages investment and development in and on the edge of town centres, where it can deliver the greatest public benefits. The important role which developments like Strood Retail Park make in supporting the town centre should also



be recognised. In parallel, new or enhanced development in out of centre locations should be resisted to avoid undermining efforts to protect and enhance the vitality and viability of the District's town centres.

We trust the above comments are welcomed and would appreciate being kept informed of future consultations on the new Local Plan. Should you have any queries or require any additional information, please do not hesitate to contact me.

Yours faithfully



Susie Stephen Associate Director

Name: Simon Fisher

Reference 146

Organisation

Barton Willmore

On Behalf Of

Goodman

Type of Consultee

Developer/Consultant

BRISTOL CAMBRIDGE CARDIFF EBBSFLEET EDINBURGH LEEDS LONDON MANCHESTER NEWCASTLE READING SOLIHULL



bartonwillmore.co.uk The Observatory Southfleet Road Ebbsfleet Dartford Kent DA10 0DF

Planning Policy and Regeneration Community and Culture Medway Council Gun Wharf Dock Road Chatham KENT ME4 4TR

BY POST

15144/A3/SF/kf

08 January 2016

Dear Sir or Madam

MEDWAY LOCAL PLAN – ISSUES AND OPTIONS CONSULTATION

We are pleased to respond to the above consultation, on behalf of our client Goodman. Goodman owns the London Medway Commercial Park (previously known as the Kingsnorth Commercial Park/Kingsnorth Employment Area).

Our response focusses on the following question within the Consultation Document:

Question 15 – Where should such sites [employment sites] be located, considering opportunities in existing employment areas, and potential new sites such as Lodge Hill or other developments?

Medway Council's broad approach to the London Medway Commercial Park in the Consultation Document is to confirm that it offers significant space for heavy industries and large scale distribution (pages 30-31).

The continued allocation of the London Medway Commercial Park for large scale employment development within the Core Strategy is supported by Goodman, for the following reasons:

• In the period since the previous Local Plan was adopted, Goodman has been progressing the implementation of the London Medway Commercial Park. Outline planning permission was granted on 26th November 2009 (ref MC/08/0370) and renewed on 2nd October 2013 (ref MC/13/1594). A number of reserved matters applications have also been approved. Implementation of the development is therefore now well under way. A stable planning policy context for the site is required in order to accompany the implementation of the development that is envisaged within the outline planning permission.

It would be much appreciated if you would please continue to keep me informed of any future developments or consultations in relation to the emerging Local Plan.

Yours faithfully SIMON FLISHER Director





Registered in England Number: 0C342692 Barton Willmore LLP Registered Office: The Blade Abbey Square Reading RG1 3BE

Name: Phil Copsey

Reference 147

Organisation David Locke Associates

On Behalf Of

Tarmac

Type of Consultee

Developer/Consultant



Medway Council Local Plan: Issues and Options 2012 - 2035

29th FEBRUARY 2016

These representations are submitted on behalf of Tarmac. Tarmac, a CRH company, is the UK's leading sustainable building materials and construction solutions business. Tarmac's innovative services and solutions help to deliver the infrastructure needed to grow the economy today and create a more sustainable built environment to support the nation's future prosperity.

Tarmac and its predecessors Laf arge T armac, Laf arge and B lue C ircle have been constructively engaged in Local Plan-making activity over many years. Until recently Lafarge T armac were working with Me dway C ouncil in the promotion of mixed-use development at Temple Waterfront.

Tarmac has extensive land interests in the Medway Valley associated with the permitted Medway Cement Works and other residual ownerships.

Tarmac r emains fully committed to the delivery of M edway C ement Works which is permitted to operate until 2041. The Medway Local Plan period r uns to 2035. It is important that a suitable Local Plan context is maintained to allow the operation of the cement works.

Over the plan period there may be opportunities arising for development within Medway on land within Tarmac's control around the periphery of its ownership that may come forward alongside the implementation of the cement works. It must be stressed that no formal decision has been taken at the present time by Tarmac to specifically identify or promote land. However, given the timescale of the Local Plan and the levels of growth that Medway is required to accommodate Tarmac consider it prudent that the potential future availability of development opportunities informs the Local Plan process.

