[redacted]

From: [redacted]
Sent: 18 July 2024 11:02
To: policy, planning
Subject: Medway Local Plan

GOOD MORNING I WOULD LIKE TO SEE RAINHAM GET A MASSIVE REGENERATION AND FACELIFT PLEASE. THERE ARE ABOUT 6 SHOPS THAT HAVE CLOSED DOWN IN THE LAST 6 MONTHS OR SO AND WE NEED RENTS FROZEN OR LOWERED ON ALL SHOPS AND PRIVATE LANDLORDS TO GIVE PEOPLE THAT PEACE OF MIND. WE COULD ALSO DO WITH A POLICE STATION IN RAINHAM AS WELL. CRIME IS ON THE INCREASE HERE. KIND REGARDS CARL DUNKS

Sent from Mail for Windows

[redacted]

From: Medway Council [redacted]
Sent: 02 September 2024 14:56
To: policy, planning
Subject: Contact Form from OpusConsult

You have recieved a message from the OpusConsult contact form

From: CARL DUNKS

Email: [redacted]

Message:
RAINHAM RAPIDLY NEEDS MORE INVESTMENT. GET ON WITH IT MEDWAY COUNCIL STOP DRAGGING YOUR FEET

[redacted]

From: [redacted]
Sent: 07 August 2024 10:40
To: policy, planning
Subject: Medway Local Plan

Follow Up Flag: Follow up
Flag Status: Completed

IF YOU ARE GOING TO MAKE THE BEST FOR THE MEDWAY TOWNS. YOU MUST PUT THE INFRASTRUCTURE PLANNING IN PLACE FIRST OF ALL. I LIVE IN RAINHAM. IN MY VIEW IT THE MOST UNDERINVESTED PART OF THE MEDWAY TOWNS. RAINHAM BADLY NEEDS INVESTEMENT. I HAVE ENQUIRED ABOUT PUTTIG SOME SORT OF CROSSING ON MAIDSTONE ROAD RAINHAM NEXT TO THE MANOR FARM. YOU ALSO NEED SPEED CAMERAS ALONG LONDON ROAD ALL ALONG THE DOUBLE RED PARKING LINES. ALSO YOU NEED TRAFFIC CALMING SOLUTIONS ALONG STATION ROAD IN RAINHAM AS WELL AS AUOTMATIC NUMBER PLATE RECOGNITION IN ALL OF THE CAR PARKS IN ALL OF THE MEDWAY TOWNS AND ALONG THE MAIN ROADS IN THE MEDWAY TOWNS. KIND REGARDS CARL DUNKS
Sent from Mail for Windows

[redacted]

From: [redacted]
Sent: 28 August 2024 17:00
To: policy, planning
Subject: Medway Local Plan

Follow Up Flag: Follow up
Flag Status: Completed

GOOD AFTERNOON. THERE ARE TWO FORMER CARE HOMES IN RAINHAM THAT WOULD MAKE GOOD COUNCIL PROPERTIES. THEY ARE DURLAND HOUSE IN RAINHAM HIGH STREET AND CHERRYACRES IN BERENGRAVE LANE. THEY BOTH HAVE NO RESIDENTS IN THEM WHATOSEVER. MY ADRESS IS [redacted] ME8 [redacted].
KIND REGARDS CARL DUNKS

Sent from Mail for Windows

From: [redacted]
Sent: Sunday, August 25, 2024 5:35 PM
To: [redacted]
Subject: Gibraltar Farm Development

Good afternoon Councillors

The Gibraltar Farm development seems to have raised its head once again in the media which has got me thinking.

There are arguments for and against such developments all over the South East. Our own area of Rainham North has seen its share of diminishing greenspace with increased demand on the existing resources. Developers are required to put funds in to already stretched local council budgets to cover some of this increased demand but I expect it is never enough. They are also required to reduce the environmental impact of the development by providing open spaces and other environmental safeguards such as in the case of the Gibraltar Farm development four hectares of new woodland. The developments on the Lower Rainham Road and Otterham Quay Lane have had to put in ponds for the retention of surface water on the insistence of Southern water. All these things enhance the landscape and help the environment but they are never seen by the community as a whole.

The developments are compartmentalised, they will become enclaves with only one way in and out. It doesn't help integrate them in to the community. I very much doubt if there are any plans to link the Hamlet Park development in to Homefield Drive, Ten Acre Way or Kingfisher Green in to Macklands Way by footpath or cycleway although the access points have been there since they were constructed.

There could have also been an opportunity to upgrade the public right of way from the lower Rainham Road to the back of the Iron Mountain Depot. All this would allow the existing community access to the riverside area by foot or cycle and the new community access to Rainham without having to negotiate busy roads. Currently to walk between either of these new developments and Rainham you have to negotiate poorly paved and ill-lit roads. You don't need a degree in urban planning to see what is going to happen once the mornings get darker and a trip to the station is required.

The same goes for the Gibraltar Farm and all future developments. Don't let them become enclaves, integrate them in to the existing community. Have new Public Rights of Way and Cycle routes put through them to make it possible for alternative means of transport to be used. The opportunity may have been missed with Gibraltar Farm as there will be several Public Rights of Way lost in the development. It would have been good to see a link between Lords Wood and Capstone Farm perhaps going on to Darland and beyond in the future.

Regards

Roger Langley

[redacted]

ME8[redacted]

[redacted]

1) Introduction

This document is a submission as the result of the Regulation 18 public display of the proposed Medway Plan as published in August 2024, in particular the display at St Nicholas in Strood.

This submission concentrates on the energy aspects of the proposed Plan – Chapter 13 and calls for proper integration of Energy in the Plan in the same way as Population, Housing and the Environment. In order to carry out the proposed Plan in whatever form is finally agreed, supply of energy is absolutely essential for the execution of that Plan. All aspects of energy supply and use should therefore form a fundamental part of the Plan itself.

There is a considerable history in the Medway area, as in many other areas in the UK, of underestimating the effect of energy demand, both on the demand level itself and the infrastructure installed to meet that demand level. This is not helped by the parlous underinvestment in the existing housing infrastructure, leading to great waste of that energy.

Recent examples include the Riverside development in Chatham, Rochester and Strood where several specification decisions have led to future needless expense to correct them: –

a) Installation of radiator systems requiring circulation water temperatures of 70° to meet winter heating requirements even though the buildings are modern and adequately insulated. Had there been a planning requirement to design for circulation temperatures of 55° max, this would have cut the heating and hot water energy demand by an estimated 30 – 40%.

b) Almost no use to date of existing ambient heat resources such as river water from the Medway or air coupled to heat pumps.

c) Inadequate electrical distribution infrastructure to meet future loads from installed heat networks and heat pumps. This includes both cable sizes and spare ducting space to run larger cables.

d) Modernisation and upgrade of the existing housing stock insulation levels.

e) The inevitable clash between the need to preserve the existing historic ambience, and the installation both of external insulation envelopes and solar electric/hot water panels on older structures. The cost of foregone modernisation decisions should be clearly available and form part of the decision matrix for any relevant planning application.

M W Slavin [redacted] [redacted]
[redacted]
[redacted] ME1 [redacted]

These examples show that it is shortsighted not to fully integrate energy planning into the Medway Plan.

2) Development of Current Energy Use Model

The first stage should be the development and ready availability of year round daily energy demand data and consequent CO_2 emissions for all areas of Medway with proper correlation with Heating Degree Days (HDD). This local data should be readily available to anyone making a planning application so that, if required, the effect of that planning application on the future energy demand and CO_2 emissions for that area/street can be checked.

A good instance would be an application to install a heat network in a given area. Does the planned installation have a major effect on the heat demand for that area? Is the energy supply sufficiently robust to sustain the maximum demand? If not, what is the extra capital cost of supplying and installing higher capacity facilities?

3) Integration of Energy Model to Main Plan

We thus need an Energy Supply and Usage Strategy to complement the other main strategies of the Medway Plan. This should be integrated with the Climate Strategy and form part of the Main Plan.

4) Efficient Use of Capital

The Medway plan already includes a Capital Strategy plan; it must be recognised, however, that modernisation of the basic distribution network and housing infrastructure will need considerable capital spend over the next quarter-century. For instance there is already significant evidence that the local National Grid network is inadequate and will need modernisation with additional generation sources added, if only to keep up with the requirements of the increasing population. The fund providers of this new capital, whether private or public, will of course require to have their loans serviced and this should be reflected in the Capital Strategy plan.

All capital projects should therefore be represented in a future funds model coupled to the Energy Plan – as modifications are made to the Energy Plan, so the financial requirements are reflected in the Funds Model.

M W Slavin [redacted] [redacted]
[redacted]
[redacted] ME1 [redacted]

One can foresee that, in future, it may well be in the Council's interest to be an investor in reinforcing the local Grid in partnership with National Grid to take advantage of Medway dedicated offshore generation facilities in the Thames estuary, or extensions of the existing wind farms offshore from the Thames estuary. These could, for instance, use existing grid switching facilities in the Isle of Grain upgraded with recently available Advance Power Correction Facilities (APCF) to sustain grid stability, at the same time, reduce the generation from local hydrocarbon-based facilities.

5) Technology Change & Human Resources

The current rate of change in the available technology is notably high and Council planning staff should therefore have access to the best technical advice, together with an external review panel to ensure that the changing commercial and technology factors are progressively incorporated in revisions of the Medway Plan – unless of course that is one of the intended objectives of a Regulation 18 consultation.

M W Slavin [redacted] [redacted]
[redacted]
[redacted] ME1 [redacted]

Introduction

This document is a submission as the result of the Regulation 18 public display of the proposed Medway Plan as published in August 2024. It is based on a recent report issued by the Capital Markets Information Task Force (CMIT) which deals with the availability of capital for investment in the UK market.

Local Investment

One of the major elements which stands out from the Medway Plan is the need for investment in the infrastructure of the Medway area to modernise and make available up to date assets for use by the people of Medway. A good example is the need to cut and ultimately replace carbon-based heating in the Medway infrastructure. This will need a lot of investment in the energy infrastructure, begging the question as to how that capital can be raised, serviced, and ultimately paid out.

A rough approximation as to how much can be derived from a national estimate from the CMIT report that £1 trillion will be required over the next 10 years for the UK as a whole. Given that the Medway population is about 1% of the UK total population, a first approximation is thus that Medway's investment requirement over the same period will be about £10 billion.

Investment Entities

It is accepted that £10 billion is a very rough estimate – it is not entirely clear from the CMIT report how the national figure is obtained – but it is sufficient to give an idea of the scale of possible local investment. Some of this will come from private sources and their investments in local enterprises.

It is recognised, however, that there is an enormous task ahead to modernise the existing infrastructure for the next 100 years, and the Council may not necessarily be the best form of organisation to undertake the raising and servicing of such a capital sum.

One immediate recommendation is therefore to commission a study and report from a local entity such as the Kent Business School. The major elements of such a study should include: –

– **Scoping the requirement for the new organisation**

– **Review of existing entity formats and their performance, both in the UK and abroad.**

As an example there must already be a considerable history of experience with New Town Corporations and their ability to attract and service development capital.

– **Financial structure of the new organisation**

This section should include a funds flow projection for the recommended structure, as well as a discussion on whether the Council itself should hold equity in the new organisation. Is there scope, for instance, for the Council to invest in new grid connections to make maximum use of existing and future offshore wind power?

- **Implementation plan**

It is assumed that the general wish is to preserve the existing building structure as far as possible. What then are the optimum – and acceptable – strategies for reducing energy demand both for space heating and substantially improving the carbon signature of the existing building structures?

Economic growth (GDP)

UK ‘needs £1tn investment over 10 years to hit economic targets’

To achieve 3% annual growth, £100bn a year must be found for key sectors like housing and energy, City taskforce finds

The report said £20bn-£30bn was needed to invest in housing stock, and £50bn in the energy sector. Photograph: Paul White/UK Industries/Alamy

Kalyeena Makortoff

Fri 6 Sep 2024 06.00 BST

The UK needs £1tn of fresh investment over the next decade if the government is to hit its economic growth targets, a City taskforce has said.

The Capital Markets of Tomorrow report, led by the City veteran and former boss of Legal & General Sir Nigel Wilson, said that in order to achieve at least 3% annual growth, the UK would have to attract around £100bn of investment per year, divided between key sectors.

That includes £20bn-£30bn towards the UK's housing stock, £50bn for the energy sector, and £8bn for water projects. It also calls for £20bn-£30bn worth of venture capital for growing companies that are beyond the startup stage and need more sustainable funding to expand.

The report said the challenge was to make the UK "a competitive market in which to invest". While many initiatives to boost investment in British infrastructure and companies were already under way, it stressed that the government and regulators needed to focus on creative opportunities and providing incentives for investors. "The global pitch needs to be levelled," it added.

"There has never been such a large amount of money globally available and seeking investment opportunities," Wilson said.

"Capital pools include domestic and international capital sources, such as sovereign wealth funds, retail investment, private equity 'dry powder', and the UK is fortunate in that we have £6tn of long-term capital within our pension and insurance industries. In other words, the supply of capital for growth is available."

That includes creating new investment funds through an existing long-term investment for tech and life sciences (Lifts) initiative to attract private cash, and ensuring that the £60bn-£70bn per year of tax breaks for annual pension funds is applied in a way that encourages investment in UK companies, the report said. It also called for the reintroduction of tax credits on dividends received from UK companies, which was scrapped in 1997.

Wilson's report stressed that the UK needed to kickstart a culture in which everyday consumers were far more keen to take risks and invest their money in British companies than to leave it languishing in cash accounts. That could be aided by axing stamp duty on share purchases, and allowing companies to nudge people with large cash savings towards investments.

It called for a "streamlined" UK ISA that would allow people to invest a certain amount of money in British stocks, tax-free. While plans for a British ISA were floated under the last Tory government, reports this week suggest that the chancellor, Rachel Reeves, is poised to mothball the project before the 30 October budget.

The report was produced for the UK Capital Markets Industry Taskforce (CMIT), an influential body headed by the London Stock Exchange chief executive, Dame Julia Hoggett, alongside senior City figures including the bosses of the asset manager Schroders, the pharmaceuticals company GSK, the pension savings provider Phoenix Group and the venture capital firm Lakestar.

Hoggett said: "We have a great base in the UK on which to build, including world-leading universities and a highly regarded financial services sector. But the opportunities need to be seized."

Since its founding in 2022, CMIT has been pushing for changes to regulations that it believes have stifled investment, and have ultimately left the UK lagging behind the US in terms of developing capital markets - where money is raised for projects and companies - and economic growth.

The group has also been sounding the alarm over the growing number of companies that have been leaving or snubbing the London stock exchange for overseas rivals, including the US.

A Treasury spokesperson said: "The chancellor has been clear that difficult decisions lie ahead on spending, welfare and tax to fix the foundations of our economy and address the £22bn hole in the public finances inherited by the government. Decisions on how to do that will be taken at the budget in the round.

“We have already taken action to reinvigorate our capital markets and boost growth, including by announcing a pensions investment review to drive more investment in homegrown business.”

UK FINANCE

EY
Building a better working world

UK CAPITAL MARKETS

Building on strong foundations

May 2023

ABOUT UK FINANCE

UK Finance is the collective voice for the banking and finance industry. Representing more than 300 firms across the industry, it seeks to enhance competitiveness, support customers and facilitate innovation. Our primary role is to help our members ensure that the UK retains its position as a global leader in financial services. To do this, we facilitate industry-wide collaboration, provide data and evidence-backed representation with policy makers and regulators, and promote the actions necessary to protect the financial system. UK Finance's operational activity enhances members' own services in situations where collective industry action adds value. Our members include both large and small firms, national and regional, domestic and international, corporate and mutual, retail and wholesale, physical and virtual, banks and non-banks. Further information is available at www.ukfinance.org.uk.

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UK FINANCE FOREWORD

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Conor Lawlor
Managing Director,
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Capital markets drive modern economies. They enable and support lending and investing – from large multinational companies through to mortgages, savings products, and our pensions. They are vitally important to the UK's economic future, and we need to ensure our markets continue to work for an evolving population and economy.

Cycles of innovation and reinvention are a fact of life. Our response to these cycles – be it a result of technological change, politics, or the changing priorities of companies and investors – is what determines success. Adaptation and innovation have enabled the UK to be one of the world's pre-eminent financial centres. That position is under threat. We have more challenges to that position than at any time in the last 35 years, and so we must continue to evolve and innovate.

It is for this reason that we have partnered with EY to examine the evidence and cut through the noise. Our report not only looks at the current state of play, but also sets out findings and proposes a series of recommendations for consideration based upon data and market sentiment.

We would like to thank all the stakeholders, market participants, companies, and our members that gave us their time. Everyone we spoke to had a fascinating and captivating story to tell. We therefore had a great responsibility to do their stories justice. We would also like to thank EY for their support on this journey.

This report is our contribution to a generationally important debate. By championing what we do well, being honest about what we can do better, and being excited for the opportunities ahead, together we can build on strong foundations and ensure the UK's capital markets can deliver for everyone.

EY FOREWORD

Axe Ali
Partner, Head of Private Equity & Venture Capital, Financial Services, EMEIA

Pierre Pourquery
Partner,
Head of Capital Markets, UK

Matt Preston
Partner,
Financial Services Strategy & Transactions

UK capital markets have long been considered a 'jewel in the crown' of the broader financial services sector, with a global reputation and standing, large pools of capital, and strong governance and transparency, bringing numerous benefits to the wider economy. Today their traditional strengths and status are being challenged by an ever-changing macroeconomic and geopolitical environment, combined with the evolving needs of companies and investors.

EY is proud to have supported UK Finance in providing a detailed understanding of the current state of UK capital markets, particularly focused on equity capital markets and growth. The quantitative analysis, including the size of the market, survival rates of companies, availability of capital, combined with feedback from over 100 market participants and industry experts through interviews and surveys provides a real depth of insight on the key strengths and areas for attention for UK capital markets.

Many of the concerns raised by the market participants are not new; however, their continued persistence in 2023 highlights that whilst regulatory reform initiatives and other actions have been undertaken or are in progress, there is potentially further action required to address the structural considerations which may still exist.

Despite the wide range of market participants engaged as part of this report, including pre-listed companies, public companies, investors, and advisers, it is important to note that not all market participants or stakeholders have been involved. Therefore, it is critical to ensure that the recommendations derived from this data by UK Finance are further tested to ensure alignment with the objectives of real economy businesses, the financial services industry, policymakers, and the wider public.

BACKGROUND AND OBJECTIVE

Dynamic and well-functioning capital markets play a critical role in supporting the UK real economy. By helping to finance the growth and scaling of companies, facilitating investment, providing liquidity and helping to secure long-term personal futures, for example, through pensions – the capital markets are central to securing economic futures across all the nations and regions of the UK.

The UK capital markets remain one of the strongest in the world, providing a wide range of benefits

£14.7bn

of equity raised in 2021 for UK and international companies.

8.3%

contribution from the financial services sector to UK GDP.

A talent pool of

1.2mn

employed in financial services.

£11.6tn

of assets under management (AuM) in 2021.

Figure 1: The UK capital markets remain one of the strongest in the world
2021

Source:
Ecosystem – UK Parliament and Zippia (for financial services); ONS, US Bureau of Labor Statistics, Eurostat (for Workforce jobs); Worldbank (for Political stability index)
Companies – Stock Exchanges, WFE, Refinitiv
Investor base – Investment Association, BCG

Note:
i. Talent pool by number of jobs in the financial and insurance sectors.
ii. BCG; Global Assets Management 2021; Estimated value by applying 90% to North America total AuM.
iii. Percentile Rank (0-100) indicates the rank of the country among all countries in the world.
iv. Stock exchange market capitalisation: Calculated as the aggregated value of market capitalisation of all listed companies from the issuer list of the given exchange (includes companies who are not exclusively listed on the given exchange).

A new macroeconomic environment, ongoing sectoral shifts and technological advancements have changed how companies and investors behave – with global capital markets at an inflection point.

This report touches upon many facets of the wider capital markets and private market ecosystem; however, a large proportion of what is covered is written in the context of the UK's equity markets. Whilst the UK's equity markets have long been strong, there is an opportunity for the UK to reflect, rethink and reinforce.

- **Reflect:** Consider the UK's place within evolving global equity capital markets.
- **Rethink:** Identify how UK equity capital markets can adapt to best serve the needs of current users and those of tomorrow.
- **Reinforce:** Pursue measures to strengthen the UK's position as a market of choice for companies for decades to come.

Over the past few years, there has been an industry-wide focus on enhancements to the regulation of the broader UK capital markets, including through the Wholesale Market Review, UK Listing Review, Independent Strategic Review of UK FinTech, the Secondary Capital Raising Review, the Edinburgh Reforms and, most recently, the second phase of the FCA's Primary Markets Effectiveness Review.[1,2,3,4,5,6] The efforts of the UK regulatory community have resulted in changes being made already, with further regulatory initiatives in progress. The Capital Markets Industry Taskforce (CMIT) has been established to maximise the impact of these initiatives.[7] This report is a complementary next step in this journey, set against a backdrop of competing perceptions on the strength of the UK's equity capital markets – perceptions which are increasingly being played out in the public discourse.

The following chapters explore the broad spectrum of regulatory and non-regulatory factors that influence the decisions made by companies and investors using the UK's public and private markets. This research is based on detailed quantitative analysis, supplemented with extensive qualitative insights gathered through more than 100 interviews and survey inputs from across the market ecosystem, including:

- Pre-IPO companies
- Publicly traded companies
- Advisers, including investment banks, law firms, and accountancy firms
- Investment managers
- Infrastructure providers (e.g., trading venues, technology solution providers)
- Trade bodies and industry organisations

In bringing together data and market sentiment, the objective is to present a clear and frank assessment of UK equity capital markets today and explore a vision for the future.

The data typically covers 1 January 2017 to 31 December 2021. This acknowledges that 2022 was an extraordinary year due to the macroeconomic and geopolitical conditions. 2022 data is used in appropriate circumstances. The jurisdictions covered in the report include the UK, France, Netherlands, US, Hong Kong and Singapore, given the international focus and nature of these markets.[8]

1. https://www.gov.uk/government/consultations/uk-wholesale-markets-review-a-consultation
2. https://www.gov.uk/government/publications/uk-listings-review
3. https://www.gov.uk/government/publications/the-kalifa-review-of-uk-fintech
4. https://www.gov.uk/government/publications/uk-secondary-capital-raising-review
5. https://www.gov.uk/government/collections/financial-services-the-edinburgh-reforms
6. https://www.fca.org.uk/publications/consultation-papers/cp23-10-primary-markets-effectiveness-review
7. https://capitalmarketsindustrytaskforce.com/
8. Frankfurt, Shenzhen and Shanghai Stock Exchanges, for example, are not covered due to domestic focus.

EXECUTIVE SUMMARY

The UK has been a leading global centre for capital markets for decades. This success is facilitated by the key raw ingredients of an open economy underpinned by strong institutions and a leading regulatory framework that helps reinforce the positive global reputation of the UK as an open, international market. This reputation enables the UK to access a large pool of global talent, supporting sectors and ancillary services.

The growth and evolution of the UK's market have also led to the development of a broader supporting ecosystem such as banking, payments, risk management, derivatives, capital raising, advisory services, insurance and a host of tier 1 professional services that further add to the strength and cluster effect of the UK's financial services hub. This is why many international companies have established, invested and grown in the UK.

The world and the financial services landscape are changing rapidly, driven by innovation and material, technological advancements. Many long-established companies remain and thrive and have been joined by a new cohort looking to establish themselves, grow at scale and shape the products and services of an evolving and equally innovative population – banking and finance and other traditional sectors such as mining and engineering are now joined by FinTech, CleanTech, MedTech and more.

As such, the capital markets built over the decades of the 70s, 80s, 90s and beyond need to adapt and evolve to achieve two critical goals. One – continue adequately serving the long-standing established companies that make up the critical mass of the economy and stock exchanges, and two – harness, nurture and grow the emerging new cohort of companies beginning their journeys.

As this report sets out, the route to achieving these goals is not only through amendments to laws and regulations. It requires a national conversation about attitudes to saving and investing, how to invest in the future, manage pensions and whether we invest enough in financial education in the early years to drive a culture of financial empowerment in later years. We need to create a market system that works not only for sophisticated investors and corporates, but for everyone. It will also require a reassessment of the fundamentals on which our capital markets ecosystem is built, both to understand the role these have played in getting to where we are today and, more importantly, how they can be optimised to ensure they continue to be fit for purpose for tomorrow.

Addressing these challenges is a worthy pursuit. Just as forests and trees support a much wider ecosystem of other life, thriving capital markets can support companies to grow and investors to optimise their returns leading to effective and sustainable economies. In this context, this report refers to and touches upon many facets of the UK's capital markets ecosystem but largely speaks to the equity markets, given that they are often seen as a proxy for the success of the broader capital market.

Therefore, a strong and dynamic market becomes a strategic and economic priority for the UK. As noted above, this means creating the right conditions to encourage new companies to raise capital and grow in the UK and nurturing the evolving and more mature companies that provide the critical mass to our economy. Those conditions should result in an environment that generates and enables a sustained flow of UK growth capital throughout the early stages of a company's lifecycle, accompanied by assistance and guidance to navigate the transition from seed funding through private capital-funded growth to SME-focussed and then more senior markets. Along the way, it will be important to remove frictions and barriers to growth, so we not only generate successful companies but enable them to stay in the UK.

The prevailing public discourse has started to paint a picture of the UK losing some of its attractiveness, with reports of poor-performing IPOs and companies choosing to list elsewhere. This narrative focuses on the UK lagging behind the US in technology and high-growth company valuations.

This report explores and unpicks these perceptions through quantitative market data and feedback from market participants. It then identifies areas for improvement to enhance the competitiveness of the UK's capital markets. The findings should be considered complementary to, and read alongside, the existing reviews and reports that look at boosting UK competitiveness in capital markets.

By way of illustrative example, included below are some key findings, our recommendations and an outline of what a successful capital market may look like by 2030.

While the data continues to show the UK's strong position, it also indicates some trends in continued de-equitisation of the UK markets, preference of private capital over public capital and the attraction of UK companies to other international markets.

Understanding the key challenges

To examine the current state of the equity market, data was assessed over a historical period and relative to other exchanges. Interviews and surveys with market participants across companies, advisers, investment managers and infrastructure providers were undertaken.

The analysis of the data and feedback identified four key challenges that interviewees felt needed to be addressed to maintain and enhance the global competitiveness of UK capital markets.

1. **SMEs need more help to access UK capital markets:** Companies, especially in non-traditional or tech sectors, find attracting the appropriate growth capital at various growth milestones challenging. The listing process and the journey to becoming a publicly traded company were also seen as overly complex and costly.
2. **UK capital does not always reach UK companies:** It was felt by a number of the market participants interviewed that UK investors (depending on their characteristics) prioritise: (a) capital returns over the patience needed for longer-term returns in growth companies and (b) saving in cash or other liquid products rather than investing for the future. Some respondents consider that this was due to historical changes to insurance rules and pension reforms. UK retail investment in equities was also seen as an area that could be improved when comparing rates of retail participation against the US and the EU.
3. **Too much friction is stifling capital flows:** There is a demand to simplify and streamline operational processes, such as introducing technology to improve efficiency, addressing the burden of duplicative continuous obligations, and considering the benefits of tokenisation. A better transition from AIM to the Main Market was also identified as an area for improvement.

4. **The UK's profile overseas is suffering:** Respondents and interviewees considered the UK has an opportunity to redefine how it showcases itself to global market participants. The public discourse was perceived to have had a disproportionate focus on corporate failure rather than championing success, which was in sharp contrast to the perception of the US as a pro-business environment. An often-cited example was the difficulty to attract and retain global talent.

To supplement these insights, companies were asked to rank the key features they look for when choosing which exchange to trade on.

Top five influencing criteria when considering an exchange

1. **Access to a strong investor base:** Access to sophisticated investors with a sector and business model understanding.
2. **Valuation and research coverage:** Research analysts with appropriate depth of knowledge to be able to provide insights for investors.
3. **Liquidity:** Sufficient market volume in the aftermarket, index eligibility and volume of trading in indices.
4. **Comparable companies:** Presence of comparable companies on the relevant market.
5. **Ease and cost of being publicly traded:** Cost and complexity of the process, driven by regulatory, accounting and disclosure requirements, and the availability of support during the process.

Addressing the key challenges

To address the issues identified, we have proposed a series of actions under four separate themes:

1. Address the structural challenges hindering UK growth companies
2. Reboot the nation's culture towards financial empowerment and entrepreneurship
3. Continue to improve 'the plumbing'
4. Reinforce the UK as a destination of choice

Coalescing around change

There was an overriding sense amongst market participants that there can be no room for complacency. Many of the areas for attention and remedies identified have been part of the discourse for some time. That in itself is significant, but now it is essential to build on the progress in areas like regulatory reform and address remaining barriers to growth and the development of the UK markets.

The challenges identified in this report require the ecosystem to come together. It is no small task, but the potential reward is material.

CHAPTER 1

The UK capital markets today

1.1. OVERVIEW

UK capital markets are underpinned by strong fundamentals

The infrastructure at the heart of a thriving capital market consists of companies, investors, and an enabling ecosystem, all linked together to establish a 'virtuous circle'.

The UK is a leading global centre for capital markets with a deep and broad offering, supported by a strong talent pool and a network of linked stakeholders, including world-class legal and professional services expertise. This is underpinned by a strong and evolving regulatory framework central to the UK's positive global reputation as a place to do business.

1.2. A STRONG MARKET

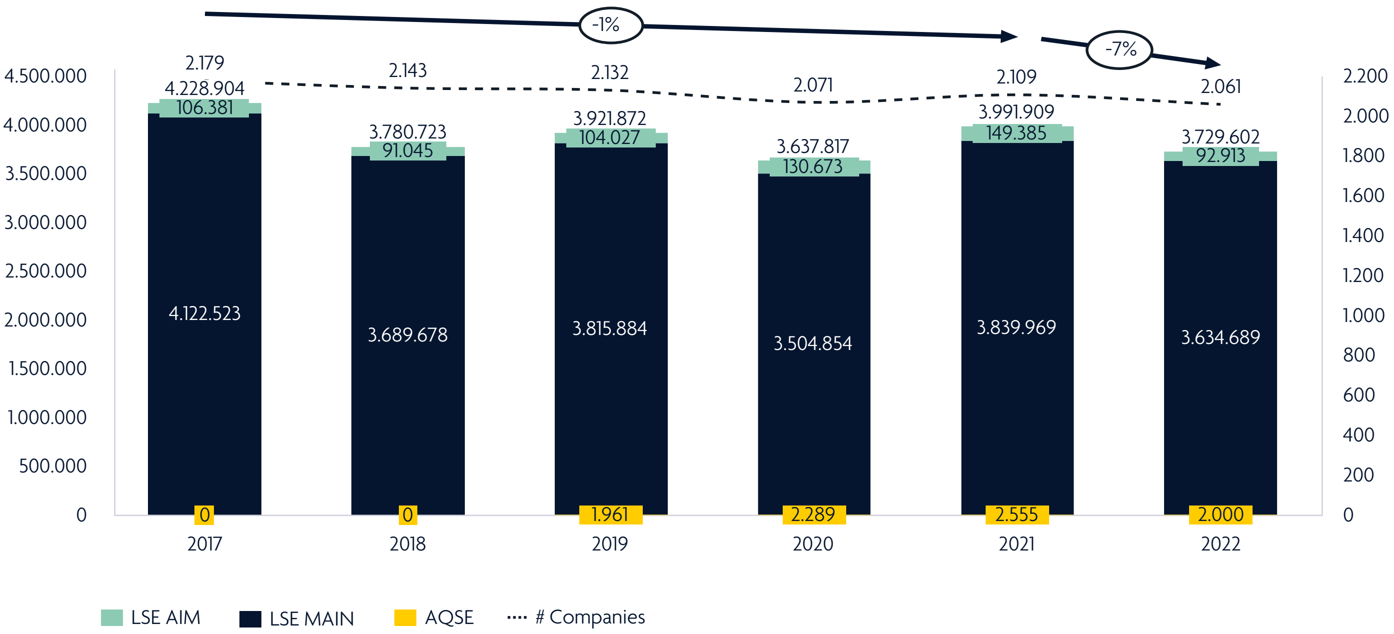
The UK market has several advantages, including:

- The breadth and depth of the wider public market, including the equity and debt markets.
- A well-respected legal and regulatory environment.
- A strong blend of competencies, skills and talents. The UK has a pool of 1.2 million finance and insurance employees who support companies through their lifecycle, and access to private and public financing for growth.
- A strong secondary market infrastructure with diverse trading mechanisms that help to meet the investment needs of different investors.
- Robust and timely information flows to support investment and insights for investors.
- A significant cohort of investment research analysts.
- A listing process with costs comparable to other major markets.
- An established global reputation in services with a long history of contractual certainty and trust in the UK's public institutions.

Focusing on the equity capital markets, a key component of this report, the UK has an equity market capitalisation of £4tn and hosts one of the world's oldest stock exchanges. Over 2,000 companies have been admitted to trading on the UK's primary markets with a new equity issuance of £14.7bn from 126 IPOs in 2021.[9,10]

Figure 2: UK equity market capitalisation by stock exchange

£mn, 2017–22

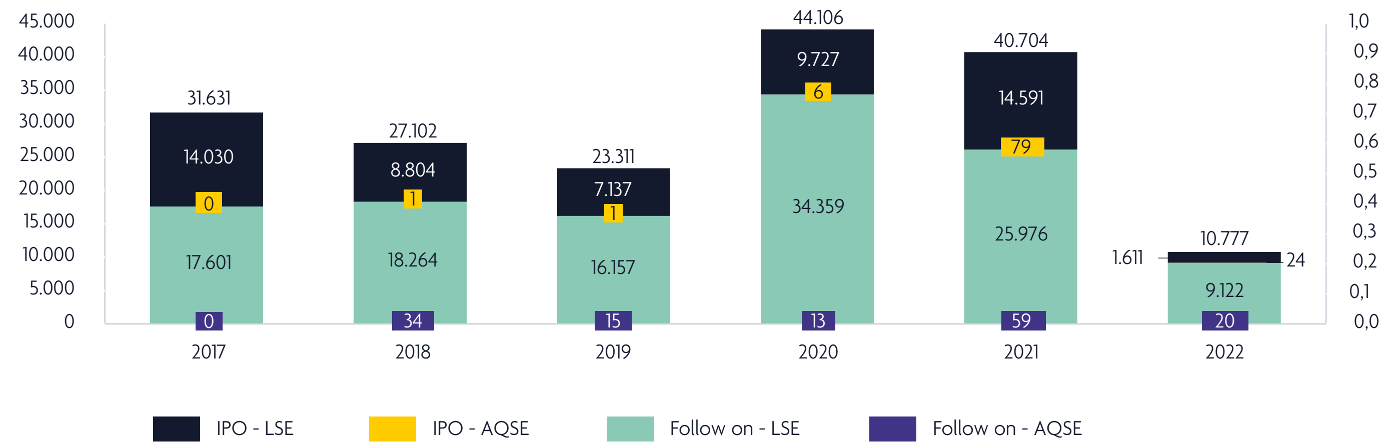


Source: LSE, Aquis

The global pandemic and recent geopolitical uncertainty highlighted the strength and resilience of UK equity markets, with companies continuing to be able to raise capital. Between March 2020 and November 2021, UK businesses raised around £77bn of net additional financing through UK-based banks and financial markets. This allowed many to leverage the UK's global markets to weather the impact of challenging economic conditions.

Figure 3: UK total capital raised

£mn, 2017–22



Source: LSEG

9. Including the London Stock Exchange (2,017 listed companies, £4.0tn market capitalisation, and £14.6bn IPO capital raised by 126 companies) and Aquis Exchange (92 listed companies, £0.003tn market capitalisation, and £0.079bn IPO capital raised by 14 companies).
10. Unless otherwise specified, LSE refers to the Main and AIM markets, and UK refers to LSE and Aquis stock exchanges.

1.3. THE VIRTUOUS CIRCLE

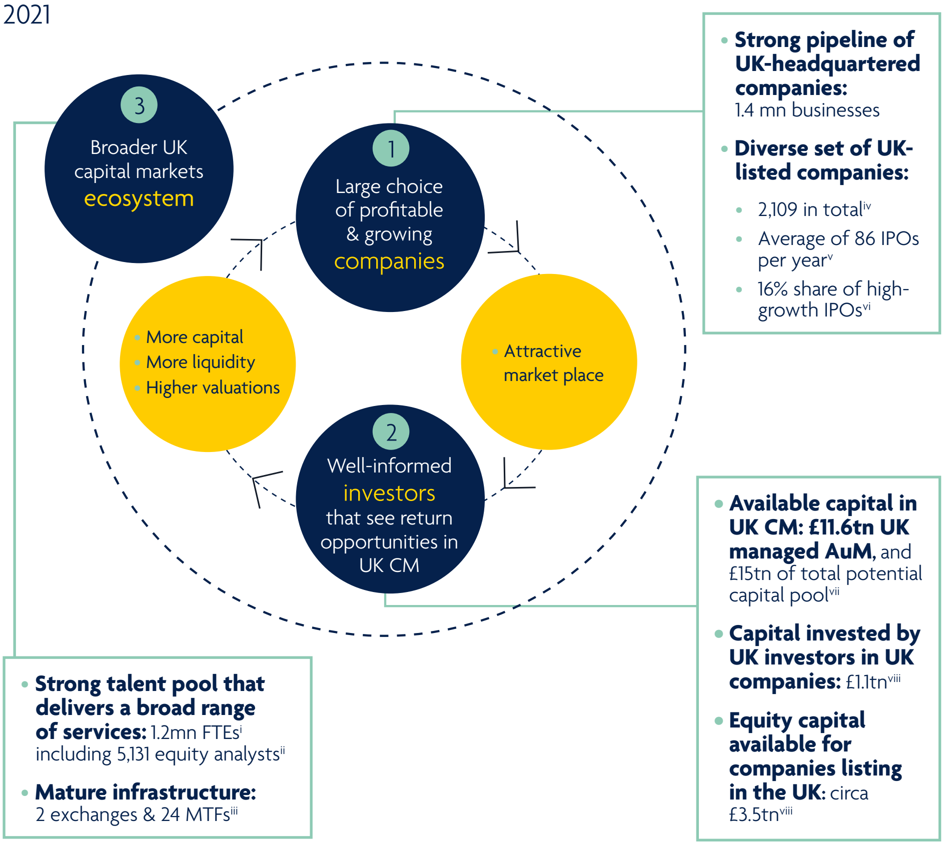
The infrastructure for fully functioning and competitive capital markets consists of three main components.

1. **Companies:** A critical mass of diverse companies across all sectors and stages of growth. The development of innovative companies with the ability to grow and scale is a key driver of future success.
2. **Investors:** A varied and actively engaged investor base with an appropriate risk appetite who can provide the capital and liquidity for funding requirements as companies grow and scale. This includes institutional, private and retail capital.
3. **Ecosystem:** An ecosystem that facilitates and enables a broad and deep market. This includes proportionate and agile regulation set in conjunction with global standards, a proportionate tax regime including targeted tax measures to support specific sectors and an investment culture that supports growth-orientated businesses.

These three components establish a 'virtuous circle' to create a unique and resilient interrelated infrastructure serving companies and investors.

Figure 4: The UK capital markets today

2021



The 'virtuous circle' drives the successful outcomes that are the fundamental requirements of a thriving capital market:

- It attracts a broad range of companies, including those from high-growth sectors.
- It is comprised of well-run domestic and international companies.
- It attracts strong capital flows, ensuring companies have sufficient capital and liquidity to achieve their objectives.
- It enhances shareholder value and long-term stewardship.
- It facilitates access to global and domestic companies and investors worldwide.

Notes:

i. FTEs in finance and insurance activities in the UK in 2021; Source: ONS.
ii. Equity analysts' data for the UK, as of Dec 2022; Source: Refinitiv.
iii. 2 exchanges offering primary equity issuance and 24 MTFs approved by the FCA; Source: FCA.
iv. Based on the number of companies on the LSE and Aquis stock exchange in 2021. International is defined as companies that are not UK-incorporated.
v. Average number of IPOs between 2017 and 2022 on LSE and Aquis stock exchange.
vi. Based on 2021 Market Cap of high growth sectors, which include Technology and Biotechnology, compared with total free float of LSE-listed companies.
vii. £15tn includes deposits and cash ISA; Source: Investment Association; Source: GOV.UK.
viii. Proxied by percentage of institutional AuM invested in global equity and UK equity.

CHAPTER 2

The strength of the UK virtuous circle

2.1. OVERVIEW

The UK equity capital markets are at an inflection point

The broader UK market remains strong and continues to benefit from the cluster impact of being a global financial centre – attracting a large talent pool, a diverse range of capital providers, specialist sectors and engaged trade bodies.[11] The UK is a global hub for this cluster of financial and professional services. This continues to be a significant benefit for companies considering where to scale and grow their business.

The UK also has a strong and proud tradition of innovation and facilitating start-up companies, with further growth expected to continue.

Despite this, some smaller companies struggle to attract the capital they need to help them scale. Where they are supported, this tends to be by international private capital. This capital can then influence those companies to choose exchanges outside the UK for the next phase of their growth. This may be due to a perception that joining other exchanges will result in a better valuation.