Issues and Options Question:	Representations
1) What do you think should be the key components of and ambitions for the Local Plan's vision for Medway in 2035?	A positive and constructive response should be taken to supporting economic activity, accommodating the growth required, protecting environmental assets and support new infrastructure.
Strategic Issues	

David Lock Associates Town Planning and Urban Design



Issues and Options Question:	Representations
 What do you think are the strategic issues that the Local Plan needs to address? 	The Medway Towns, Medway Gap Settlements and Maidstone create a
that the Local Plan needs to address?	
	unique focus for population, economic
	activity and infrastructure at the heart
	of Kent. Working jointly with its partner
	authorities, Medway should take a
	positive approach to the potentials of
	this area in providing for economic
	activity supported by new
	infrastructure. In particular, the
	proposed route of the Lower Thames
	Crossing (due to open 2025) would
	transform the connectivity of Medway.
	This may also require a reassessment
	of linkages from the M2 to the M20.
3) How should the council respond to these	
issues?	
Housing	
4) Do you agree with the approach and	
conclusions of the assessment of housing needs	
calculated for Medway over the plan period?	
5) What do you consider to be the appropriate	
5) What do you consider to be the appropriate	
housing market area for Medway?	
6) Do you agree that 25% is an appropriate level	
for the requirement of affordable housing, and	
what threshold should be set for the scale of	
development that needs to provide affordable	
housing?	
7) What form of housing best meets the needs	
of Medway's growing population of older	
people?	
8) What housing is needed for other specific	
groups in Medway?	
9) How can development make a positive	
contribution to the health and wellbeing of	
Medway's communities?	
10) Do you have suggestions for potential sites	
for starter home developments?	
11) How do you consider the infrastructure	
needs of starter home and self and custom build	
developments should be addressed?	
12) How should the council provide for the	
demand for land for self and custom build	
housing? For example, integrated with larger	
developments, on standalone sites, or linked to	
placemaking ambitions to deliver highly	
sustainable and innovative design quality.	
13) What is the demand for student housing and	
where would this be best located? For example,	
would dedicated student housing be appropriate	
in Medway's town centres?	
14) What is the level and type of need for gypsy,	
traveller and travelling showpeople's	
accommodation in Medway, and what criteria	
should be used to identify appropriate sites?	

David Lock Associates Town Planning and Urban Design



Issues and Options Question:	Representations
Economy	
15) Where should such sites be located, considering opportunities in existing employment areas, and potential new sites such as Lodge Hill or other developments?	There is merit in co-locating new jobs with new homes to promote sustainable patterns of activity. The Medway Valley is also well suited for new employment allocations given its accessibility to a wide pool of labour from neighbouring districts / settlements and its accessibility by a range of transport modes.
16) What are the opportunities for further business growth in and close to town centres in Medway?	
17) Do you agree with scale of jobs and employment land needs identified for Medway over the plan period?	Economic and employment forecasts are notoriously volatile and it is therefore recommended that precise employment land requirements are not treated as ceilings or maxima. Tarmac note that further evidence on this matter has been published and reserve the right to comment further during the extended consultation period.
18) How can Medway realise opportunities to capitalise on growth in the wider area, including London?	
19) How should the plan respond to opportunities arising from the expansion of higher and further education in Medway?	
20) Is it feasible to reduce the amount of out- commuting from Medway, and what would be required to achieve this?	
21) How should the plan address the specific locational requirements of some businesses, for example access to wharves?	
Tourism	
22) What scale and form of additional visitor accommodation is needed to support and develop a successful tourism sector in Medway?	
23) What are the opportunities for extending tourism in Medway beyond day trips to the main attractions and events?	
24) What role does the river and Medway's countryside have to play in developing tourism locally?	
Retail, Commercial Leisure & Town Centres	
25) Should we focus investment & retail capacity on Chatham to consolidate its position as Medway's highest order centre?	
26) Should we seek to facilitate development in Chatham of sufficient critical mass to improve market share, or plan for investment to meet currently identified capacity only?	
27) What should the mix be in Medway's town centres between retail and other supporting	