2.2. COMPANIES

The importance of achieving scale

Of the 5.5mn companies in the UK, 1.4mn are larger than sole traders and are potentially within scope to access UK capital markets; acknowledging that not all companies will scale to sufficient size or choose to access public markets, the demand to access and utilise UK capital markets should still grow over time as the number of newly registered companies in the UK increased by 7% annually from 2017 to 2020.[12] However, growth in the number of domestic public companies (-1%) fell short of the rate at which new businesses are registered.[13]

Figure 5: Number of UK companies by size

Absolute value, 2021

Size		Average revenue (£k)	Total number of companies
Size	All	£2,765[i]	1,447,900
Size	1-9 employees	£447	1,187,045
Size	10-50 employees	£2,803	217,240
Size	51-250 employees	£19,687	25,940
Size	250+ employees	£264,799	7,675

Source: GOV.UK

i. Weighted average

11. A feature of the UK, compared with the US for example, is the quantum of UK traded company shares held by global institutional investors.
12. World Bank and Federal Reserve Economic.
13. London Stock Exchange and London Stock Exchange Group; UK-incorporated companies traded on UK exchanges decreased from 1,751 to 1,682 from 2017 to 2021; -1% CAGR.

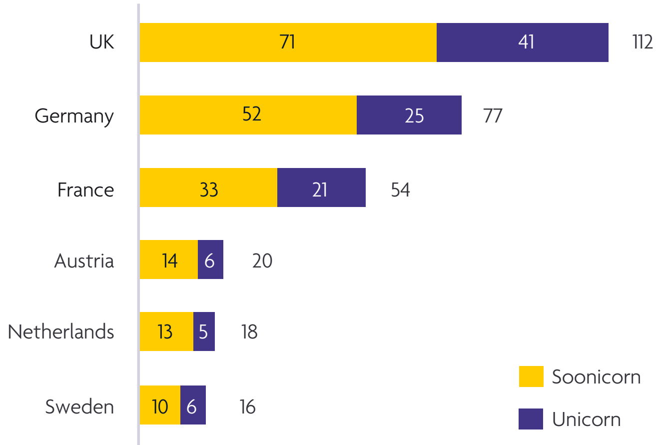
a. There is an increasing need to better support the growing number of UK start-ups

The UK has the largest number of newly registered companies in Europe, 774,000, broadly comparable with the US in terms of businesses per capita and significantly ahead of the per capita figure for other major European countries.[14,15] The UK leads the way in Europe on high-growth start-ups, Unicorns (companies valued at £1bn) and 'Soonicorns', those that are likely to become Unicorns in the next 24 months.[16] The US is ahead with 704 Unicorns.[17]

Figure 6: Number of businesses per capita
Absolute value, 2022

Source: ONS, Government website

Figure 7: Number of Unicorns and Soonicorns by selected European countries
Absolute value, as of January 2022



Source: i5invest and i5growth

The UK's start-up environment is well-capitalised and supported by government-incentivised venture capital investment schemes. There are three notable schemes: the Enterprise Investment Scheme (EIS), aimed at early-stage companies, has raised £24bn overall, with 4,215 companies funded between 2019 and 2020 alone; the Seed Enterprise Investment Scheme (SEIS) and the Social Investment Tax Relief (SEIT) scheme.[18,19] Investors can also derive tax benefits from investing in shares in a venture capital trust (VCT). A VCT is a company (like an investment trust) that has been approved by HMRC and invests in or lends money to unlisted companies. £4.4bn has been invested in VCTs since 2016.[20] These schemes, albeit beneficial for early-stage growth, are not intended to support later-stage growth as the tax benefits, and therefore capital, fall away. Innovate Finance has estimated a £15bn gap in growth capital requirements for UK companies.[21] It's at this stage where UK scale-up companies tend to turn to international private capital to fill the investment gap due to a lack of UK domestic capital.

14. The Office for National Statistics
15. World Bank
16. i5invest and i5growth; the 2022 European unicorn & soonicorn
17. Statista
18. Dealroom.co; venture capital in the UK
19. SITR will not be available for new investments made on or after 6 April 2023.
20. GOV.UK; venture capital trusts statistics: 2022
21. Innovative finance; the Future of Growth Capital

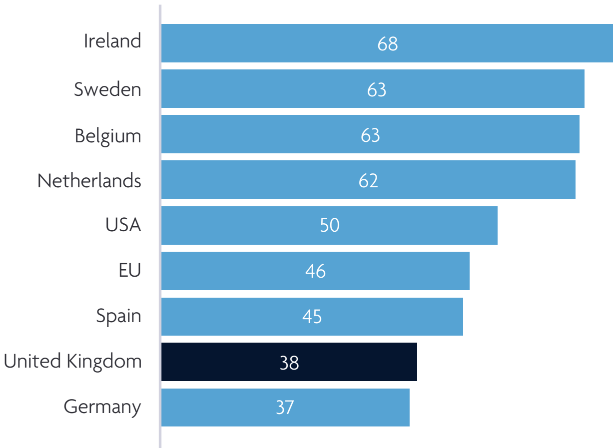
UK companies are typically less well-capitalised than their US counterparts over their full growth lifecycle, and on average, US companies raise more capital at every funding stage. The UK also shows lower five-year survival rates for newly founded companies than key major European countries and the US.

Figure 8: Comparison of funding for UK vs. US start-ups
$mn, 2017–22

	Pre–early VC (Accelerator/Angel/ Seed)		US:UK funding ratio	Early VC (Rounds A–C)		US:UK funding ratio	Late VC (Rounds D+)		US:UK funding ratio
	US ($mn)	UK ($mn)		US ($mn)	UK ($mn)		US ($mn)	UK ($mn)	
1-9 employees	1.6	1.1	x1.5	2.7	1.0	x2.7	3.3	1.7	x1.9
10–50 employees	3.5	2.6	x1.3	10.4	6.0	x1.7	9.0	5.8	x1.6
51–250 employees	5.0	4.5	x1.1	57.4	19.1	x3.0	32.2	20.7	x1.6
200+ employees	–	–	–	73.2	34.8	x2.1	107.5	119.5	x0.9
Total	**10.1**	**8.2**	**x1.2**	**143.7**	**60.9**	**x2.4**	**152**	**147.7**	**x1.0**

Source: Pitchbook

Figure 9: Global five-year company survival rate
Percentage, 2015–20



Source: World Bank, EuroStat

Public companies:

While the UK nominal GDP growth was 2.2% from 2017 to 2021, UK market capitalisation from domestic companies grew at 0.8% – resulting in the market–GDP ratio decreasing from 1.3 to 1.2. The same ratio in the US over the same period went from 1.6 to 2.2. This was partially driven by increasing valuations, but it was also supported by an increasing number of companies that became publicly traded between 2017 and 2021.[22]

22. Nasdaq and NYSE; US incorporated companies traded on US exchanges increased from 3,359 to 4,410 from 2017 to 2021; 7% CAGR.

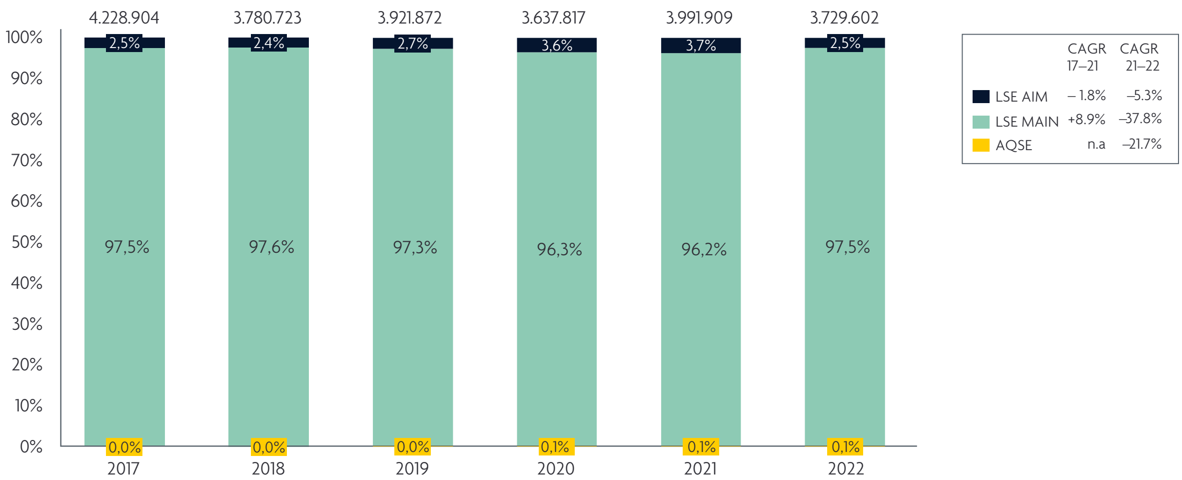
b. SME growth markets are growing at a high rate

For companies that have bridged the funding gap and choose to stay in the UK, there are supportive SME growth markets demonstrated by the growth in AIM and AQSE.

While the LSE Main Market represents 97% of the UK equity capital market between 2017 and 2021, AIM and Aquis exchange (AQSE) grew faster.

Figure 10: UK equity market capitalisation by stock exchange

£mn, 2017–22



Source: LSE, Aquis

c. Certain sectors are showing differentiated growth

The technology, financials, consumer and biotech sectors are expected to grow above the 2021-25 compound average growth rate (CAGR) of 6% of the UK GDP. Traditional, telecommunication, medical and pharmaceuticals sectors are forecasted to grow somewhat slower, by 4% to 5%.[23]

Consistent growth across the UK technology industry saw it reach the $1tn in value milestone in 2022, making it only the third country ever to hit this valuation after the US and China.[24] The UK technology industry is ahead of comparable technology industries in Europe and is worth more than double Germany's $467.2bn and three times more than France's $307.5bn.[25]

In 2021, the UK had 41 unicorns with capital raised of circa €23bn (as of 20 January 2022) and created over 40,000 jobs.[26] Fintech, the highest-valued sector, attracted a record investment of more than $11.6bn.[27] The Clean and ClimateTech sector secured investment of £134bn in 2021, 4.4% higher than the previous record in 2018. Research highlights there are 8,500 of these firms based in Europe, with just under 2,000 of these based in the UK.[28]

23. Traditional includes industrial, industrial support services, basic materials, energy and utilities sectors.
24. Compiled by Dealroom for the Digital Economy Council – https://www.gov.uk/government/news/uk-tech-sector-retains-1-spot-in-europe-and-3-in-world-as-sector-resilience-brings-continued-growth.
25. ibid
26. i5invest and i5growth; 2022 European unicorn & soonicorn
27. Innovative Finance; Fintech investment
28. https://www.govgrant.co.uk/sector-research/is-there-enough-cleantech-investment-in-climate-change-solutions/

2.3. INVESTORS

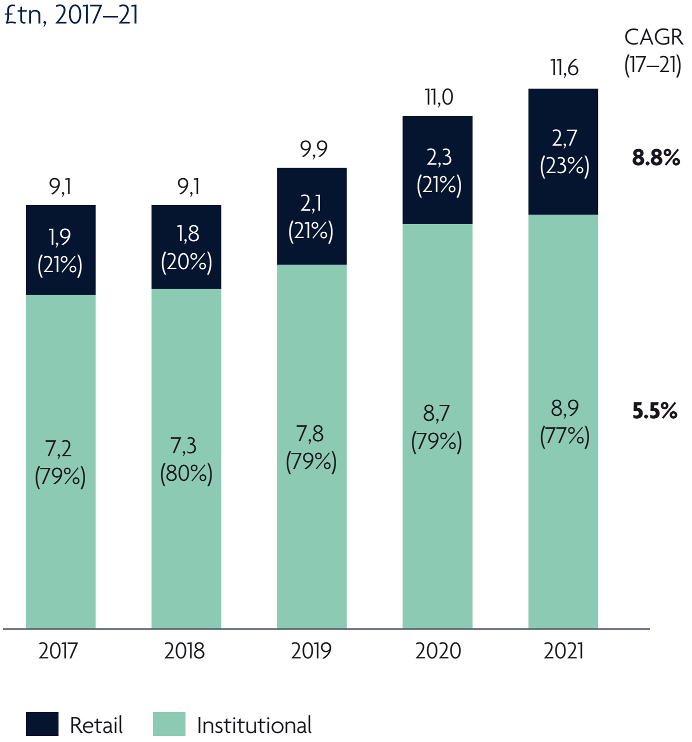
Increasing the diversification of capital investment

a. Institutional investors provide the largest contribution to UK capital investment

The UK markets manage £11.6tn of capital, with £2.7tn in retail AuM and £8.9tn in institutional AuM.[29] This pool of capital finances investments both in the UK and overseas. There is an additional £3.4tn of UK deposits and approximately £0.4bn in cash ISAs, meaning an overall pool of capital of some £15tn.[30,31]

Figure 11: UK total AuM by investor type

£tn, 2017–21



Source: Investment association, PPF Purple book

- Institutional investors provide 60% of the UK capital pool, with the biggest contributors being pension funds and insurance firms.
- Almost half of pension fund capital is in defined benefit (DB) schemes (approximately £2.3tn). DB schemes generally have an investment mandate favouring lower-risk investments (such as bonds and gilts), given the need to pay defined liabilities.[32]
- The UK had £1.7tn in funds under management that sustained year-on-year growth of 7% between 2017 and 2021.[33,34]

29. Investment Association
30. https://www.ceicdata.com/en/indicator/united-kingdom/total-deposits
31. https://www.gov.uk/government/statistics/annual-savings-statistics/commentary-for-annual-savings-statistics-june-2021.
32. EY analysis of Investment Association data.
33. Investment Association
34. 2022 funds under management saw a 13.5% outflow reflecting market volatility.

b. Retail assets play a material role

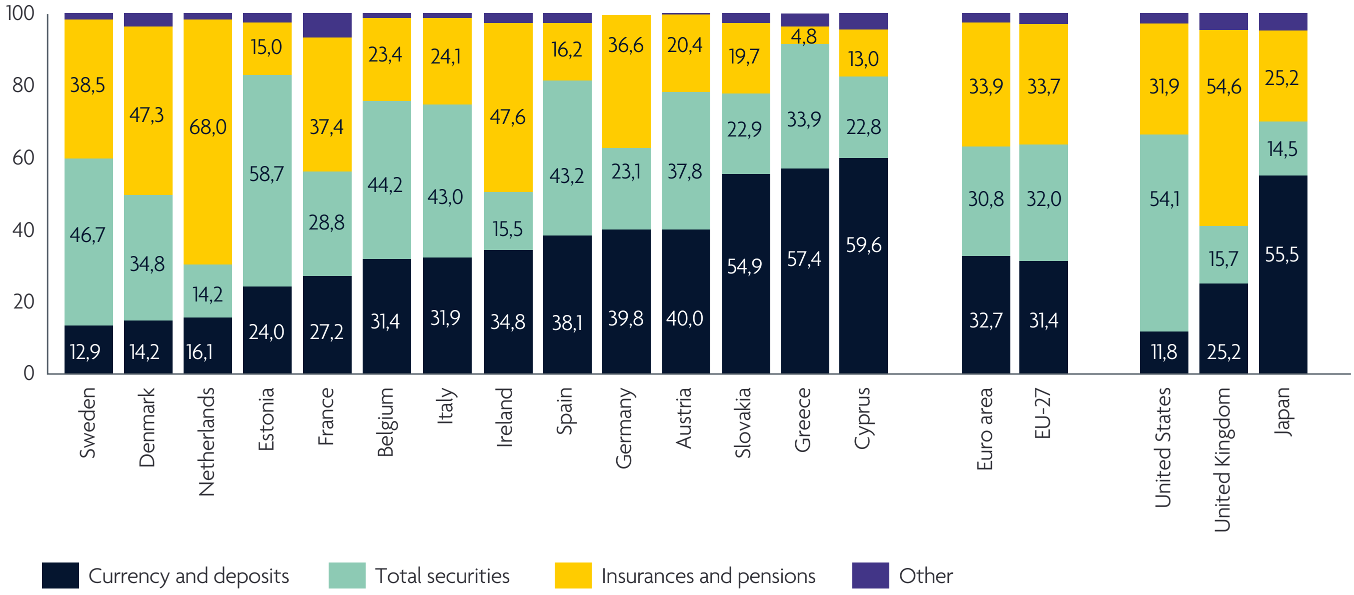
Retail AuM grew by 9% between 2017 and 2021 to a total of £2.7tn, as noted above. A further circa £3.8tn of retail cash is not invested and held in cash deposits and cash ISAs.

There are 30mn savings accounts and 27mn cumulative ISA accounts in the UK – the latter includes cash ISAs, stocks and shares ISAs, innovative finance ISAs, Lifetime ISAs, and Help to Buy ISAs.[35,] In 2020-21, roughly 8.2mn were subscribed (e.g., engaged with or newly opened) cash ISAs and approximately 3.5mn were subscribed stocks and shares ISA (noting any one person can have multiple ISA products).[36] In contrast, retail participation in capital markets-related activity is higher in the US and other European countries, e.g., in the US, there are over 100mn trading accounts with the top six online brokerages alone and over 10mn new users in 2020-21.[37]

Whilst it is challenging to identify the precise numbers of retail customers participating in the IPO market, it is estimated to be below the number of stocks and shares ISAs referenced above. Approximately half of active IPO investors are also active in follow-on capital raisings by companies already trading on the public market.[38]

Figure 12: Composition of households' financial savings in selected EU and non-EU countries

Percentage, 2019



Source: Eurofi

Note: 'Total securities' include all existing market-based instruments held directly or indirectly, in the form of bonds, equity, mutual funds and money market funds; 'Other' includes loans and other accounts receivable/payable as defined by Eurostat.

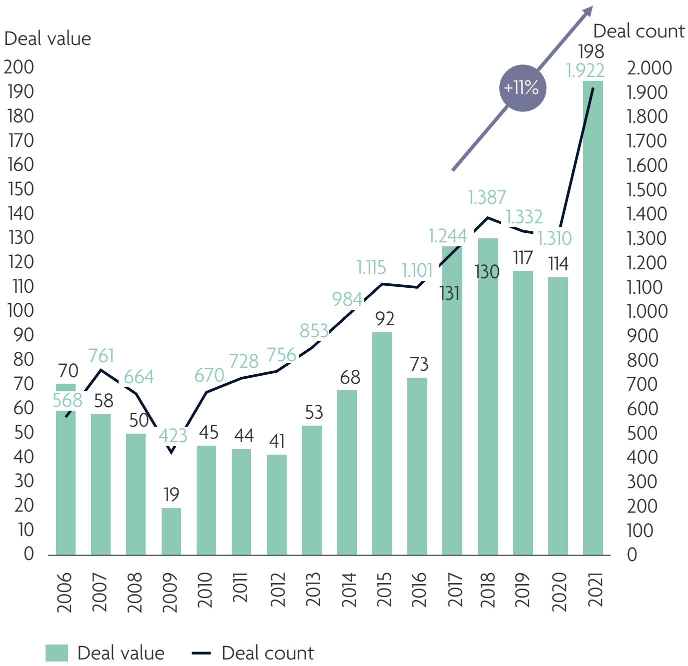
35. https://www.gov.uk/government/statistics/annual-savings-statistics-2022/commentary-for-annual-savings-statistics-june-2022
36. Gov.uk, as above. Note that HMRC data suggests that on average less than 50% of the stocks and shares ISA limit is used. Number of individual investors, however, can be significantly (up to 50%) higher than 2021 S&S ISA subscribers, e.g., users of trading and stockbroking platforms are not reflected in this number, as well as those S&S ISA customers who have investments but did not subscribe in 2021.
37. Reuters – Factbox: The US retail trading frenzy in numbers
38. PrimaryBid Investor Survey, March 2023

c. Private capital has seen year-on-year growth

Private capital, funded primarily through institutional investors, reached £0.5tn in 2021 and has shown strong growth, with an estimated CAGR between 2017 and 2021 of circa +14%.[39]

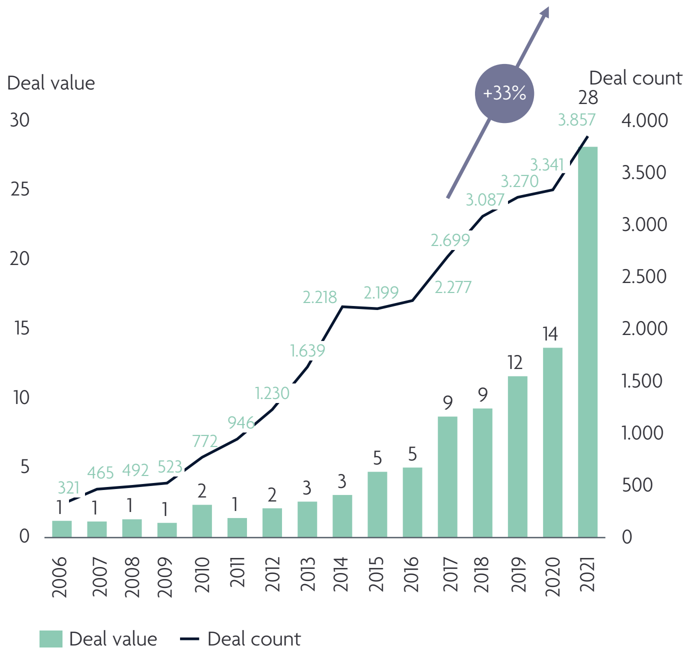
This includes a strong increase in private equity (PE) and venture capital (VC) fundraising in recent years. Between 2017 and 2021, PE deal value increased at a CAGR of 11% and 33% for VC. UK companies successfully attract international PE and VC investors, with US and European investors funding over half of UK total private capital in 2021.

Figure 13: UK/Ireland PE deal activity
£bn, 2006–21



Source: Pitchbook

Figure 14: UK/Ireland VC deal activity
£bn, 2006–21

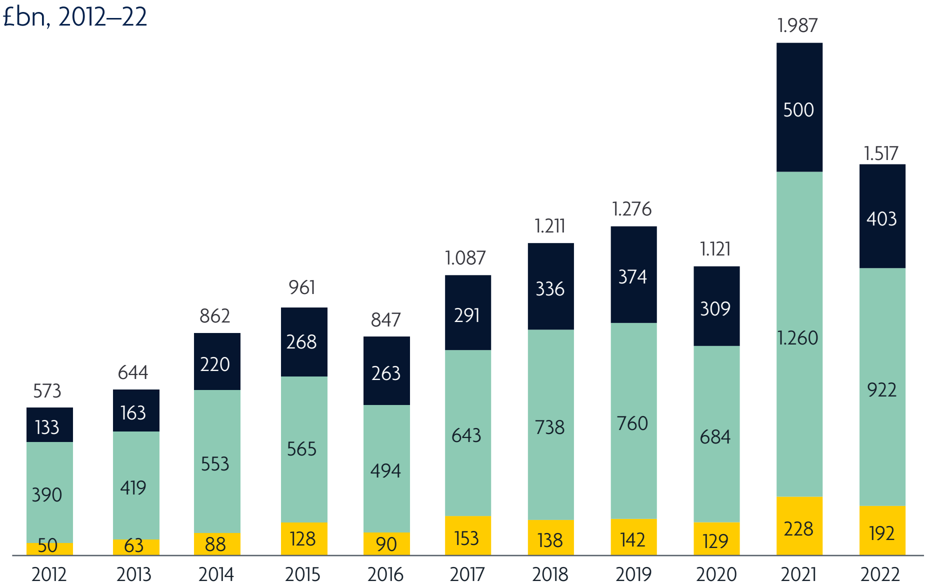


Source: Pitchbook

39. EY analysis of McKinsey data.

Whilst all other major markets show growth, the UK outperforms them all in the growth of PE deal size. Between 2012 and 2021, the UK saw PE deal volumes grow 14.4%, compared with 9% in North America and 11.7% in the EU.

Figure 15: Private equity deal value per region
£bn, 2012–22



Region	CAGR: 2012–22
EU	11.71%
North America	8.98%
UK	14.40%
Total	**10.22%**

Source: Pitchbook
* This includes EU, North America and UK only, as per Pitchbook data

d. UK capital markets continue to attract overseas investors

The UK attracts a wide international investor base, with approximately £2tn to £2.5tn invested in UK equities by overseas investors.[40] Nearly two-thirds (62%) of the shares traded on the LSE are held by non-domestic institutional investors, compared with only 18% in the US.[41]

Figure 16: LSE – Geographic breakdown of institutional investors

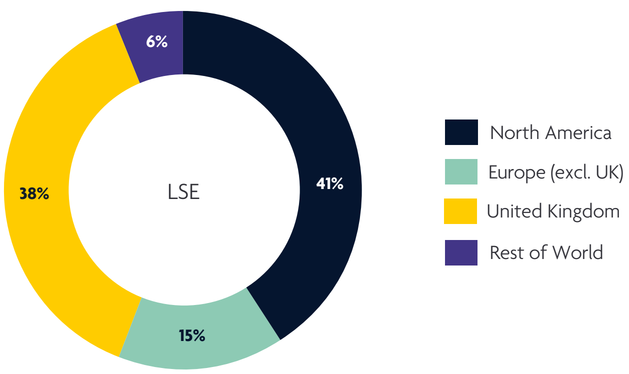
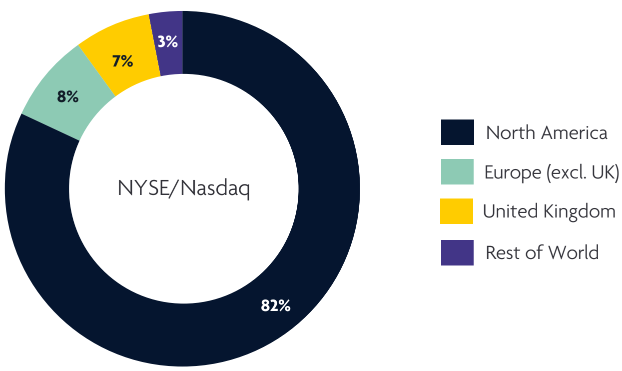


Figure 17: NYSE/NASDAQ – Geographic breakdown of institutional investors



Sources: LSEG, institutional investors analysis, Dec 2022

40. EY estimate for the amount of international capital invested in the UK, on the basis that 62% of LSE institutional investors are overseas investors.
41. LSEG analysis – December 2022.

2.4. ECOSYSTEM

A unique hub of talent, services and frameworks

- The UK has a globally leading regulatory framework supported by a strong legal system and contractual certainty.
- The UK has a cluster of talent across financial services and supporting industries, such as professional advisers, private equity and venture capital. A significant cohort of research analysts also supports information flows to investors.
- The UK has a mature primary and secondary market infrastructure. The LSE and Aquis operate primary markets aimed at a wide range of companies ranging from SMEs to mature issuers. This is complemented by a diverse secondary market structure, including several trading venues that facilitate equity trading operated by firms such as the LSE, Cboe Europe and Turquoise, and execution venues known as systematic internalisers operated by investment firms. Overall, there are a number of trading venues and systematic internalisers in the UK across different asset classes.[42] The secondary markets survey showed that:
  - There was consensus around the fact that the UK's OTC infrastructure, capital markets intermediary technology and capital markets support (e.g. consultants) are leading or comparable to other jurisdictions.
  - There was broad consensus that the UK's trading venue infrastructure is leading or comparable to other jurisdictions.

2.5. SUMMARY

UK capital markets continue to be underpinned by strong fundamentals, but it should not be assumed they will remain in place without action. Most UK-based companies have access to sufficient capital to support growth; much of that capital is from international pools. The composition of companies evolves, as well as the sources of capital. In an ever-evolving macro-environment, there are several challenges for the future of the UK's capital markets ecosystem and the companies it serves. Further feedback on these challenges and suggested recommendations are set out in the following chapters.

42. HMT, Wholesale Markets Review Consultation, July 2021 - As of July 2021, in the UK there were six firms that operate a Regulated Market (RM), 38 firms that operate a Multilateral Trading Facility (MTF) and 24 firms that operate an Organised Trading Facility (OTF). Some firms operate multiple venues. In addition, there were 65 firms that had notified the FCA that they are acting as a systematic internaliser (SI) in at least one asset class.

CHAPTER 3

Setting the record straight

3.1. OVERVIEW

The UK remains a major international IPO market

In a complex and dynamic global environment, the requirements and expectations of investors and companies have continued to evolve. In this context, some recent perceptions have developed regarding the strengths of the UK's equity capital markets and areas that require attention.

The data shows that many of the negative perceptions regarding the UK's equity markets are more nuanced than they may appear.

The analysis shows that UK equity capital markets:

- Are in the top three international markets globally.
- Attract companies from high-growth and new economy sectors.[43]
- Perform better than the US equity markets in post-IPO price performance (2017 to 2021).[44]
- Attract capital from global institutional investors.

However, there are findings which also show the challenges faced by the UK equity capital markets to maintain their position and grow:

- The UK has lost some market share to the US, as certain sectors, e.g., healthcare, have seen a significant proportion of UK companies choosing to join US public markets. Additionally, following the UK's withdrawal from the EU, more European companies appear to be choosing exchanges within the EU single market.
- In recent years, the overall share price performance on the LSE Main Market has been lower compared with the performance of comparable exchanges in other markets.
- The US has more liquidity overall, specifically in new economy sectors.

43. Example: IPO capital raised for the technology sector increased from 2% to 33% of all capital raised from 2017 to 2021, and the respective percentage for the healthcare sector moved from 1% to 3%.
44. Price performance is calculated using the trading price at 31/12/2021 and IPO offering price.

3.2. PERCEPTION 1

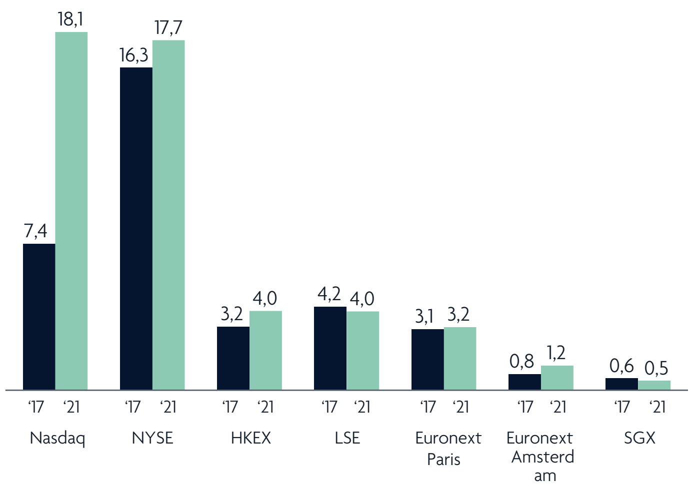
US and European exchanges are growing at the UK's expense

The LSE (Main Market and AIM) remains the largest stock market in Europe, with a market capitalisation of £4tn as of 2021. However, its market capitalisation declined by 6% between 2017 and 2021, with the contribution from new international company IPOs on the LSE down from 35% to 29%.[45] The number of companies traded on the LSE also decreased by 7.4% during this period.[46]

The principal US exchanges, NYSE and Nasdaq, have both seen growth in market capitalisation. This has been more prevalent on Nasdaq, which has seen rapid growth in technology stock valuations.

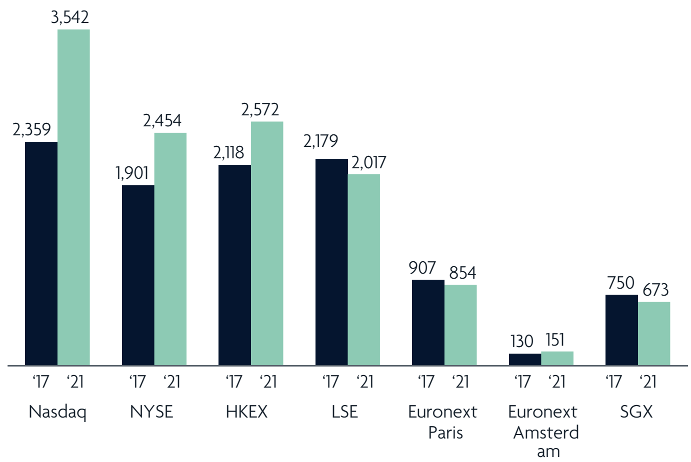
Amsterdam and Paris have both seen an increase in total market capitalisation. For Amsterdam, this increase has been driven by several new companies admitted to trading. Paris, like the UK, has seen a decline in the number of companies traded on its exchange, suggesting that there has been an overall increase in the average valuation of companies on that exchange.

Figure 18: Market capitalisation by stock exchange
£tn, 2017 and 2021



Sources: Stock exchanges, World Federation of Exchanges

Figure 19: Number of companies by stock exchange
Absolute value, 2017 and 2021



Sources: Stock exchanges

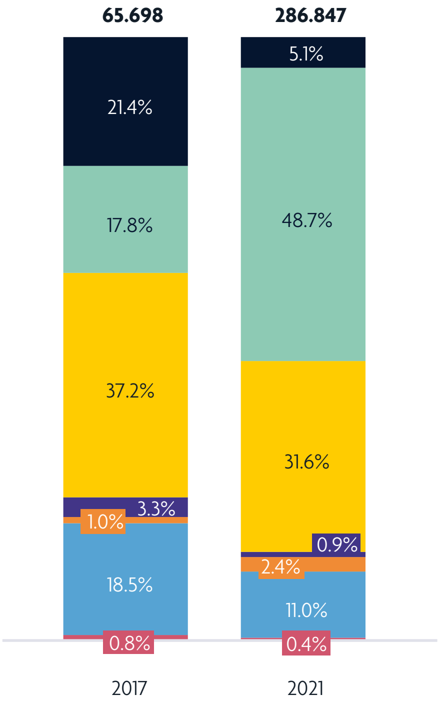
The amount of capital raised and the number of IPOs on the LSE have increased in absolute terms. However, the LSE's share relative to the international IPO market has decreased.

- The amount of capital raised through IPOs on key international markets (the LSE, Nasdaq, NYSE, Euronext Paris, Euronext Amsterdam, HKEX and SGX) increased from £65.7bn in 2017 to £268.8bn by 2021, a rise of 337%.[47]
- The LSE's share of capital raised has fallen by a factor of four; 5.1% (£14.0bn) in 2021 compared with 21.4% (£14.6bn) in 2017.
- Over the same period, the LSE saw its share of IPOs by number decline from 19.5% in 2017 to 9.1% in 2021.
- By number (including SPAC IPOs), the Nasdaq accounted for over half of all successful IPOs in 2021 (54.5%).

45. London Stock Exchange
46. ibid
47. Stock exchanges; aggregated data

Figure 20: Share of total IPOs by capital raised in value

£bn, 2017 and 2021



	2017	2021	CAGR
LSE	£14.0bn	£14.6bn	1.0%
Nasdaq	£11.7bn	£139.6bn	86%
NYSE	£24.5bn	£90.7bn	38.8%
Euronext Paris	£2.2bn	£2.6bn	4.3%
Euronext Amsterdam	£0.7bn	£6.9bn	79.1%
HKEX	£12.2bn	£31.4bn	26.8%
SGX	£0.5bn	£1.0bn	17.8%

Sources: Stock exchanges
Note: Final percentages are rounded up

Figure 21: Share of total IPOs by capital raised in number of deals

Absolute number, 2017 and 2021

	2017	2021
LSE	108	126
Nasdaq	136	753
NYSE	83	303
Euronext Paris	24	64
Euronext Amsterdam	6	24
HKEX	174	98
SGX	24	15

Source: Stock exchanges
Note: Final percentages are rounded up

The distribution of companies on the LSE is changing to reflect the new macroeconomic environment. The market capitalisation of European incorporated companies has dropped by 35% since the UK's withdrawal from the EU, reflecting a desire from companies within the EU and parts of Central Europe to list within the EU single market. At the same time, other regions increased their share, including Asia (+38%) and Africa/Middle East (+13%), reflecting the increasing growth of those regions from an economic perspective.

Result of the analysis of the 50 largest companies by market capitalisation that left the LSE between 2018 and 2022:

58%

were the result of M&A on market consolidation

26%

were taken private by private equity houses

16%

removed a secondary listing.

Findings

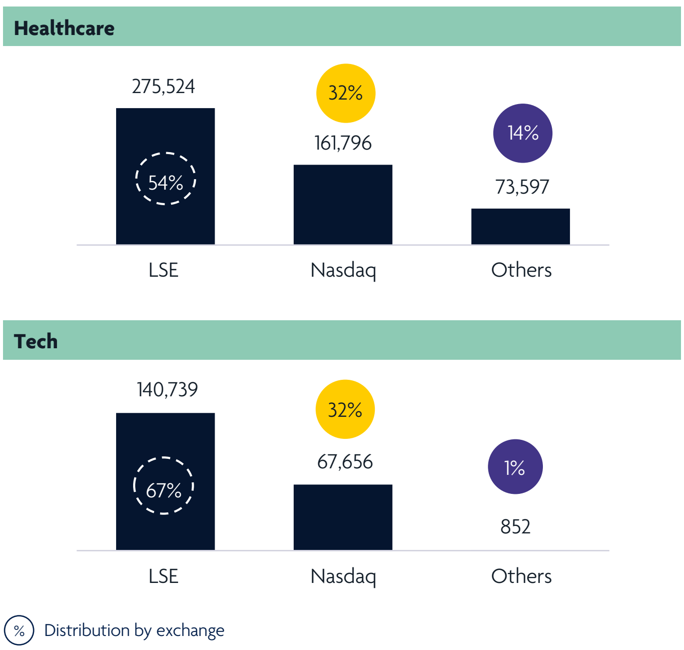
The LSE remains the largest IPO location in Europe in terms of the number of companies joining the public market and the amount of capital raised. The US exchanges have taken a significant market share in both metrics, partly due to the growth of technology companies and the US being perceived as a natural destination for such companies. The LSE remains bigger than the European exchanges regarding market capitalisation and the number of companies that trade on it. However, between 2017 and 2021, the growth rate of IPO numbers and capital raised in Europe has been stronger. This suggests the UK will need to change its approach if it wishes to retain and enhance its position in the context of further macroeconomic changes, market fragmentation and continued technological and innovative changes.

3.3. PERCEPTION 2

The UK struggles to retain and attract growth companies

In 2021, many healthcare companies founded in the UK (46%) chose an exchange outside the UK, predominantly in the US (32%). One-third (33%) of technology companies founded in the UK elected to join non-UK markets, with 32% of the companies choosing an exchange in the US. The two sectors combined account for 35% of all IPO capital raised in the UK in 2021.

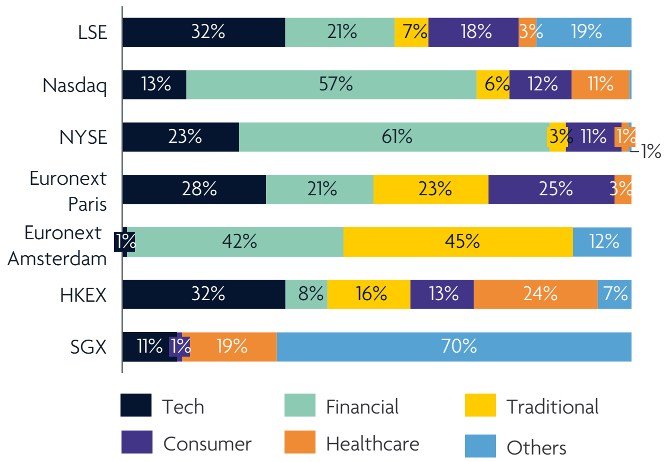
Figure 22: Exchanges on which UK-incorporated healthcare and technology companies are admitted to trading
£mn, market capitalisation, 2021



Source: LSEG, Euronext, Nasdaq, Refinitiv

The UK's attractiveness for technology companies looks even stronger when compared with its European counterparts. While Amsterdam is gaining a reputation for attracting technology sector stocks, with 33% of its total market capitalisation derived from the technology sector, it has only had two technology sector IPOs in the last six years, compared with 16 on the LSE. Technology sector firms represented only 1% of the equity capital raised in Amsterdam in 2021.

Figure 23: Proportion of capital for key sectors across selected exchanges
2021, IPO capital raised



Source: Stock exchanges
Note: Final percentages are rounded up

For **industry sector**, we have leveraged the LSE ICB indicators and grouped them by the following:
Tech = Technology + Telecommunication
Financials = Financials
Traditional = Basic Materials + Energy + Industrials + Utilities (In 2019, 'Oil & Gas' is replaced by 'Energy')
Consumer = Consumer Discretionary + Consumer Staples
Healthcare = Healthcare
Others = Real Estate + Blank values [Real estate was put under Financials sectors up to 2018; we adjusted the LSE dataset to put it under others for better comparability across time and jurisdictions]

Findings

The UK continues to attract technology company IPOs; however, many UK healthcare companies choose other exchanges, typically in the US.

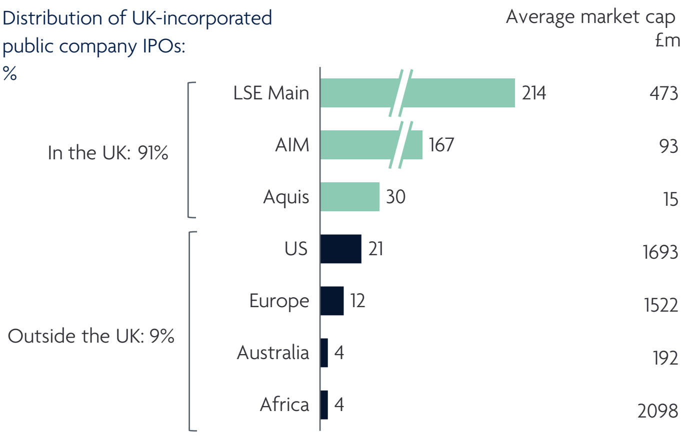
3.4. PERCEPTION 3

Large UK companies choose an exchange outside the UK

91% of UK-incorporated public companies who completed an IPO between 2017 and 2022 selected a UK exchange. Those who chose a US or European exchange had an average market capitalisation of £1.6bn, around four times that of those choosing to remain in the UK.