David Lock Associates Town Planning and Urban Design



uses, including food and drink, commercial leisure, employment and residential? 28) Should we consider making provision for a new or replacement supermarket in Gillingham town centre? If so, where should this go? 29) What should our approach be to proposals for new or enhanced out of town retail? Environment 30) What are the most effective means to secure and strengthen Medway's environment, in the context of the area's development needs? 31) What opportunities should be pursued in the Local Plan to extend connectivity for wildlife and people throughout urban and rural parts of Medway? 32) What approach should be taken to determining the role of landscape in producing a spatial strategy for the new Local Plan, and determining the role of landscape in producing a spatial strategy for the new Local Plan, and development management policies? The Metropolitan Green Belt is principally a planning policy and shou not be treated as an 'environment' or 'landscape' factor. 33) What approach should we take to managing Medway's heritage assets, particularly in the context of bringing forward regeneration? 34) What characteristics of you think makes a good place to live? 35) What areas or characteristics of Medway are most distinctive? How should these be protected, enhanced or reflected in new development? 36) What areas of Medway have weaker character and what are the opportunities for improvements? 37) What requirements should be sought of new developments in Medway to give them a distinct character and ensure they function well, in both central areas (including brownfield sites) and suburban areas?	Issues and Options Question:	Representations
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39) What provision needs to be made for		
employment in rural Medway?		
	employment in rural Medway?	
40) How should the Local Plan address the need		
to maintain and improve access to services in		
rural areas?		
41) What consideration should be given to		
strategic infrastructure and development in rural		
Medway?		
42) How can the Local Plan ensure that strategic	42) How can the Local Plan ensure that strategic	
and local needs are satisfactorily addressed in		
areas working towards production of a		
Neighbourhood Plan?		
Infrastructure and Services		
43) What changes to the built environment could		
	facilitate healthier communities?	


Issues and Options Question:	Representations
44) How can the Local Plan encourage access	
to healthy food options and growing	
opportunities?	
45) How can the Local Plan most effectively	
promote greater physical activity in Medway?	
46) What changes to the current siting of	
healthcare facilities should be considered in the	
Local Plan? Are there opportunities to provide	
new sites, and/or to integrate health services in	
local communities?	
Social and Community Infrastructure	
47) How best can the Local Plan secure the	
provision of new and expanded schools to meet	
the needs of Medway's communities and ensure	
that such infrastructure is delivered in a timely	
manner and located appropriately as a key	
element of sustainable development?	
48) What community facilities are needed by	
Medway's population over the plan period, and	
how should they be delivered and managed?	
Open Space	
49) Is it an appropriate ambition to preserve the	
integrity of the open space estate, or should we	
be seeking to rationalise the estate?	
50) Should we continue to set a local space	
standard and seek to address shortfalls by new	
provision, and if so is the current level of 3.25ha	
per 1,000 population appropriate?	
51) Should we move to a multi-functional hub	
model of provision, and what might this look like	
in practice?	
52) Should new development provide on-site	
open space, investment into the existing estate,	
or a balance of the two approaches?	
53) What management models and priorities	
should we consider? Should we seek to	
increase community involvement in open space	
provision and how might this be accomplished?	
Sports Facilities	
54) What provision should be made for sport in	
the Local Plan, including in relation to population	
growth and new developments?	
55) How should the Local Plan address the	
aspirations for a new stadium for Gillingham	
FC?	
Natural Resources	
56) What weight should be given to the	
protection of the best and most versatile	
agricultural land, in the context of considering	
sustainable locations to accommodate growth in	
Medway?	
Air Quality	



epresentations he Medway Local Plan must ecognise the permitted Medway ement Works as a commitment to ome forward within the plan period.
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ome forward within the plan period.
he proposed route of the Lower
hames Crossing (due to open 2025)
ould transform the connectivity of
ledway. This may also require a
eassessment of linkages from the M2
the M20.
h o le



Issues and Options Question:	Representations
72) What measures should be considered to	
increase public transport usage and rates of	
walking and cycling in Medway?	
73) What provision should be made for car	
parking?	
74) What are the requirements for waterside	
infrastructure, such as docks, wharves, marinas,	
piers and berths, and their supporting landside	
facilities, to support commercial and leisure	
activities?	
75) How should the aviation facilities at	
Rochester Airport and Stoke be considered in	
the Local Plan?	
Deliverability	
76) How can the Council ensure that the Local	
Plan and its policies remain deliverable while	
seeking to ensure that development in the area	
is high quality and sustainable?	
77) Should we consider setting different rates of	
affordable housing and CIL contributions to take	
account of differing viability between areas of	
Medway?	
78) How can we ensure timely and appropriate	
delivery of infrastructure to meet the needs of	
new and existing communities? What	
infrastructure types or projects should be	
prioritised where funding is limited?	
79) What use should be made of new methods	
of delivery to help speed up the planning	
process, and how can we ensure that quality is	
not compromised in favour of speed?	
Development Strategy	
80) Are the development principles right?	
Should other guiding principles be introduced?	
81) Do you agree with the assessment of	
advantages and disadvantages of the various	
development type options set out above? Are	
there other advantages and disadvantages that	
should be considered?	
82) Which development type (or combination of	
types) do you think best meets the identified	
growth requirements for Medway?	
83) Should we consider more radical	Tarmac consider that the level of
approaches to meeting development needs,	growth required and the need to
such as significant increases in density, or large-	promote sustainable patterns of
scale redevelopment of existing employment	development represent the exceptional
areas for residential or mixed use?	circumstances that justify a review of
	Green Belt boundaries.
84) Should the green belt boundary be	Tarmac consider that the Medway
reviewed?	Local Plan should include a review of
	the Metropolitan Green Belt:
	1. The level of growth required
	and the need to promote
	sustainable patterns of
	development represent
	exceptional circumstances.
	อกระยุแบกลา รางนาทรเล่าเรื่อง.



Issues and Options Question:	Representations
	 There is a need to consider all reasonable alternatives as part of the Sustainability Appraisal process. Green Belt is a strategic policy and hence a strategic issue in the terms of the Duty to Cooperate. Given the prevalence of Green Belt in neighbouring Tonbridge and Malling it is suggested that a review should be undertaken jointly as part of a shared evidence base.
85) What provision should be made for mixed use in residential developments, both high density and lower density?	
86) What approach should be taken to future development opportunities and mix of uses in Chatham town centre and Waterfront?	
87) Do you agree that the other town centres require improvement in their existing roles, or should we consider holistic review of any of them in conjunction with nearby waterfront regeneration sites?	

[PDC/LAF007 29-02-16]

Name: Tom Ogden

Reference 148

Organisation Bloomfields Ltd

On Behalf Of

Type of Consultee

Developer/Consultant



77, Commercial Road, Paddock Wood, Kent, TN12 6DS

www.bloomfieldsltd.co.uk

Planning Policy Regeneration Community & Culture Medway Council Gun Wharf Dock Road Chatham Kent ME4 4TR

Our Reference: P.16.018.1361

26 February 2016

Dear Sir / Madam

Issues and Options Consultation

We are writing on behalf of our client Mr M Presneill and in respect of the above.

Housing

Pages 20 to 25 consider the matter of Housing. In short this section recognises that "*the council is embarking on the plan preparation process with the intention of meeting the objectively assessed needs identified for Medway's administrative area*". Principally, we observe little consideration is given to housing in rural areas.

In response to the relevant questions, on behalf of our client we would comment:

Question 8 - What housing is needed for other specific groups in Medway?

Answer - A range of housing in well screened rural sites in the countryside which can provide good access to fresh air and the enjoyment of the surrounding landscape.

Question 9 - How can development make a positive contribution to the health and wellbeing of Medway's communities?

Answer – By supporting development for multiple dwellings in well screened rural sites in the countryside which can provide good access to fresh air, enjoyment of the surrounding landscape and a sense of community.

Notwithstanding our view that Dudley Farm (Site Reference 1060) is considered suitable for housing provision and contrary to the Council's preliminary assessment of the site (expanded on in our letter of the same date and regarding the Strategic Housing Assessment), we consider it prudent for the Council to consider other opportunities for site allocation which align with the Council's Strategic Objectives. This may include for the purposes of tourism or mixed use site. Such an approach is being proposed by Maidstone Borough Council.

<u>Tourism</u>

Pages 36 and 37 consider the matter of Tourism, recognising the important role this plays within Medway's economy and culture.



In particular we note the identified point that rural areas offer great opportunity for the tourist industry which has generated nearly £300m of value in Medway and providing over 4000 full time equivalent jobs. We also recognise that day trips form the majority of these visits. We note with your observation that "*increasing the length of visits to the area would provide the basis for securing additional spend in the local economy, in accommodation, food and drink and shopping, and allow visitors to explore beyond the main attractions*"

Following on from this, we recognise the Council's view that opportunities have been identified to extend the visitor accommodation on offer including within Medway's countryside, an overlooked part of Kent.

In response to the respective questions set out in the Issues and Option Consultation document we would comment:

Question 22 - What scale and form of additional visitor accommodation is needed to support and develop a successful tourism sector in Medway?

Answer – Greater support for sites looking to promote permanent accommodation in the countryside.

Question 23 - What are the opportunities for extending tourism in Medway beyond day trips to the main attractions and events?