Figure 24: Location of UK IPOs and average market capitalisation

Absolute value, 2017–22



Source: LSEG, Euronext, Nasdaq, Refinitiv

Findings

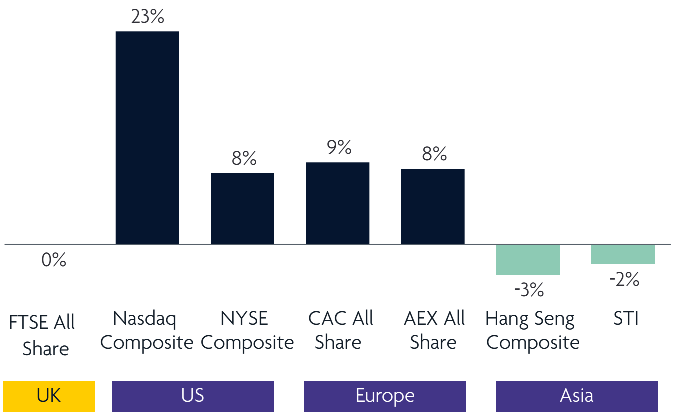
The majority of UK-incorporated publicly traded companies choose to trade on domestic markets. Companies with a higher market capitalisation are more likely to consider an exchange outside the UK than small and medium-sized companies. This might result from various factors such as international profile and sector recognition.

3.5. PERCEPTION 4

Companies trading in the UK suffer from poor share price performance

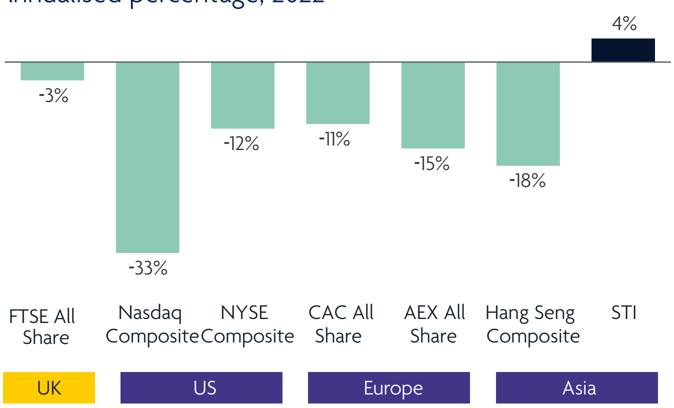
The data shows that the UK equity market underperformed the US and Europe in index price and total return between 2017 and 2021. In 2022, the FTSE All-Share index, which includes many traditional companies, performed significantly better than comparable indexes outside the UK. This shift is largely attributable to high energy prices relating to the war in Ukraine. Once geo-political tensions ease, growth is expected to return to levels seen in preceding years.

Figure 25: Comparison of historical index price return
Annualised percentage, 2017-2021



Source: Refinitiv

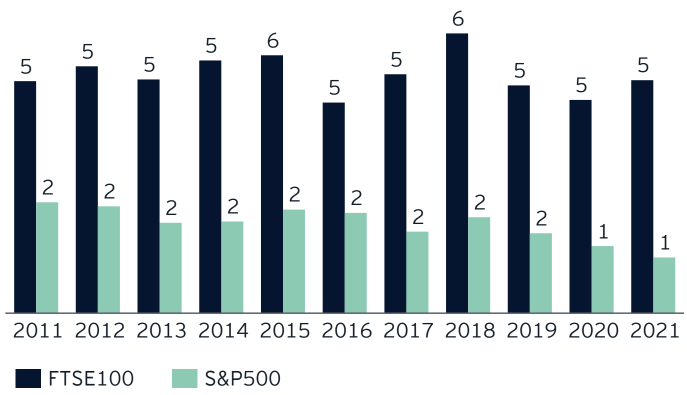
Figure 26: Comparison of recent index price return
Annualised percentage, 2022



Source: Refinitiv

FTSE companies have had higher and more stable dividend pay-outs over the past 10 years than those in the S&P 500, improving total shareholder return (TSR). Share buybacks from the FTSE 100 amounted to 29% of dividends (compared with 154% for the S&P 500).[48,49] The gap remains in terms of TSR – which was 5.5% for the FTSE 100 vs. 19% for the S&P 500 between 2017 and 2021.

Figure 27: Dividend pay-out ratio for FTSE100 vs. S&P500
Percentage, 2011–21



Source: AJ Bell, S&P Dow Jones Index

Dividend/Mkt ratio is calculated by the total annual dividend payout by the index covering companies over the index end-of-year market cap.

Findings

UK companies have seen a decline in overall share price performance in recent years, although 2022 saw an improved performance relative to similar companies in comparable markets. UK-traded companies have returned higher average dividends when compared with those in the US; however, this has not compensated for differences in price performance, resulting in lower levels of total shareholder return.

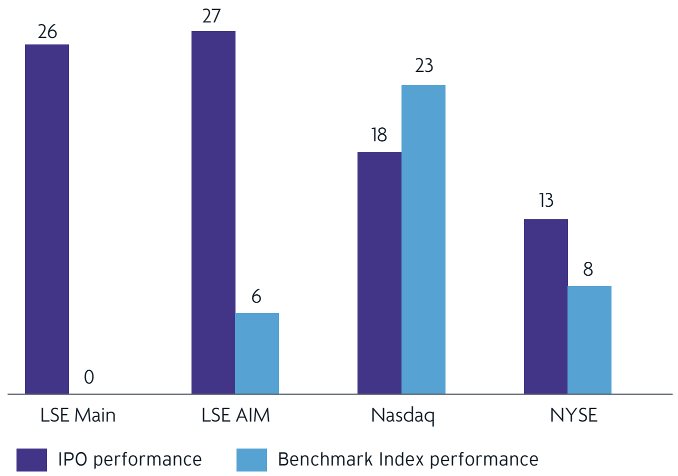
48. Thisismoney.co.uk; average ratio of share buy-back to dividends between 2017-21.
49. Yardeni; average ratio of share buy-back to dividends between 2017-21.

3.6. PERCEPTION 5

US IPOs perform better than UK IPOs, and US valuations are higher than UK ones

There is a significant gap between the index price performance of the FTSE All-Share, the Nasdaq and NYSE Composite (0% vs. 23% and 8% annual growth, respectively, between 2017 and 2021), indicating that US companies, on average, had better price performance. However, LSE IPOs have seen a better aftermarket share price performance than those on Nasdaq or the NYSE, indicating that the latter have seen a downward price adjustment after IPO.[50]

Figure 28: Aftermarket share price performance
Percentage, 2017–21

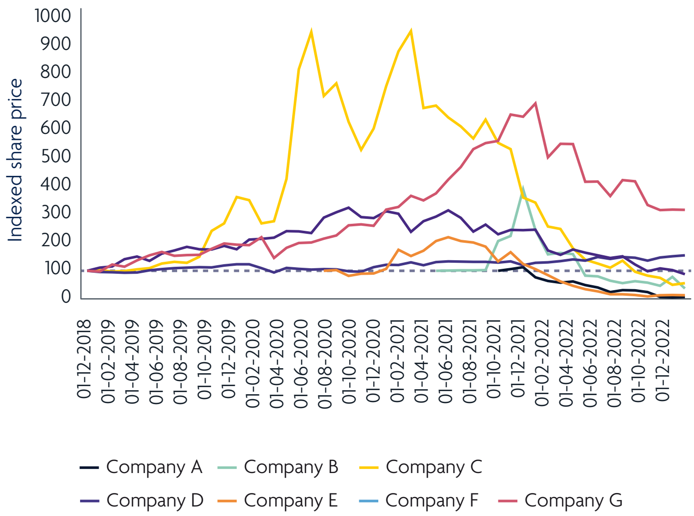


Source: LSEG, Euronext, Nasdaq, Refinitiv

Note: Aftermarket share price performance is calculated using the average of annualised performance (in terms of trading price at 31/12/2021 to the IPO offering price) for all companies that had an IPO in the 2017-21 period.

The experience of UK technology companies admitted to trading in the US also shows that there is no guarantee that performance post-IPO will be better in the US.

Figure 29: Performance of UK technology companies trading on US exchanges[51]
Absolute value, 2018–22

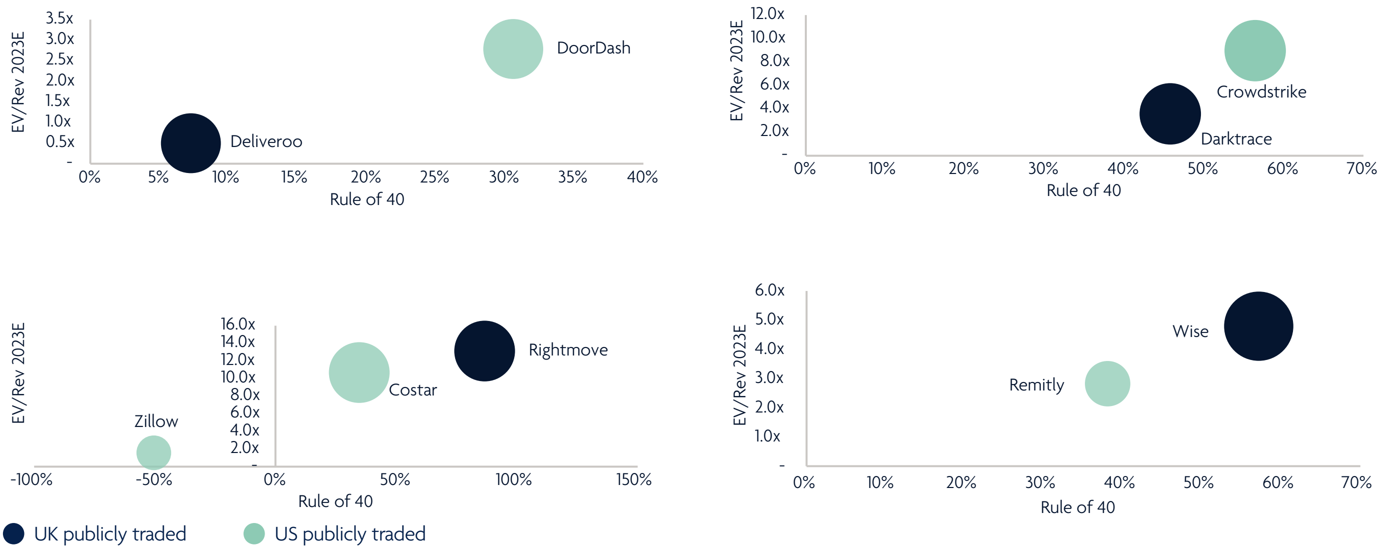


At the end of 2021, UK companies' average valuation multiples (P/E ratios) were below the other jurisdictions covered in this report (15x for FTSE All Shares vs. 20x for NYSE Composite and 33x Nasdaq Composite). The UK was the only market among those covered that had a declining average multiple over the past five years (from 20x to 15x). However, it is important to note the high share of lower growth traditional type companies in the LSE portfolio that will naturally result in a lower overall average multiple.

50. Aftermarket share price performance is calculated using the average of annualised performance (in terms of trading price at 31/12/2021 to the IPO offering price) for all companies that had an IPO in the 2017-21 period.
51. Benchmark indices included: FTSE all share index for LSE, FTSE small cap index for LSE AIM, Nasdaq composite index for Nasdaq, and NYSE composite index for NYSE.

LSEG research shows that when analysing against comparable companies, fundamentals (i.e., growth and profitability of the company) are more influential than market venue in determining valuation.

Figure 30: Example of UK and US publicly traded technology company valuations



Source: Refinitiv, May 2023
Rule of 40 refers to revenue growth (2022/2023E) + EBITDA margin (2023E)
EV/REV refers to the enterprise value-to-revenue. It is calculated by taking the enterprise value of the company and dividing it by the company's revenue.

Findings

While the LSE has lagged behind the NYSE and NASDAQ regarding yearly total returns, it has outperformed in post-IPO price performance. Furthermore, the performance of UK technology sector firms choosing to trade in the US is mixed. The perceived valuation differential between companies traded in the UK and the US is not validated when looking at a group of comparable companies with similar growth characteristics; however, the declining overall average P/E ratio of the LSE is something to note.

3.7. PERCEPTION 6

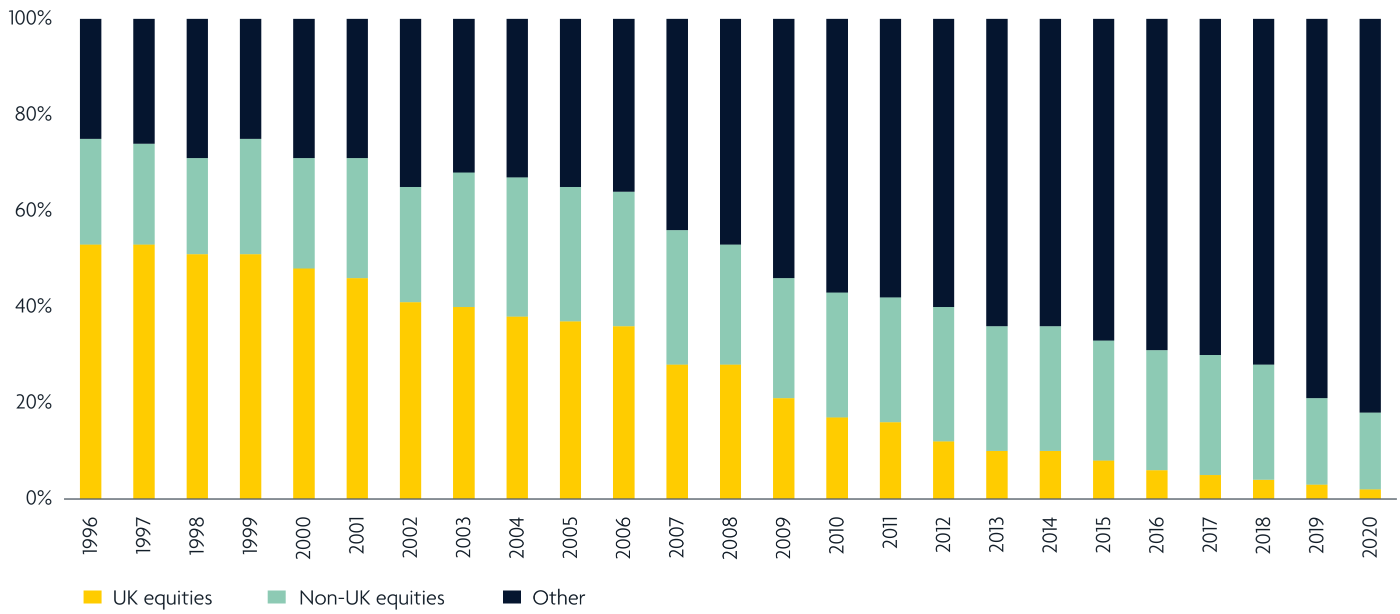
The UK is de-equitising due to a lower risk appetite from investors

There has been a 20-year transition away from investment in UK equities, partly driven by changes in the investment strategy of UK defined benefit (DB) pension funds and changes to the insurance sector's capital regimes.

Recently, DB funds have tended to invest mainly in fixed-income products, a trend driven to a large extent by demographics, i.e., an ageing population covered by DB schemes, hence the shorter expected pay-out timeframes. As the UK has the second highest ratio of institutional funds (including pension funds) to retail clients in Europe (Switzerland has the first), this represents a substantial proportion of capital not invested in equities.

Figure 31: UK DB pension fund asset allocation

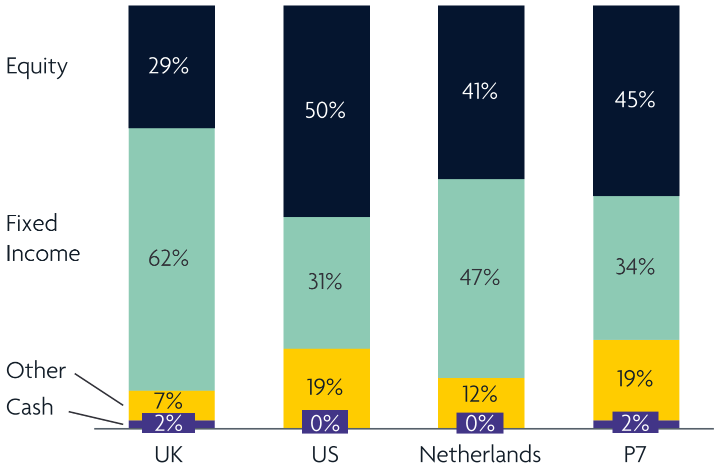
Percentage, 1996–2020



Source: UBS, PPF/TPR Purple Book

In 2021, UK pension funds (including DB and defined contribution (DC) funds) invested around a third of their assets in equities (29%), significantly less than in other leading countries.

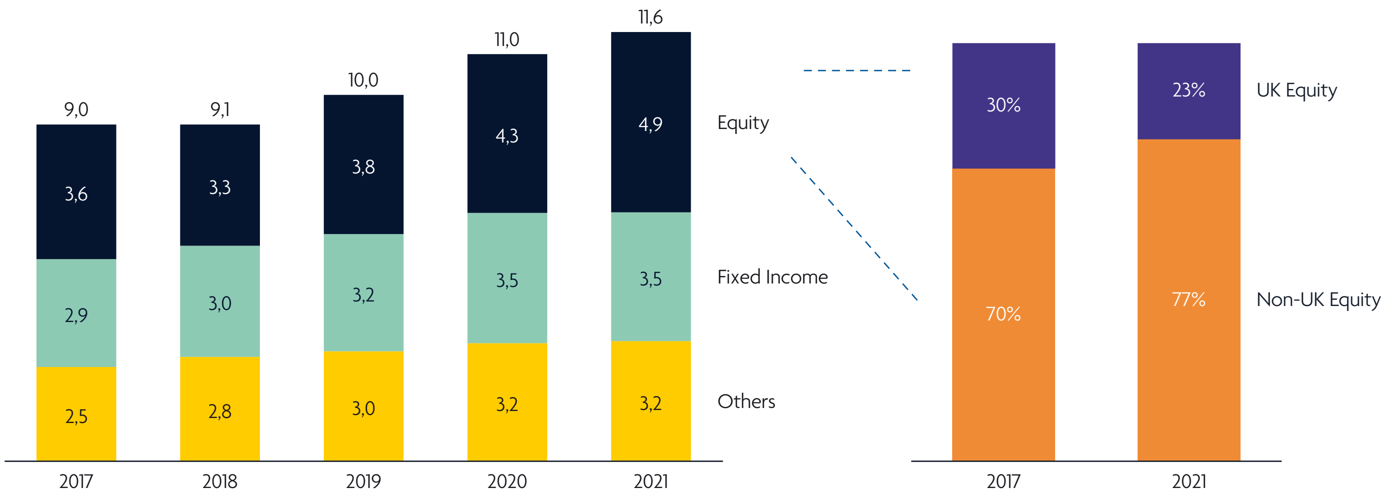
Figure 32: Global pension fund asset allocation
Percentage, 2021



Source: Thinking ahead Institute (Global Pension Assets Study, 2022)

While UK asset managers allocated a higher percentage of their mandate to equity investments from 2017 to 2021 (40% in 2017 to 42% in 2021), the proportion of this invested in UK equities dropped significantly, from 30% in 2017 to 23% in 2021.

Figure 33: UK asset managers' asset allocation and equity allocation into UK and non-UK equities
£tn, 2017–21

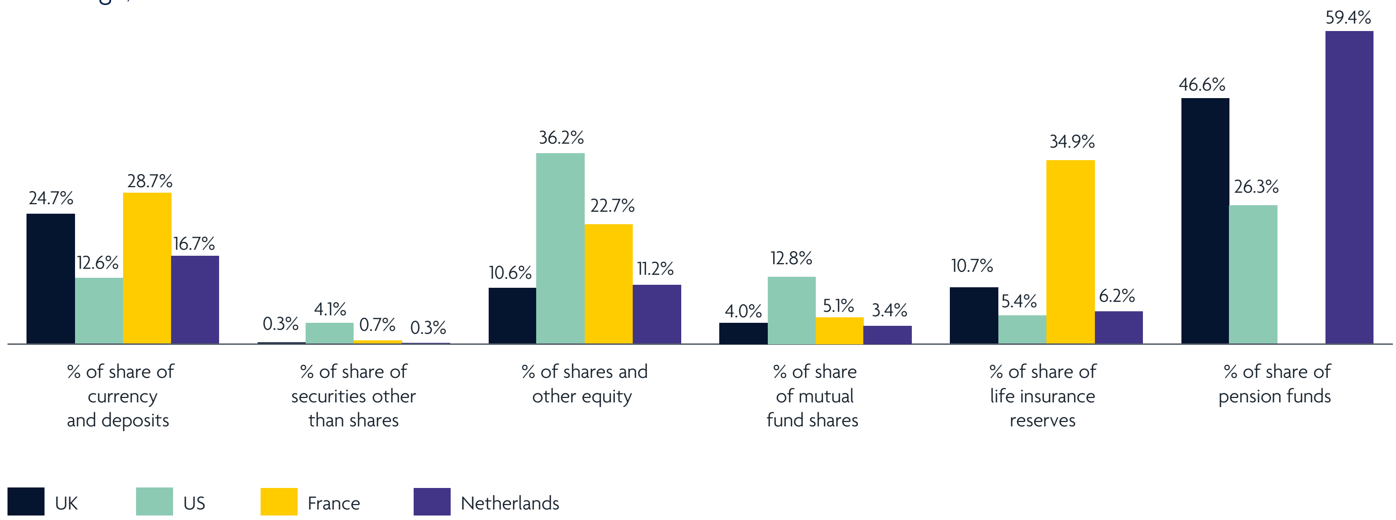


Source: Investment Association
Note: Final percentages are rounded up

UK households hold 10.6% of their financial assets in equity, compared with 36.2% of US households and 22.7% of French households.[52]

Figure 34: Household financial assets

Percentage, 2017–21

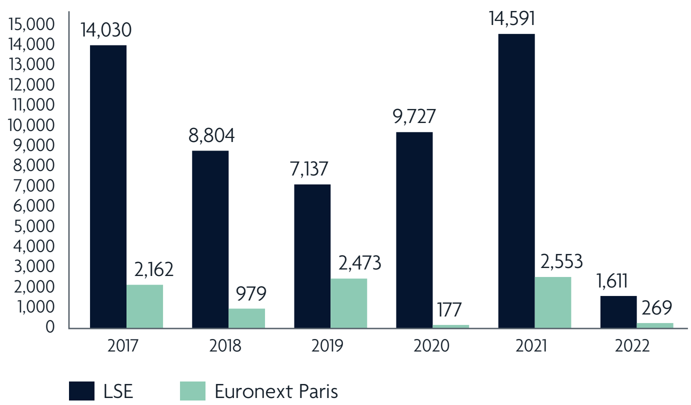


Sources: OECD

Despite the various trends referenced above, £14.6bn of new capital was raised on the LSE in 2021, substantially higher than the next highest European exchange, Euronext Paris, which raised £2.6bn.

Figure 35: IPO capital raised

£mn, 2017–22



Source: Stock Exchanges

Findings

When assessed against historical trends and international comparators, institutional investors, including UK pension funds, invest less in equities, specifically UK equities. This gap is compounded by low levels of retail participation. Despite the declining share of UK equity investments by UK domestic institutional investors, equity capital raising in the UK has increased from £14bn to £14.6bn from 2017 to 2021, funded in large part by overseas investors.

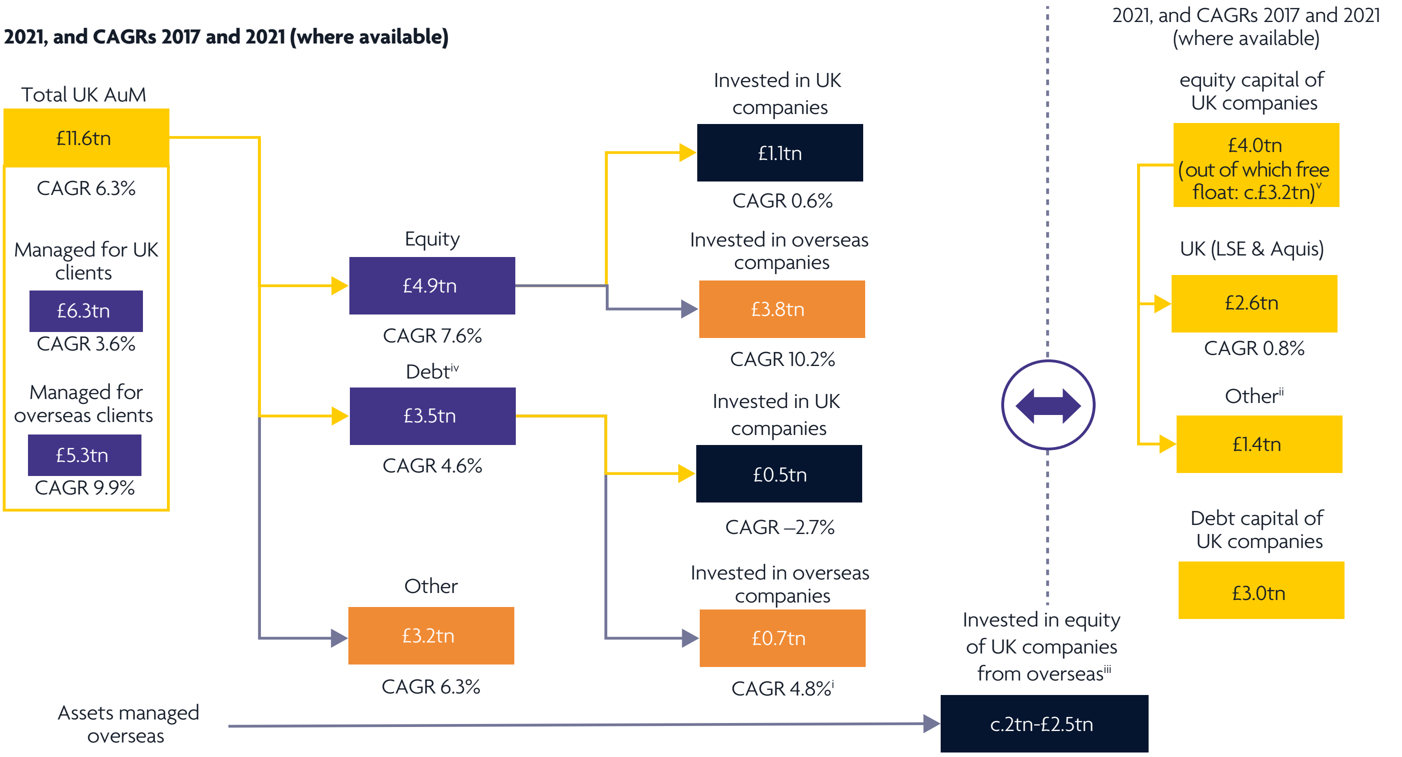
52. OECD

3.8. PERCEPTION 7

UK companies struggle to source equity capital in the UK

As of 2021, UK-incorporated publicly traded companies (wherever traded) had £4tn of equity. Of this, only £1.1tn was provided by UK investors, despite UK investors allocating £4.9tn to equities globally.[53,54] The gap is being met by overseas investors with an appetite for UK equities.[55]

Figure 36: Capital invested in UK equity capital markets vs. capital raised by UK companies
£tn, CAGR 2017–21, 2021



Source: Investment Association, London Stock Exchange, Aquis, Euronext, Nasdaq, Frankfurt Stock Exchange, BIS

i. CAGR for capital invested in overseas corporate bonds is from 2019 to 2021 due to data availability.
ii. Includes market capitalisation of UK-incorporated companies listed on NYSE, Nasdaq, Euronext, and Frankfurt Stock Exchange at end of 2021.
iii. Estimate for amount of international capital invested in the UK, considering that 62% of LSE institutional investors are overseas investors.
iv. Total debt includes corporate bonds, government bonds and others. Only the corporate bonds (£1.2tn) component has been decomposed further.
v. Average free float rate for companies listed on LSE Main Market is c.80% as of end of 2022.

Findings

UK-incorporated companies can raise equity capital, but this is not necessarily raised through the medium of a domestic exchange using UK-based investors. A significant proportion of the capital required by UK companies is provided through other means. For example, capital raised by UK companies on overseas exchanges amounts to circa £1.4tn in total. A further circa £2.5tn was raised by UK companies through domestic exchanges but from international investors who also support UK companies with capital through private markets. It is also worth noting that 39% of the UK's AuM is invested in international companies. For domestic companies looking to join the UK markets, there needs to be a strong pool of domestic capital to complement the international investor capital the UK is already successful in attracting.

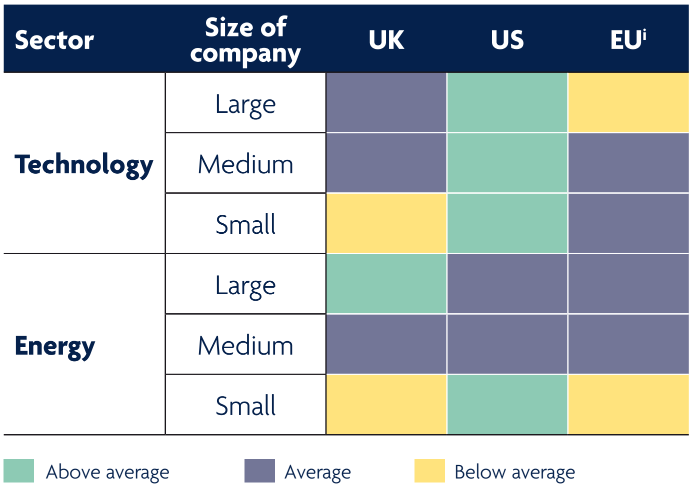
53. London Stock Exchange
54. Investment Association
55. Ibid

3.9. PERCEPTION 8

US capital markets provide more liquidity than the UK

Analysis through a sampling approach, including representative sectors from the 'old economy' and 'new economy,' found that technology companies, especially small-cap companies sub $500mn trading in the US, have greater liquidity than those in the UK. Large technology sector firms have deeper liquidity in the UK than in Europe. For traditional energy companies, the research highlighted that UK liquidity was relatively deep for large caps, while the US has comparatively deeper liquidity for small caps.

Figure 37: EY liquidity analysis across the UK, US and EU
Bid-ask spread, 2018–23



Source: Refinitiv, MarketAxess
i. Includes Paris and Amsterdam

Findings

There is deeper liquidity in the US than in the UK, but the UK generally still provides deeper liquidity than EU markets. It is worth noting that behind the averages, numerous factors influence liquidity, e.g., index inclusion and the company's location – i.e., small UK or EU technology firms choosing to trade in the US will not necessarily experience deeper liquidity.

CHAPTER 4

Market participants' sentiment of UK equity capital markets

4.1. OVERVIEW

Consistent themes are emerging across UK equity capital markets participants

Recent reforms to UK equity markets and the ongoing FCA reform agenda focus predominantly on legislative and regulatory changes. Non-regulatory factors, which often drive market practices, are equally important to the success of markets and are far harder to influence.

Through qualitative research from in-depth interviews and surveys across the market, we have identified some key themes from the perspective of a broad array of market participants, including pre-IPO companies, publicly traded companies, investors, advisers, investment managers and infrastructure providers. Even if some of the themes expressed here are hard to empirically reference or support with hard evidence, they are important indicators of the perceived reality of market participants and decision-makers.

- Companies: Many factors influence a company's decision on whether to join the public markets, including:
  - Their approach to scaling, including the sources of scale-up capital and its future impact on strategic decision-making.
  - Identifying appropriate investors with appropriate attitudes to risk and navigating media and press scrutiny when preparing to trade publicly.
  - Concerns regarding operating in a publicly traded environment, such as the costs and the requirement to meet new regulatory obligations.
  - The ability to invest for growth whilst meeting investor demands on profitability and capital returns, including dividends.
  - Access to liquidity and capital flows.

- Investors: Asset managers, pension funds, private capital and retail investors face differing challenges, including:
  - Structural dynamics (the size of the UK market), pricing, the focus on costs and regulatory factors impact investment choices.
  - Financial education, which remains an important driver of active participation.
  - A need for a pipeline of good quality and exciting IPOs.
- Ecosystem: Those working across capital markets, including investment banks, law firms, accountancy firms, and infrastructure providers (e.g. alternative trading venues and technology platforms), opined that:
  - Markets need to support technology companies better for the UK to attract more overseas companies.
  - The UK's withdrawal from the EU can be an opportunity for the UK, but divergence with the EU also brings risks, especially given the global nature of UK markets.
  - The increased use of technology and innovation will reduce the cost of access to both primary and secondary markets and improve the participation of smaller companies and investors.
  - Early-stage companies can benefit from a diverse market structure that allows for a range of primary venues, supporting transparency and wider reach.

4.2 ABOUT THE COMPANIES

Pre-IPO companies

Scale-up capital required for growth

The research found that the ability to access the capital needed to scale-up and grow is central to informing a company's strategy when considering joining the public markets.

The UK creates the greatest number of businesses per capita in Europe (one per 12.5 versus one per 17 in France and one per 25 in Germany).[56] However, the survival rate of newly founded businesses after five years was only 38% (in line with Germany but well below France).[57] Companies felt that whilst seed and early-stage capital was accessible, including through government-incentivised schemes, e.g., the Enterprise Investment Scheme (EIS) and the Seed Enterprise Investment Scheme (SEIS), accessing scale-up capital after that was difficult.

Companies highlighted the increasing reliance on international sources of capital, especially private capital (either venture capital or private equity) and the more risk-reward-focused institutional capital, to obtain the necessary capital required for growth. The desire for venture capital and private equity to take board seats, enabling them to influence the strategy of portfolio companies, was considered significant, especially for future liquidity events, including at IPO.

> **"UK companies have a lot of confidence in being able to grow at an early stage; it is the scale-up stage that becomes problematic."**
>
> Private company

> **"It would be good to develop early-stage infrastructure to avoid looking for US venture capital support."**
>
> Law firm

56. Office for National Statistics and government websites
57. Eurostat

The capital gap is an opportunity for UK institutional capital, e.g., potentially DC pension funds, to support companies to scale. It is estimated that pension funds currently contribute approximately £0.2tn to this cohort per annum, accounting for only around 3% of required funds.[58]

Companies cited that the recent reforms to R&D tax reliefs, including the SME additional deduction rate reducing to 86% from 130%, the SME payable credit rate reducing to 10% from 14.5% and refocusing R&D relief towards innovation in the UK had the unintended consequence of potentially transitioning them away from the UK.

> **"While lots of government grants and tax incentives are available for small companies, especially at early stage, they are not a predictable source and may lead to cliff edge situations."**
>
> Private company

> **"Fiscal incentives are common in other European countries, not as much to attract international companies, but to retain their own companies. France is a good example where Macron is keen to attract and retain French FinTech."**
>
> Publicly traded company

Beyond scale-up capital and fiscal incentives, companies felt that government could play an active and supporting role in achieving operating scale and traction, especially through tender processes and procurement.

> **"In the US, there are laws that mandate the government to buy from small companies, minority-led or minority-owned, and therefore support sales and a key funding source for these companies."**
>
> Private company

Preparing to join the public markets

Companies highlighted that increasing innovation is enabling new business models to be established, and this is reflected in the key sectors forecast to drive GDP growth between 2021 and 2025, namely technology (31.9%), financials (27.6%), consumer (27.2%) and medical and pharmaceutical (19.8%).[59] Respondents expressed concerns that UK equity research coverage was not specialised enough to effectively analyse these new business models. Comparable companies used for benchmarking were at a lower valuation than company expectations, and the opportunity to raise the profile of these new sectors to investors was lost.

The UK has 5,000 equity analysts, the highest in Europe but lower than the 30,000 in the US.[60] Of those 5,000 equity analysts, 721 focus on the technology sector, eight times fewer than the US's 6,741.[61] While these differentials reflect a considerably larger market in the US, there was a feeling amongst some market participants that the introduction of MiFID II has impacted research coverage.

Additionally, the number of analysts, their tenure and experience levels have also reduced. It is estimated that European brokers and banks have lost 3,074 years of experience (as a combination of the number of analysts and average tenure) since MiFID II came into effect.[62]

> **"The US doesn't have just technology analysts; they have sub-sector deep analysts, e.g., blockchain and AI."**
>
> Investment bank

> **"Research is not reaching the broader ecosystem and is not widely accessible anymore."**
>
> Investment bank

58. EY analysis based on McKinsey – Private markets rally to new heights, McKinsey Global Private Markets Review 2022
59. Oxford Econometrics
60. Refinitiv; sell side equity analysts data for the UK, as of Dec 2022
61. ibid
62. https://www.tradersmagazine.com/news/research-lost-7500-years-of-experience-since-mifid-ii/

Companies cited their experience of the difficulty of obtaining scale-up capital from UK investors and investment from UK investors at IPO.[63] Companies felt that there was a lack of traditional cornerstone investors compared with Asia, who could champion IPOs and facilitate follow-on offerings; 92% of respondents felt that the UK had a conservative culture and mindset, resulting in an investor base that lacked diversity and dynamism.

> **"In the US, the culture is different, and they admire ambition. They are just happier with success and growth."**
>
> Private company

> **"While Britain offers lower costs and lower securities litigation, as well as more certain price discovery, the American market has much more depth and liquidity, and crucially, the growth investors that the UK is lacking."**
>
> Publicly traded company

> **"Looking at Scandinavia or Switzerland, local investors just turn up, both retail and institutional. [Unlike in the UK] they are there at the IPO, then follow and back companies."**
>
> Investment bank

Concerns around the UK investor base were pervasive from several perspectives – 90% of respondents felt the investor community in the US was better for growth-orientated companies, as UK investors were perceived to be largely interested in capital returns, including dividends.

> **"We have so much growth to fund, and I don't want to get hammered by conservatively minded investors for the investments we make instead of focusing only on the profitability of the core business."**
>
> Private company

> **"UK investors are not ambitious; they don't want to invest in growth as they don't see the value in future pay-outs versus dividends."**
>
> Investment bank

Companies felt that the lack of diversity and dynamism of the UK investor base resulted in short-termism and an overt focus on risk, which had hampered their ability to execute strategic objectives, including attracting post-IPO talent.

> **"The remuneration report is absolute madness, as you need to pay to get the right people."**
>
> Law firm

Companies cited the requirements and expectations to operate as a publicly traded company were significant from 'Day 1', and there was a need for additional support from exchanges and advisers to prepare and undertake the transition effectively. It was noted that the broader UK infrastructure was centralised, with the exchanges and nominated advisers (Nomads) based in London and companies in other regions lacking support.

> **"It is like being expected to graduate immediately, whilst yesterday you were still in the nursery."**
>
> Private company

> **"You can't apply the same rules to a mid-cap as to a FTSE 100 company."**
>
> Investment bank

> **"We used to have 42 regional exchanges; that is now all centralised."**
>
> Infrastructure provider

A 'nursery' type environment would alleviate concerns about cliff edge expectations, providing a 'glide path' for companies to grow into their status as a publicly traded company.

63. A cornerstone is an investor who commits to buy a fixed amount or percentage at any price across the range when the price range is announced.

Some companies highlighted that their perception of the approach and attitude of the media had an oversized influence when considering whether to join the UK markets, with certain companies stating that their approach was to join the UK market in 'stealth mode' to avoid the news cycle and potential negative public sentiment.

> **"The media in the UK tends to be 'glass-half-empty', and that is not easy to address ... the culture in the US has more patience."**
> Private company

There were concerns from non-UK companies, particularly those from emerging markets, about their ability to engage UK investors and the difficulty in satisfying the necessary due diligence requirements. Others, especially small companies, highlighted insufficient support to deal with cross-border legal and regulatory complexities.

Publicly traded companies

Operating in a public environment

Companies cited the considerable cost of being publicly traded, including costs associated with governance and reporting, undertaking audits, and the need to establish specific committees. For smaller companies, the cost was estimated at over £0.5mn per year, factoring in professional service fees.

> **"Regulation is the result of good intentions, but it is complicated in practice when moving from private to public due to governance that aims to protect the system rather than the company."**
> Investment bank

> **"The price of being public is significant, and the requirements are daunting for smaller companies."**
> Law firm

Additionally, smaller companies raised the complexity of the IPO process and considered that it was a significant distraction from focusing on the core business.

> **"Getting listed is a tedious process, but not worse [in the UK] than on Nasdaq ... you need to be good enough, and if it takes longer, it takes longer."**
> Publicly traded company

> **"The listing process is distractive and takes your eye off the ball."**
> Publicly traded company

Ability to invest for growth

Most publicly traded companies on the LSE interviewed for this report highlighted that their ability to execute a growth strategy was hampered by investor expectations of capital returns, including dividends. Dividends paid by FTSE 100 companies are five times higher than S&P 500 (adjusted to reflect total market capitalisation).[64] Some companies cited that pre-IPO concerns to attract talent and compensate appropriately to deliver future growth had resulted in special structures to overcome remuneration challenges.