Answer – Supporting sites looking to promote permanent accommodation outside of the main attraction areas and in particular within the countryside.

Question 24 - What role does the river and Medway's countryside have to play in developing tourism locally?

Answer – A big role if the Council support the provision of sites looking to provide permanent accommodation.

We would also go on to comment that the Council should consider the allocation of mixed used sites in their Local Plan that may be able to provide a combination of residential, leisure and tourism facilities. This may help to give owners of potentially available rural sites confidence that the principle of any forthcoming planning applications for permanent accommodation would be supported.

Please do not hesitate to contact me if you have any queries.

With best wishes

Yours faithfully

Thomas Ogden BSc (Hons) MRICS MBIAC Director

Name: Joanna Male

Reference 149

Organisation

On Behalf Of

Type of Consultee Member of the public

JOANNA MALE BA (HONS), MA, MRTPI CHARTERED TOWN PLANNING CONSULTANT 10 Grange Road, Camberley, Surrey, GU15 2DH.

Planning Policy Regeneration, Community & Culture, Medway Council, Gun Wharf, Dock Road, Chatham, Kent, ME4 4TR

26th February 2016

Dear Sir/Madam

MEDWAY LOCAL PLAN I SSUES A ND OPTI ONS CONSUL TATION AND ADDITIONAL INFORMATION RELATING TO SLAA REPORT

I am instructed to write in response to your em ail of W ednesday 20th January 2016 which relates to both the publicat ion of the Council's updated S LAA Report and the Issues and Options Consultation for the new Local Plan.

The Council are currently inviting comment s on the Issues and Options docum ent and confirm that the se may includ e f urther in formation r elating to i ndividual potential development sites. The f ollowing comments are m ade within this con text and relate to the specifics of my clients' site under the heading 'SLAA Report', and to the general principles that should be adopted for the Local Pl an, under the heading 'Issues and Options Consultation'.

SLAA Report

My clients own the site of the Former Reservoir, Browndens Road, Upper Halling which was submitted as a suitable housing site for consideration within the SLAA (Site Ref:1046). The Council's assessment of the site's suitability for housing concludes *"The site is co nsidered unsuitable for developm ent unless identified co nstraints can be addressed"*. The identified constraints relate to the following issues:

- 1. Access to services, facilities and public transport opportunities
- 2. Site Access
- 3. Ecological Impact
- 4. Landscape
- 5. Air Quality
- 6. Agricultural Land
- 7. Amenity/overlooking

All of the other issues considered relevant to the site's suitability have been scored 'green' and so it is not considered necessary to provide any further information in relation to them at this stage. Each of the above identified issues is addressed below.

1. Access to services, facilities and public transport opportunities

Whilst my client's site is scored 'red' in relation to this issue, this fails to reflect the fact that the site does currently benefit from both the provision of local facilities and access to public transport. The Council's Issues and Options c onsultation notes that public transport serving rural areas can be liminated however indicates that this is more of an issue on the Hoo Pennisular than in the Medway Valley, where Upper Halling is situated.

Upper Halling, and specifically Browndens Roa d, is served by a regular bus service (No. 151) which operates M onday – Saturday and the adjoining settlement of Halling offers a main line station which provides a service into London St. Pancreas International in under 50 minutes.

In addition, Upper Halling bene fits from existing local f acilities such as the Jub ilee Hall, Browndens Road which provides an i mportant focus for c ommunity events, and the Cour t Farm butchery and farm shop which also o ffers community activities such as a pop-up cinema and arts and crafts exhibitions. Furthermore, Halling offers a local school and medical facilities.

It is recognised that new rural housing will ge nerally have m ore limited access to services, facilities and transport opportuni ties than housing in a tow n centre location, however this element of 'sustainability' must be balanced against the econom ic and social advantages to the rural area offered through the provision of new housing which is also encouraged by national planning policy.

As stated in m y original SLAA subm ission, the NPPG provides advice on how local authorities should sup port su stainable rural communitie s. It states *"It is im portant to recognise the particular issues facing rura l areas in terms of housing supply and affordability, and the role of housing in suppor ting the broader sustainability of villages and smaller settlements"*. It goes on *"A thriving rural community in a living, working countryside depends, in part, on retaining lo cal services and community facili ties such as schools, local shops, cultural venues, public houses and places of worship. Rural housing is essential to ensure viable use of these local facilities"*.