> **"Dividend-focused investors are hampering the ability to invest and grow."**
> Publicly traded company

> **"Compensation practices need to change, as international companies need to pay in line with US peers to be able to attract the right talent."**
> Publicly traded company

Maintaining liquidity and accessing capital flows

Several companies felt a lack of liquidity in their equity and found it difficult to continue accessing existing investors and/or bring in new investors. The EY analysis highlights that liquidity is less healthy for small-cap companies,

64. EY analysis of AJ Bell, S&P Dow Jones Index data.

including in the UK. However, there are differences across markets. For example, small biotech firms in Amsterdam have two-to-three times higher bid-ask spreads.[65] Several UK companies who chose to trade on other markets, such as in the US market for potentially greater liquidity or in Amsterdam for ease and simplicity, have further suffered due to the distance from their home market.

> **"Small and mid-cap fund managers are providing less liquidity as they are less active than they used to be."**
>
> Investment bank

> **"Listing in the US is not a one-way ticket to success. A lot of companies have become orphans, with no affinity with that market and have lost the attention of investors."**
>
> Investment bank

Companies highlighted that those not admitted to trading on the LSE Main Market lost out on index investors and accordingly had lower capital flows and lower research coverage. Although passive investors are not actively trading, index inclusion is still perceived to be highly beneficial to liquidity and provides visibility and profile for the company. The analysis shows, on average, that the liquidity of AIM-traded companies is significantly worse than those trading on the Main Market.[66]

> **"Once you are in the FTSE 100, your capital will keep going up. The fundamentals are not reflected in the value allocated to you."**
>
> Investment bank

> **"A technology index, even if synthetic, would support visibility and clustering of growth companies."**
>
> Private company

4.3. ABOUT THE INVESTORS

Asset managers

Respondents highlighted structural dynamics, including the size of the UK market, the perceived lack of quality companies, the influence of venture capital and the criticality of after-market liquidity as key factors contributing to their investment decisions.

The size of the UK market was a key consideration driving appetite for risk. The number of UK IPOs in 2021 was 140 (126 LSE, 14 AQSE) compared with 1,056 in the US.[67] AuM in the UK represents 29% of AuM in the US (£11.6tn to £40tn).[68] Of UK-managed equity AuM, only 22% is invested in UK equities (£1.1tn compared with £4.9tn in total).[69] Asset managers referred to a necessity to meet the needs and expectations of 'end customers', which could limit their ability to take risks.

> **"UK fund managers have a different risk profile due to the volume of capital available for them to invest. While a US fund manager may have 50–100 IPOs per year to invest in, a UK one might have only 5."**
>
> Investment bank

> **"There is relentless pressure on meeting your benchmarks; exploration comes with 'hit and miss, and needs a longer-term view than quarter-to-quarter."**
>
> Investment manager

65. Refinitiv; EY analysis based on a sample of 102 companies across five stock exchanges and three sectors.
66. Ibid
67. LSEG, Nasdaq Stock Exchange, New York Stock Exchange.
68. BCG; Global asset management 2022
69. Investment Association, LSE, Aquis.

UK investors felt that there had been a lack of new, good-quality UK IPO candidates in recent years, and the perception of international investors was that the UK could do more to support innovation that, in exchange, would attract capital.

> **"We have seen very few exciting UK IPOs for years. When there is one, everyone wants to get an allocation of the same company."**
> Investment manager

Respondents suggested that early-stage and growth companies may prefer venture capital and private equity as strategic partners to other early forms of financing, as they can provide the support required over the longer term.

> **"[US] venture capital money is a popular route to market, as the venture capital owner can effectively help to scale."**
> Investment bank

The importance of understanding aftermarket liquidity was raised, especially when investing in riskier regions or companies. Respondents mentioned government-backed schemes to ensure liquidity post-IPO as a potential solution that has worked well in other countries.

> **"Initiatives from exchanges where they can talk about an IPO fund and can cornerstone an IPO and support aftermarket liquidity has resonated very strongly with a lot of issuers."**
> Investment bank

Pension funds

Regulatory considerations, attitude to risk, the convoluted value chain around pensions and the current political focus on activating pension capital were all raised as factors impacting investment strategy.

The impact of recent proposals regarding the pension fee cap and performance fees were cited as positive steps in the right direction; however, this would not address the structural issues in the market.

> **"Regulation on the pension fee cap is not the issue, but competitive dynamics are."**
> Investment manager

There was broad agreement that a lack of motivation exists around risk-taking, including engagement and empowerment of the end customer (policyholders). UK households hold 10.6% of their assets in equities, a third less than US ones and half the amount French households invest.

> **"We haven't created 401k style pension plans and corresponding engagement."**
> Investment manager

> **"There are a couple of areas where younger generations are actively expressing interest, such as crypto, ESG (e.g., energy transition), that can be potentially leveraged."**
> Investment manager

There were concerns that pension funds were in danger of being told when and where to invest based on the broader political discourse for greater investment into equities by pension funds.

> **"Uncertainties in the UK market make it unattractive for pension funds to get in, and they should not be forced."**
> Investment manager

Private capital funds

Interviews with venture capital and private equity funds highlighted that the exit strategy used to achieve the relevant fund returns was the overriding factor when considering a liquidity event. The ability to execute that strategy was also influenced by where the fund was domiciled, timeframes for achieving a liquidity event and the ability of new investors to understand the private equity business model related to debt and leverage.

Respondents commented that an exit via public markets is not the primary exit strategy currently. Private equity firms typically seek a 'complete exit' from the relevant asset. The exit approach and the increasing trend for private equity firms to invest in complex assets means that an M&A route (including a sale to another private equity fund) is more attractive, especially given the process and time to market on an IPO. Between 2017 and 2021, only 11% of private equity exits were IPOs.

> **"Our businesses are typically not the vanilla businesses that are easy to price. We need sophisticated investor money."**
>
> Private equity

> **"We cannot afford the extra time that the LSE and FCA require from a company with a complex financial background [compared with some European exchanges]."**
>
> Private equity

Private equity firms also highlighted the leverage of portfolio companies and the requirement for market depth and commented that US exchanges are more comfortable with high leverage.

> **"Our businesses are 6x–7x leveraged; we need the proceeds from IPO to pay down debt. It is difficult in European markets. In the US, it is easier to exit."**
>
> Private equity

Critically, when private equity considered an IPO exit, exchanges that provided the greatest immediate gain through valuation, with the so-called 'IPO pop', were most attractive.

It was also noted that a large amount of private capital is locked up due to market developments in 2022 and not being 'recycled' to support new companies, as PE companies face challenges to exit. Companies tend to use private capital longer, meaning that the focus and capital allocation are moving from early-stage towards later-stage.

> **"Early-stage capital should go back to early-stage investment."**
>
> Publicly traded company

Retail

Interviews with technology solution providers and other platforms highlighted the challenges in enabling individuals' ("retail") seamless and cost-effective access to public markets. At the same time, feedback showed that there was a perceived need to simplify messaging and financial education if markets are to be more accessible to them. However, there was also the reflection that a range of investment vehicles that cater for the different needs of investors (including SIPPS, ISA variations, EIS, SEIS and EMS) is required to be maintained going forwards.

> **"Retail investors don't have sufficient understanding to participate in equity and bond markets, as they lack understanding of the products."**
>
> Investment bank

Interview participants have identified several potential benefits to retail participation. Individuals behave differently to institutional investors, potentially contributing to market diversity. Adding in additional retail investors was also highlighted as a way of creating more market depth They are also perceived to contribute to better price discovery and liquidity, given broader views and different investment motives.

Some interviewees observed that during the 2020 COVID-19 crisis, the liquidity provided through retail investor participation in some equity capital markets helped the recovery of those markets, and this view has been further supported by research studies.[70] In an environment where other investors were exiting the markets due to regulatory and internal risk management requirements, retail investors could step in by purchasing shares and thereby supporting companies. These interviewees observed that improved retail investor participation will benefit the capital markets and enable long-term wealth creation for individuals, an imperative in an environment where pension schemes are moving away from defined benefits to defined contributions resulting in individuals having to take greater personal responsibility for saving and investing.

For example, in the US and France, 10% of the IPO offer amount is typically made accessible to retail investors.[71] In the UK, however, those who interviewed felt cultural aversion, legal concerns and technological limitations provide friction to investments.

> **"While [a global investment manager firm] may sell all your stocks the next day after the IPO if the price is up, a retail investor will feel ownership and stick around for 5-10 years."**
>
> Trading technology provider

> **"While in the US it is absolutely common, in the UK raising capital from retail is seen as having trouble accessing institutional capital."**
>
> Publicly traded company

An estimated £3.9tn of UK investor assets are in cash deposits and cash ISAs.[72] Participants said that an element of these cash balances could be reallocated to support UK equity capital markets. However, this will need to happen step by step.

> **"Savings account holders will not want to jump into IPOs right away – they will need to be supported in their journey of investing through buying bonds, (passive) ETFs and individual stocks on the secondary market first, to gain confidence."**
>
> Trading technology provider

Interest in trading on the secondary market is increasing. The Freetrade and Vanguard UK platforms gained over 1mn and 400,000 customers in the past five years, respectively.[73] Even the incumbent Hargreaves Lansdown is growing at a yearly rate of 13%, reaching close to 2mn users with an average invested amount of £100,000.[74] However, the US surpasses the UK in scale – Robinhood alone had 23mn funded accounts at the end of 2022.[75]

> **"Scale and adoption is still behind the US where there are multiple trading accounts per person."**
>
> Investment bank

70. World Economic Forum; 'Future of Capital Markets: Democratisation of Retail Investing- Insight Report August 2022': During the 2020 COVID 19-related stock market drop, the presence of retail investors buoyed the market, leading to a quick recovery through the provision of liquidity.
71. PrimaryBid
72. Investment Association
73. Freetrade and Vanguard
74. Hargreaves Lansdown
75. Robinhood

4.4. ABOUT THE ECOSYSTEM

Interviews with a range of key advisory functions which support equity capital markets, including investment banks, law firms and accountants, to understand whether the sentiments raised by companies and investors resonated with those who facilitate equity capital raising. Most advisers commented that the points raised by companies and investors were consistent with their understanding.

Investment banks

Investment banks highlighted regulation and change, investor mindset and emerging business models and markets as key areas of friction.

The recent regulatory changes following the UK Listings Review, including reducing the minimum free float to 10% and the changes permitting certain dual-class shares, were called out as positive influences on a company's choice of market. Respondents commented, however that many recent changes were iterative and more transformational changes were required. There was a sense that the UK now has an opportunity to move away from EU regulation. However, many also saw that divergence as a potential risk. It was felt the UK would need to work hard to stay competitive, given potential reforms in the EU.

> **"[rules] have become easier and more flexible; but still not enough of a difference to make a strong difference to list in the UK instead of Europe."**
>
> Investment bank

> **"We shouldn't spend time on developing products and adapting to new regulation if the impact delivered is minimal."**
>
> Investment bank

> **"The UK could benefit, for example, from a more purposeful pre and post transparency regime. It has the ability to be more agile than the EU as they need the compromise of 27 regulators."**
>
> Investment bank

Investment banks felt that the UK equity capital markets had not adapted to the change to new business models, especially those that were asset-light and more intellectual property (IP)-driven, as quickly as other markets and, as a consequence, had been less able to capitalise on the transition to the new economy sectors.

> **"Technology companies find the City conservative and are looking for like-minded peers, investors and advisers, including lawyers and accountants who understand their business."**
>
> Investment bank

Emerging markets and broader geopolitical considerations were seen as an opportunity for the UK to reorientate itself and maximise on trends. These include the increase of IPOs in the Middle East and navigating the approach with China and the UK's relationship with the US.

> **"Aligning with the US is an issue when having business with China. The scrutiny of the SEC follows even after delisting."**
>
> Law firm

It was felt that the UK was in a position of strength regarding secondary markets, with market-leading infrastructure and technology. However, accepting cultural change could restrict further growth and innovation.

> **"It is hard to improve the existing ecosystem. The market is strong, very well connected, people know each other, but at the same time, these people are resisting change."**
>
> Investment bank

Law firms

Law firms highlighted the need for companies to receive holistic, unbiased advice to support the decision-making process, which wasn't always considered to be the case. Companies appeared to have predefined perceptions of the benefits of a particular destination.

> **"The softer factors have been lost against valuation and liquidity ... need to bring them more to the forefront so people can make a holistic decision."**
>
> Law firm

Common themes were the complexity of the experience, that regulation was over-emphasised and the progress from recent reforms not fully appreciated. It was also felt that companies underestimated the complexity of US regulation and that the media narrative on the ease and upside of joining exchanges outside the UK contributed to decisions on where to trade.

> **"Regulation in the UK is not as bad as is made out versus other markets. In Hong Kong, the process is very invasive, litigation issues in the US are consistent, and in Sweden, there is a high degree of regulations."**
>
> Law firm

> **"We are not in a good place in terms of perception. Companies are pulling out of the market based on what they are hearing in the press."**
>
> Law firm

Accountancy firms

Accountancy firms highlighted the structural shift away from equities as a key factor, which had been exacerbated by attitudes to and perception of risk. It was felt that the regulators' stance on risk management policies for the investment management industry was often interpreted with risk-based outcomes, e.g., the concept of value for money, which was driving a focus on costs.

> **"We need to illustrate to policymakers the relatively low risk associated with equity in a balanced portfolio of investments versus gilts."**
>
> Accountancy firm

Some firms expressed concerns about the lack of AIM's success in providing a stepping stone to the Main Market. It was commented that founders enjoy distinct tax reliefs on AIM, which fall away on a move to the Main Market. It was suggested that if the loss of this relief were tapered, this would encourage more 'step-ups'.

> **"AIM has not proven to be a successful feeder to the Main Market."**
>
> Accountancy firm

CHAPTER 5

Analysis of sentiment

5.1. OVERVIEW

Clear consensus on the strengths and areas for attention for the UK equity capital markets

The interviews and the surveys highlighted important themes and insights on how market participants view the different aspects of the UK capital markets.

These sentiment themes and insights were structured to better understand the following:

- The most important decision factors, as well as differences between various types of companies.
- The key strengths and areas for attention for UK capital markets.

The approach used to analyse market sentiment has followed three main steps:

- Identifying seven distinct company types.
- For each company type, identification of the main decision factors related to the use of an exchange.
- Identification of the strengths and areas for attention for the UK capital markets – by integrating the qualitative and quantitative data analysis.

Overall, there has been a level of consistency among the market participants on the critical factors when considering where to trade. By order of importance, and across the different types of companies, these factors were as follows:

- Access to a strong investor base
- Valuation and research coverage
- Liquidity
- Comparable companies
- Ease and cost of being publicly traded

Key nuances were identified across the different types of companies. For example, small, high-growth US and international companies expressed a preference to join the AIM market in the UK – as US markets were inappropriate due to their size and eligibility and continuing obligations requirements. For this type of company, the ease and cost of trading publicly was a strong deciding factor. For most other company types, the access to a strong investor base was considered the main decision criterion.

This market sentiment analysis combined with the quantitative analysis has also highlighted the key strengths and areas for attention of the UK capital markets.

- The key strengths include: The UK has a deep capital pool, a large research analyst base, a considerable level of liquidity and a wide range of companies.
- The key areas for attention: Despite the deep pools of capital and the reasonable level of liquidity, certain companies find it difficult to access capital and grow. Continuing obligations requirements and the sponsor regime seem onerous and distracting for some.

5.2. ANALYSIS OF COMPANY TYPES

To evaluate the broad range of issues and perspectives gathered from market participants, the data was structured by creating seven different types of companies that utilise UK equity capital markets. These groups provide additional insight into how the characteristics of the companies, e.g., size, sector, stage of development and location, impact their requirements. Additional characteristics of ownership structure and leverage have also been used.

Figure 38: Preferred location by company 'types'

		UK-incorporated companies			International companies			
		A	B	C	D	E	F	G
		Small domestic-focused UK companies	Medium high-growth UK companies	Large international-focused UK companies	(Small) European companies	(Traditional) Non-European companies	Companies that are secondary listed international	Small high-growth US/international companies
Preferred market		UK	UK/US	US	Europe	UK/HK/US	US/UK (Secondary)	UK – AIM
Type	Size	Small	Medium	Large	Typically Small	Medium	Large	Small
	Business coverage	UK	International	International	EU	Regional	Global	US
	Growth rate	Any	High-growth	Medium growth	Medium growth	Any	Medium growth	High-growth
Further company Insights		• Typically owned by founders and management (who will continue to lead firm post admission), moderate growth ambitions, profitable and cash generative business	• Typically high-growth (e.g. tech/health) firms which are (foreign) VC/PE owned, with owners looking for an exit	• Typically firms still having further growth potential, have strong follow on capital needs, have a global business, management team/talent pool	• Companies, typically from Eastern Europe looking to move beyond their home markets, with moderate capital need	• Companies, typically traditional, from Central and Eastern Asia, without mature and liquid home markets	• Major international firms that are looking to boost liquidity and reputation through a secondary listing	• Small companies (incl. Canada, US), seeking equity funding but too small to trade in the US due to listing regulations

Notes:
i. Observations refer to the interviews and surveys with companies , as well as inputs from advisors discussing certain company type.
ii. Methodology: Both interviews and surveys have been utilised to devise the rankings, and observations from both companies and advisors have been used. The first step consisted of ranking the importance of these dimensions at an individual level (after undertaking either an interview or survey for each company or advisor) – survey candidates were prompted to make a ranked selection from a list of 15 criteria, while interview candidates were asked about their priorities and tested on the most commonly listed items by survey participants. The second step consisted of taking all the dimension score for companies in the same type and summing them together to create an overall ranking for each company type. The dimensions of importance were then chosen and ranked above.

Companies were asked to rank the critical factors they consider when assessing the strength of an exchange. The top five results were consistent, regardless of the type of company:

- **Access to a strong investor base:** access to sophisticated investors with an understanding of the sector and business models.
- **Valuation and research coverage:** access to specialist research analysts with appropriate depth of knowledge to be able to provide insights for investors.
- **Liquidity:** sufficient market volume in the aftermarket, index eligibility and turnover of indices.
- **Comparable companies:** the presence of companies from the same sector or with similar business models on the relevant market.
- **Ease and cost of being publicly traded:** complexity and cost of the process, driven by regulatory, accounting and disclosure requirements, and availability of support during the process.

While there was consistency on the top-ranking issues, it should be noted that other responses highlighted considerations that were more specific to the type of company – resulting in a longer and more nuanced list of critical factors.[76]

Three most notable differences emerged from this exercise. Firstly, governance was the top issue for large internationally focused UK companies (type C) but not in the five top factors for most other company types. Secondly, liquidity was much less of a factor for UK companies than international companies. Thirdly, small and medium companies are more concerned by the ease of the process.

Figure 39: Top 5 listing decision criteria by company 'types'

		UK-incorporated companies			International companies			
		A	B	C	D	E	F	G
		Small domestic-focused UK companies	Medium high-growth UK companies	Large international-focused UK companies	(Small) European companies	(Traditional) Non-European companies	Companies that are secondary listed international	Small high-growth US/international companies
Preferred market		UK	UK/US	US	Europe	UK/HK/US	US/UK (Secondary)	UK – AIM
What are the Top 5 decision criteria for company type when assessing the strength of a stock market?	Rank 1	Access to a strong investor base	Access to a strong investor base	Governance matters	Valuation/ research coverage	Liquidity	Liquidity	Ease and cost of being publicly traded
	Rank 2	Valuation/ research coverage	Valuation/ research coverage	Access to a strong investor base	Access to a strong investor base	Stability	Reputational considerations	Access to a strong investor base
	Rank 3	Ease of process	Ease of process	Valuation/ research coverage	Liquidity	Access to a strong investor base		Liquidity
	Rank 4	Geographical relevance	Liquidity	Reputational considerations	Governance matters	Diversity of ecosystem		Reputational considerations
	Rank 5	Liquidity	Comparable companies	Comparable companies	Geographical relevance	Comparable companies		Valuation/ research coverage

Note: The colours represent the same criteria across the company type column.

76. Additional criteria definition: **Reputational considerations** (external factors that can impact a company's reputation, e.g., the attitude of the press/media), **Geographical advantage** (growth opportunities in the company's home market or new markets), **Governance matters** (Practices regarding the executive remuneration and a company's corporate/board structure), **Stability** (Refers to a country's economic and political stability), **Diversity of ecosystem** (Ability for an ecosystem to provide a broad range of products and services to its market participants. E.g., the sophistication of products, accessibility of pre- and post-IPO services).

The company types also had differing preferences on location. While small companies, both domestic-focused (Type A) and US or international (Type G), see a substantial benefit from trading in the UK, medium high-growth UK companies (Type B) and large international-focused UK companies (Type C) more often choose another destination. Having a UK presence is still important for some non-European companies (Type F), while EU companies (Type D) may prioritise locations within the EU.

Figure 40: Number of companies per company type that trade in the UK or elsewhere

		UK-incorporated companies			International companies			
Company types:		A	B	C	D	E	F	G
	Total sum of companies across types	Small[ix] domestic-focused UK companies[i]	Medium[ix] high-growth[ii] UK companies	Large[ix] international-focused UK companies	(Small) European companies	(Traditional) Non-European companies	Companies that are secondary listed international	Small high-growth US/ international companies
Preferred market		UK	UK/US	US	Europe	UK/HK/US	US/UK (Secondary)	UK – AIM
Companies traded on the LSE	1902[viii]	1355	15	89	100	235[v]		110[vi]
Companies IPOed on LSE (from 2017 to 2022)	467	352	7	6	15	58		29
Companies that have migrated to other exchanges (from 2017 to 2022)[iii]	161	28	4	4	51[iv]	NA	NA	74[vii]

Notes:

i. Number of all UK-based AIM and small Main companies used as a proxy for type. Listed on LSE from end of 2022 LSE issuer list: AIM [704] and small Main [651]; UK-incorporated companies that IPOed on LSE from 2017 to 22: AIM [167] and small Main [185].

ii. For high-growth companies, technology and healthcare sectors have been used as an approximation.

iii. Estimated based on global IPOs as tracked by LSEG, for 2017 to 2022 period.

iv. Number includes cross-country listings of EU companies on Euronext [15] and EU companies traded in the US [36]. Excludes companies that have listed on their domestic market or on other locations.

v. Non-EU companies include North America (114), Asia (56), Australia (29), Africa (12) , Latin America (3),and Middle East (19).

vi. All non-UK based companies on AIM, including North America (52), Europe (27), Asia (5), Australia (20), Africa (1), Latin America (1) and the Middle East (4).

vii. Companies from outside EU listed on Euronext Growth [1] + Micro foreign companies traded in Australia [73]. We defined micro companies as companies with market cap below £200mn.

viii. Unclassified companies: 161. They might behave as company type A, B or C based on their individual characteristics.

ix. For analysis of the company types, the following size definitions are being applied: "Large" companies defined as market cap above £4bn, "Medium" companies as market cap between £1 and 4bn, "Small" companies as market cap below £1bn.

5.3. SENTIMENT ON THE STRENGTHS OF UK EQUITY CAPITAL MARKETS AND AREAS THAT REQUIRE ATTENTION

Combining the qualitative sentiment from interviews with the quantitative data from surveys and the rankings of different market participants, many strengths of the UK equity capital markets have been identified. Similarly, there are areas that require attention.

Company perspective

Access to a strong investor base

- Strength: In aggregate, the UK is perceived to have deep pools of capital and significant market liquidity compared with European financial centres.
- Areas for attention: The benefits of these capital pools were not necessarily felt by all companies. In addition, the UK has a conservative investor base with limited risk appetite and a preference for capital returns, including dividends, over supporting growth.

Valuation and research coverage

- Strength: The UK has a large analyst and research base providing coverage of the mid and large segments of the market. Coverage predominantly focuses on traditional business models, with limited pockets of specialist coverage of emerging sectors, e.g., renewable energy.
- Areas for attention: There is a lack of independent research coverage for smaller companies and a limited number of research analysts for high-growth sectors. Companies felt this impacted the profile of specific sectors and contributed to a lack of investor understanding and appetite to invest.

Liquidity

- Strength: The UK is considered a highly liquid market, especially for companies on the Main Market, with index inclusion more predictable than the S&P 500.
- Areas for attention: Small and mid-cap fund managers provided lower levels of liquidity as they are less active, which impacts the companies in this segment.

Comparable companies

- Strength: UK markets have more comparable companies in traditional sectors, including manufacturing and natural resources, than other European markets.
- Areas for attention: High-growth companies are adversely impacted by a lack of appropriate comparable companies in the UK markets.

Ease and cost of being a publicly traded company

- Strength: The robustness of the process required to join public markets is respected. AIM provides a lower entry threshold with a relatively straightforward admission approach. Underwriting costs in the UK are considered to be moderate compared with the US and Asia. Litigation risk is also lower than in the US.
- Areas for attention: Some view the sponsor regime as onerous, distracting and unduly complicated, especially for non-UK companies. The system does not cater for complex scenarios, e.g., managing the impact of US SEC regulation for US-domiciled companies. For smaller companies, the cost of being public is significant, and the requirement to comply with all continuing obligations immediately on listing is challenging. The transition from AIM to the Main Market is not straightforward and creates friction. The FCA published proposals in May 2023 to establish a single Main Market listing category for equity shares in commercial companies. A more flexible, disclosure-based approach to eligibility and continuing obligations is proposed together with modifications to the role of the sponsor.[77]

77. https://www.fca.org.uk/publications/consultation-papers/cp23-10-primary-markets-effectiveness-review

Investor Perspective

Market efficiency and infrastructure

- Strength: The UK has a mature market infrastructure. Specifically, secondary market infrastructure is viewed as world-leading due to intermediary technology.
- Areas for attention: In the UK, infrastructure that can support early and growth-stage private companies is considered less mature and is relatively limited. Non-US platforms operate on significantly lower volumes than US ones, e.g., Forge and Nasdaq Private Market. However, there are live initiatives in the UK currently assessing solutions such as an intermittent trading venue (ITV) to bridge private and public markets.

Quality of companies

- Strength: High regulatory standards, including disclosure requirements, provide assurance that UK companies are well-managed and appropriate for investment.
- Areas for attention: There is a perception that high-growth or high-potential companies' decisions to join overseas exchanges resulted in domestic exchanges accommodating less attractive companies.

A pipeline of new companies

- Strength: Many new companies are created in the UK compared with other markets, underpinned by strong talent and a spirit of entrepreneurialism.
- Areas for attention: Impact of private capital (i.e., companies staying private longer or taken private after flotation) and associated exit strategies impact on the decision on whether and when to seek a public listing.

Diversity of investment opportunities

- Strength: Opportunities are available across all sectors, including companies at various sizes and stages of their lifecycle.
- Areas for attention: There is a perception that the UK does not have scale in certain sectors, and it is difficult to find a sufficient number of 'exciting' investment opportunities that are worthwhile to invest in.

CHAPTER 6

Recommendations to support UK capital markets

6.1. OVERVIEW

Action needs to be taken now to build on the market's strong foundations

The information presented in this report shows that while the UK equity capital markets have strengths, there are four areas where enhancements need to be made to ensure our markets are better equipped to continue to serve the economy in the decades to come:

- Companies need more help to access growth-stage funding, especially those companies that require investors to remain invested for a specific duration (so-called patient capital).
- More capital could be unlocked from institutional and retail investors and invested in UK equity.
- Frictions in the system should be removed to drive further efficiencies.
- The benefits of joining and investing in the UK should be celebrated, and those willing to invest and grow in the UK should be supported and championed.

The recommendations cover both targeted 'quick wins' and the need for further market change. Together they form a package that could help optimise the UK markets for the future. These recommendations are put forward in the spirit of further debate and should be considered alongside other initiatives that look to enhance the competitiveness of UK capital markets.

6.2. DIAGNOSTIC

The data identifies current factors and developing market trends that, without intervention, will put the UK's market on a downward trajectory. It is time to move from ideas to action to secure the fundamental long-term health of the UK's markets.

Four distinct but interrelated themes have been identified, noting that some issues are not new; however, their persistence in 2023 demonstrates they remain outstanding, and more work needs to be done.

SMEs need more help accessing UK capital markets

Feedback pointed to the fact that small and medium-sized UK-based companies find it challenging to obtain appropriate funding and support at certain stages of their growth lifecycle. If left to continue, this will hinder the future depth of UK capital markets and their overall attractiveness to investors. Based on data and survey feedback, we provide four tangible illustrations of the challenges facing smaller companies:

- Some companies struggle to obtain the support they need to help with R&D-related investment initiatives following recent changes to tax credits.
- New and emerging businesses find it difficult to secure investors who understand their business model and future potential. This is especially true for niche and new subsectors and technologies.

- There is a perception that the path to becoming publicly traded is too complex. This deters companies from joining public markets, as they are concerned that they will need significant additional resources and that management will be distracted from running the core business.
- The 'cliff-edge' expectation of having to operate on Day 1 as a publicly traded company, with no 'glide path' to ease into significant new obligations and duties, was a particular concern.

UK capital does not always reach UK companies

The UK's approach to investment is driven by both structural factors (such as accounting and regulation) and cultural factors (a desire for return rather than longer-term growth). The result has been a sharp drop in the capital invested in UK equity. The data-gathering exercise demonstrated that:

- UK investors prioritise capital returns, including dividends, over the patience needed for longer-term returns in growth companies.
- 90% of participants (across all cohorts interviewed) felt that the investor community in the US is more supportive of high-growth companies.
- Historical changes to insurance rules and pension reforms resulted in lower relative equity holdings.[78]
- UK households, on average, hold significantly less (10.6%) of their financial assets in equity than comparable countries.[79]
- Public market participation is not culturally embedded in the UK.
- In 2021, UK investors invested £3.8tn in non-UK equities.[80]

Collectively, these factors are stifling the capital available to UK markets – especially for small and medium companies with high-growth potential. In contrast, there is a perception that US VC markets have 'deeper pockets' and are more willing to support small companies through their early lifecycle to IPO.

Too much friction disrupts capital flows

The UK can do more to further simplify and streamline operational processes. This would ensure an optimal flow of capital between domestic and international investors and companies. Some areas of friction in the system include:

- The burdens placed on companies by manual and duplicative processes are costly and out of place in a digital world.
- The cost and time needed to manage the obligations that apply to publicly traded companies (such as governance and reporting) are seen as onerous and disproportionate.
- MiFID II unbundling rules have led asset managers to scale back on the number of research providers they use. Breath of stock coverage – particularly at the smaller end of the market – has suffered as a result. Additionally, the changes introduced in 2018 to facilitate a broader range of investment research on IPOs have not resulted in a marked increase in research and have introduced an additional week of potential market risk into the IPO launch timeline.
- Frictions in the transition process from AIM to the Main Market hamper the ability of companies to 'step up'.

The UK's profile is suffering

The UK has an opportunity to redefine how it showcases itself to global market participants. Currently:

- Some respondents considered the public discourse disproportionately focussed on corporate failure rather than championing success. This was viewed in sharp contrast to the 'pro-business' environment in the US.
- Respondents also noted the focus on relative senior-level pay and remuneration in the UK and its subsequent impact on hiring and retaining global talent.

78. Powerful Pensions; unlocking defined contribution capital for UK tech growth.
79. OECD
80. Investment Association

6.3. RECOMMENDATIONS

One of the aims of this report is to prompt debate. It is critical to adopt a collaborative and cooperative approach in order to improve UK markets. The recommendations in this report are not presented as comprehensive; they are practical and aspirational actions that, collectively, can move the dial.

Some of the actions build on existing ideas and initiatives. Other suggestions are more transformative and originate in direct response to the needs identified. These recommendations are intended to prompt further debate and engage key stakeholders to strengthen the UK's position as a market of choice in the decades ahead.

Recommendation 1: Address the structural challenges hindering UK growth companies

There is a need to scale-up UK Limited to UK PLC and help support UK SMEs' understanding of their path to becoming publicly traded companies. The core action is harnessing the convening power of government and industry to share ideas, challenges and opportunities to help maximise the growth and potential of UK companies.

When defining timing, the following has been assumed: short-term actions to be tackled within a year, medium-term ones within two to three years, and long-term ones in three years or beyond.

Action 1.1 R&D incentives: Provide larger, sustained R&D tax breaks for targeted sectors. Such incentives should be structured over a long enough period (e.g., 10 years) to provide companies with clarity across the investment cycle. The provision of greater incentives to UK-incorporated companies trading on a UK market should also be considered.

Key stakeholders: HMT/HMRC; Timing: medium-term.

Action 1.2 Improve investment products to help companies scale and grow. Examples include:

a Schemes to encourage investment already exist; however, their current scope should be expanded. The scope of investment under the Enterprise Investment Scheme (EIS) and the Seed Enterprise Investment Scheme (SEIS) should be extended into regulated entities, for example, regulated fintech businesses. Enterprise management incentives (EMIs) should be included alongside the SEIS to eliminate an 'incentive cliff edge' for scaling companies.

   Key stakeholders: HMT/HMRC; Timing: medium-term.

b. Consideration should be given to tax policies that incentivise companies to continue to grow and ultimately join UK markets. For example, any public money paid via tax schemes could be repaid if a company chooses an exchange outside the UK within 10 years of receipt of the relevant funds.

   Key stakeholders: Government, HMRC; Timing: short-term.

c. The UK could develop fund structures to support companies on their growth journeys and channel more domestic capital into UK equities. By way of example, this could be achieved by:

   – The introduction of 'growth funds' that are privately funded (i.e., by attracting money from DC pension pots) and focus investments on early-stage companies and or target sectors. The development of the Future Growth Fund, being led by the City of London Corporation, will be an important initiative in this regard.

   – Cross-over funds which support companies on their journey from private to public. The investment strategy of these funds would be to take private companies through a public process and remain invested, acting as a cornerstone investor.

   Key stakeholders: HMT, HMRC, City of London Corporation, market participants; Timing: short-term.

Action 1.3 Establish a 'Web Summit'-style annual conference in the UK. This would enable the government and regulators to listen to the challenges and opportunities from both UK-traded companies and candidates that could join public markets in the future in a more informal conference-style environment suited to seeking feedback on sentiments and perceptions on how UK markets are serving UK businesses. Other stakeholders, such as infrastructure providers, advisers and investors, could also be involved in such a gathering.

Key stakeholders: DBT, HMT, stock exchanges, trade bodies; Timing: short-term.

Action 1.4 Provide a glide path to becoming a traded company and beyond. The obligations publicly traded companies are required to comply with are a significant step for a company previously held privately, meaning that a 'bridge' to the public markets and additional support in their early life as a traded company would be beneficial. A proposal for an 'intermittent trading venue', enabling shareholders in privately held companies to trade shares on set days, is already under consideration. Expected new rules implementing HMT's proposals to reform the prospectus regime include provisions aimed at encouraging companies to disclose future financial information (e.g., forecasts). This expected relaxation of existing requirements may provide companies choosing to go public with another way to tell their story to the market.

Regulators and market operators should establish a more formal communication channel with newly traded companies to help them through at least their first six months as a publicly traded company.

Less burdensome requirements on moving from a growth market to the Main Market should also be considered. Collectively, the in-flight initiatives and suggestions mentioned above will act as a bridge to support private companies looking to transition to public markets.

Key stakeholders: HMT, FCA, stock exchanges, trade bodies; Timing: medium-term.

Recommendation 2: Reboot the nation's culture towards financial empowerment and entrepreneurship

The perception of the UK as a conservative market where high-growth firms struggle to gain attention needs to be addressed. Actions should focus on strengthening the image of the UK as a positive destination of choice for companies and where they will find a dynamic and supportive investor base. Changing this narrative will require a cultural shift toward valuing high-growth 'patient' investments, complemented by changes to the regulatory and structural frameworks that restrict equity investment.

Action 2.1 Education and engagement: Empower individuals to take personal ownership of their financial future:

a. Early engagement: Emphasise the importance of investing for the future (the concept of no risk, no reward, the power of compounding and the benefit of starting to invest early) from an early age is key to increasing financial empowerment. This needs to be in accessible formats that can engage a young audience, e.g., via traditional and social media. Some examples of this are already happening, such as the City of London campaign on Financial Literacy.

   Key stakeholders: Department of Education; Timing: long-term.

b. Speaking to schools: Linked to 2.1.a, create industry-supported events in schools to educate the next generation on the importance, where appropriate, of saving and investing for your future. This could include:

   - Workshops after SATs in England and an equivalent appropriate time in the devolved nations to educate children on the benefits and methods of investing any disposable income and how to recognise potential frauds or scams.

     Key stakeholders: Department of Education; Timing: long-term.

– School-based talks by successful start-ups and other local success stories could improve children's understanding of business, the balance of risk and reward and the path to success. Talks could also cover the basic purpose of the capital markets so that children understand the positive and enabling role of capital in society (they provide the funds to help companies grow and to support them in their retirement).

  Key stakeholders: Department of Education; Timing: long-term.

– Engaging children aged 16 to increase their knowledge of saving vehicles, such as junior ISAs, pensions and what to do if they have junior ISA maturing at 18.

  Key stakeholders: Department of Education; Timing: long-term.

c. Raise awareness and engage educators: Delivery of the above recommendations will require the support and backing of educational leaders. The 'All Party Parliamentary Group on Financial Education for Young People report' found that two-fifths of teachers, who have a statutory duty to deliver financial education, were not aware that it is a national curriculum requirement. Raising awareness of this is important given that financial education is a life skill which can have significant positive impact on children and young people's future financial wellbeing and social mobility.

   Key stakeholders: Department of Education; Timing: short-term.

d. Start early and build: Drive long-term investment appetites and individual responsibility via early exposure to investment products and tools, e.g.

– An education campaign to raise awareness about the benefits of investing in JISAs and similar products. The planned HM Treasury and FCA review of the financial guidance and advice boundary could consider how more support can be provided to individuals to encourage greater utilisation of the available products and to ensure that informed decisions deliver an appropriate mix between cash and equity investing.[81]

  Key stakeholders HMT; Timing: medium-term.

– Making the gilt market more accessible to individual investors, e.g., through a digitised gilt supported by a government marketing campaign.

  Key stakeholders: HMT; Timing: long-term.

e. Access to other asset classes: A key area of attention should be to progress work on tokenising assets to enable UK citizens to have 'skin in the game' by owning part of UK PLC. Tokenisation allows assets to be fractionalised, making some investments more accessible. For example, this would make it possible for individuals to invest their SIPP in a broader range of assets with just £10 (rather than having to have £100,000).

   Key stakeholders: HMT; Timing: long-term.

Action 2.2 Incentivising UK equity investment: Provide incentives for investors to invest in UK equities:

a. Support equity investment: Encourage the utilisation of the full ISA allowance in conjunction with an education campaign to raise awareness about the benefits of investing in stocks and shares ISAs. The planned HM Treasury and FCA Review of the financial guidance and advice boundary could consider how more support can be provided to individuals to encourage greater utilisation of annual ISA allowances and ensure that informed decisions deliver an appropriate mix between cash and equity investing. Policymakers may also want to consider how ISA policies could be used to support investment in UK companies. Investors should also be able to fund ISAs through "in specie" contributions, i.e., they should be able to 'gift' any shares that they hold directly into a stock and shares ISA.

   Key stakeholders: HMT/HMRC; Timing: long-term.

b. Removing the 0.5% stamp duty on share purchases could help wider participation and secondary market liquidity. Removing stamp duty would reduce the cost of investing, incentivising more investments in equities. HMRC is currently seeking views on the SDRT regime.[82]

   Key stakeholders: HMT/HMRC; Timing: long-term, e.g., apply initially to newly traded companies only.

81. Yearly costing can be done by assessing predicted annual birth rates.
82. https://www.gov.uk/government/consultations/stamp-taxes-on-shares-modernisation/consultation-stamp-taxes-on-shares-modernisation

c. Remove structural impediments to equity investment: Maintain momentum in addressing the legal and regulatory impediments that deter insurance and pension funds from investing in traded equity.[83] Specifically:

   – Defined benefit: Support the ongoing Solvency II reforms to provide broader incentives to back the UK economy. Consider whether there are additional changes that would unlock UK capital from a risk-adjusted reward perspective. While it is unlikely that we will see material investment into UK equities given current regulatory requirements and the underlying demographics of the individuals investing through these schemes, opportunities remain to utilise DB or insurance capital to support UK PLC meaningfully.

     Key stakeholders: HMT, DWP, industry bodies; Timing: short-term.

   – Defined contribution: Support the reforms to fee caps in relation to pension performance to incentivise consideration of higher returns for pension holders. This needs to be aligned with education (action 2.1.a) so individuals are engaged with their pension funds throughout the products lifecycle and better understand risk-adjusted returns and the need to provide patient capital.

     Key stakeholders: HMT, DWP, industry bodies; Timing: short-term.

d. Encourage investors to focus on risk-adjusted, long-term returns, as opposed to cost, liquidity and short-term return.

   Feedback has suggested that there is too much focus on cost and not enough on long-duration risk-adjusted returns. The DC pension reforms seek to address this issue in part by seeking to move performance fees on corporate pensions outside of the default fee caps. This has the potential to support a reshaping of the approach and narrative to investments, aligning interests, and putting the emphasis back on ensuring appropriate investments to support what are, in reality, long-dated liabilities (i.e., ensuring adequate savings for retirement).

   Key stakeholders: UK government; Timing: ongoing DC pension reform actions.

Recommendation 3: Continue to improve ‘the plumbing’

Enhancing efficiencies and removing frictions in the system will benefit all users of UK capital markets – companies, investors and ultimate pension beneficiaries. We need to maintain the momentum created by the positive steps taken to date, such as the reduction in the free float requirement and the changes to dual-class share rules, as well as more recent structural proposals to improve the UK’s listing regime. This will require positively engaging with the digitisation of UK capital markets and the UK’s regulatory reform programme, particularly the FCA’s Primary Markets Effectiveness Review and HMG’s amendments to wholesale markets through the Financial Services and Markets Bill. To maintain the UK’s competitive position, stakeholders need to remain open to further enhancements in the future to accompany and address a dynamic and evolving marketplace.

Action 3.1 Continue to improve information flows in the market. This can be done by:

a. Introducing a more flexible regulatory approach to MiFID II unbundling requirements. It has been observed that the MiFID II unbundling rules have led asset managers to scale back on the number of research providers they use; competition and analyst coverage – particularly at the smaller end of the market – have suffered as a result. Removing the MiFID II requirement on market participants to ‘unbundle’ research and execution costs and instead applying a broader level of flexibility such that clients have the option to choose how they pay for the research they consume (i.e., on a bundled or unbundled basis), would help to redress this trend and stimulate information flows in the market.

   Key stakeholders: Investment Research Review, HMT, FCA, industry bodies; Timing: short-term.

83. For example, please see the Powerful Pensions, unlocking defined contribution capital for UK tech growth.

b. Exploring with mid-size and smaller research houses their appetite for other market innovations to improve information provision on smaller cap companies or those in target sectors. There have already been some steps to create introductory independent sector notes or calls, and the future outcomes of the Investment Research Review will be important in this regard.

   Key stakeholders: HMT, FCA, industry bodies; Timing: short-term.

Action 3.2 UK index refresh: Revisit and refresh indexation policies to ensure that they remain fit for purpose. In addition, the possibility of new indices should be explored – potentially around specific sectors or high-growth companies, e.g., a UK SME index.

Key stakeholders: Index providers, including FTSE Russell; Timing: align with the ongoing FCA Primary Markets Effectiveness Review outcomes and proposed single listing category for equity shares in commercial companies.

Action 3.3 Harness technology to improve market infrastructure for the benefit of issuers and investors. For example:

a. Full digitisation of the shareholding system, including full dematerialisation (physical to electronic) of the way shares are held. This should include efficiencies in the way that smaller shareholders hold their shares. Additionally, nominees should improve the voting service provided to clients.

   Key stakeholders: DBT, CREST; Timing: in progress/ Douglas Flint Digitisation Taskforce.

b. Permit companies to communicate with their investors solely on an electronic basis so that companies can benefit from email distribution of shareholder communications by default.

   Key stakeholders: DBT; Timing: in progress/Douglas Flint Digitisation Taskforce.

c. Remove the requirement for hard copies of annual reports and shareholder communications. Make physical annual reports available on request.

   Key stakeholders: DBT; Timing: in progress/Douglas Flint Digitisation Taskforce.

d. Allow companies to choose whether to hold AGMs/ GMs entirely virtually, in a blended format, or in-person only, depending on the relevant company's individual requirements.

   Key stakeholders: DBT; Timing: in progress – Douglas Flint Digitisation Taskforce.

Action 3.4 Encourage global investors to vote consistently on key shareholder resolutions across international markets: to ensure that companies can compete for talent on a level playing field.

Key stakeholders: Investor communities and representative bodies; Timing: long-term.

Recommendation 4: Reinforce the UK as a destination of choice

Attracting domestic and global companies and investors to the UK and retaining them once they are here is critical to the success of the UK marketplace. Developing and pitching a new narrative on the future of UK equity capital markets and the benefits of being traded here would benefit the whole ecosystem.

Action 4.1 Develop 'Why choose UK capital markets' content. Develop and promote UK success stories (e.g., a focus on sectors), celebrate home-grown entrepreneurship, and encourage the public to back businesses using UK markets through targeted communications and engagement with the media.

Ensure that audiences have the opportunity to hear UK success stories (including the wider benefit of traded companies, e.g., supporting growth and investment, spreading wealth and employee share ownership) and permeate the public discourse, which tends to focus on highlighting failures. This can be linked to financial education and the need to empower individuals to take personal ownership of their financial future.

Key stakeholders: HMG, DBT, and industry bodies; Timing: immediate.

Action 4.2 Reward companies for choosing to trade publicly in the UK. Publicly traded companies provide wider investment opportunities to institutions and individual investors and value to the UK's economy and financial ecosystem. Their management and strategy are also more transparent and can be seen and gauged by all stakeholders. To encourage companies to take this path, we believe that UK-domiciled companies which choose to trade on UK markets should benefit from targeted incentives to offset the additional costs and regulation applicable to publicly traded companies.

Key stakeholders: HMT/HMRC; Timing: short-term.

Action 4.3 Identify potential 'non-UK company' targets. Proactively reach out to appropriate companies headquartered outside the UK seeking to IPO or undertake a secondary listing to showcase UK market strengths (subject to appropriate due diligence). We can no longer assume that these companies will choose the UK. This approach can complement the existing outreach programmes undertaken by stock exchanges by coordinating with trade bodies and government departments.

Key stakeholders: HMT and other government departments, Industry bodies; Timing: short-term.

Action 4.4 Active support for non-UK companies. Ensure non-UK companies benefit from sufficient support and education on joining UK markets (e.g., understanding UK listing rules and ongoing obligations). For example:

- A proactive communication and advertising campaign could be disseminated at an appropriate time via relevant UK entities, such as the Department for Business and Trade. For example, assuming the IPO market is open, recent and proposed changes to the listing regime/other macro changes would be an opportunity to showcase that the UK is 'open for business'.
- 'Trade envoy' for UK capital markets to join broader UK trade delegations.
- In this context, we note ongoing efforts by the FCA via the Primary Markets Effectiveness Review, which aim to introduce a simpler and more flexible listing regime and widen access to UK equity capital markets to a greater range of companies.[84]

Key stakeholders: *HMT and other government departments, FCA, market participants, listing venues; Timing: short-term.*

Action 4.5 Work towards deference mechanisms. Applying, where appropriate and on a targeted basis, deference mechanisms to reduce unnecessary duplication of legal and regulatory requirements for international companies and companies who trade publicly in more than one jurisdiction. This could build on the recent reforms initiated by Lord Hill's Listings Review.

Key stakeholders: HMT, FCA, stock exchanges; Timing: long-term.

84. https://www.fca.org.uk/publications/consultation-papers/cp23-10-primary-markets-effectiveness-review

CHAPTER 7

A future vision for UK capital markets

7.1. COALESCING AROUND CHANGE

This report has assessed how the UK's capital markets ecosystem is currently structured, and the views and perceptions that may shape its future. Alongside this, we have set out the key challenges that, if left unaddressed, will stifle the future progression and evolution of the UK's capital markets ecosystem and impact how those markets serve our economies. We must keep the momentum and coalesce around change. It is time to harness the most impactful initiatives and innovative concepts that have been put forward by a range of stakeholders into a plan that enables our equity markets and, by extension, our broader capital markets to serve the economies and populations of the future.

Whilst this report does not set out a comprehensive menu or set list of what an evolved UK capital market may look like, it does set out below what the prize might be for overcoming the challenges set out earlier in the report. Having a coherent vision, clear targets, and an understanding of whether efforts are resulting in progress will help steer and positively shape UK markets and contribute to a 2030 vision.[85]

7.2. THE PRIZE

Achieving these outcomes will require the UK to address, through collective action, the four challenges that this report has identified and upon which we have predicated the recommendations.

Companies need more help accessing UK markets

If structural challenges hindering UK growth companies are addressed:

- ☑ More of the innovative start-ups and early-stage companies founded in the UK will be able to scale in the UK and join UK public markets.
- ☑ Early-stage companies will no longer face a 'cliff edge' when they outgrow existing funding schemes and incentives; UK markets can provide the capital and investors needed for their entire lifecycle.
- ☑ Early-stage companies will be able to easily access information and resources to support them in their journey to becoming publicly traded companies.

85. For example, the Finance for Growth initiative, https://news.cityoflondon.gov.uk/leading-city-executives-join-forces-to-map-out-future-of-uk-financial-services-sector/

UK capital does not always reach UK companies

If action is taken to reboot the nation's culture towards financial empowerment and entrepreneurship:

- ☑ A greater proportion of UK capital, both retail and institutional, can be deployed into UK companies and local economies.
- ☑ The decline in the proportion of UK pension fund capital invested in UK equities can be reversed and begin to increase.
- ☑ A national conversation can take place about risk and reward, supported by better financial education, resulting in more people understanding the benefits of taking informed risks and generating long-term returns.
- ☑ UK-managed AuM can continue to grow at 6% and above yearly, and allocations to equity will increase. If just 5% of the circa £4tn cash savings were mobilised, the UK would have an additional £200bn to support UK companies.

Too much friction is stifling capital flows

If the UK continues to improve the plumbing of its capital markets:

- ☑ Small and mid-cap UK companies can be better-covered by specialist research analysts.
- ☑ Retail investors can have greater choice in how they access public markets and play a more active role in supporting the companies they use every day.
- ☑ The UK can move toward a fully digitised shareholding system.

The UK's profile overseas is suffering

If measures are progressed to reinforce the UK as a destination of choice:

- ☑ The UK can not only maintain but increase its share of the global IPO market.
- ☑ The UK can cultivate a positive dialogue around success and entrepreneurship and celebrate that through media, industry, and the government and regulatory sector.

7.3. CONCLUSION

The role of capital markets extends beyond the world of finance and investment and its societal contribution is significant. From job and wealth creation and developing skills and talent, to driving innovation, the criticality of dynamic and well-functioning capital markets to the overall health and prosperity of the UK cannot be underestimated.

UK capital markets are at an inflection point – several reviews and initiatives have delivered beneficial changes. However, the opportunity exists to deliver a vision that builds on the existing strong foundations and achieves the structural change required to remain competitive in an ever-evolving global environment.

The challenges described in this report require all capital markets participants – companies, investors, and the wider ecosystem – to come together with government to create the right conditions for economic growth.

Taking on this challenge of rebooting our capital markets is no small task. Still, the reward is material – a greater source of domestic capital that supports our SMEs and other UK companies, an empowered population with more choices on savings and investments and an international investor base that deploys capital to all corners of the economy. With these fundamentals in place, the UK's capital markets ecosystem and global financial reach can power the UK's economic future.

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Capital Markets & Wholesale Policy
alastair.campbell@ukfinance.org.uk


1,036,100
2,123,400
39,730,100
2,459,400
13,319,100
11,863,300
540,100
31,183,600

[redacted]

From: [redacted]
Sent: 28 August 2024 09:20
To: policy, planning
Subject: Fwd: Chatham Docks
Attachments: Draft bullet points for Local Plan Reps RJ2.docx

Follow Up Flag: Follow up
Flag Status: Completed

From: **Sidney Anning** [redacted]
Subject: Fwd: Chatham Docks

Subject: Chatham Docks

Dear Sir,

I have tried to add my thoughts about future planning for Medway and in particular the thought of Peel Ports planning application to in fact destroy the last piece of what was Chatham Naval Dockyard for nothing more than residential flats, and some light industries which in the mean time would destroy hundreds of well paid jobs and to maintain working docks for future generations. This must not be allowed to happen and fully agree with the draft bullets that were supplied to me. I am registered but cannot find my way around your website so apologise for that.

Medway Council has only this opportunity to stop the desecration of its last remaining working Dock, and let's be fair about this, if you look at what Peel Ports have done to other ports around the Country everything is geared up for short term profits before moving onto somewhere else to do the very same thing again. Next will be Sheerness you mark my words.

Yours sincerely,

[redacted]

[redacted]

[redacted]

[redacted]

ME1[redacted]

Chatham Docks
Local Plan Consultation
Bullet Points

1. We wish to strongly support keeping our Chatham Docks open in the future.
2. Chatham Docks is a great place – it is thriving with 800 jobs, and a strong supply line.
3. The Docks are very busy and operate 24 hours a day, for seven days a week.
4. There is a full range of well-paid jobs.
5. There are about 180 ship movements a year taking advantage of the non-tidal Docks– so it is a very sustainable operation taking full advantage of the Dockside access.
6. We know the existing roads to St Mary's Island and the Docks are very congested, and the Docks provide a greener sustainable alternative.
7. The river-borne and sea-borne traffic allows direct sustainable connections with the rest of the South-East and with European ports, rather than just lorry deliveries in and out.
8. It is draws on a workforce mostly from the local area. Please don't let them shut us down.
9. We have been living here for xx years.
10. We have been working at the Docks for xx years.
11. My family is very grateful to the Medway councillors who stood side by side with us and supported our existing jobs and keeping the Docks open.
12. It is vital that the new Medway Council continues to support keeping our Docks open in the future – despite the many attempts by development company that owns the freehold to close us down so that they can build flats.
13. Please continue to support us in the new Local Plan so that the Docks cannot be closed down.

14. It cannot be right to not support our existing well-paid employment..

15. We trust our Council to do the right thing to continue to represent us and protect our existing jobs in the new Local Plan.

[redacted]

From: Medway Council <medway@oc2.uk>
Sent: 29 August 2024 16:34
To: policy, planning
Subject: Contact Form from OpusConsult

Follow Up Flag: Follow up
Flag Status: Completed

You have recieved a message from the OpusConsult contact form

From: Mr Robert Bland

Email: [redacted]

Message:
As a Rainham resident what I'm commenting on does not particularly affect me.
I just feel the Medway tunnel is massively discriminates against pedestrians and cyclist. If the outside lane was made narrower and the inside lane moved over and the speed limit reduced to about 25 mph, this should add about 25 seconds to journeys
This would allow room for pedestrian and cycling access. I don't believe safely would be compromised as there are lanes around Medway which have national speed limits, I.e. 50mph, a closing speed of 100mph on single track lanes with nowhere for pedestrians or cyclists, but we don't have accidents on these roads. So why should there be accidents on one way straight line roads with an enforceable speed limit?

[redacted]
ME5 [redacted]

1st September 2024
(Sent via email to planning.representations@medway.gov.uk)

Medway Council
Gun Wharf
Dock Road
Chatham
Kent
ME4 4TR

Dear Sir

Re: Medway Local Plan Regulation 18 Consultation

I am writing to express my strong objection to Medway Council's proposed Local Plan, particularly the developments planned for the Capstone Valley area. The plan, as it stands, is deeply flawed and fails to consider the significant negative impacts it will have on the local community, infrastructure, environment, and wildlife.

1. Highways and Traffic Congestion
The road infrastructure around Capstone Valley, including North Dane Way, Princes Avenue, Bluebell Hill, and the M2 junctions 3 and 4, is already under severe strain, particularly during rush hour. The area is frequently gridlocked, causing significant delays, increased pollution, and a higher risk of accidents. Adding 3,500 homes will exacerbate these issues dramatically, with thousands of additional vehicles being funnelled into an already overburdened network. This is unacceptable and dangerous, clearly demonstrating a lack of foresight in the planning process.

2. Loss of Open Space
The proposed development site includes valuable open space that is crucial for both environmental and community well-being. The Capstone Valley is a vital green lung for the area, offering residents much-needed recreational space and preserving the natural landscape. Some of the land earmarked for development is agricultural, actively worked as recently as last week. The loss of this land to housing development is not only a loss to the local environment but also undermines the agricultural heritage of the area. This development will destroy one of the last remaining green spaces in this area of Medway, which is an irreplaceable loss to current and future generations.

3. Impact on Lidsing
The proposed plan shockingly overlooks the significant development at Lidsing, which includes 2,000 homes and an industrial estate. The Capstone Valley development, in conjunction with the Lidsing project, will bring the total to 5,500 new homes. This influx of residents, along with the associated industrial traffic, will result in an overwhelming number of vehicles on local lanes that are simply not capable of handling such volume. These lanes cannot be widened without destroying the character and safety of the local area. The compounded impact of both developments will devastate the local infrastructure, making daily life for current residents intolerable.

Also, as mentioned at one of your events, it is disingenuous of the Council to not highlight the full extent of development around the Capstone Valley/Lidsing area but not showing the development over the border into Maidstone Borough Council on the drawings presented to the public. It should also be noted that Medway Council strongly opposed Maidstone's Local Plan, when it was put before the Planning Inspector. However, no one at the event could explain why large-scale development within the Medway boundary, at the same location, is completely acceptable.

4. Strain on Infrastructure

While the plan makes vague mentions of additional schools and healthcare facilities, it fails to address the real challenge of staffing these critical services. The current shortage of teachers and doctors in Medway is already causing unacceptable delays in education and healthcare provision. Where will the Council find the additional doctors, nurses, and teachers required to meet the needs of an expanded population? Waiting times for doctor appointments and at A&E departments are already at unacceptable levels, and this development will only exacerbate the situation, putting lives at risk.

5. Housing Affordability and Local Needs

As a parent of two adult children living at home, I am particularly concerned about the lack of affordable housing options in the area. My children, like many others in Medway, are unable to afford the high-value homes that have been developed lately. These homes are being marketed primarily in London, targeting buyers who can afford the inflated prices, rather than catering to the needs of the local population. This approach not only pushes local families out of the housing market but also contributes to the unaffordability crisis in our community.

My children do not want to end up in flats that are not fit for purpose if they wish to start a family. They deserve the opportunity to buy a home in the area where they grew up, not be forced out by developments that cater exclusively to wealthy outsiders. The Local Plan, as proposed, fails to address this crucial issue and instead perpetuates a housing market that is increasingly inaccessible to local residents.

6. Impact on Wildlife and Ecology

The Capstone Valley is not just a recreational space for the community; it is also a thriving ecological habitat that has supported a diverse range of wildlife for many years. This area is home to various species of birds, mammals, and insects, many of which could be severely impacted or displaced by the proposed development. The destruction of this habitat for housing not only threatens local wildlife but also disrupts the ecological balance that has been maintained for generations. The loss of biodiversity in the area would be a tragic consequence of this poorly planned development.

7. Concentration of Development

Finally, it is deeply concerning that the Council has chosen to concentrate development in specific areas in this draft Local Plan, rather than distributing it more evenly across Medway. This approach unfairly burdens certain communities, while others escape the impact of such drastic changes. A more balanced and thoughtful distribution of new housing would have mitigated many of the issues outlined above, including the pressure on infrastructure, loss of open space, and traffic congestion.

In conclusion, the proposed Local Plan is fundamentally flawed and poses a significant threat to the quality of life, environment, infrastructure, and wildlife in Capstone Valley and the surrounding areas. I urge Medway Council to reconsider this plan and to explore alternative solutions that distribute development more evenly across the borough, protect our open spaces, preserve wildlife habitats, and ensure that the necessary infrastructure is in place before any further housing developments are approved.

Whilst I hope that Medway Council reconsiders this deeply concerning draft Local Plan, I fear that this is simply a ‘tick box’ exercise and the concerns of the residents in the local area will be completely ignored. This is not a simple case of nimbyism; I am writing as someone who must sit in the gridlock every day, who cannot get a doctor’s appointment, has been on a hospital waiting list for 18 months and has had enough of the local area being decimated by Medway Council.

Yours faithfully

Mrs Amanda Broadhurst

[redacted]

From: MUNNA CTG [redacted]
Sent: 02 September 2024 23:22
To: policy, planning
Subject: Local consultation

Follow Up Flag: Follow up
Flag Status: Completed

Hi
I want to take part in your consultation program by giving some suggestions. It is your choice whether you accept or not but I believe these are vital for the future development of Medway.

1. Parking: Parking until 10 pm is not helping neither your residents nor the business owner of medway. Restriction to enter into the high street, made this as barren land. Our high streets are dying because there are no customers. Parking should be 9 a.m to 6 pm Monday to Friday, weekend should not be included. you have given so many permits to the same resident , business permits to many people. Because of them we can't park in the designated parking area. Where can we park, reply council please.

2. Bus service should be cheaper or at least more affordable just likeLondon bus service.

3.There should be a children's playground either at Brompton field or nearby as there are no playgrounds nearby. There is One in Mill road only for the infants not suitable for all the children.

[redacted]

From: [redacted]
Sent: 03 September 2024 20:04
To: policy, planning
Subject: Medway Local Plan

I have been a resident of Middle Stoke for the past 28 years, prior to this I grew up in Allhallows, moving there in 1977. I am very concerned by the land shown on the proposed Local Plan which would lead to a very extensive development in both Stoke and Allhallows, in fact doubling the size of both villages. The plan shows the areas of development but do not show an improvement to local infrastructure. There is only one small country road into Allhallows and between Allhallows and Stoke, this is already used to capacity with people living in the villages and holiday makers using the local Haven site in Allhallows. There are numerous accidents on these roads every year especially in the winter due to the winding nature of the roads, the pot holes, sinking drains and areas of flooding. There have been road closures in Allhallows over the past year to repair a water leak, this has still not been resolved. Binney Road, where a large area has been indicated for development, has a natural spring half way down. This means there is surface water on the road all year round, this freezes in the winter and the road is unusable and unsafe at times. I believe some of the areas identified for building on are also in an area identified as flood plain, how can this be included for building? Both Stoke and Allhallows have regular power cuts due to the age of the existing cables, how will more houses get their power. There is a lack of appointments at the doctors now, where in the plan does it show a solution for this, we need a health centre and several more surgeries now, with all the extra development being shown getting a doctors appointment would be impossible. Stoke school was closed several years ago, the only school in the villages is already filled to capacity. I presume your answer will be building both new primary and secondary schools. Does this mean we are expected to put our three year olds onto a bus to be transferred to these schools, this will not be safe for them and is frankly immoral. Are these proposed developments for local residents or is it true that London boroughs will be purchasing the houses? Nightingales and other endangered species live in some of the proposed areas, the buildings will displace them, is this allowed? I look forward to hearing a response outlining the solutions to the above.

With kind regards

Jo Barrett

[redacted]

From: [redacted]
Sent: 03 September 2024 15:44
To: policy, planning
Subject: Medway Local Plan (Allhallows)

Follow Up Flag: Follow up
Flag Status: Flagged

I have been to a meeting to day in allhallows.
My first comment is your planning portal is not user friendly. And I was in able to comment on line as I could not find the page

My comments are below and I would like them to be considered
The road from Fenn corner is unsuitable for any more traffic and has many pot holes and is a very narrow country lane

The bus service is poor so people need to drive to get to and from here .

The school is full now you allowed for stoke school to be shut and it now has to serve both villages with no foot paths between

The mains water into the village. We have burst pipes three or more time's a year and will not stand anymore. Houses it would need to support.

We have power cuts weekly and this the infrastructure is not suitable

The surfaces drain block and have to be unblocked by tanker

The mains drain block regularly due to more house been built

There are more caravans in Haven than houses in the village and this all increases the constraints in the village at change over time the road is block with people waiting to get In back past the school and there is more planned by them this also put strain on utilities

Mobile and internet is poor and well below the national standard

There is only three shops. So you have to travel into town for shopping

There is no enough doctor or dentist out here to support the people already

Building more house would just mean more people from London would come and they can afford them and local people would not be able to afford as we are seeing now so this would not help local people in this area

Please look a brown field sites and site that where brown field. Like the old filled in quarry in st Mary Hoo.

The area needs more business out here on the old kings north site and at grain

Michael turner

[redacted]

From: [redacted]
Sent: 03 September 2024 18:51
To: policy, planning
Subject: Binney road Allhallows

Follow Up Flag: Follow up
Flag Status: Completed

Good evening I am writing this e mail to say i would not like the build to go ahead opposite Binney road
We have 9 houses just been built and still one is still on the market after a year ,
It is hard enough to get a doctor and dentist on the peninsula without adding more houses , we only have a one water waste pump station that has to have a Mts lorry to pump it out every year so I think with more houses being built it will only get a lot worse ,
The roads are awful always a burst somewhere in the village
if there is a accident on the peninsula no one can get off and if there's traffic sometimes it can take over an hour to get to my work on Medway city estate,
The local secondary school is full to capacity and the buses get full as it is ,
People don't want to live this far out hence why still houses for sale around the area
There is a lot of wildlife that will suffer
Yours sincerely
Tina Billings

[redacted]

From: Medway Council <medway@oc2.uk>
Sent: 03 September 2024 20:58
To: policy, planning
Subject: Contact Form from OpusConsult

Follow Up Flag: Follow up
Flag Status: Completed

You have recieved a message from the OpusConsult contact form

From: Miss J Eames

Email: [redacted]

Message:
If there was no danger of this farmland being put forward for development then surely it would not even be mentioned. The fact that it has been highlighted strongly suggests it is in the running. I would like to point out that not all the 9 houses built on Binney Road have been sold yet in over a year of being built! The residents of this village already have to cope with an inadequate transport system, almost impossible to get a doctor/dentist appointment. Limited capacity at the local primary school and surrounding primary schools. We have had a water leak at the bottom of Binney Rd caused by the builders of the new houses. (Along with frequent water main bursts along Ratcliffe Highway coming into the village) The lane floods when the ditches overflow and the sewage pump house smells and is often temporarily fixed by pumping it out, using several large lorries on a single track lane. By building more houses we are also forcing people to drive as it is almost impossible to live here without a car on roads that are not designed for so much traffic - not to mention pollution. There is also an abundance of wildlife, including badgers, foxes, snakes, frogs, greater crested newts etc. Also a vast variety of birds , swifts, swallows, cormorants, herons, marsh harriers, sparrow hawks, swans and so many more. The village also gets cut off in bad weather or road accidents. Hopefully sense will prevail.

[redacted]

From: Les Brown [redacted]
Sent: 19 August 2024 10:11
To: policy, planning
Subject: Re: Invite to annual Agents meeting - 24 September 2024 Local Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: [redacted]

I have one question, it is rhetorical.

If all the policies have changed, and I turn up at the Inquiry and ask
why has the old (some at least) not been taken forward?

If only text changes meaning the same why? But the text to Barristers have then to review and assess all over again.

Manual for Streets 1 and 2 are not much different. More clarity, more research. Re MfS3 I am encouraging Louse Haigh to publish this year. The revised NPPF refers to A National Standard.

Regards

Les

On 19/08/2024 09:49, policy, planning wrote:

> Good Morning,
> Thank you for your feedback. Would you like me to enter this as a response to the consultation and/or pass this onto colleagues?
>
> Regards,
> Planning Policy
>
> ---
>
> **From:** Les Brown [redacted]
> **Sent:** Friday, August 16, 2024 5:30 PM
> **To:** policy, planning <planning.policy@medway.gov.uk>
> **Subject:** Fwd: Invite to annual Agents meeting - 24 September 2024 Local Plan
>
> Dear sir, Madam,
>
> I sent the original email to Beverly, now to you as feedback.
>
> The Government NPPF update (consultation ends 8th September) may have to be subsumed into your plan.

Regards

Les

-------- Forwarded Message --------

Subject: RE: Invite to annual Agents meeting - 24 September 2024
Date: Fri, 16 Aug 2024 15:22:44 +0000
From: [redacted]
To: Les Brown [redacted]

Hello Les

It's good to hear you have attended the Local Plan consultation events and that you have found them informative.

The Agents meeting is probably not the right forum at which to raise issues in relation to the length and text of the Local Plan. I would suggest you email any comments and thoughts to planning.policy@medway.gov.uk

There will be an update on the Local Plan during the Agents meeting but we will not have time to discuss the Plan in detail.

Kind regards

[redacted]
[redacted] | Gun Wharf, Dock Road, Chatham, ME4 4TR

You can register to receive updates about our work on the Medway Local Plan.

bsi ISO 9001 Quality Management Systems CERTIFIED
FS 77901

From: Les Brown [redacted]
Sent: Friday, August 16, 2024 2:20 PM
To: [redacted]
Subject: Re: Invite to annual Agents meeting - 24 September 2024

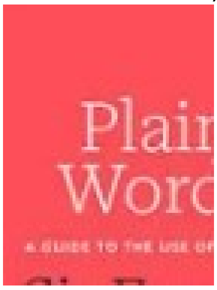
Hi [redacted]

I have one more question to ask re the agents meeting. By reading
the Local Plan consultation (I have attended the venues - I am impressed as always as informative and very concise), plus responding by the web consultation;
the New Local Plan may run into 500 odd pages or even longer.

"Back in the war" as my son says to me; the Select Committee on the Future of Planning refers to verbose Local Plans. They refer to 500 odd pages.
The NPPF cut down copious documents. Why not a tidy Medway Local Plan. A concise Local Plan.

I wonder if anyone has asked forward Planning Policy "Why not reuse the previous policies". When Governments change they normally do ask simple questions.
But if the local plan is coming forward via Consultants then they charge accordingly.

The other issue I have is the length of text per policy. You get lost in the mire (not sure if it is the correct word).



The Government also published a plain English book. The Institution of Civil Engineers advised
potential chartered engineers to include it on their reading list. As it happens I have a copy. A tad dusty.

They, (Government) still have updates on their web site. The BBC also do it.

Whatever is written also goes before the Local Plan Inspector; then Barristers in the High Court.
I have forgotten about PINS
as you need some luck to get it approved any time soon.

The reasons why I ask re the above will come to the fore at the meeting. Another 5 to 10% of planners will have retired since last year.
More words, more restrictions, less SMB's, less housing, less affordable housing, volume housebuilders getting away with murder 150 odd trees next to my estate.

I am not trying to be cynical. But young graduates entering the profession and those soon to leave need hand holding as everything is
getting complicated.   There is no need or justification for it.

It sounds as though this may be my last year of attendance also.

Regards

Les

--
L Brown Associates Ltd
[redacted]
ME5 [redacted]
L Brown Associates LTD
Parking Standards UK

--
L Brown Associates Ltd
[redacted]
ME5 [redacted]
L Brown Associates LTD
Parking Standards UK

How far do people walk?

Gareth Wakenshaw BSc (Hons), PGDip, MCIHT WYG Group

Dr Nick Bunn BSc (Hons), MSc, PhD, MCIHT, CMILT WYG Group

Presented at the PTRC Transport Practitioners' Meeting
London, July 2015

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Abstract

Walking and, to a lesser extent, cycling are important factors in assessing land allocations in Local Plans and in determining planning applications. Accessibility to public transport, defined in part, as the walking distance to bus stops can have significant financial implications for new developments if bus services need to be provided or diverted to serve the site. The information on walking distances is limited. Planning Policy Guidance 13 Transport, which gave some useful guidance on walking and cycling distances, was withdrawn in 2012. The IHT's Providing for Journeys on Foot and Planning for Public Transport in New Development were both published 15 years ago. In all three documents there is limited evidence to support the advice given. However, there is a clear need that policy and decision taking should be based on the best evidence available.

The National Travel Survey is a large-scale travel diary survey which provides data on a wide range of transport matters, including walking and cycling distances. It has limitations because it relies on self-completion and the distances are those estimated by respondents. However, the data has been consistently collected across the UK since 1988.

We have used the NTS to obtain average and 85th percentile distances for journeys where walking is the main mode of travel, and also where walking is the first stage of a public transport trip, i.e., walking distance to a bus stop or railway station. When assessing the accessibility of a new development on foot we suggest that the 85th percentile distance should be used to estimate the distance upto which people are prepared to walk. For new bus stops and railway stations, we suggest that the average walking distance is used for planning purposes. The contribution which the walking distance to a bus stop, or railway station, plays in the perceived convenience of public transport is not well understood and is an area for further study. Until further information is available, the use of average walking distance from the NTS is at least based on the distance that people actually walk.

We have looked at the influence of region, whether the area is urban or rural, journey purpose and gender on walking as the main mode and on walking to a bus stop or railway station.

We conclude that the following distances should be used for planning purposes:

	Mean (m)	**85th Percentile (m)**
Walk – As main mode of travel		
UK (Excluding London)	1,150	1,950
London	1,000	1,600
Walk to a Bus Stop		
UK (Excluding London)	580	800
London	490	800
Walk to a Railway Station		
UK (Excluding London)	1,010	1,610
London	740	1,290

1.0 Review of Advice & Guidance

Walking

1.1 The Government introduced advice on walking distances in the 2001 revision to Planning Policy Guidance 13: Transport (PPG13) (DETR, 2001, para 75) which advised that, *"Walking is the most important mode of travel at the local level and offers the greatest potential to replace short car trips, particularly those under two kilometres"*. This advice was retained in the 2011 revision of PPG13 (DCLG, 2011). The 2km distance has been used for many years to define the areas within which facilities are considered accessible on foot. However, PPG13 did not provide any rationale or evidence to support the selection of 2km as an appropriate distance.

1.2 In 2012 PPG13 was withdrawn and replaced with the National Planning Policy Framework (NPPF) (DCLG, 2012). NPPF does not provide any specific guidance on walking distances, although walking is considered to be an important contributor to sustainability.

1.3 Planning Policy Guidance for Transport Assessments and Statements (DCLG, 2014, para 015) does not give any specific guidance advice on walking distances but advises that Transport Assessments and Transport Statements should include *"a qualitative and quantitative description of the travel characteristics of the proposed development, including movements across all modes of transport"*.

1.4 The Guidelines for Providing for Journeys on Foot (IHT, 2000, para 3.30) includes some evidence on walking distances taken from the NTS's summary *findings "Approximately 80% of walk journeys and walk stages in urban areas are less than one mile. The average length of a walk journey is one kilometre (0.6 miles). This differs little by age or sex and has remained constant since 1975/76. However, this varies according to location. Average walking distances are longest in Inner London"*.

1.5 The same guidelines produced a table of suggested acceptable walking distances, which is reproduced below at Table 1.1. These distances are for people without mobility impairment and it is suggested in the guidelines that these may be used for planning and evaluation purposes.

	Town centres (m)	Commuting/school Sight-seeing (m)	Elsewhere (m)
Desirable	200	500	400
Acceptable	400	1,000	800
Preferred maximum	800	2,000	1,200

Table 1.1 – Suggested Acceptable Walking Distance (IHT, 2000, Table 3.2)

1.6 It is notable that these distances are only "suggested" and no evidence is provided to support them. From the NTS data quoted in IHT (2000), the average walking distance is 1km, which means that around half of walking trips are longer than the "suggested acceptable" walking distance for commuting and school purposes. The preferred maximum distance is the same as that in PPG13, but it is not clear why walking "elsewhere" should be associated with shorter distances, or why the distances in town centres are so much shorter. There are clearly problems inherent in this table.

1.7 The Manual for Streets (DfT, 2007) promoted the concept of walkable neighbourhoods and these are typically characterised by having a range of facilities within 10 minutes' walking distance (about 800m) of residential areas. The Manual also advised that 800m is not *"an upper limit"* (DfT, 2007, para 4.4.1) and referred back to the 2km advice in PPG13.

1.8 Planning for Walking (CIHT, 2015) is an update to IHT (2000) and provides the following guidance on walking distances *"Most people will only walk if their destination is less than a mile away. Land use patterns most conducive to walking are thus mixed in use and resemble patchworks of "walkable neighbourhoods", with a typical catchment of around 800m, or a 10 minute walk"* (CIHT, 2015, p.29).

1.9 It also recognises the lack of supporting evidence and that more work is needed, "These guidelines are designed to address the limited amount of guidance available to professionals about planning for walking. Some of the research quoted is quite old but is still valid and does in itself indicate that more work is needed in this area", and, "CIHT would welcome examples that build on the content of this guidance for inclusion in further guidance on the subject" (CIHT, 2015, p.5).

1.10 Transport Statistics GB (DfT, 2014a) reports that walking accounted for 22% of all trips, and that 78% of all trips of less than one mile were walking trips. The DfT also produces Personal Travel Factsheets which provide summary detail on various sections of the NTS results (DfT, 2013a). The most recent document (released in 2011) showed that in Great Britain in 2009 11% of all commuting trips were on foot, whilst walking accounted for 47% of trips under 2 miles (DfT, 2011a). Although these documents provide some useful information they do not give details of the range of distances walked and the parameters used are often inconsistent.

1.11 In summary, there is no current national guidance on acceptable walking distances and the published guidance makes some suggestions, but with little supporting evidence. The CIHT acknowledges the current guidance is old and more research is needed.

Walking to Public Transport

1.12 PPG13 did not advise on walking distances to bus stops or railway stations and neither does the NPPF. Planning Policy Guidance on Transport Assessment (DCLG, 2014) also gives no guidance on acceptable distances, leaving Local Authorities and practitioners to devise their own estimates.

1.13 Planning for Public Transport in New Development (IHT, 1999, para 5.21) advises that, *"New developments should be located so that public transport trips involving a walking distance of less than 400m from the nearest bus stop or 800m from the nearest railway station";* advice which has been widely adopted by Local Authorities. It also advises that *"These standards should be treated as guidance, to be achieved where possible by services that operate at regular frequencies and along direct routes. It is more important to provide services that are easy for passengers to understand and attractive to use than to achieve slavish adherence to some arbitrary criteria for walking distance"* (IHT, 1999, para 5.17).

1.14 IHT (1999) bases its recommended walking distance to a bus stop on DoE Circular 82/73. This circular advised that *"Estates should be designed so that the walking distance along the footpath system to the bus stops should not be more than 400m from the furthest houses and work places that they serve"* (DoE, 1973, para 4.3). The Circular provided no evidence to support its advice or to give any guidance on the walking distance to railway stations.

1.15 Planning for Walking (CIHT 2015, p.30) advises that, *"The power of a destination determines how far people will walk to get to it. For bus stops in residential areas, 400m has traditionally been regarded as a cut-off point, in town centres, 200m. People will walk up to 800m to get to a railway station, which reflects the greater perceived quality or importance of rail services".* Again, no evidence is provided to support the advice it gives and, by describing 400m as a cut-off point, is more rigid in its recommendation than IHT (1999).

1.16 The Masterplanning Check List (TfQL, 2008) reports a 2003 study by Kuzmyak et al. (2003a) which found that walking was the dominant mode of station access for home to station distances up to 0.5 miles, 0.625 miles and 0.75 miles, for three different railways in San Francisco. The authors of the Check List interpreted this as supporting the assumption of an 800m (0.5 mile) catchment for railway stations, although Kuzmyak et al. 2003a study (cited in TfQL, 2008) reported the range of distance was between 800m and 1,200m.

1.17 Transport Statistics GB (DfT, 2013b) includes an assessment of the time taken to walk to the nearest bus stop broken down by area type (metropolitan, small urban, etc). This reports that in 2012 for all areas, 85% of people live within a 7 minute walk of a bus stop, 11% live between 7 minutes and 14 minutes, and 4% live over 14 minutes' walk. Assuming a walking speed of 1.4m/s (IHT, 2000), these equate to 85% of people living within 588m of a bus stop, 11% living between 588m and 1,176m, and 4% living over 1,176m. This data does not report how far people walk to bus stops.

1.18 In summary, a 400m walking distance to a bus stop and an 800m walking distance to a railway station has been widely adopted. However, the reason why these distances have been selected is not clear. The most recent publication from CIHT acknowledges that the research is old and more work is required.

2.0 National Travel Survey

2.1 The NTS is a household survey of some 15,000 households across the UK, of which normally around 55% fully co-operate; for the 2010 to 2012 survey years this was between 7,700 to 8,200 households and over 18,000 individuals (DfT, 2010, 2011b, 2012a and 2013b). A travel diary is used to record journeys by mode of travel, distance and the purpose of the journey as well as a range of other factors.

2.2 The NTS has some limitations because it relies on self completion of the diary and on individuals accurately estimating the distances travelled, as a result there may be inaccuracies in the data.

2.3 The NTS has been used to assess how far people walk to local facilities, bus stops and railway stations. Its use is recommended in Traffic Advisory Leaflet 6/00 Monitoring Walking (DfT, 2000). The NTS 2002 to 2012 dataset was available and the most recent three years' data (2010, 2011 and 2012) were selected for our analysis.

2.4 Walks of 1 mile or over are recorded on every day, whilst those less than 1 mile (termed "short walks"), which may form part of a multi-stage journey, are collected only on day 7 (DfT, 2012b). The day on which respondents begin completion of their travel diary is randomised, so that the day on which short walks are noted is randomly distributed over all weekdays. As a result, Day 7 includes both long and short walks and has been used for the walking assessment in this Paper. Appropriate weightings were applied to the data to adjust for non-response and drop-off in the number of trips recorded in accordance with DfT (2012b).

2.5 It is recommended by DfT (2013c) that for stage estimates, samples of less than 300 should not be used and that samples of less than 1,000 may not be statistically reliable. Where sample sizes are less than 300 the data has not been reported.

2.6 The longest 1% of walk distances from each dataset was removed from the sample to eliminate unusually long walks. As a result, our analysis was based on 99% of the surveyed distance distribution.

2.7 Actual walking distances are generally recorded in NTS to the tenth of a mile, but some are recorded to the hundredth of a mile, for example 0.5 miles and 0.75 miles. The reported distances have been converted to metres and then rounded to the nearest 50m, or to the nearest 10m for the walking distances to public transport.

2.8 The datasets were analysed for walking distances in relation to several variables and the mean and 85th percentile distances were determined. The mean is a useful measure of the distance that the average person walks, whereas the 85th percentile is a measure of the distance upto which people are prepared to walk, and so could be used to establish catchment areas for walking.

3.0 Results

Walking

3.1 These are for journeys where walking is the main mode of travel.

a. Regional Variations

3.2 The walking distances by region are shown below at Table 3.1.

Region	Weighted Sample Size	Mean (m)	85th Percentile (m)
North East	1539	1200	1950
North West	4251	1150	1950
Yorkshire & Humber	3067	1150	1600
East Midlands	2535	1150	2000
West Midlands	3029	1100	1600
East of England	3072	1150	1800
London	4608	1000	1600
South East	4765	1150	1950
South West	3159	1200	2250
Wales	1743	1100	1950
Scotland	3222	1100	1950
All Regions (Excl. London)	30382	1150	1950
All Regions (Incl. London)	34990	1150	1600

Table 3.1 – Walking Distances by Region

3.3 The results show that there is little variation in the average walking distance, which is between 1,000m and 1,200m. Excluding London the variation would be only 100m. There is greater variation (650m) in the 85th percentile distances, which are between 1600m and 2250m. London has the shortest average walking distance and has the one of the shortest 85th percentile walking distances at 1,600m.