If Upper Halling is to sustain the existing community facilities that it has, and to continue to justify the existing bus service, it is necessary for the population of the village to be refreshed and expanded in order to ensure a balanced demographic. The provision of additional housing within the rural area allows this, thereby supporting the use of local facilities, community uses and businesses to the benefit of the rural economy

My client's site imm ediately adjo ins an exis ting settlem ent which already provides some local and comm unity facilities and which is served by p ublic tran sport. As suc h, it is significantly better placed than a number of the other sites referred to in the SLAA Report which were also given a red grading on this issue. As such, it is requested that the classification be reviewed by the Council. In addition, both national policy guidance and the Council's own Issues and Options Consultation document (para. 13.5). recognises the role of providing new housing to support a good quality of community life, and this should be taken into consideration in determining the suitability of my client's site for housing.

2. Site Access

Whilst coloured 'amber' the Council's assessment states that *"it is likely a suitable vehicular access could be created to Browndens Road which is directly adjacent to the site"*. The site is currently s erved by a 6 m wide access track from Browndens Road. This provides am ple opportunity to provide an appropriately desi gned access road, including passing bays along its length to serve a deve lopment of the scale proposed. This will be a matter for the detailed design of any schem e and given the Council's recognition that a suitable access can be provided to the site, no further evidence is required on this issue at present.

3. Ecological Assessment

The Council's assessment of suitab ility indicates that an ecological survey had yet to be undertaken and as such the presence or absence of protected species and or habitats could not be estab lished at this stage. Furthermore, that Natural England guidance indicates that development of this site poses a potential risk to a SSSI.

This correspondence is accompanied by a report prepared by Richard Tofts Ecology which addresses both of the above issues.

The report includes an extended Phase 1 survey to identif y evidence of and potentia 1 for protected species. This site su rvey was supplemented by further desk top investigations. It found no evidence of rare or protected species on the site although recognises that it could provide a suitable habitat for reptiles. Should the Council be m inded to allocate the for mer reservoir site for housing purposes, the undertaking of a further su rvey for reptiles could be made a condition of its development. Dr. Tof t's report makes clear that even if reptiles are found as a result of a follow-up survey it would be *'reasonably straightforw ard'* to implement a translocation exercise,

In respect of the potential risk to neighbouring SSSIs, Dr. Tofts notes that whilst the site does indeed lie within an *'impact risk zone'*, only certain types of development within these zones are considered to pose a risk to nearby SSSIs. These are listed on the G overnments MAGIC website and for rural residential development only schemes of 100 units or m ore are deemed likely to pose a risk.

Accordingly, the site's location within a SSSI impact risk zone does not im pose a constraint to a small-scale residential development.

In view of the findings of Dr. Tofts report, it is concluded that ecological issues do not provide a b ar to the a llocation and subsequent developm ent of the site f or r esidential purposes.

4. Landscape

The Council's assessment of suitability indicates that "whilst the site is situated outside of the built up ar ea, the lan dscape is considered less sens itive and to h ave some potential to accommodate change". As stated, the site has previously been developed and is currently occupied by a significant concrete structure (picture below).



Some, immature boundary planting is available which serves to screen the development from the adjacent agricultural land.

The site sits in an area which is not subject to any landscape designation. Due to the contours of the land, only lim ited views of the site are o ffered from the north, east or west, and fr om the south, it is seen only within the context offered by the existing village.

The landscape quality of the existing site is poor and will continue to degrade unless brought into an optim al viable use. The site's alloca tion for housing purposes offers the potential to achieve a sensitive form of development, consistent with the adjacent settlement, which will facilitate a strengthening of the planting on the site's boundaries to the benefit of the visual amenities of the immediate area and the limited views offered of the site within the wider landscape.

5. Air Quality

The Council recognis es that m itigation of any air pollu tion constraint is likely to be deliverable and accordingly no further inform ation as to this point is required at the present time.

6. Agricultural Land

The Council's assessment indicates that the site is situated on agricultural land, however it is thought to be of Grade 3 or less. This fails to recognise the previously developed nature of the site and its use as a res ervoir which, according to Case Law, is a sui generis use. As such, there can be no objection to the use of this land for non-agricultural purposes and no further assessment of its agricultural quality should be required.