3.4 The shorter walking distances in London given by the NTS does not fit with the information in IHT (1999) which found that walking distances are longest in Inner London. The NTS data is for both Inner and Outer London, but unless the walking distances in Outer London are abnormally low then it is difficult to reconcile the difference. Further study is needed and for this reason the remainder of our analysis excludes London.

3.5 The walking distances for All Regions excluding London should be used.

b. Urban and Rural Distribution

3.6 The walking distances by 2011 Census Rural/Urban Classification are shown below at Chart 3.1.

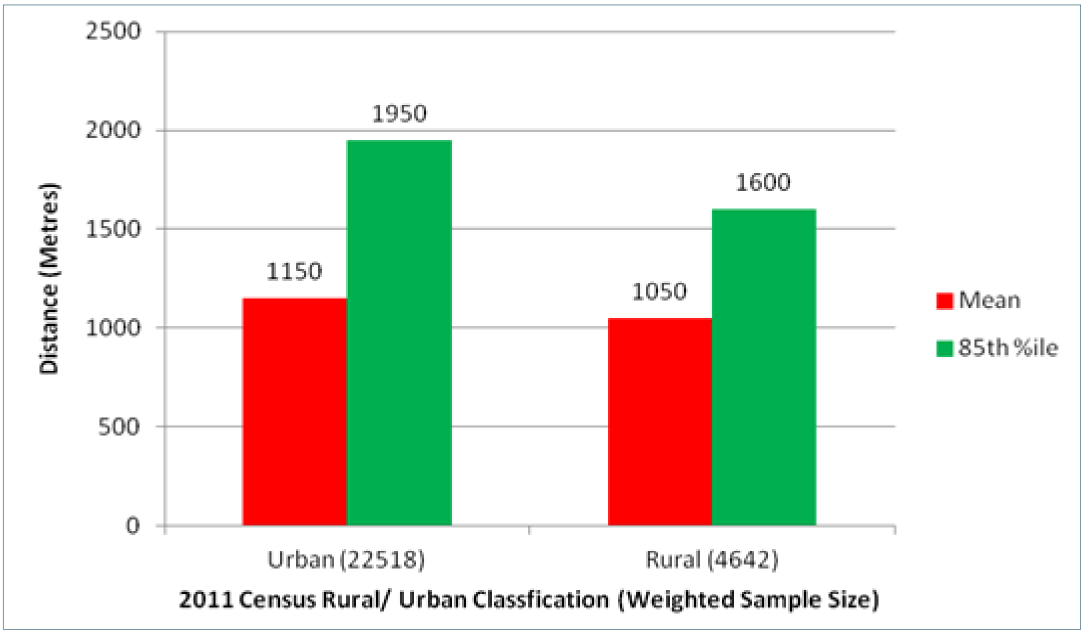

Chart 3.1 – Walking Distances by 2011 Census Rural/ Urban Classification (Excluding London)

3.7 People living in urban areas walk further than those in rural areas, with 85th percentile distances of 1,950m and 1,600m respectively. The result for rural areas corresponds with that for London, although the availability of facilities in London and in rural areas is likely to be quite different. Clearly further study is needed.

c. Effect of Gender

3.8 The walking distances by gender are shown below at Chart 3.2.

Chart 3.2 – Walking Distances by Gender (Excluding London)

3.9 There are slightly more women (54%) than men (46%) in the sample and they have a similar average walking distance, but men walk some 400m further than women at the 85th percentile level.

d. Effect of Journey Purpose

3.10 The walking distances by gender are shown below at Table 3.2.

Journey Purpose	Weighted Sample Size	Proportion	Mean (m)	85th Percentile (m)
Commuting	2166	7.1%	1250	2100
Business	290	1.0%		
Education/ Escort	5609	18.5%	1,000	1600
Shopping	5958	19.6%	1,000	1600
Other Escort	1392	4.6%	1100	1600
Personal Business	2730	9.0%	1,000	1600
Leisure	5539	18.2%	1150	1950
Other (including just walk)	6698	22.0%	1450	2400
All	30382	100%	1150	1950

Table 3.2 – Walking Distances by Journey Purpose (Excluding London)

3.11 The results show that walking is mainly used for leisure and other purposes, which together account for 40% of all walking journeys.

3.12 Education and shopping each account for around 20% of walking trips and they have the same average walking distance of 1,000m and the same 85th percentile walking distance of 1,600m. The walking distance for commuting is longer, with an average of 1,250m and an 85th percentile of 2,100m, but only 7% of walking journeys are for commuting.

3.13 It is difficult to compare the values in Table 3.2 with those from IHT (2000), reported at Table 1.1, even if it is assumed that their Preferred Maximum accords with our 85th percentile values, because “town centres” and “shopping” may not be looking at the same activity and the IHT table groups together a number of different purposes.

e. Summary

3.14 The analysis has shown that there is some variation in walking distance across the country, with London having the shortest walking distances. Walking is mainly used for leisure and other purposes, which together account for 40% of all walking trips, followed by shopping and education each accounting for 20%. There is a slight gender bias with women walking more, but men walking for longer distances. People in rural areas, on average, walk a similar distance to those in urban. People in rural areas walk shorter distances than people living in urban areas.

Walking to a Bus Stop

3.15 Walking distances have been analysed for those trips where walking was the 1st stage/ mode of travel and bus was the 2nd stage/ mode of travel. This is the walking distance from, for example, home to the bus stop or work to the bus stop. However, in considering only the most recent three years of data, the sample sizes are too low for reliable results. In order to increase the sample size, the whole 2002 to 2012 dataset has been used.

a. Regional Variations

3.16 The walking distances to bus stops by region are shown below at Table 3.3.

Region	Weighted Sample Size	Mean (m)	85th Percentile (m)
North East	293		
North West	775	600	800
Yorkshire & Humber	527	620	800
East Midlands	347	650	1210
West Midlands	580	550	800
East of England	472	630	800
London	2916	490	800
South East	717	580	800
South West	359	640	1290
Wales	133		
Scotland	871	510	800
All Regions (Excl. London)	5075	580	800
All Regions (Incl. London)	7990	550	800

Table 3.3 – Walking Distances to Bus Stops by Region
Note samples below 1,000 may not be statistically reliable

3.17 The sample size for two of the regions is below 300 so the data has not been shown.

3.18 Even with the larger dataset, many of the regions have sample sizes which are too low to report, or below 1,000, and so possibly unreliable. Reliable data is only available from London and for All Regions.

3.19 Within the limitations of the data, the results identify some regional variations. Notably, London has the lowest mean distance of 490m and the joint lowest 85th percentile of 800m, whereas the South West has the highest mean distance of 640m and the highest 85th percentile of 1,290m. The inclusion of London within the All Regions sample has a marginal effect on the average walking distance; 550m opposed to 580m, but has no effect at the 85th percentile level. The average walking distance to a bus stop is notably longer than the 400m recommended in IHT (1999) and CIHT (2015).

3.20 For consistency with previous practice, London has been excluded from the remainder of the analysis.

b. Urban and Rural Distribution

3.21 The walking distances to bus stops by 2011 Census Rural/ Urban Classification are shown below at Chart 3.3.

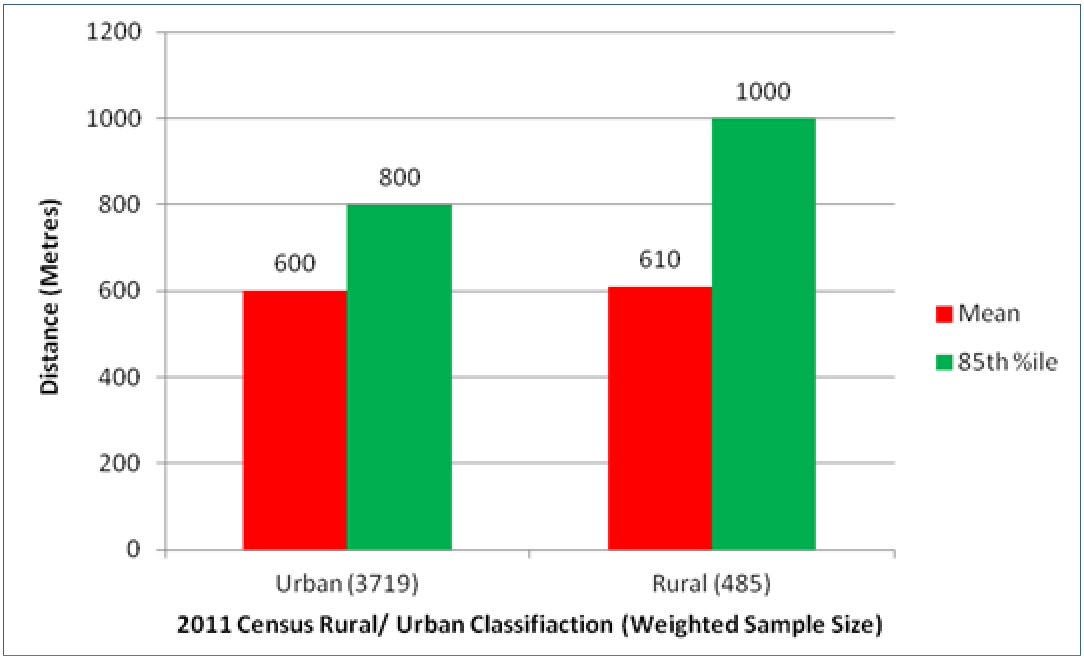

Chart 3.3 – Walking Distances to Bus Stops by 2011 Census Rural/ Urban Classification (Excluding London)

3.22 The sample size in rural areas is less than 1,000 so might be statistically unreliable.

3.23 The graph shows that the use of buses by people living in rural areas is quite small, accounting for only 12% of the distribution, and on average these people walk no further than those in urban areas although, at the 85th percentile level, rural people walk 200m further than those in urban areas.

c. Effect of Gender

3.24 The walking distances to bus stops by gender are shown below at Chart 3.4.

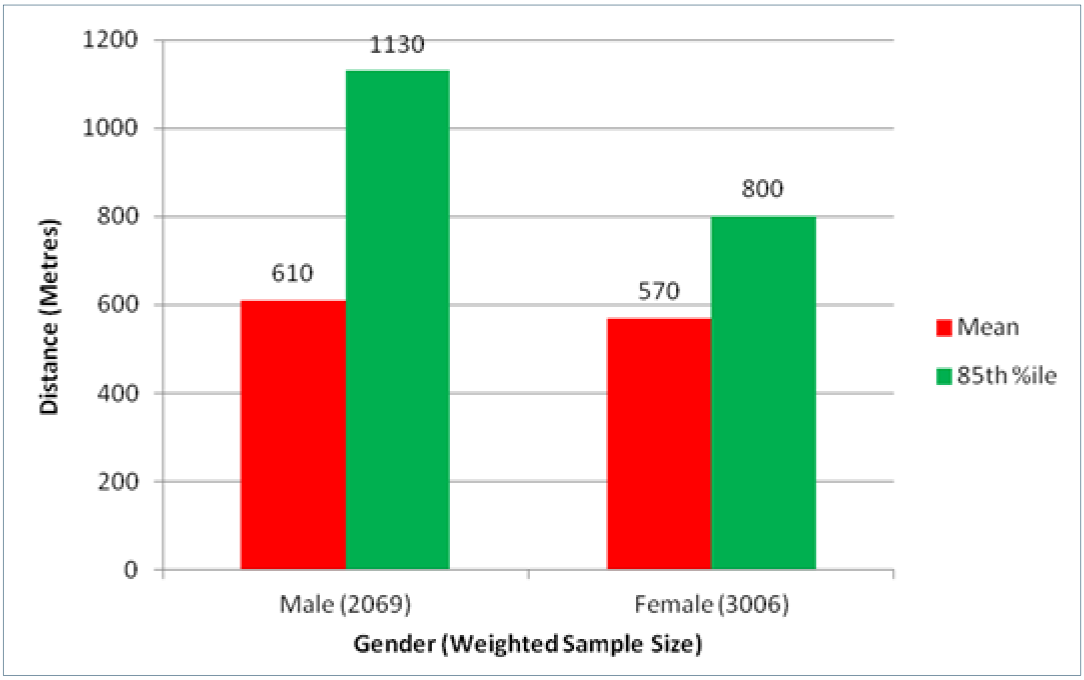

Chart 3.4 – Walking Distances to Bus Stops by Gender (Excluding London)

3.25 The results show that women account for 59% of the sample but walk on average slightly less to a bus stop than men; 570m opposed to 610m, whilst at the 85th percentile men walk considerably further; 1,130m opposed to 800m.

d. Effect of Journey Purpose

3.26 The walking distances to bus stops by journey purpose are shown below at Table 3.4.

Journey Purpose	Weighted Sample Size	Proportion	Mean (m)	85th Percentile (m)
Commuting	1352	26.6%	610	840
Business	97	1.9%		
Education/ Escort	845	16.7%	610	800
Shopping	1097	21.6%	500	800
Other Escort	109	2.1%		
Personal Business	479	9.4%	550	800
Leisure	1088	21.4%	640	1290
Other (including just walk)	7	0.1%		
All Purposes	5074	100.0%	580	800

Table 3.4 – Walking Distances to Bus Stops by Journey Purpose (Excluding London)
Note samples below 1,000 may not be statistically reliable

3.27 The sample size for three of the journey purposes is below 300 so the data has not been shown.

3.28 The results show that buses are mainly used for the purpose of commuting, followed by leisure and shopping purposes, these together accounting for over two-thirds of the distribution, followed by education/ escort.

3.29 The average walking distances to a bus stop for commuting, education and leisure are similar at just over 600m. However, people do not walk as far if on a shopping journey (500m). The 85th percentile for each journey purpose is similar, at 800m, apart from leisure at 1,290m.

e. Summary

3.30 This analysis has clearly demonstrated that average walking distances to a bus stop exceed the 400m which has been the distance recommended for use in IHT (1999) for some time. The analysis has also shown that the walking distances to bus stops in London are less than elsewhere in the UK. Walking to bus stops is mainly used for commuting, leisure and shopping purposes, and there is a small gender bias with women walking more, but men walking for longer distances. People in rural areas, on average, walk a similar distance to those in urban areas.

Walking to a Railway Station

3.31 Using the 2002 to 2012 dataset, walking distances have been analysed for those trips where walking was the 1st stage/ mode of travel and rail was the 2nd stage/ mode of travel. This is the walking distance from, for example, home to the railway station or work to the railway station.

a. Regional Variations

3.32 The walking distances to rail stations by region are shown below at Table 3.5.

Region	Weighted Sample Size	Mean (m)	85th Percentile (m)
North East	20		
North West	293		
Yorkshire & Humber	191		
East Midlands	67		
West Midlands	191		
East of England	505	1030	1610
London	3212	740	1290
South East	878	1020	1610
South West	89		
Wales	77		
Scotland	365	980	1610
All Regions (Excl. London)	2676	1010	1610
All Regions (Incl. London)	5888	870	1610

Table 3.5 – Walking Distances to Rail Stations by Region
Note samples below 1,000 may not be statistically reliable

3.33 The sample size in seven regions is below 300, so the data has not been shown, and in three regions the sample size is below 1,000 and so might be statistically unreliable. Reliable data is only available from London and for All Regions.

3.34 The results show that London has the lowest average walking distance of 740m and the lowest 85th percentile walking distance of 1,290m. The East of England and South East England have the highest average walking distance of 1,030m and 85th percentile walking distance of 1,610m.

3.35 By comparing data for both All Regions samples it can be seen that the inclusion of London results in a shorter average walking distance, 870m as opposed to 1010m, but has no effect at the 85th percentile level.

3.36 The average walking distance to a railway station outside London is notably longer than the 800m recommended in IHT (1999) and CIHT (2015), but is similar to that noted by Kuzmyak et al. 2003a (cited in TfQL, 2008).

3.37 IHT (1999) and CIHT (2015) both advise that people should not have to walk more than 800m to a rail station. The results show that people outside London walk on average 1,010m and 15% walk more than 1,610m.

b. Urban and Rural Distribution

3.38 The walking distances to rail stations by 2011 Census Rural/ Urban Classification are shown below at Chart 3.5.

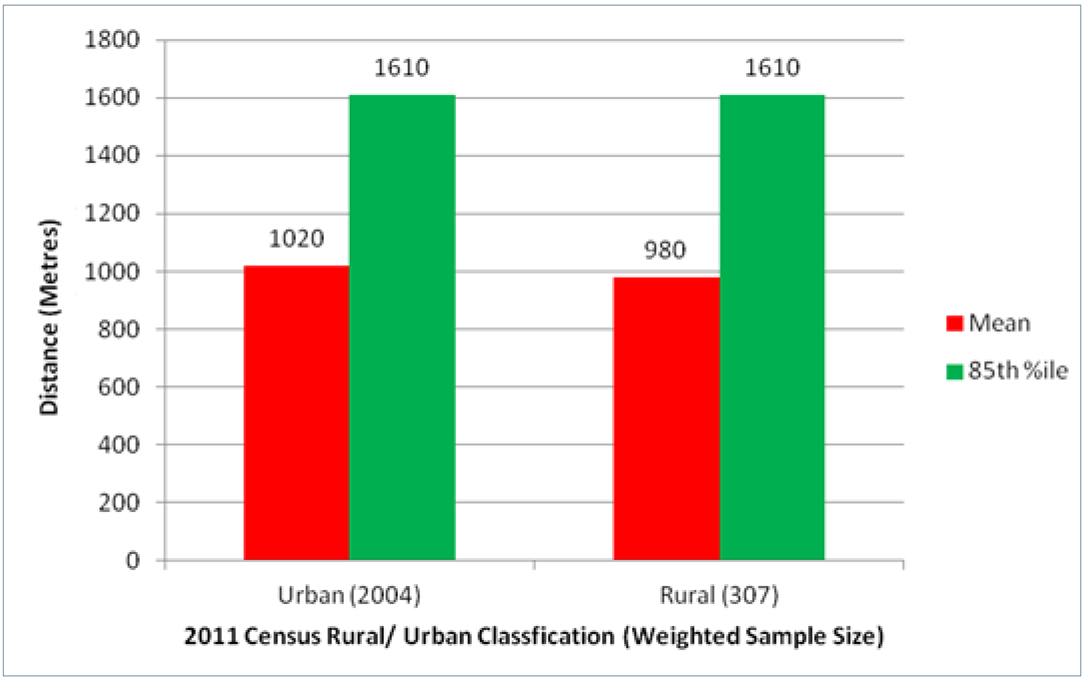

Chart 3.5 – Walking Distances to Rail Stations by 2011 Census Rural/ Urban Classification (Excluding London)

3.39 The sample size in rural areas is less than 1,000, and only just above 300, so is likely to be statistically unreliable; nevertheless the walking distances are similar.

c. Effect of Gender

3.40 The walking distances to rail stations by gender are shown below at Chart 3.6.

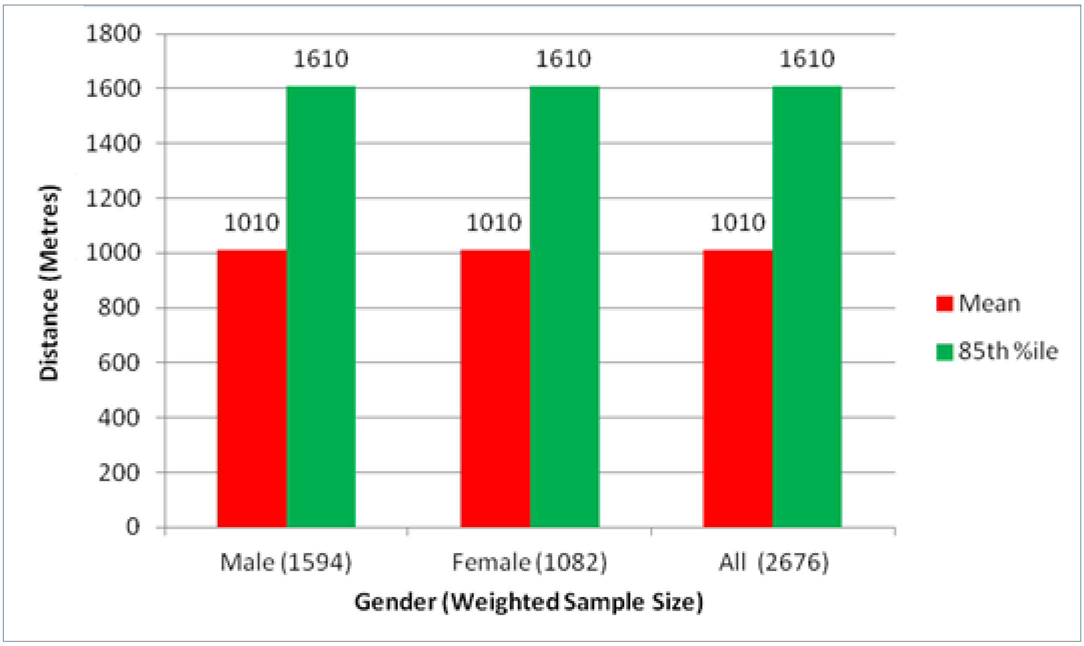

Chart 3.6 – Walking Distances to Rail Stations by Gender (Excluding London)

3.41 The results demonstrate that the average and 85th percentile walk distances to a rail station are unaffected by gender.

d. Effect of Journey Purpose

3.42 The walking distances to rail stations by journey purpose are shown below at Table 3.6.

Journey Purpose	Weighted Sample Size	Proportion	Mean (m)	85th Percentile (m)
Commuting	1307	48.8%	1030	1610
Business	165	6.2%		
Education/ Escort	217	8.1%		
Shopping	220	8.2%		
Other Escort	50	1.9%		
Personal Business	119	4.4%		
Leisure	598	22.3%	1010	1610
Other (including just walk)	2676	100.0%	1010	1610
All	1307	48.8%	1030	1610

Table 3.6 – Walking Distances to Rail Stations by Journey Purpose (Excluding London)
Note samples below 1,000 may not be statistically reliable

3.43 The sample size for five journey purposes is below 300 so the data has not been shown and one is below 1,000 so might be statistically unreliable.

3.44 The results show that walking to a railway station is undertaken predominantly for commuting (50%) and leisure (22.3%), these together accounting for over two-thirds of the sample.

3.45 The average walking distances to a rail station for commuting and for leisure are very similar at just over 1,000m, whilst the 85th percentile level is 1,610m.

e. Summary

3.46 The analysis has shown that average walking distances to a rail station exceed the 800m maximum distance recommended in IHT (1999). The analysis has also shown that walking distances to rail stations in London are less than elsewhere in the UK. Walking to rail stations is mainly used for commuting and leisure purposes, and there is no difference in the distances walked. There is very little difference in the distances walked to a rail station in rural and in urban areas.

4.0 Discussion

4.1 In relation to walking as the main mode of travel the main interest from a planning perspective is to assess whether there is a range of facilities within a reasonable walking distance of a site. This is normally done as a walkable catchment which shows the furthest extent that could reasonably be walked. In the past the 2km value from PPG13 was used, but since its withdrawal there is no basis for continuing to rely on this value.

4.2 From the simple analysis of the NTS data we have shown that the average walking distance for All Regions excluding London is 1,150m and the 85th percentile distance is 1,950m, which corresponds to the PPG13 2km value. We suggest that for planning purposes the 85th percentile distance should be used to establish the walking catchment for sites outside London.

4.3 In London we found that walking distances were less; the average is 1,000m and the 85th percentile is 1600m. It is not clear why the distances are less than elsewhere in the UK, but it is notable that the walking distances to a bus stop or a railway station are also lower in London. It may be that people don't have to walk far to reach the facilities they need, but the London walking distance are similar to those in rural areas where the opposite argument would apply. Further study is needed.

4.4 Outside London, walking is mainly a leisure activity accounting for 40% of journeys, with education and shopping each accounting for 20%. Commuting on foot was little used, accounting for only 7% of trips. People walked the furthest for commuting and other journey purposes, both at the average and 85th percentile levels (2,100m and 2,400m respectively). People did not walk as far for shopping or education purposes both at the average and 85th percentile levels (1,600m for both). With this data it is possible to consider the walking catchment of workplaces, schools and shops. The distances set out here should replace those in IHT (2000).

4.5 It has been found that males walk further than women especially at the 85th percentile level. Further study of gender differences in relation to journey purpose would be worthwhile.

4.6 At present the walking distance recommendations of 400m and 800m by IHT (1999) have been widely adopted. From our assessment the distances people actually walk to catch a bus or train are notably longer. The average walk to a bus stop is 490m in London and 580m elsewhere in the UK and the average walk to a railway station is 740m in London and 1,010m elsewhere. So, outside London, the average person walks further to a bus stop or railway station, with 15% walking further than 800m to a bus stop and further than 1,290m to a railway station in London, and further than 1,610m to a railway station elsewhere.

4.7 So what is a reasonable walking distance to a bus stop or railway station for planning purposes? There is no simple answer. To compete with car travel, bus services need to be convenient for passengers. Convenience is a poorly defined term (OECD/ ITF, 2014) comprising several aspects, only one of which is the access distance to the bus stop. From Transport Statistics GB (DfT, 2014), 86% of homes are shown to be within 588m of a bus stop and yet bus patronage is 7% nationally. From Kuzmyak et al. 2003a study (cited in TfQL, 2008) for home to station distances of 800m to 1,200m, walking was the predominant mode of access.

4.8 The contribution that the access distance to public transport has on the uptake of the mode is not clear and further research is needed. What is clear from our assessment is that the average walking distance to a bus stop is well above 400m and the average walking distance to a railway station, outside London, is well above 800m. Therefore, average walking distances to bus stops and railway stations based on revealed behaviour recorded in the NTS should be used for planning purposes in preference to the 400m and 800m distances recommended in IHT (1999). When considering the potential walking catchment of a new development, to bus stop or railway station, the 85th percentile distance should be used.

5.0 Conclusions

5.1 There has been little or no information about how far people walk to underpin the policy and guidance which has been used for many years.

5.2 Policy making and decision taking should be based on the best evidence available and the following distances are recommended for planning purposes.

	Mean (m)	85th Percentile (m)
Walk – As main mode of travel		
UK (Excluding London)	1,150	1,950
London	1,000	1,600
Walk to a Bus Stop		
UK (Excluding London)	580	800
London	490	800
Walk to a Railway Station		
UK (Excluding London)	1,010	1,610
London	740	1,290

Table 5.1 Recommended Walking Distances

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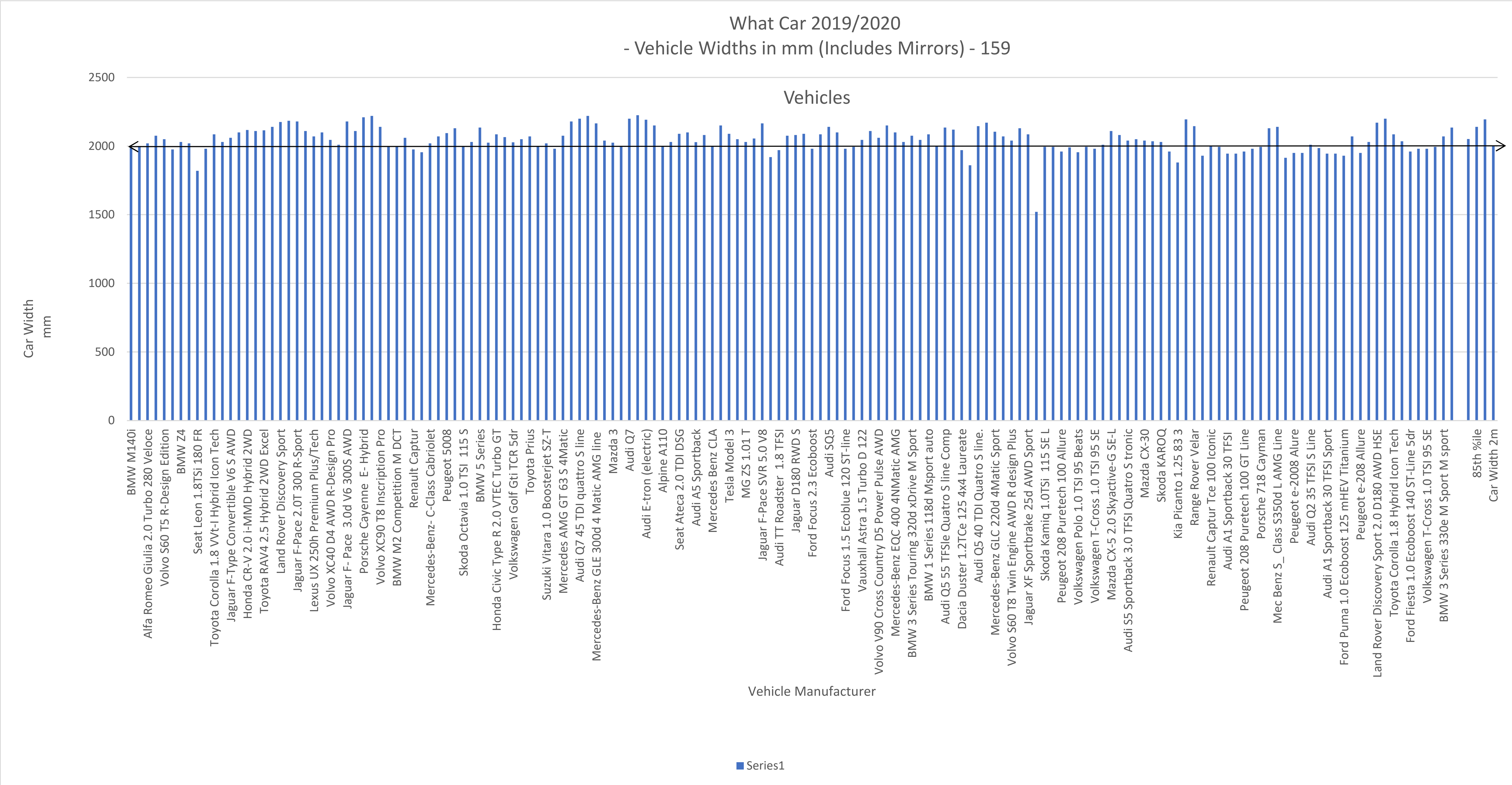

Car Width 85th Percentile 2140mm 95th Percentile 2195mm

Dear Planning Team

Medway Council Local Plan Regulation 18 consultation

I am responding to the above plan as a local horse rider member of the Local access forum

Medway plan 2024 .2.1 The Local Plan will set out the direction for Medway's growth over coming years. It will be a Plan for people who live, work, or study in Medway and visitors. It will be a Plan for Medway as its own place. A complex place, which encompasses distinct towns and villages, with their own strong identity and history. A place of contrasts, from remote marshes and mudflats to busy urban streets. A place of noted heritage, but also looking to the future, with innovation and enterprise, and universities and colleges equipping students with skills for the changing world of work

I use the above statement from the plan as I think it relates to Medway at this present time

I feel that the proposed development with an increase of 28000 houses will mean about 112000 people who will need doctors, hospitals, places to work, travel to work, schools to name a name a few. Their leisure time will require infrastructure, i.e. sports centres, football pitches, also park land and countryside which is important for all residents and visitors
These proposals will ruin the villages and the countryside around them. The new housing estates will turn quiet lanes into busy narrow lanes with fast moving traffic
Of the three growth options which include urban focus, dispersed growth and blended strategy, the urban focus will protect the villages on the Hoo peninsular which is some of the best countryside Medway has. The council prefers the blended strategy option which takes up a lot of the rural area so will require more protection and input to protect all the rural area and the people in it.
Medway's rights of way is quite poor with only 186 miles and a lack of paths for higher rights users, including horse riders which are hardly mentioned in the whole plan despite the fact that 7 per cent of Medway's population will want to ride; this may be at a riding school, livery yard or kept at home which brings in a lot of money into the rural economy by way of vets, farriers, feed merchants and instructors. A horse brings in approx £6,700 per year and with there being over 4000 horses in the Medway postcode area, that is a lot of money

The care of horses is a healthy way of life, they require care 365 days a year in all weather. The care is manual. Both in the care and riding it is a known fact that this is mostly done by women who would not use any of the other sport facilities that is on offer. Older women have been identified in government studies as a social group with relatively low levels of participation in physical activity. In a British horse society study, some 93% of questionnaire respondents were women and 49% percent of female respondents were aged 45 or above. These are comparable figures to a major Sport England survey which found that 90 percent of those participating in equestrianism are women and 37 percent of the female participants in equestrianism are aged 45 or above. The gender and age profile of equestrianism is not matched by any other sport in the UK[1]
Horse riders with a long-standing illness or disability who took part in the survey were able to undertake horse riding and associated activities at the same self-reported level of frequency and physical intensity as those without such an illness or disability.

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[1] The health benefits of horse riding in the UK. Research undertaken by the University of Brighton and Plumpton College on behalf of The British Horse Society (2010)

Horse riders have to use the narrow country country lanes to access the rights of way that are there. Safe routes for equestrians are desperately needed because the accident statistics in respect of horses on the roads are horrific. There have been 5,784 incidents reported to the British Horse Society since 2010, 44 people have lost their lives, 1350 have been injured, 441 horses have been killed, 1,198 horses injured, and 75% of these incidents involved vehicles passing too close to the horse and/or too fast.

Alongside the proposes football, cricket and hockey pitches, there should be provision of a public manège for horse riders.

The government's Cycling and Walking Investment Strategy Safety Review says: "*1.2 But safety has particular importance for vulnerable road users, such as walkers, cyclists and* ***horse riders****. All road users have an equal right to use the road, and safety and the perception of safety are key factors in determining how far people use these modes of transport. The safer they feel, the more they will use these active modes of travel. The more people who use Active Travel, the fitter and healthier they will be, and the more their communities will benefit from lower congestion and better air quality, among a host of other benefits*"(Jesse Norman, Minister for Transport)

Inequalities in health and deliver better outcomes for residents, by promoting opportunities for increasing physical activity and mental wellbeing, providing access to nature locally, through attractive and safe green infrastructure and public realm design for walking, cycling, parks and other recreation facilities, and improving access to healthy food choices; and to reduce social isolation by supporting retention and development of businesses and local services close to where people live, and connected and inclusive environments that are accessible by all groups in society, including people with disabilities, a range of ages, incomes and identities. To support our diverse communities to realise their potential and to be proud to live in Medway

Again, there is no mention of horses in the above statement despite its potential to meet many of the requirements of equestrians.

Cycle Routes and rights of way
Medway has 81 miles of cycle paths across the five towns. In the last five years Medway has invested £2.5 million in cycling. It has created on-road and off road cycle paths that make it easier to cycle. Public Rights of Way are a free and accessible resource. There are public rights of way across the whole of Medway in both rural and urban areas . There are approximately 186 miles of public rights of way in Medway which Medway has spent very little on over the last years both in maintenance or creation of new ones. There are four types – footpaths, bridleways, restricted byways and byways. All of these can be used by pedestrians. Cyclists and equestrians can use bridleways, restricted byways and byways, and these can form useful links in the active travel network so the creation of bridleways are very good value for money.

I recognise that many of the proposed routes within this consultation are in urban areas. However, many horses are kept on the urban fringe, so it is important that equestrians are not excluded from routes that exit the urban areas into the surrounding area as these could keep vulnerable users off busy roads

With the ongoing developments in the area equestrians are actually losing out because many paths they have used by permission for years by kind landowners are being lost due to change of ownership with land being sold on for building of houses or retail units or a change in farming crops and road widening.
Medway's Rights of Way Improvement Plan (ROWIP)28 recognises the importance of public rights of way for many people, including those with mobility impairments and health needs.

The ROWIP sets out the priorities for improving rights of way to meet the needs of the public, now and in the future.

Sue Saunders [redacted]

Access rep for British Horse Society and Medway LAF
Sent by e mail

[redacted]

From: [redacted]
Sent: 05 September 2024 16:54
To: [redacted] policy, planning
Subject: Site HW3 - Proposed site for Secondary School, Community Hall and Hospital/Health Hub. Hempstead Road/Hempstead Valley Drive.

Follow Up Flag: Follow up
Flag Status: Completed

Dear [redacted]
Many thanks for your help - the link on page 1042 works well.

I copying this to the Planning Policy team so that they can include the following as a consultation response.

“Please see my consultation response in relation to site HW5(Hempstead Valley Shopping Centre). There is of course a need for additional Secondary School accommodation but this proposal with associated community and health facilities would only add to the further overloading of the local road network particularly Chapel Lane and the Sharsted Way/A278 junction. The site includes a well established allotment gardens and it not clear whether these would be retained.

The adjacent site HW4 is small area of land near the disused subway but there appears to be no description in the documents of what is proposed”

Kind regards
Ray Dines

Sent from Sky Yahoo Mail for iPad

Please treat the following as a response to the proposed allocation HW5.

As I read it the proposals for Hempstead Valley Shopping Centre the following is proposed.

102 Bedroom Hotel

102 Unit - sheltered residential accommodation

Up to 266 residential dwellings

Additional Retail/Leisure etc. between 1858 and 3066 sq.m

These figures are quite precise and imply that there are already quite detailed proposals being considered.

Can the Council confirm whether this would involve loss of the existing retail floor space or other uses?

It is difficult to see how such proposals could come forward without loss of existing parking space. Overall parking provision surely must be compliant with normal Medway Council parking standards.

Roads in the area particularly the Sharsted Way/A278 junction are already overloaded and congested. The cumulative effect of proposed developments at Hempstead Valley Shopping Centre, Lidsing, Gibraltar Farm, East Hill, and further residential now proposed in the Capstone Valley would be unsustainable.

Kind regards

Ray Dines

[redacted]

From: [redacted]
Sent: 06 September 2024 19:53
To: policy, planning
Subject: Medway Local Plan

[redacted]

What are the key issues that you want the plan to address.

Infrastructure
Stoke Road is exactly the same as it was when I used to walk to school in 1950. Much of it has no pavement on one side. The drains are blocked with mud and when we have rain, a stream runs down the road. One house near me found the water ran into their garden and house, so they raised their drive, only to find that instead, the lady next door had the water running down her driveway.
.Many of the houses in Stoke Road have overhead power lines, as does mine, and I had my power line brought down by a lorry one day. There is now so much traffic that it is difficult to reverse in my drive. The cars come around the bend doing about 45 miles an hour, and do not stop and wait. One day there will be a serious accident.
Further afield, there is just the one road on and off the Peninsula, and it seems as if there is no suitable alternative to this.

Which of the growth options do you prefer and why?

I prefer Option One. This area is not suitable for more houses and more people.
Surely the failure of HIF shows this.

What are the most important issues for you in planning new developments?

I feel that it is very important to that houses have proper gardens. Not just a small space with a shed and a washing line, and somewhere to put the bins. I think people should have the options of being able to grow plants and food and to have an outdoor space of their own, even if they just have grass and a place for children to play. It is not adequate to have a space in the middle of the estate with a climbing frame. It becomes a place just frequented by groups of bored teenagers, as young children need to be taken to these areas by an adult.
It is also very important that all houses have adequate space for parking, and for white vans, otherwise these all spill out onto other roads and the whole place just becomes one big car park, as can be seen in some areas of the older housing estates in the village.
Also, of course, infrastructure must come first. I believe there was a plan to give the village a new health centre and a new sports centre, as well as other things, on the field on the left of Vicarage Lane. Well I watched as traffic came to a halt as a lorry tried to negotiate the ninety degree bend from Church Street into Vicarage Lane.This area is just not suitable for all this without the proper infrastructure .

Do you have any wider comments on the plan?

I believe there is a plan to put a supermarket in Roper's Lane.Well we certainly need larger shops here now. The Coop was in the village in the nineteen fifties, and has served this village well, but is now not adequate.I think it would be a nice gesture to ask the Coop if the would like to provide a supermarket, in return for their faithful service over the last seventy years or more,

Patricia Blackwell

Sent from my iPad

Rehman Chishti

Former Member of Parliament: Gillingham & Rainham 2010-2024

Rehman Chishti
[redacted]
ME8 [redacted]

Medway Local Plan 2041 Regulation 18 Consultation
planning.policy@medway.gov.uk

6 September 2024

Dear Sirs

Re. Representations on the Medway Local Plan 2041 Regulation 18 Consultation, further to the publication by Medway Council of their proposed next steps.

I am writing to you further to my previous representations on Medway Council's draft local plan (during my time as Member of Parliament for Gillingham and Rainham).

As the Medway Local Plan is looking at a strategy that meets the needs of Medway residents for the future, I was disappointed to note that your draft local plan does not include the following:

> **A new hospital for Medway**
> Medway Maritime Hospital serves the busiest A&E Department in Kent, and with an increasing population and people living longer, it is vital that Medway Council has a site identified for a new hospital. A new hospital for Medway should be a top priority for the Labour-run Medway Council, for Medway Labour MPs, and for the Labour central government.
>
> **Provision for all Faith Communities to have adequate space for worship**
> I specifically refer to the need for the local Hindu community in Gillingham & Rainham who are looking for a site for a temple.
>
> **A new stadium site for Gillingham Football Club**
> The local football club, Gillingham FC, currently sit at the top of League Two and if they are to achieve their true potential and achieve top-tier football they will need a site for a new stadium, identified in the plan.

Protection of Green Spaces
Gillingham & Rainham is one of the most densely populated constituencies in Kent and it is vital that green spaces, be that the Capstone Valley in Hempstead, or east of Rainham, are protected from development.

Future housing needs should be met in tandem with all necessary and appropriate supporting infrastructure including hospital capacity and healthcare, schools, roads, and transport needs.

Top-down housing targets by central government without regard for local demographics such as in Gillingham & Rainham which is very densely populated should not be the way forward.

Gillingham in the regeneration of brownfield sites now has the excellent large-scale Victory Pier development, which alongside appropriate supporting infrastructure meant that Gillingham & Rainham played its part in meeting local housing needs.

Yours sincerely

[redacted]

Rehman Chishti

[redacted]

From: [redacted]
Sent: 08 September 2024 09:47
To: policy, planning
Subject: Medway Local Plan

I live in ME3 [redacted]. I would like to choose option 1 for the In Medway Plan
Regards Brian Styles

[redacted]

From: [redacted]
Sent: 08 September 2024 10:41
To: policy, planning
Subject: Concrete Jungle - Regulation 18

Hello,

As a local resident this proposal is deeply worrying. And shows the lack of many things, common sense, empathy, listening to the locals, just to name a few.

1. NHS - it takes weeks already for a doctor's appointment.
2. Schools - are at breaking point, too many students in a class. Not getting first choice school placements.
3. Roads - full of potholes and traffic already.
4. Environment - we all get taxed for green initiatives. How does this help the environment? Almost as if we're being lied to. Maybe plant 5,000 trees instead on houses. And let me guess, when air pollution rises due to an inept council, the plebs will be taxed even more like in many other cities.

Now imagine the above with an extra 5,000 houses from Maidstone and Medway council. We all know the council will do nothing to ease any of the above, your proposal will be a pathetic roundabout for traffic easing, well done. As useful as chocolate teapots.

We all know why we need more houses, and we all know how to lower the need for more houses. Maybe look to solve the root cause rather than ruin everyone's lives.

Thanks,
Jon.

[redacted]

From: [redacted]
Sent: 08 September 2024 10:41
To: policy, planning
Subject: Medway Local Plan

Hello,

I moved out of Rainham nearly three years ago, due to what I perceived as overcrowding in the area. Now, you wish to overcrowd it EVEN further with what amounts to another town/village at Capstone ¡! Destroying green space where hundreds of people go to get away from 'town' life ¿? Did you realise that Capstone is home to a few rare orchids, Lizard orchid being one ¡! I will constantly oppose any building on these valleys - full stop.

Yours sincerely,
Wendy Buss

[redacted]

From: [redacted]
Sent: 08 September 2024 10:57
To: policy, planning
Subject: Medway Local Plan - Medway Local Plan Regulation 18 consultation 2024

I have had problems commenting on the local plan and would like my views here on this email logged in full.

I'm absolutely aghast that the Medway Local Plan looks like it does. Already we have traffic problems - traffic that is heavy enough and that causes potholes in roads, especially noisy lorries that all to often thunder up and down Hempstead Road, a road where dogs are walked and school children walk - it's busy at all times. With so many more homes planned, how possibly can roads cope? Public transport links are dire and shameful so it doesn't encourage or give confidence for people to use what is there already. All too often empty buses thunder past our home when there could better routes planned. Ie why isn't there a bus route through Gillingham Business Park? Because of this, people travel just 10 minute journeys in their car, on their own, so they can get to work. If there were regular buses that arrived in time for workers' shifts it would alleviate traffic and queues. This will only get worse with the planned housing.

But not only on that vicinity will it be affected, the whole of Medway will be affected. It's not rocket science to know that traffic queues are a dominoes effect and one queue affects another area and so on.

The planned residents will also want good GP access. Do you have good GP access now? We certainly don't - it's getting worse. They never have appointments, when you're referred for an MRI for example it takes months, operations are queued up, the nhs here in Medway especially are at breaking point. We need at least another hospital on the north side which would make so much sense.

Capstone Valley is a lovely area that homes wildlife galore. It's a photographer's haven and the whole area will be ruined if this went ahead. I am disgusted that it's even being considered. It's all down to greed. There are empty homes and brownfield sites GALORE in Medway and these need to be considered for homing first and foremost. Do not ruin this area. Once homes are built there is no going back. We need our green spaces!

Consider the Hoo Peninsular once more. There is a complete lack of housing and those that have moved to new homes there are happy with the area. Extend those developments and SAVE CAPSTONE VALLEY!!!!!!

Denize Halfpenny
[redacted] ME7 [redacted]

[redacted]

From: [redacted]
Sent: 08 September 2024 11:21
To: policy, planning
Subject: Regulation 18 Public response to the emerging Medway local plan.

Medway Local Plan Regulation 18

Consultation. 07 September 2024.

Mr J Brewood (ME5 [redacted]

Could you ensure this submission on the emerging Medway local plan is included in the ongoing consultation process? If not for the attention of this department please forward as appropriate and kindly confirm.

Regulation 18 Public Comments.

The council's vision for Medway is blurred, and there is no policy to provide a new Medway Hospital that is fit for purpose. Development plans to increase air movements and to remove all respite benefits.

To direct all intensified air movements over the same residents contrary to planning policy and environmental legislation. Propose safeguarding non-essential aviation use is not in the best public interest or that of government core planning policy or the requirement to adapt to climate change.

Medway's infrastructure cannot meet demand today most major routes and local roads are potholed dangerous and antiquated through the lack of investment and proper planning by consecutive past Medway administrations.

The emerging local plan fails to include a policy for a new hospital to serve the Medway Towns. Or one to provide an alternative medical facility that is desperately needed. To ease the current unsustainable pressures on Medway Maritime Hospital.

The hospital site is not ideally located there is inadequate parking space road access is extremely poor. Patients and visitors often arrive late for appointments through inadequate parking facilities and the constant traffic congestion on the local surrounding road network.

There is no available development land to modernise the hospital or to accommodate current patient demand let alone to provide the care needed for a growing population. Unless this situation is addressed as urgent and reconciled.

The new local plan will not improve the safety health or well-being of the ever-growing Medway communities or the infrastructure needed. Rarely is the infrastructure needed first in place.

There is no policy to provide or to ensure new infrastructure is first in place. To meet current needs or the ambitious housing and demand the masterplan for the airport site and other new in combination development plans create.

Or to alleviate the existing problems of poor air quality and gridlock conditions that worsen daily. This unsustainable situation weakens the local economy and discourages new employers and investment to create new jobs.

This incompetence adversely impacts on NHS finances and resources. The synergistic effects of development without improved infrastructure adversely affect the well-being and government policy statutory legislation and the effects of global warming.

To achieve the council's aspirations for Rochester airport that are not shared by residents. The National Planning Policy Framework the Noise Policy Statement for England. Planning Practice Guidance sound plan-making guidance and planning protocol are frequently ignored.

The gyratory systems link and connect with Junction 3 of the M2 SRN. Bridgewood the lord lees and Torrington gyratory systems with A229 Bluebell Hill. Often are at a complete standstill throughout the day not only at peak travel times or infrequently.

The emerging Medway local plan will make this bad situation in the surrounding and wider Kent areas much worse. Kent County Council and Highways England have no improvement plans or money to finance the major infrastructure improvements needed to meet demand. Highways England considers the airport location unsuitable for an employment hub.

There is no realistic prospect of infrastructure improvements happening before 2028. Only then works will not be complete for a decade. Traffic using the road network to access the SRN will soon be gridlocked. These effects impact global warming and cause stress and heart-related illnesses.

Intensifying aircraft movements and toxic carbon fossil fuel emissions will not reduce noise or improve safety. With no strategy to monitor carbon and GHG emissions from the airport, the council cannot mitigate the impact and effects or measure the daily toxic output.

The Tonbridge and Malling Borough Council's emerging local plan has no transport plan for the Lord leas gyratory system or to improve conditions for users of Bluebell Hill.

However, TMBC has new development proposals that will adversely impact and affect the areas highlighted above and significantly impact the purposes of the strategic Medway Gap with no reversibility of the dire consequences.

The Medway Gap maintains the separation between Maidstone and the Medway Towns and prevents this area from becoming one extended polluted urbanised congested sprawl. Plans that adversely impact this strategic feature conflict with the Climate Change Act 2008 and government core planning policy.

Medway council refused to consider greener healthier and safer alternative land uses in 2014 when the lease on Rochester Airport expired. They missed this and the opportunity to resolve long outstanding and demonstrably harmful issues.

The land released for non-essential aviation use should have been made available to provide an ideal location for a new modern Medway Hospital. That is fit for purpose and capable of meeting the demands of this century and beyond.

Medway has no local plan strategy to improve public safety well-being public health or to reduce carbon deposition of more transport movements. The learning environment well-being health and safety of thousands of young children in schools are needlessly adversely compromised.

17 schools precariously surround the airport hazard, and every day thousands of young children are dangerously exposed. To the significant and irreversible adverse effects of the operation of the unfettered Rochester airport.

With no restrictions on annual aircraft movements, the council cannot mitigate for an unfettered single runway and flight path dangerous airport arrangement.

The council has another opportunity to put past mistakes right and to finally address past failings and all cross-authority boundary issues raised by the ongoing and commercial development of the airport site that was influenced and not plan-led.

The hospital trust and the public would gladly accept and support the idea of offering the development land needed for a new hospital. For the hospital trust to only pay the council a nominal peppercorn rent for the airport property as Maidstone Hospital Trust arranged with their landowner.

Safeguarding non-essential aviation use and only receiving an unrealistic peppercorn property rent from a private company fails to achieve. Medway councils fiscal duties to return the best financial return on the property rental to council coffers

The councils plan to construct a new road and airport access in the setting of the North Kent Downs AONB close to the AONB purposes. Conflicts with the Medway mission statement and sound-making guidance. To properly consider the appropriateness of the development site.

This incompetence and oversight will exacerbate the irreversible problems of such as. Infrastructure overcapacity aviation overburdening noise nuisance and poor air quality do not create a healthy environment.

That will not make this a better safer healthier or greener place in which to live or work in.

The unfettered situation of the airport means the council cannot prevent mitigate or minimize the significant impact and adverse synergistic effects generated by the new airport access. Here the infrastructure improvements cannot first be in place to meet demand.

Medway is one of the three most polluted councils outside of London. Rochester Airport is and has been a heat spot for pollution and will be for decades to come. The council's only solution and emerging local plan policy.

Is to make this situation considerably worse simply to grow the business of a private company and to raise the status of an airfield to one of a commercially viable airport? Without any consideration of reversibility of impact.

The status quo and the high-ranking AONB status in terms of planning are ignored. All material planning considerations are not taken into account as all councils in the UK should.

All traffic using the new airport access will use the Rochester Maidstone B2097. This single-lane road cannot accommodate current usage. The B2097 will be overwhelmed adding and exacerbating the existing problems locally specifically Bridgewood and Taddington roundabouts.

This situation cannot be prevented or alleviated. There is no land available for the major infrastructure improvements needed. The B2097 is sandwiched between the airport and M2 motorway where no development land can be made available.

There is no mandate or evidence of any private sector or public support for the masterplan or a science and business park for the airport.

The council promoted the IPM as the masterplan flagship and centre piece of the overall development and provided disinformation. To the experts consulted and statutory organisations.

To persuade them to support the masterplan rather than accept the fallback position of an unfettered airport situation that we have currently.

Medway Council unlawfully implemented the IPM in advance of examination of the masterplan is subject to full examination in its entirety. The issue of transport was scoped out of the screening process based on more disinformation and false statements.

Without the grassed bund in place to mitigate the increased noise pollution of the airport operation. Increased noise nuisance is not mitigated nor is the attractiveness of the site maintained.

The council has concealed the impact and effects of the overall masterplan development conflicts with public opinion government planning policy statutory legislation and the 2003 Medway Local Plan.

The reasons policy S11 was removed are completely ignored for planning convenience. Medway Council's emerging local plan is flawed. Unless the council correctly follows planning protocols and finally listens to their residents when consulted nothing has changed.

The council rely entirely on saved local plan policy ED1 to prematurely implement the masterplan in a piecemeal fashion. Even though ED1 is in conflict with policies ED5 and T23.

No safeguarding policy for non-essential aviation use should be considered or included. Without proper and full public consultation. Public support and a mandate from residents this liability falls too.

Kindly include my submission dated June 2008 in response to the proposed inclusion of policy T4 policy and response to question 7.

James Brewood.

[redacted]

[redacted]

From: [redacted]
Sent: 08 September 2024 13:35
To: policy, planning
Subject: Comment on Medway Local Plan (Regulation 18, 2024)

Dear Medway planning,

As a resident of Hempstead I wanted to respond to the Local Plan.

The 2020 lockdown reaffirmed the importance of local greenspaces to the community and it seems that this plan will result in an enormous loss of these spaces. From Spekes bottom to the north, to proposed development around Capstone to the west, the loss of allotments to the SE and proposed development on Gibraltar Farm to the south, our local area will see a detrimental loss of greenspaces and a reduction in the quality of life for residents. Not to mention the proposals from Maidstone Borough Council that would lock this area into a wider surburban sprawl.

As a road user, I am also concerned about the impact of thousands of extra cars on our crumbling road infrastructure- with local roads already in a poor state of repair.

Finally, hospital and GP provision. Have the impact of thousands of new houses been adequately assessed against our over stretched medical services?

Andrew Mayfield
[redacted]

[redacted]

From: [redacted]
Sent: 08 September 2024 14:03
To: policy, planning
Subject: 2041/1823/proposed local plan

Hi

My objections are as follows :

I object as This is the last area of green that links gill to Chatham . In an AONB!
Where is the road infrustructure going to be to support ALL this housing ?! . Chapel lane is closed as we speak Due to a burst water main . For days now. And is at least a few times a year .With heavy traffic already around the LANES esp At busy times and the Gibraltar Fm dev plus the development next to the lane leading to Walderslade ?
POLLUTION is going to be major issue …which is already affecting Medway badly .what's going to gappen about this ?
There is no Train Station so they'll b thousands more cars …how will people travel .Will there b a good bus service ?
Where is the sewage going ?How will anyone there get an Doc appointment ? From all these proposals Where's the infrastructure I e Doctors/walk In clinics? What we DO need is a hospital b4 Any more building and decent road network. This is FARMLAND where is our FOOD going to come from in a climate emergency ??? Makes no sense .
Please use brownfield sites first . And built flats but nice flats that people will love! Maybe with living walls?And outside space There are bats /hawks/ possibly dormice … as well as lots of different birds /insects in the proposed area… .Where will they go ?

MRS S L Agnew [redacted] ME8[redacted]
Sent from my iPhone

Medway Local Plan – Regulation 18 Consultation

Comments and Observations from Mr DJ Pettitt and Mrs JA Pettitt

Planning Criteria – You state in planning criteria that nearly 28,000 new homes will be required from 2024 to 2041 -17 years- **1.658 per annum**.
We fail to see how this figure has been arrived at. The historic population growth in the Medway has been only 1,225 pa (1990 242,000 2021 280,000) thus by 2041 this gives an estimate of 31,850 people. Using an average of 2.36 persons per household this gives only 13,495 homes being required or **794 per annum**
Unless you are aware of major commercial / industrial growth we fail to see how the target of 28,000 homes has been arrived at.
2011 to 2021 there was an increase of 24.3% of people over 65 years in Medway – an unusual feature. Based on published statistics our estimate is that there are about 70,000 elderly people In Medway. We estimate that at around 250 homes p.a. will become available due to death of the elderly over the next 17 years bringing the annual calculated increase of available housing to about **550 homes per annum** or **9,350 homes in total**.

Infrastructure –

- Health facilities, are as you are fully aware, are completely inadequate – Medway Hospital has been in urgent need for improvement for more than a decade.
- With all the new homes you predict we assume you know where schools will be built or expanded?
- Roads - Our local roads are congested and at times are gridlocked – locally to us the junctions linking on to Hoath Way are regularly choked as is the old A2 through Rainham. The M2 motorway is frequently at a standstill as are the junctions Hoath Way and Blue Bell hill.

Existing planned developments – We currently are threatened with a planned development at Lindsing Farm, Gibraltar Farm and land at East Hill Chatham. Together these amount to **over 3,500 dwellings.** We note that the Lindsing development is sponsored by Maidstone Council but almost all the supporting infrastructure will need to be supported by Medway. This development was objected to all the local Members of Parliament at the time together with Medway Council and ratepayers in the locality. We note that the landowner and developer is the same in all cases.
We are also aware that many housing developments alongside the Medway have been bought and used by London councils to satisfy their housing needs – this seems to be very flawed.

Environment – People need open spaces in their areas – country parks, parks and other open spaces for families and children. Charging for the local country parks hardly encourages families to seek recreation outside. We suggest there is a need to increase the provision of outside facilities for all. The thought of all the areas surrounding the

Capstone and Darland Banks areas becoming a sea of urban sprawl horrifies us and many others.

Growth Options – We completely support growth plans based on developing existing brownfield sites benefiting from good transport links and accessible locations. We are wholly against a dispersed growth option which encroaches on green belt land. Dwellings that are affordable should be the focus not 4/5 bedroom homes which the developers seem to favour.

[redacted]

From: [redacted]
Sent: 08 September 2024 14:32
To: policy, planning
Subject: Medway Plan Consultation. Objection to development HW4 and LW7

From Greg Davis
[redacted]
ME7 [redacted]

Dear Sir/Madam,

I wish to register my objection to the proposed development of HW4 and LW7 on the Medway Plan.

These areas have already been surrounded by development and to remove the gaps between communities will mean that you severly impact the lives of those who live in Lordswood, Hempstead and Bredhurst.

There are many arguments that one could make against this mindless development of precious green space, but I will just mention two:

1. Mandate; the council has a responsibility, indeed a duty of care to represent and look after its residents. Very few people want these developments and I believe you are acting beyond your powers to consult but ignore the residents who voted you into office.

2.The air quality in parts of Gillingham and Chatham is already outside of the permitted guidelines the adding of 3000 plus extra houses and cars, will surely mean that you cannot meet the air quaity guidelines going forward.

We need our green spaces they are our communities lungs.

Yours Faithfully

Greg Davis

[redacted]

From: [redacted]
Sent: 08 September 2024 15:10
To: policy, planning
Subject: Re: Medway Plan Consultation. Objection to development HW4 and LW7

From
Margaret Davis
[redacted]
ME7 [redacted]

Dear Sir/Madam,

I wish to register my objection to the proposed development of HW4 and LW7 on the Medway Plan.

These areas have already been surrounded by development and to remove the gaps between communities will mean that you severly impact the quality of lives of those who live in Lordswood, Hempstead and Bredhurst. Much emphasis is put upon
the need for green spaces to support mental health; it is irresponsible to remove the much loved and used few remaining green spaces in the area when brownfield sites abound throughout Medway. There are many arguments that one could make against this mindless development of precious green space, but
the council has a responsibility, indeed a duty of care to represent and look after its residents. Very few people want these developments and I believe you are acting beyond your powers to consult but ignore the residents who voted you into office.

The air quality in parts of Gillingham and Chatham is already outside of the permitted guidelines.The adding of 3000 plus extra houses and associated cars will surely mean that you cannot meet the air quaity guidelines going forward.

We need our green spaces they are the lungs of our communities.

Yours Faithfully

Margaret Davis

[redacted]

From: [redacted]
Sent: 08 September 2024 15:14
To: policy, planning
Subject: Medway Plan Consultation. Objection to development HW4 and LW7

Dear Sir/Madam,

I write regarding the proposed development of HW4 and LW7 on the Medway Plan.

As a resident of Hempstead I am impacted daily by the increasing traffic levels, pollution levels and overcrowding of the Medway area. The green spaces left around us are limited, and provide clean air, open space for communities and family to enjoy and receive wellbeing, as well as woodland habitat for many species of animals and birds.

Despite the high number of objections to various housing plans in Medway over the past few years, more applications keep being lodged, and the current residents are not being listened to. The council should be working to preserve farmland, woodland and green spaces, and create more open spaces, instead of destroying what little is left.

I object to the current plans because the road infrastructure cannot handle all the vehicles from the additional housing. I also object because it would be far better to repurpose all the brown field sites, of which there are many throughout Medway, rather than dig up farmland. I am aware that there are housing targets to be met but surely this can be done in a more creative way utilising empty spaces available in areas of Medway that are already built up.

Kind regards

Emma Davis
[redacted]
ME7 [redacted]

From: [redacted]
To: policy, planning
Subject: Proposed Development of Capstone Valley
Date: 08 September 2024 15:33:03

Whilst I understand more homes are required I would like to know how you intend to deal with all the extra traffic that will be created once hundreds of homes are built in Capstone Valley.

Also how are the local schools, doctors and the hospital going to cope because I can guarantee many of the houses will be purchased by people outside Medway meaning an influx of more people into the area.

I live in Walderslade Woods and the traffic is already horrendous. It is getting harder to get out onto the Walderslade Woods road due to the amount of traffic and the Lord Leas junction is becoming a joke - queues of traffic during the day and often the junction is gridlocked. When all these houses are built more cars will be using this road to get on to the M2 and M20.

Even if you build a doctor's surgery there are no doctors to run it a which means existing surgeries will have to take on additional patients affecting their current patients. Plus how many extra people will need to use Medway hospital which already struggles as it covers such a large area.

More houses means more water consumption - summers are getting warmer so how do you intend to make sure there is enough water to go round as I am not aware any more reservoirs are being built to cope with the ridiculous amount of houses being built in Medway and surrounding areas.

The people who make these decisions are only interested in building more houses - they are not bothered about how the infrastructure will be affected and the impact on existing households.

Regards

Mrs Jackie Haylock
[redacted]
ME5 [redacted]

From: [redacted]
To: policy, planning
Subject: Medway Local Plan
Date: 08 September 2024 15:48:27
Attachments: image003.png
image004.png
image005.png

My Name: Mark Grant
My Address: [redacted], ME7 [redacted]

I am emailing my comments on the draft local plan since your website is so user unfriendly, I cannot even work out how to register to make comments let alone make the comments.

I OBJECT in the strongest terms to the proposed plan, for all the good it will do me. The reasons:

1. This is not a holistic plan, it includes no, little or scant detail about health provision and specifically what the plan is to improve Medway Maritime Hospital. In fact, the plan should be to build a new hospital. The current hospital cannot cope let alone building another 35,000 houses in Medway. At the consultation in Hempstead I was told by one of the planning officers that 'conversations are still ongoing'. A PLAN SHOULD NOT BE PRESENTED TO US UNTIL IT IS COMPLETE AND HOLISTIC – AND NOT WHEN IT IS TOO LATE. VINCE MAPLE SAID IN HEMPSTEAD THAT THE NEXT STAGE WILL BE A HOLISTIC PLAN- BUT BY THEN IT'S MORE OR LESS COMPLETE AND ALTHOUGH MEDWAY WILL CONSULT ON IT, THEY DON'T HAVE TO. We need to see the whole plan, have the chance to comment and for those comments to be considered – not paid lip service to.
2. What has Medway got against Lidsing, Hempstead and the Capstone Valley? Your plan talks about the need for green space – and then you propose concreting over the Capstone Valley. There is no infrastructure to support this development and your proposed solutions are ridiculous. Perhaps you can explain why a planning officer told me at the consultation in Hempstead Valley that Capstone Valley has been chosen as the infrastructure will be provided by Maidstone Council's proposal for 2,000 houses at Lidsing. That is subject to a potential judicial review so it's a bit premature to propose further development there without knowing the result. Do you know something we don't?
3. Hempstead and Wigmore have had huge amounts of development since the 70s and 80s. Neither Wigmore nor Hempstead can support further development – they are FULL. BUILD YOUR HOUSES AND INFRASTRUCTURE ON THE HOO PENINSULA – IT'S THEIR TURN. YOU CAN BUILD 10S OF THOUSANDS OF HOUSES THERE AND STILL LEAVE A LOT OF GREEN SPACE.
4. You should ask central government to reinstate the £140 million or however much it was that the Tories withdrew in a fit of pique after Medway were selected, for development of the infrastructure = including a new station – out on the peninsula.

MEDWAY IS CRYING OUT FOR BETTER TRANSPORT INFRASTRUCTURE.

5. Capstone Valley is the last ‘green lung’ in this part of Medway. Your proposal to concrete it and join it up with Lordswood will SUFFOCATE this area.
6. The M2 junction at Gillingham cannot support your proposals – unless you are assuming the changes proposed by Maidstone at Lidsing including the changes to the junction will go ahead. This is a big assumption. See above.
7. Your plan pays lip service to much of what you say you are aware of and then concretes it. Air quality is given a passing mention. No real plan for the provision of health care (See above re hospital).

If you persist in presenting a plan that takes no account of Medway’s real needs you will find a challenge to it, in the courts if necessary, in the same way that Maidstone’s plan is being challenged. We will organise ourselves to delay any plan adoption if we cannot stop it. It will cost you significant amounts of money in legal and other fees and tie you up for years – during which time voters like me who have voted for Labour or my life will vote you out at the next elections. I may be one voice but there are many many voices saying the same.

Mark Grant

Mark Grant
Regional Director, Europe, Middle East & Africa
(Based in UK)

TERRALEX

15175 NW 67th Avenue, Suite 207
Miami Lakes, FL 33014
USA
[redacted]
W www.terralex.org

From: [redacted]
To: policy, planning
Subject: Local plan
Date: 08 September 2024 16:10:10

I am writing to raise my concerns over the proposed local plan, which includes a massive amount of development in the Hempstead area, including provision of a new hospital and secondary school and a hotel amount a large number of houses.

The roads in this area cannot cope with the traffic there is, let alone what the proposed development would generate. The exit routes from Hempstead are at present stretched to capacity. Cars cannot exit via Sharsted Way as they are prevented by the volume of traffic leaving the motorway at junction 4.

This causes a back up which prevents residents from leaving their houses via The Rise currently.
Hempstead would become massively over congested and grid locked.
In addition many residents in Hempstead have extremely large trees that have grown over many years and they are unable to remove them as they all have tpo's on them, or afford the works required to reduce the size of these trees. However these proposals appear to use the woodlands surrounding the properties that are covered with TPOs. This is clearly unfair to residents who have spent many years maintaining these trees to retain them, but the council plans to just chop down the trees nearby.

Susan Hidson
[redacted]
Sent from my iPhone

From:	Katie Crompton
To:	policy, planning
Subject:	Medway Local Plan
Date:	08 September 2024 17:20:04

Hello

Am am emailing to express my concerns regarding more propose building works on Capstone Valley.

There is already too much traffic and diminshining green spaces.

Thanks

From: [redacted]
To: policy, planning
Subject: Medway Local Plan
Date: 08 September 2024 18:08:02

Hi there,

I just wanted to email in my concerns over the proposed plans for Capstone valley. I understand the deadline is by 11.59pm tonight.

My main concern is infrastructure, loss of farm land & potential loss of the Hempstead allotment if your plans are correct.

We cannot keep tarmacing over fields that should be used to grow our food. Our roads in Medway, especially Rainham are choked in rush hour, we do not need more houses as there are plenty empty ones that can be utilised. We need someone with some sense to lobby parliament seeking an injunction on houses laying empty beyond a certain period of time can be seized, force through a sale & one less house needed.

Medway, part of the garden of England is becoming one big, pot hole road. It's terrible to see the destruction before us. Old pear orchards ripped up, Gotham trying to do the same with his apple orchards so the land can be paved over. We're destroying what little green space we have and for what? To line the pockets of the builders & developers for shoddy properties they throw up.

There is no thought at all for our only hospital in Medway, no new hospital on the horizon as there's no profit to be made. It makes me so sad to see what my local area is becoming & I just hope that our local allotment is left as it is as that is my oasis after a day at work. Your plans seem to suggest it will be built over.

Thanks for reading, I doubt it'll make any difference but one can hope.

Daniela Manzotti

From: [redacted]
To: policy, planning
Subject: Medway plan
Date: 08 September 2024 18:45:20

Hi
I would like to strongly oppose the planning for Hempstead. There will be no green spaces left and this will affect the air quality and wildlife. There will be homes, hotel, school next to the boundary of Maidstone and there proposed Lidsing development. The houses in Medway will connect, walderslade, lordswood to Hempstead and then Rainham becoming one big built up area. As the capstone valley is part of the Medway plan. The roads can't cope with the amount of traffic at the moment shown by the hideous quality of Hempstead road.. lots of pot holes and no surface.

How can the council build this amount without taking affect the negative impact of pollution ? The pollution is already at an alarming level ! They will be cutting down trees .. which is laughable as we Hempstead residents know that almost every tree in Hempstead has a tpo so please explain why now trees can be removed ??

Kind regards
Sue Self

From: [redacted]
To: policy, planning
Subject: Medway Local Plan ref 18 consultation.
Date: 08 September 2024 19:06:08

Hi
I object to the amount of development being ear marked on our valuable. green fields and spaces. Medway has suffered enough development on valuable green spaces. Capstone valley is a valued and well needed green space to escape the urban sprawl and was never meant to be developed in order to provide a barrier between estates, and villages. It provides a valuable 'green lung' for Medway which has a very high pollution level, which in turn has an impact on the residents and services. You say you want to protect environments yet you want to build all over what is left of green fields and woodland on this side of Medway. The m2 at junction 4 is already a car park now at rush our and building on the areas highlighted on the maps, in Hempstead will make this location impossible to move around. The pollution with be increased. Invaluable wildlife, flora and fuana will be lost for ever. The water that is currently absorbed by the fields will run off and flood those living further down in the Capstone Valley. I fail to see the need for a 102 room hotel at this location when the Premier Inn in Rainham is considering closing.
To build here, on top of the potential 2000 -plus houses in Lidsing as well as Gibraltar Farm will dramatically change this area for ever, and not for the bt would not enhance it all. Many residents of Medway enjoy this area, cycling, running, horse riding and walking for their mental health. Where are they expected to go? How will you make it safe for all the horse owners to still ride here? How are all these extra cars going to move around? It will be grid lock and with that more pollution for those living around it.
What about all the empty houses, brown field land, empty retail spaces and industrial units. From what I am seeing with all this development in our beloved county, It is aimed at foreign investors, developers actively advertising to them, and encouraging Londoners to move to the area who need to commute, so will drive putting further strain on our roads. They are not going to walk and cycle. That is not a self sustaining development.
Far from making Medway a nice place to live, it is turning into an awful place to live and if this goes ahead i will be moving. I moved to Parkwood in Rainham because the countryside was on my doorstep and it was nice to live here, But the increasing development with the lack of thought on impact on the area, its services and infrastructure is having a huge negative impact.
Yes houses are needed but not in the form of these huge developments. Its too much and the wrong sort in the wrong places. Developers are rubbing their hands at the moment but we should be prioritising food security, protecting or green spaces and building with nature. not destroying it. I would love to see how the housing prediction numbers are worked out. They are certainly not for local people.
Regards
Ann Jeffery
[redacted]
[redacted] ME8 [redacted]

From: [redacted]
To: policy, planning
Cc: [redacted]
Subject: FW: Response to The Medway Local Plan
Date: 08 September 2024 19:27:01

[redacted]

Please see below a representation from one of my constituents, Kim Wood, who had difficulties with the online system.

Can you kindly ensure her views are considered along with all those others who have submitted responses.

Many thanks for the assistance.

Chris Spalding

Councillor Christopher Spalding
Member for All Saints Ward

From: [redacted]
Sent: Thursday, September 5, 2024 7:14 AM
To: [redacted]
Subject: Response to The Medway Local Plan

Hi , Chris
Thanks for offering to receive comments from those who are unable to navigate the Future Medway consultation comments forum. They have not made it easy for those of us who do not have an IT degree !
So ... here goes !
My concerns are for the Peninsula and in particular Allhallows where I live .
Firstly my choice isOption 3.
Considerations that I deem important are ;
Infrastructure . Roads on and off the Peninsula most often already gridlocked .
Haven now have 10000 people in and out in change over days at peak times
Single Lane carriageways your the villages (excepting Hoo) .
Developers must be encouraged to do this first as it is not uncommon for them to build the houses then scarper onto another development and then say they can't afford to do it . This includes them providing and maintaining play areas etc
Only Fire Station is at Grain and is part time/ Flexi
No GP attending any village other than Hoo. They take the capitation fees but expect everyone to trek to them . Bus service after Hoo woeful . Allegedly , it took one poor woman a 5 hour round trip to see a GP . How many times have you stood in the GP surgery only to be told that what you want is not ready come back tomorrow ?? Ok if

you drive but not if you are reliant on lifts or a bus . Taxis reluctant to come to AH (and expensive)
New developments need at least parking for 2 large cars (Smart cars no good out here , disappear down the potholes never to be seen again) with visitor parking as the village roads too narrow for off street parking . AH has no parking areas for current homes .
Developers need to install decent maintenance companies that will manage the green spaces and not just take the money and then the residents expect the parish council to pick up the slack.
That the chosen Housing Associations are ones that will give preference for social housing to go to Medway residents and not take other councils homeless / in need
Affordable homes to be truly affordable to local residents . 2 new houses in Binney Road still unsold at £350000 as doubt many out here are on salaries of £780000+ to be able to afford a mortgage for that price
AH Academy now full with awaiting list. Apparently there are children in there from as far as St Mary's Island !!!
No school in Stoke .
No library (I am not the only one that enjoys a good book) and mobile library no longer running . Only library is in Hoo but again without a car could entail a 5 hour round trip on the bus . A home service is supplied but for housebound / care homes etc so not suitable for those with just mobility and transport constraints
The active cemetery in AH near capacity so that desperately needs expanding
The village has a large flood plain and last Autumn some households were refused home insurance renewal cover and this is a worry for new residents if they cannot insure their homes .
The plan mentions 'skilled jobs' but no mention of what 'skills' will be required . The main ideas seem to be retail.
Supermarkets are in Strood . Need to build a suitable one in Hoo with a Bus hub serving the villages . Do not need another shop in AH and if a supermarket was built it would attract shoppers from surrounding villages and there is not enough off roads parking to facilitate any overspill from the few spaces the shop would provide .
People are getting more inconsiderate in their parking and our lanes cannot accommodate this or buses , emergency services and tractors (those few that will be left after farmland built on) will be impeded.
Sorry to waffle on but hope this can be fed back to the Medway consultation.
I see another consultation has been set up in AH on the evening if 19th but that's too late for those who attend to comment as that closes on 8th.
Regards and thanks again
Mrs Kim Wood

From:	[redacted]
To:	policy, planning
Subject:	Medway Development Plan Consultation
Date:	08 September 2024 19:52:38

I have read and commented on the Medway Local Development Plan through the portal.

Sadly, it would appear Capstone Valley is doomed to be developed beyond recognition irrespective of local views concerning infrastructure, the sustainability of the Country Park and at odds with other considerations the Council have made in the plan concerning the value of green spaces, preserving biodiversity and protecting the intrinsic nature of the area.

I have a couple of additional comments:

- there is scant reference to the problems Medway faces and how these will be addressed, particularly in the face of the proposed expansion.
- there is no suggestion of local consultations on individual specific housing developments - will these happen?

Regards
Sue Bassett
ME5 [redacted]

I have attached below the comments I sent following the initial consultation meeting. The latest iteration of the plan has not answered the questions I posed.

Future Medway Consultation

I am writing in response to the request for comments on the document “Setting the direction for Medway 2040” following attendance at the meeting in Lordswood on 17th October. Thank you for putting this event on and for staffing it with people from the planning group on the Council.

My overarching comments concern the overall capacity of the Medway Towns area to absorb and service the proposed expansion to 2040 without SIGNIFICANT change to the Medway Towns.

The 2021 census figure put the Medway population at approximately 280,000. The Council have put forward plans to deliver 28,500 houses. Working on the census average of 2.4 people per household this would see a population expansion of 68,400 to 2040 or a 25% increase. Services are already squeezed, for example, Medway Maritime Hospital and GPs struggle to meet demand, Souther Eastern water is under performing.
Question: How does the Council propose to increase service provision in hospital (and health more broadly such as GPs, dentist, auxiliary health provision), sewerage, education etc meet this?

Based on the census average of 1.33 cars per household this would mean an extra 100,000 cars in the towns. Of significance is that 33% of households have two or more cars which is relevant when looking at house building. I accept these would not be all on the road at one time, but will be problematic given the congestion issues that already exists, and the parking demands at home and for shopping/leisure/rail stations.
Question: How does the Council propose to meet the additional parking demands and address the additional congestion throughout the Medway Towns that such an increase in car ownership would bring? What measures will the Council introduce to ensure air quality does

not drop further especially in the centre of towns where congestion is likely to be highest.

The boundaries between Medway and Maidstone will become more indistinct.
Question: What efforts would be made to ensure Maidstone residents do not chose Medway amenities as they are closer to home, putting additional strain on Medway infrastructure and services.

The Medway Towns can boast areas of special scientific interest and seasonal homes to migrating birds. The North Kent Marsh areas are special and unique.
Question: How will the scale of the proposed increase in the population density be mitigated to prevent adverse effects on these special places.

I have specific concerns about the proposed development of Capstone Valley.

1. Infrastructure demands to service nearly 10,000 houses (possibly up to 24,000 people, 13,000 cars) would be significant. Current roads into Chatham, Maidstone and Hempstead are already congested especially at peak times. Massive road building projects will be required, yet, for example, Luton Road could not realistically cope with higher volumes of traffic and alternative routes are not obvious.

2. The area would be changed beyond its current “green lung” provision in the area, notwithstanding the Capstone Farm Country Park will still be there.
Building on this farmland will effectively join up the southern developments between Hempstead, Lordswood and Walderslade where there has already seen expansion over the last few decades.

Feedback on local development plan

James Ingram

[redacted] ME3 [redacted]

Email: [redacted]

The plan should be sustainable and improve employment/prospects for Medway residents

Firstly building on what the SDO (Spatial Delivery Option) identified as unsustainable sites (i.e. Hoo peninsula) does not suddenly become sustainable just because you build some sustainable urban developments as well. What you have is some unsustainable development and some sustainable. Or if developers get their way, just the unsustainable developments as they won't want to build the urban ones (due to greater complexity involving traffic management, road closures, decommissioning costs of industrial or contaminated sites, etc).

For sustainable development to protect the environment and reduce global warming, people should be encouraged to work near to where they live, not enticed to live in remote locations due to housing availability/affordability. The Reasonable Alternative Strategic Site Analysis is fundamentally flawed in assessing all urban and green field sites as having the same climate change mitigation (one of the criteria) "because there is no site specific data". That is simply excluding an important criterion. It should be obvious to both Medway council and the consultants who wrote this report that developing a site e.g. AS21 at Allhallows, that is 10 miles plus from jobs, schools, hospitals, supermarkets and with a very poor bus service that stops at 7pm and no trains is going to be considerably worse for climate change than one 0.5 miles away from facilities.

Developers should be forced to build housing stock that reflects the needs of Medway's demographic, not what they think they can sell to relatively wealthy London/Maidstone commuters. Developers should be forced to build on brown field sites close to employers.

It is a laudable aim to transition from cars to sustainable modes of transport. However, the idea that these development sites in Allhallows are even remotely adequately served by public transport is ridiculous. The bus service consists of one bus an hour, stopping at 7pm, that takes 45 minutes to make a journey that's 20 min by car; every household that is built there will end up requiring a average of two cars, each doing 10K miles a year commuting alone (assuming a conservative average 40 mile round trip) and 250 working days per year. There is no way the current infrastructure will support 1400 electric vehicle charging points and will result in large increases in vehicle pollution for the foreseeable future. Not to mention the increase in pollution levels getting off the peninsula. It is illogical that the Reasonable Alternative Strategic Site Assessment does not permit a negative score for a lack of public transport nodes (its rather woolly and unclear criterion). The overall score for transport and accessibility for AS21, AS22 and AS23 should be majorly negative. Scoring AS21 and AS22 as positive impact because of proximity to a bus stop is bordering on the delusional and should be majorly negative (even after mitigation). People will use their cars as public transport can never be made good enough, time wise/capacity/financially, to be a viable alternative given that over 50% of people don't even work in Medway and those that do are commuting a minimum of 20 miles return journey. This is therefore unsustainable development. There are already travel bottlenecks at the bottom of Four Elms Hill, on the A2 towards London and at Bluebell Hill.

Site AS21 in particular at Allhallows is according to the council's earlier assessments, grade 1 agricultural land and would be a loss of BMV (best and most versatile) land if developed which is in contradiction to sustainable development. I'd also question the grading of AS22 as Grade 4 as the farmer seems quite capable of growing arable crops, mostly cereals every year, which would imply Grade 3b or above.

The object of the plan should be to provide housing for people for whom, either their primary income is from a job in the Medway towns or have been residents of Medway for a significant period of time. Medway currently houses more workers who work outside the Medway Towns than workers commuting in. Medway should not be providing housing for workers in Maidstone, Dartford and London in favour of less well paid local residents.

Medway's blended approach/dispersed growth strategies make the situation worse in this respect. Even if some jobs are created in Hoo, Allhallows, Grain etc, there won't be enough jobs to create a net positive effect, as the number of jobs **per head of local working-age population** will likely decrease – the Reasonable Alternative Strategic Site Analysis used the wrong metric. Sustainable jobs and employment are not helped by importing 10k workers and creating, say, 0.5k local jobs for them. The metric should be jobs per working-age person in the vicinity of the development site not simply jobs.

There are no major employment sites within 5km of Allhallows, Grain is the nearest at 6km. Specifically regarding AS21, AS22 and AS23 (D.13.2.3), a row of shops and a pub is not going to provide employment in Allhallows for 700 new households; this is a doubling of the village size (source: ONS statistics). The number of jobs per head of population in Allhallows will at best remain the same, assuming the shops actually get built. The Reasonable Alternative Strategic Site Analysis for AS21 having employment and economy ++ (and access to employment as +) is completely illogical if a sensible metric is used (i.e. jobs per head of village population).