7. Amenity/Overlooking

The Council's assessment states *"The site has the potential to impact upon amenity of nearby residential properties"* however recognises that this is likely to be resolvable through sensitive design and an approperiate judgement on the site's capacity. Any development's impact upon the character and amenities of the area is one for the development management

process once the Council has al located the site for housing purposes and m y cl ient is confident of delivering a residential scheme which will not have any adverse impact upon the amenities of the adjoining residential properties.

Issues and Options Consultation

One of the key challenges set out in the Issues and Options consultation document is the need for the emerging Local Plan to balance the requirements for future growth within the District with safeguarding the area's valued environment and landscape.

It is a req uirement of national p olicy that Local Plan ning Authorities m eets the full, objectively assessed housing needs of the housing market area as far as is consistent with the policies set out in the F ramework. In the c ase of Medway, these are ca lculated as being a requirement for 29,463 housing units over the Plan period.

Policies within the Fram ework allow for a number of options for the supply of housing including through larger scale developments such as new settlements or urban extensions. Whilst the scale of such schemes offers advantages in terms of infrastructure provision and economies of scale, they tend to have a more significant impact upon the environment and can erode valuable green spaces and buffers between settlements.

The NPPF m akes clear that it is a core prin ciple of planning policy that planning should encourage the effective use of land by reusing land that has pr eviously been developed and which is not of high environmental value.

In December 2015, the Department for Communities and Local Government published a consultation paper on proposed changes to national planning policy. This includes supporting housing development on brownfield land and small sites and sets out the Government's intention that 90% of brownfield land suitable for housing will have planning permission by 2020.

It makes clear that in order that all possible opportunities for brownfield developm ent are pursued, they intend to introduce effectivel y a 'presumption' in favour of brownfield development and states *"Building new homes on small site s, whether in rural or urban locations, can deliver a range of economic and social benefits, including:*

- Providing opportunities for small and medi um sized companies to enter the development market, helping to promote competition and quality in house building market
- Increasing build out rates in local areas
- Creating local jobs and sustaining local growth, particularly in rural areas; and
- Making effective use of developable land".

It goes on "We also intend to make clear that t proposals for develop ment on small sites immediately adjacent to settlement boundaries should be carefully considered and supported if they are sustainable".

Whilst, it is accepted that the above does not comprise current adopted national planning policy, it clearly demonstrates the *'direction of trave l'* of Government thinking and emphasises the important role for brownfield sites in meeting identified development needs.

It is considered that this priority should be reflected within the emerging Medway Local Plan and that appropriate w eight should be afford ed brownfield sites on the edge of existing settlement boundaries.

The Issues and Options consultation docum ent offers a number of suggested developm ent strategies in tended to m eet the f uture n eeds of the au thority. Thes e include a continued commitment to the Lodge Hill n ew settlem ent (sub ject to the appeal outcom e), urban extensions, incremental surburban growth or significant growth of existing settlements.

In order to m eet the Council's objective of meeting the f uture development needs of the District, whilst protecting the existing environment, in a manner that will be found 'sound' by the Inspector i.e. compliant with national policy, it is considered essential that the review of the SLAA and subsequent identif ication of suitable housing si tes priorities the use of previously developed land adjacent to settlement boundaries.

Such sites offer opportunities to provide new development in locations already served by existing facilities in a manner which is unlikely to have a materially greater im pact upon the local environm ent given the brownfield nature of the site. Indeed, such sites often offer opportunities for visual or environmental enhancement.

The use of s uch sites, also offers be nefits in terms of the land of ten being readily a vailable, without significant land assembly being required, and therefore can be developed and make a contribution to housing supply within the short-term.

It is requested that the above comments be taken into account in the Council's planned review of the SLAA sites and that the additional information provided be used to review the suitability of my clients' site for housing purposes. In addition, it is requested that the general comments relating to the priority that should be afforded brownfield sites, be taken into account in the consideration of the Issues and Options Consultation responses.

Using the Council's own assessment criteria, it has been clearly dem onstrated that none of the identified issues of access to services, site access, ecological and landscape im pact, air quality, agricultural land and amenity issues prevent the site for being considered <u>suitable</u> for housing.

It is considered that the use of a b rownfield site adjacent to a sett lement boundary comprises a sustainable for m of development in direct li ne with the Government's current priorities as expressed in their December 2015 Consultation Paper. Accordingly, it is requested that the site of the Form er Reservoir at Upper Halli ng be allocated for housing purposes within the emerging Local Plan.

Should you require any further information, please do not hesitate to contact me.

Yours faithfully



Jo Male

cc. Client