Regarding LCA (Landscape Character Assessment), why has this been judged as minor for AS21 and AS22 (by the Reasonable Alternative Strategic Site Analysis)-there is no justification for this. Doubling the size of a small village, and encircling with new developments is not going to be a minor loss of rural character.

Similarly I would argue that the affect on PRoW (Public Rights of Way) views and Local resident views at Allhallows (AS21, AS22, AS23) will be majorly negative, as they will be completely encircled by housing developments ongoing for potentially decades. What's the justification for any other conclusion than a majorly negative impact? The plan also proposes to build up to the walls of Slough Fort site (Grade II* Listed and a Scheduled Monument); the views across the fields there having not changed much since the late 1800's.

The way the Reasonable Alternative Site Assessments consider air pollution is also flawed because it doesn't consider the cumulative effect on air pollution beyond the location of the development sites. Building on AS21, AS22 and AS23 will again be significantly negative as it will make the traffic bottleneck at Four Elms Hill worse on a daily basis. Therefore, ignoring this issue (i.e. rating as neutral) just because it might not be a big issue in the immediate vicinity of the developments is not justified. Building on any site on the Hoo Peninsula will be negative for Four Elms Hill AQMA and a detriment to the residents there because there is no other viable route off the Peninsula. So, the residents in Allhallows will be worse off but alright for air pollution but any resident along the Ratcliffe Highway from Hoo to Chattenden will be much more severely adversely affected.

The Reasonable Alternative Strategic Site Assessments with regards to Health and Wellbeing is also incorrect regarding sites AS21, AS22 and AS23 (Allhallows), regarding access to an A&E department (with 5km as the baseline in the assessment for a minor positive effect). These sites in Allhallows are 18km from Medway Maritime and some of the furthest in Medway which warrants a majorly negative impact if compared distance-wise to other sites.

Regarding access to GP services, there are only two GP practices on the peninsula both of which have their main medical centres in Hoo. AS21 and AS22 are 8700m from the nearest Medical Centre – noting that in recent years, provision has got worse for the Hoo St Werburgh practice and their local outpost in Lower Stoke has closed. Registration can also be problematic as their services (unsurprisingly since the current expansion of Hoo etc) are oversubscribed. 8700m is over 10 times the distance of 800m the assessments use as a guide for modest benefit. Clearly 10 times this distance warrants a majorly negative not a minor negative score. It is also noted that councils or for that matter developers are powerless in compelling new GP service-providers to cover a specific area and therefore have no ability to mitigate the lack of provision.

Table D.9.1: Strategic sites impact matrix for SA Objective 8 – Health and wellbeing also suggests that Access to Leisure Facilities is a minor positive. As far as I can tell there are no plans for a leisure centre anywhere near AS21, AS22 (Allhallows). Hoo Sports centre is the nearest at 11.5km. This is roughly eight times the target distance of 1.5 km. The rating given in the table of minor positive impact has no foundation and would appear to be wholly unjustified. At 8 times the recommended distance for sustainability, a rating of majorly negative is surely appropriate.

Also regarding Access to PRoW and cycle paths, while much of the developments might be within 600m of a footpath, the development of AS21 in particular will build over the existing footpaths and restrict access to many existing residents making many who were less than 600m away, further away. If the detriment to access to current villagers is taken into account the scoring should be neutral not positive.

Regarding Table D.12.1: Strategic sites impact matrix for SA Objective 11 – Education, the scores for AS21 and AS22 are highly questionable. Taking first the score for primary school as a minor positive, this might be OK for a modest development, however, the plan doubles the number of dwellings in Allhallows. The demographic of people moving into the village will be likely younger with children. For the score to be correct the primary school would need to over double its intake capacity. This is completely unrealistic. Additionally the use of AS22/23 for dwellings would mean there was no room for expansion of the school even if funds were available to do it. The result is that many primary children would need to travel out of the village for schooling. More realistically the rating should be majorly negative.

Regarding secondary school provision, this is already unsatisfactory for Allhallows (AS21, AS22 & AS23). Over doubling the child population of the village will have a majorly negative effect. It is difficult to get a place on a school bus as it is. Not all children can get into the nearest secondary school with many spending 2 hours a day or more commuting to school in Strood (30 minutes or more to the nearest school in Hoo each way, longer to Strood). This is likely to have a significant impact on children's energy and concentration levels and adversely affect academic attainment. The nearest secondary school to these sites is in Hoo, some 8 times the recommended maximum of 1.5km. The score should therefore be a major not a minor negative.

Notwithstanding that the SGO (Spatial Growth Option) is flawed since it will, no matter how you frame it, create a load of unsustainable housing stock as clearly shown by the initial SDO SA (Spatial Delivery Option Sustainability Assessment) process. The selection of AS21, AS22 and AS23 as part of the SGO is clearly flawed for reasons outlined above. As indicated above many of the positive scores awarded during the "Reasonable Alternative Strategic Site Assessment" for these sites (and quite possibly others) are either erroneous, unjustified or illogical. This whole process needs to be conducted again before proceeding with selection of any local plan as its foundations currently based on the SA conducted are unsound. In my view the current SA is not fit for purpose and needs substantial revision.

From: [redacted]
To: policy, planning
Subject: Medway Local Plan (Gibraltar farm)
Date: 08 September 2024 20:25:00

Dear committee

I am writing to confirm my issues with the the suicidal developments of the area, that has not taken any consideration to the area nor the locals and the only person who is getting any gains is the landowner , who lives in his big house in Northamptonshire.
The issues are as follows
The destruction of an area of outstanding beauty.
The destruction of the Green lungs of Medway.
Increase of traffic to the roads which would increase congestion, it takes 40 minits to get out onto the motorway.
Thus would increase the level of air pollution affecting local population.
This will also threatening to local wildlife including a number of protected species including, red kites, slow worms,door mice, kestrels and buzzards
The area also is also a natural run off for rain and holds natural Wells, which feeds into the local water supply and streams.
There are plenty of empty homes that could be refurbished.
The people of lordswood don't want the destruction of the Green space.

Yours sincerely

Daniel Broom
.

Sent from Outlook for Android

From: [redacted]
To: policy, planning
Subject: Capstone Valley
Date: 08 September 2024 21:09:08

To whom it may concern
I have commented and disapproved of the proposed dwellings in capstone valley numerous times along with many, many others raising concerns. Please do not let these plans go ahead. You only have to see how against this development people are for reasons detailed on the planning application. This would be an absolute disaster to this area. IT SHOULD NOT GO AHEAD
for such obvious reasons that are constantly being overlooked.
This would be a very bad and sad decision for this area if it goes ahead.
Yours
J Gentr

From: [redacted]
To: policy, planning
Subject: Medway Local Plan
Date: 08 September 2024 21:13:38

To whom it may concern,
I object to Medway's Local Plan and the proposed developments at Gibraltar Farm and Capstone Valley in particular, for the following reasons.
1 Area of Outstanding Natural Beauty
The area of the development is on the North Downs and has Area of Outstanding Natural Beauty (AONB) status. Permitted Development is restricted on Article 2(3) land, which includes AONBs. The AONB surrounds the small rural village of Bredhurst, which had a population of 397 during the 2011 census. The proposed development would totally ruin this area of Area of Outstanding Natural Beauty. The small community of Lidsing, which I believe is about eleven dwellings, would be totally overwhelmed by the proposed Gibraltar Farm development.
2 Air Quality and urbanisation of a rural area
The planned developments would build on a rural area which is part of Gillingham's 'green lung'. This area is vital for maintaining air quality in Gillingham within the legal limits and preventing the urban areas of Lordswood and Hempstead forming one huge urban area. The traffic created by the proposed Gibraltar development of 450 houses alone, without those in Capstone Valley, would be detrimental to the air quality of the surrounding area and the allotment site, especially as many homeowners now have more than one car.
3 Flooding
It was recently brought to my attention that work had to be undertaken in Bredhurst Village to stop further flooding events. The proposed development of 450 houses at Gibraltar Farm, plus those in Capstone Valley, would necessitate covering a large area of the current agricultural site with concrete and other impermeable surfaces, which would contribute to further flooding. Part of Hempstead Road (opposite the Boot Fair ground) already floods to a depth of a few inches every time there is heavy rain, resulting in dangerous driving conditions.
4 Poor access and roads
The roads in and around the proposed development sites are barely passable for two cars and some are narrow enough to need passing places, as in Ham Lane and Westfield Sole Road. These country lanes are totally unsuitable for the volume of traffic that would result from the proposed 450 new homes at Gibraltar Farm, plus those in Capstone Valley, and as they have no pavements, the majority of journeys would need to be by car, for safety reasons. How would all the construction traffic access the sites, bearing in mind how narrow these lanes are? The traffic and construction would cause unacceptable noise and disturbance to neighbouring residents and wildlife. What affect would the construction materials and possible dust have on the edible crops grown on the nearby Chapel Lane allotment site?
The area of the proposed developments gets gridlocked at the junction of Lidsing and Hempstead Road, when Boot Fairs are held on Sunday mornings. The extra traffic from the developments would only compound this problem on weekdays, when everyone is trying to get to work or school.
For the Gibraltar Fsrm site the planning application states that several roads adjacent to and in the area surrounding the proposed development will be widened or be subject to highway works. The roads mentioned are Lidsing Road, Westfield Sole Road, Shawstead Road, Hempstead Road, Chapel Lane (bounded on both sides by houses), Hempstead Valley Drive, Hoath Way roundabout, Hoath Way and M2 junction 4. I hope I am correct in assuming that the plans are not referring to the old Chapel Lane, which was closed off many years ago and is now partly covered by the woodland adjacent to the

allotment site. Widening of these roads or the alteration of junctions would necessitate the removal of hedgerows and trees which are a vital habit for wildlife.
5 Hospital capacity
I am concerned about the increase in population from the developments at Gibraltar Farm and in Capstone Valley. Medway Hospital already serves a population of 424,000 in Medway
and Swale and is struggling to cope with demand, as evidenced by having to redirect ambulances
on occasions. On 18th December 2020 patients were being sent to other counties, as all of Kent and Medway's Hospitals had exceeded their maximum capacity and it is unlikely that the pressure on services has improved in the four years since then. The new residents in the proposed developments at Gibraltar Farm plus those in Capstone Valley and elsewhere
in Medway would put an additional strain on hospital services already at breaking point.
6 School capacity
Do the primary and secondary schools in Medway have the capacity for the additional children from the Gibraltar Farm and Capstone Valley developments, in addition to other developments already planned by Medway Council?
7 General Practitioner and Dental services
Residents of the proposed Gibraltar Farm and Capstone Valley developments would put further strain on already oversubscribed GP and dental services in the Hempstead and Wigmore areas. I am not aware of the Capstone area providing these services.
8 Shops
Are there any shopping facilities within walking distance in Lordswood for the residents of Gibraltar Farm? There are no pavements on Ham Lane, Lidsing Road or Hempstead Road,
so it would be unsafe to walk to Hempstead Valley shopping centre, necessitating car journeys. I am not aware of any shops within walking distance of Capstone Valley.
9 Destruction of habitat and adverse effects on wildlife.
Skylarks breed on the fields either side of Lidsing Road, where the Gibraltar Farm development is planned. Sky Larks are a Red Listed Species of Conservation Concern. During the past elebven years my husband and I have been entering our bird sightings on the British Trust for Ornithology BirdTrack database.
Other Red Listed bird species recorded in recent years in the area of the proposed developments are: Cuckoo, Fieldfare, Garden Warbler, Grey Wagtail, Herring Gull, House Sparrow, Linnet, Marsh Tit, Mistle Thrush, Redwing, Song Thrush, Starling, Yellowhammer, Yellow Wagtail and Woodcock.
In addition, in recent years we have recorded the following Amber Listed Species of Conservation Concern in the area of the proposed developments: Dunnock, House Martin, Kestrel, Meadow Pipit, Mediterranean Gull, Stock Dove, Tawny Owl, Willow Warbler and Swift. Tawny Owls were heard in South Wood during our survey for the BTO.
In the same area we have recorded the following species: Blackbird, Blackcap, Black-headed Gull, Blue Tit, Buzzard, Carrion Crow, Chaffinch, Chiffchaff, Coal Tit, Collared Dove, Goldcrest, Goldfinch, Great Spotted Woodpecker, Greenfinch, Grey Heron, Jackdaw, Jay, Long-tailed Tit, Magpie, Marsh Harrier, Nuthatch, Pheasant, Pied/White Wagtail, Reed Warbler, Red Kite, Red-legged Partridge, Robin, Rock Dove, Rook, Sparrowhawk, Swallow, Treecreeper, Whitethroat, Woodpigeon and Wren.
The proposed Gibraltar Farm development is adjacent to Walderslade Woods, numerous hedgerows and Bredhurst Hurst ancient woodland. All of these sites provide excellent breeding habitat for many species of birds, mammals, reptiles and insects. The hedgerows provide access from one area of woodland to another, enhancing habitat continuity. The farmland provides suitable habitat for many additional

species which either breed or feed there, including the Skylark, a Red Listed Species of Conservation Concern. Capstone Valley would have the same important habitats for wildlife.
Mammals known to use the areas surrounding the developments, and submitted to Kent Mammal Group, include: Badger, Bank Vole, Bats (seen before dusk), Fox, Grey Squirrel, Hedgehog, Mole, Rabbit, Weasel and Wood Mouse. Hazel Dormouse are largely restricted to southern England and have been recorded during 2021 and 2022 in Bredhurst Woods, plus a site in Bredhurst.
Frogs breed on the Chapel Lane Allotment site and are likely to be in ponds nearby.
In Day Valley Adders and Slow worms were seen in 2021 and 2022 and may also be present in the area of the proposed development.
My husband and I have photographed and recorded the following dragonfly species on the nearby Chapel Lane allotment site: Azure Damselfly, Broad-bodied Chaser, Common Darter, Large Red Damselfly, Migrant Hawker and Southern Migrant Hawker.
We have also sent insect records to iRecord for the following species: several species of Hover Fly Volucella inanis, Syritta pipiens, Helophilus trivittatus, Eristalis arbustorum, Myathropa florea, Episyrphus balteatus, Scaeva pyrastri, Sphaerophoria scripta and Eristalis pertinax, a Spider Hunting Wasp (Pompilidae), Violet Carpenter Bee, Lesser Stag Beetle, Field Grasshopper, Speckled Bush Cricket, Dock Bug, Swollen-thighed Beetle, Stenurella melanura, Knot Grass Moth, Dark Spinach Moth, Toadflax Brocade moth, Platycheirus sp, Tachina fera, Nowickia ferox, Wool Carder Bee, Large Red-tailed Bumblebee, Buff-tailed bumble bee, Tree Bumblebee and ladybirds.
In 2020 my husband and I photographed and recorded the following species of butterfly on the nearby Chapel Lane Allotment site: Clouded Yellow, Brimstone, Large White, Small White, Green-veined White, Small Copper, Common Blue, Red Admiral, Small Tortoiseshell, Peacock, Comma, Gatekeeper, Meadow Brown, Orange Tip and Small Heath. Additional butterfly species seen in Day Valley included Grizzled Skipper, Marbled White and Ringlet and a Small Skipper was seen in the nearby horse paddock.
Moth species recorded on the allotment site include Cinnibar caterpillars and Silver Y moth.
Moths seen in Day Valley and Bredhurst Woods include a Copper Underwing, Riband Wave
and a Burnet or Cinnibar Moth. It isn’t physically possible to operate a moth trap in Bredhurst
Woods or at the allotment site but in our Wigmore garden we have recorded just under two hundred moth species. I would expect that the area of the proposed development would
also have a considerable number of moth species.
In April 2020 I took on another plot on the Chapel Lane Allotment site and recorded the herbaceous plants growing there. This could be indicative of the seed bank in the field where the Gibraltar Farm and Capstone Valley developments are proposed, as the allotment site was a wheat field previously.
I have an interest in Botany but do not know which of these recorded species could be of conservation concern: Cirsium sp (not in flower), Taraxacum sp, Pentaglottis sempervirens,
Sonchus oleraceus, Picris echiodes, Rumex acetosa, Mecurialis perennis, Crepis capillaris, Plantago major, Lactuca serriola, Geranium robertianum, Geranium sp. (old leaves scarlet and green), Senecio vulgaris, Ranunculus ?acris, Polygonum aviculare, Geranium pyrenaicum,
Lamium purpureum, Galium aparine, Capsella bursa-pastoris agg, Arabidopsis thaliana, Medicago lupulina, Matricaria perforata, Convolvulus arvensis, Chenopodium album,

Stellaria media, Cerastium fontanum, Malva sp, Veronica chamaedrys, Veronica persica, Epilobium montanum, Leucanthemum vulgare, Silene dioca, Cardamine hirsute, Mysotis arvensis, Papaver rhoeas, Papaver sp
(grey-green leaves), Scrophularia nodosa, Vicia sativa, Epilobium parvifloum, Sonchus arvensis
and an umbellifer similar to Wild Carrot. Additional wild flower species grow on my original
plot taken on over ten years ago. The Wood Anemones in the adjacent woods are indicative of ancient woodland.
The above records show that the area of the proposed Gibraltar Farm and Capstone Valley developments and the neighbouring areas, are long established habitats for a substantial number of Red Listed Species of Conservation Concern and for many other species of mammals,
birds, reptiles, amphibians and insects.
[redacted] Chapel Lane Allotment Site
I was very concerned to see that the Chapel Lane allotment site has been earmarked for development.
My husband and I have been cultivating our first plot organically for over ten years, encouraging wildlife
as much as possible nd the second plot in the same way for about three years. There are about 110 plots
each being cultivated by people keen to grown their own food and save food miles. What assurances
can be given that all our hard work over at least ten years will not be destroyed?
I strongly object to Medway Council's Plan and the proposed developments at Gibraltar Farm development
and Capstone Valley in particular, for the following reasons.
It is in an Area of Outstanding Natural Beauty and air quality in the Medway towns would deteriorate due to urbanisation of this rural area. The proposed developments have poor access and narrow roads. Medway Hospital, local schools, GPs and dental capacity are already overstretched and I feel these would be unable to cater for the residents of the proposed houses, in addition to other developments already planned. For safety reasons, trips to Hempstead Valley shopping centre would necessitate car journeys, because of the lack of pavements on the narrow roads. The proposed development would compromise an Area of Outstanding Natural Beauty, which is an important habitat for many species, including sixteen bird species which are Red Listed Species of Conservation Concern.
Yours faithfully,
Elizabeth Ann Pell BA(Hons)

Local Plan Response

Introduction

The following is a response to the local plan consultation.

In creating this response, I have combined my personal observation with inputs from several overlapping areas of interest across the community that I am active in, including faith (Christian), social/community action, sustainability and the environment, cultural/creative and heritage.

I had set out to also do a separate response for the Intra Community Trust (of which I am co-Chair) but found that the comments coming out are basically common across the sectors which may be a useful observation in itself.

This response deals with your 4 'Big Picture' questions which give a broad summary response to the Local Plan.

I'd love to be able to respond more fully to the detailed documents as there is much to comment on but for me it has been impossible to free up the time to do this over a busy summer period.

A scan through the wealth of information you have provided provokes many detailed questions and comments and I'd love the opportunity to test you conclusion more fully. I suspect this will be the case for many responses.

1.What are the key issues that you want the plan to address and how?

An Integrated Vision for Medway

The issues we face in Medway are interconnected in ways which may be subtle and more complex than a simple view. The temptation to operate each element of the plan in silos is a risk and I am convinced that we need a truly integrated strategy, that identifies this interconnected need, defines/ enables connected solutions and has a solid long-term implementation / review/ adjust plan that sits outside the narrow and short-term political cycle.

I would like to see that the interconnections and dependence are understood and clearly defined in this plan, and that they will be re-viewed and updated over the full lifecycle of the plan.

Obviously that plan needs to be fully costed and resourced, so the delivery element needs to be defined as part of it, just having a plan is worthless by itself, it is the ability to deliver that matters. So, I also want to see costings, risk assessments and fiscal models that demonstrate the feasibility of the plan.

This probably needs to be summarised and communicated in way which the community can grasp and buy into, as its primarily their plan and they need to own it.

The following list of topics should be seen against this desire to see that integrated approach as none of these topics stands alone.

People Come first

I see the rhetoric, but I wonder about the visibility of, and the reality of, engaging with and serving the needs of the people of our town. The council is perceived as a faceless bureaucracy and is often seen as a blocker rather than an enabler. Therefore, the plan needs to consider and implement organisational constructs that enables and implements a visible shift towards people/community working in partnership with the council team.

For me this embraces the need to ensure equality for all Medway residents by enabling the employment opportunities, transport, services, homes and community facilities for all in a safe and clean environment that is free from pollution.

Building Community

The pace of change in our communities is rapid as the population grows, new people come to live here, and the diversity of ethnicity and lifestyle is expanded. However, the scale and complexity of today's problems combined with the housing, infrastructure and economic ambitions outlined within the plan may be perceived as both intimidating and isolating. It is suggested that part of the plan should focus on empowering and building human scale communities (rather than large developments) that offer that sense of place and belonging that we all need to be part of. I see Medway as a collection of connected but unique urban villages and towns, each with its own identity.

Connected Communities

Many of us are very impatient with planning languages which create artificial zones or "quarters" (e.g. Historic Quarter, Cultural Quarter, Retail Quarter etc.). The reality is that each area is a unique mix of peoples, services and business so this language seldom represents the way people see their area developing (and is often resented).

But we also live in what could become a vibrant interconnected town but that is handicapped by an inadequate transport, communication and energy infrastructure.

The plan needs to enable an integrated set of infrastructures (connected by digital highways) that enable us to grow a truly integrated transport network (foot, bike, public transport). This should de-emphasis the current dependency on car travel around the town and reduce the number of HGV's transition through our town.

Sitting alongside this we need a more integrated approach on energy management and generation perhaps mandating that all new development should be net energy generators and moving toward community energy solutions that directly benefit the connected communities we live in.

Enabling a Sustainable Medway

Climate change is an output of our historic exploitation of our world, our environment and its finite resources. The longer-term solution is however not about just dealing with climate change but is driven by enabling a sustainable approach to all aspects of the overall plan.

It's about much more than protecting the environment and impacts almost all areas of the Medway Local Plan so we need to reflect this across each element of the plan.

It requires a long-term strategic approach that tackles sustainability in housing, transport, economic development, green space, our river, education, health and wellbeing. Therefore, I want to see much more clarity on that strategic approach, the key enablers that we need to put in place and how it will be implemented across all sections of the plan.

Clearly our local plan must also include a robust approach to an implementation that enables climate change resilience, for example by limiting development on low lying land (e.g. the Peninsula and some Riverside locations that may seem attractive in the short term but become problematic in future decades). Alongside this we should also plan to deal with the increased probability of extremes of weather, for example by enhancing storm water run-off, and protecting of low-lying land from flooding. This should also include ensuring that all new homes and our large stock of older homes are able to move to alternative cost-effective energy solutions (e.g. solar) and are also thoroughly insulated against excessive cold and heat. This should be combined with a shift to heat pumps as we transition away from traditional boiler-based heating systems.

Protection of the environment by publicising the importance of the existing special protection areas and public green spaces and facilitating the planting of trees whenever and wherever possible.

Sitting alongside this should be the pragmatic protection of good quality farmland as part of a vision to ensure food security. This implies that no new developments on Grade One agricultural land (or on flood plains), as this cannot be undone, and such actions will have repercussions for the ability of future generations to tolerate pressure from climate change. However, the provision of solar farms on less protective agricultural land should be encouraged where feasible as a means of maximising the utility of low-grade land.

Building a Thriving Economy for Medway

The diversity of the economic landscape in Medway and its location and links across our region and internationally make this a complex area so my comments focus on a few areas only:

Transition to a Green Economic Powerhouse - Medway is very well placed to become a dominant provider of green technology and support services across our region (and internationally). This needs a balanced blend of infrastructure, incentives and educational provisions but could position Medway as a regional centre of excellence and innovation.

Redefining our High Streets- the fundamental shift in how we live, buy and consume the materials and service we need to sustain and entertain us will continue to accelerate in the coming decades. Therefore, rather than trying to revitalise what is left we should reimagine our high streets as human scale community environments where people come together to enjoy meeting and being entertained, sharing food and the diverse cultural life of Medway.

Growing Our Creative Sector – Medway has a vibrant and broadly based creative sector, from world class practitioners to large entities operating across a broad mix of creative media. This offers a platform to enable Medway to become a major regional creative HUB driving economic growth by that balanced blend of infrastructure and incentive. However, to enable this we need to move this sector away from being sustained by central funding towards a more sustainable business centred approach, which needs a cultural shift in funding models.

Heritage as a Vehicle for Economic Growth- we have a diverse, attractive and colourful array of local heritage (so much more than just buildings) which may be leveraged to benefit each of the topics above. Celebrating our Heritage is also about building our future, both economic (as revenues streams) and also enjoying our cultural landscape.

Homes for all

We need to enable the provision of homes for everyone by providing the right dwellings, built to the highest standard (including environmental), in the right places and in the right numbers.

However, the historic practice of building housing estates with the absence of the supporting infrastructure needed by communities must stop and no development should be permitted that fail to provide this essential prerequisite.

This implies we must conduct our own Housing Needs Assessments on a ward-by-ward basis, and we should reject national formulas that do not appreciate the specific needs of Medway. Simply building houses to hit a target is no longer acceptable for Medway.

As part of this we must prioritise council and social housing, alongside conversion of homes for the elderly and disabled over the pressure from developers to build more expensive homes to drive short term profits margins. This implies that the council must assess the reality and veracity of each developer's business case as it tests the impact of each planning application.

2. Which of the growth options do you prefer, and why?

Although the Urban Focus Strategy would be my ideal path of travel, I agree that the Blended Strategy is on balance the most pragmatic approach as I recognise the reality of the challenges we face as a community. Looking at the maps provide, whilst it could be argued that the indicative sites identified under the urban focus provide sufficient capacity for a managed and sustainable development my reluctant conclusion is that this would limit the capacity and resources to deliver the plan and result in a protracted blight on the most densely populated parts of Medway.

I strongly recommend that the blended option limits the use of high-grade agricultural lands and flood plains with very rigorous risk assessment and mitigation plans in place before they can be used.

The blended option requires significant investment in the provision of road access, public transport connectivity and significant levels of new supporting infrastructure. The plan must define the economic and environmental cost of achieving this in a well-designed environmentally sensitive way.

3. What are the most important issues for you in planning new developments?

As discussed in my response to question 1 the issues we face in Medway are interconnected in ways which may be subtle and more complex than a simple view. The temptation to operate each element of the plan in silos is a risk and I am convinced that we need a truly integrated strategy, that identifies this interconnected need, defines/ enables connected solutions and has a solid long-term implementation / review/ adjust plan that sits outside the narrow short-term political cycle.

The plan is about much more than developments so each proposed project must be considered so that the interconnections and dependence are fully understood and clearly defined as we plan each new development, and that must be reviewed and updated over the lifecycle of the plan.

Obviously, each development must be fully costed and resourced, and each developers business case rigorously tested against our longer-term plan needs, and much less weight given to short term profit generation of any specific developer.

Each development should be restrained to offer human scale solutions that combine a sense of place and community. We can do this by combining our planning skills of forward thinking and data handling with technological know-how to scale developments so that we maximise the common good of the residents of Medway and the wider community. Also, all new homes should be built to the equivalent of Code 6 of the Code for Sustainable Homes and all development should be sustainable in terms of transport and infrastructure. The mix of housing should reflect the mix of types and size indicated at Local Housing Needs assessments at both Neighbourhood Plan level and at Medway Council Level.

Each new project shall ensure that the necessary supporting infrastructure is in place as needed and also ensure that the capacity of local services such as GPs, dentists, schools and public transport, is increased prior to major new housing developments coming into use. The negative health and social outcomes created by the current under-capacity is creating more expensive problems for the council to solve down the line.

4. Do you have any wider comments on the plan?

As discussed above, the issues we face in Medway are interconnected in ways which may be subtle and more complex than a simple view. As part of this it is important to look at the bigger picture which places our plan into the wider regional context and looks across developments in the whole of the Southeast of England. For example, understanding population movement patterns and emerging regional needs should impact our response and adjust our plan.

From: [redacted]
To: policy, planning
Subject: Medway Local Plan Regulation 18 Consultation - Representation
Date: 08 September 2024 22:07:23

Name: Helen Baker
Address: [redacted] ME8 [redacted]

To whom it may concern

I was unable to comment on the Medway Local Plan via the consultation portal and therefore make my representation via this email. If you need any further information from me, please let me know.

I have viewed the draft Medway Local Plan with horror. It seems to me, someone who has lived in Medway for 54 years, that you have decided to build on every single open space we have. Your plan is absurd.

You seek to prove to your Labour Government that you as a Labour Local Council toe the line and jump to whatever they say about planning policy. They say "you must build xxxx houses" and you just say "ok". Where has your logic gone or are you too afraid to say, actually no, the housing numbers are unsustainable?

To build the number of houses and obliterate Medway as we know it, you must surely be improving the infrastructure? One quick look at your plan proves that is not the case. Where is the hospital provision? Where is the doctor and dentist provision? Increase in fire and rescue provision? It is non-existent.

What about improving the roads? None. If you are Medway residents, you will know that we already struggle to move around it on a good day.

I have long been involved in the fight against Maidstone Borough Council's plan to build over 2000 houses at Lidsing. Now Medway Council, under its new leadership, is planning to decimate our 'green lung' with an additional 3500 houses in Capstone alone. In this one small area, we potentially have 6000 new houses. Given an average of four people per household, thats 24000 additional people to the Chatham, Lordswood and Hempstead area. How is that sustainable? Your plan will destroy any demarkation between Chatham/Gillingham and Hempstead making it one huge urban sprawl that no-one in their right minds wants.

I work in property in Medway and I get to see details of who are buying properties in our area and a large number of purchases are made by people from out of the Medway area and mostly from London. Is that who we are destroying all our green spaces for - not even local people?

The Labour Government immediately upon their election stated they were going to make it easier for developers to get their plans through, to ignore those they call 'nimbys'. Yet a developer can put in a plan, have it rejected, go to appeal, get it refused and then the very next day make a new application very slightly different from the first and begin the process all over again. How did that process ever benefit anyone other than developers? So called nimbys try to protect what we have, to stop the destruction of areas and very few actually do it for their own personal gain.

Do not pass the buck and state "we have to". Nobody has to do anything if the criteria is wrong. What you need to do is stand up and say the policy is wrong. Its simply, and to say it yet again, unsustainable.

If you were setting out to make a plan that will destroy our area, congratulations this will achieve it.

Yours in utter dismay
Helen Baker

From: G JONES
To: policy, planning
Subject: Previous email sent.
Date: 08 September 2024 22:50:16

That is the objections to all the plans regarding the Housing Developments i mentioned in my previous email I sent before & including all these too,
LW4, LW8, LW7, HW4 & HW5.

Sent via BT Email App

From:	[redacted]
To:	policy, planning
Subject:	New Housing plans & Developments in Hempstead & surrounding areas
Date:	08 September 2024 22:35:26

To whom it may concern,
(Regarding Hempstead, Lidsing Garden Village, Gibraltar Farm, Ham Hill, North Dane Way & Capstone Valley Developments)
I cannot believe what I have just read & seen today online about even more plans for more new housing at the top of Hempstead Road, on the farmers field, allottments & taking out the woods, up to Hempstead Valley Drive. Including Lidsing Garden Village & the Gibraltar Farm development.
I really don't think Medway Council have really thought this through properly & actually have a clue about any of the roads around here at all. They can't cope now! Let alone more vehicles going on the roads in the next few years.
For a start the roads are in a terrible state potholes everywhere & on Hempstead Road in particular & getting worse, not been repaired for months & when they have they just break up all over again. They will not cope with even more traffic. Everything will be at a standstill if you are relying on using the local existing roads for access to & from these housing developments. Will be a no go, we know as we live on Hempstead Road & Chapel Lane. It will cause endless traffic jams, pollution will increase even more. No proper road infrastructure has even been thought & talked about to take the traffic away from Hempstead. It will just back up on Hempstead Road, Chapel Lane, Hempstead Valley Drive, Hoath Way & going onto the M2 & off the M2.
Believe me, it does even now!
Also, the top of Hempstead Road is often closed due to a water leak, being happening for years & years never been fixed properly. Been ongoing, on & off, so this will be interesting too.
We already have powercuts in the area regularly, so this will happen even more too.
Where is all the infrastructure for all this the new roads, electricity, gas , water & of cause sewage! Where, is it all going to go the waste?
None of this has been though through properly. Just landowners, developers & Medway Council wanting to make money, being greedy. None of you care about us the actual residents living in Hempstead & the surrounding areas & how it will affect us both mentally & physically. The wildlife it will affect everything. Will be no green spaces left at all. I can't believe that any of this is being considered or allowed to go ahead. You should all be ashamed of yourselves!
This is an area of outstanding beauty, but won't be, will be a concrete city.
The extra pressure it is going to put on traffic, Medway Hospital, G.P's, Schools the Emergency services is just unimaginable.
And as for building new affordable housing in the area that is an absolute joke! ME7 area postcode is not affordable at all, do you have any idea of what even the smaller properties cost & the Council Tax!
A lot of people live & moved here because it is a nice area, with countryside nearby & not houses on top of one another. And also worked hard & saved to live here.
Yourselves, the Landowners (& whom used to in Hempstead by the way) & The Developers have not even asked & even tried to meet us half way on any of this. Just want to go steam rolling in with it all.
Really unfair. The people making these decisions obviously don't live in or around Hempstead so actually have no idea about anything at all, just seeing the pound £ signs. If this goes ahead it will be absolutely devastating to the area, horrendous on the roads, don't do this. You need to have a good walk & wander around Hempstead & actually talk to the residents personally have some compassion, please.
Shame none of this can be discussed in a civil manner with the Landowner themselves,

Developers & yourselves. Please, please don't do this to Hempstead & the surrounding areas, think about this & the impact it is going to have on everything & everyone. Our children, Grand children growing up as well. It will be so devastating take it from someone living here & speaking on behalf of many others too.
Mrs Keren Jones

Sent via BT Email App

From: [redacted]
To: policy, planning
Subject: Fw: Planning department medway local plan 2041/1823 Reg 18 Consultation Capstone Objection
Date: 08 September 2024 22:57:19

Hello,
I wish to object to the above Capstone Valley development the reasons are as follows:
I have lived in the area for over thirty years, together with my children and grandchildren. The area has gradually become more built on. Our local hospital the Medway has been extended numerous times to cope with the extra pressure on its services.
Our schools are fit to bursting and our roads are becoming jammed. An extra 3000 houses with approximately 6000 extra people in this area will take the local services to the brink.
The area is of nation beauty, we are in the garden of Kent yet we are destroying our green fields and woods with wildlife that goes with it.
We are building on greenbelt, no thought of the future for our children. They will have no green spaces to play on or to walk on. Our local area has had to much building on and traffic is going to make our villages and towns more congested and polluted. In a time when we are supposed to look after our environment, we seem to be doing the opposite and destroying our beautiful England. My main objections are :

1. Adequacy of parking in the area of development
2. Highway safety as traffic will be greatly increased
3. Traffic generation
4. Loss of trees/ green spaces
5. effect on conservation area
6. Road access
7. layout of density of building
8. loss of nature conservation
9. landscaping
10. noise and disturbance resulting from the urbanization of this area
11. Excessive building on green belt land
12. The impact of the development on the landscape will have on this area of outstanding natural beauty.
13. Loss of a view
14. The overcrowding /over use of our Local Hospital and GP surgeries.
15. Not enough schools/college places to cater for such a large increase in our town
16. The infrastructure has not been put in place for this number of houses in the area.

I hope that all the objections sent in by the people in this area will be considered fairly

Yours sincerely

Mrs Claire Sharp
[redacted]
me8[redacted]
[redacted]

From: [redacted]
To: policy, planning
Subject: Concerns Regarding the Consultation Process and Housing Developments in Allhallows and Stoke
Date: 08 September 2024 23:38:51
Attachments: petition_comments_jobs_490187692_20240908222416.xlsx
petition_signatures_jobs_490187692_20240908222352 - petition_signatures_jobs_490187692_20240908222352.pdf

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Dear Planning Policy Team,

I am writing to express my concerns regarding the proposed housing developments in Allhallows and Stoke, as well as the inadequate consultation process you have undertaken. I have completed the online form, but I must point out how inaccessible it has been. While I am young enough to navigate technology, the majority of people in my village do not have this understanding. You have made it extremely difficult for them to voice their opinions, and as a result, I know many of my fellow villagers have been excluded from this critical process.

The small sheet of paper with a few questions that was provided is insufficient. You are meant to be consulting the public, but this effort has fallen short of what a proper consultation should entail. The approach used was deeply flawed, and many residents have been left without a platform to voice their thoughts.

To help rectify this, I created an online petition to provide a more accessible way for people to express their concerns. The petition can be found here: Petition Link. I have also downloaded a list of the 210 people who have signed it so far and have attached it to this email, along with the comments left by signatories.

Furthermore, I completely disagree with the proposed housing developments in Allhallows and Stoke. Medway Council needs to take the time to truly understand the issues affecting each community, rather than being so disconnected and failing to grasp the basic requirements for our villages and residents to function. The residents of these villages deserve far more consideration than they have received thus far.

For context, I have lived in Allhallows for almost 21 years, and my mother has been here for almost 53 years. We know the challenges this community faces, and I hope you will take our concerns seriously.

Kind regards,
Rachael Selleck

change.org

Petition details Comments

Protect Green Spaces: Halt Unwanted Housing Developments in Allhallows

Started 26 August 2024

210 Signatures

500 Next Goal

Support now

Sign this petition

Why this petition matters

Started by Rachael Selleck

⭐ I would really appreciate it if you could share this to as many people as possible ⭐

I grew up in Allhallows, a small village in Rochester that has a big heart and holds a special place in mine. Just as my mother did before me, I too wish to continue my life in this little village I love. However, our peace and tranquility are under threat. It seems Medway Council has chosen to willfully disregard the needs and aspirations of the villagers, deciding to build excessive new homes in our village, specifically on the proposed Catesby Estates. These are homes we didn't ask for and ones that bring more detriment than benefit.

It is disheartening that while our pleas for road repair and enhancement of our infrastructure continue to fall on deaf ears, Medway Council moves swiftly to introduce undesirable changes to our community. The natural beauty of our countryside seems destined to be overridden by unnecessary construction. This is an alarming situation. A study by the Campaign to Protect Rural England has shown that many of the infrastructures forcedly built in rural areas do not cater to the needs of the local community, and instead, they cause harm to the environment (source: "State of the Green Belt 2018 report").

No more houses should be built in Allhallows. Our village is not equipped to accommodate this level of expansion, and it is critical that we preserve the rural charm, wildlife, and close-knit nature of our community. Adding more housing developments will only worsen the existing strain on our infrastructure, erode the character of our village, and destroy the very essence of what makes Allhallows unique.

Enough is enough. Our village wants to be heard before our lovely countryside is all but unrecognisable. We call on Medway Council to listen to us, consider our concerns, and halt these unsought housing developments to protect our village's character, environment, and sense of community.

We need Medway Council to start paying attention to us and stop ignoring the problems. It's urgent that we tackle these issues before it's too late. If you agree, please sign this petition and help make a difference.

Share this petition in person or use the QR code for your own material.

Download QR Code

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From:	[redacted]
To:	policy, planning
Subject:	Objections to Medway Council"s Local Plan
Date:	08 September 2024 23:48:46

To Whom It May Concern

I am writing to object in the strongest possible terms to any proposals whatsoever in Medway Council's Local Plan to develop and build over Capstone Valley.

Medway Council's proposed new developments of Capstone Valley will rip the heart out of our precious countryside and lay waste to the green belt running through Capstone Valley. It will have a **profound negative impact** on amenities, traffic, noise and air pollution, loss of green spaces and countryside in an area of outstanding natural beauty with the irreversible destruction of native wildlife, local flora and fauna and delicate eco-systems with an unacceptable risk to the Red Listed Skylark. Farmland will be lost, never again to grow our own food. With a big push on saving resources to protect the planet from global warming, it seems ludicrous to destroy open green spaces and land producing local crops and produce.

The countryside has many positive impacts all of which are vital in mitigating global warming:

1. Carbon Sequestration: Capstone Valley has woodlands, grasslands, and agricultural lands that act as carbon sinks, absorbing carbon dioxide from the atmosphere and storing it in plants and soil1.
2. Biodiversity: Capstone Valley has diverse ecosystems, which enhance resilience to climate change. Biodiverse areas are better at adapting to changes and provide essential natural processes like pollination and water purification.
3. Sustainable Agriculture: Farming practices in the Capstone Valley reduce greenhouse gas emissions. Techniques like crop rotation, organic farming, and agroforestry improve soil health and reduce the need for chemical fertilizers.
4. Reduced Urban Heat Island Effect: Capstone Valley has more vegetation and open spaces compared to urban areas, which helps in cooling the environment and reducing the urban heat island effect.

These factors collectively contribute to mitigating the effects of global warming and promoting a healthier environment.

The local community cannot sustain the increase in population of anymore new housing or other developments in the Capstone Valley area. Our local amenities, including GP surgeries, dentists, schools, emergency services and local hospital are already overloaded with waiting lists. The proposed developments will add even more strain to the infrastructure and amenities I rely on. Accessing services and navigating congested roads is already fraught with frustration due to overcrowding. The neighbourhood cannot take any more people or cars.

The Attwoods who own this land do not live in the area. They will not be affected by the adverse impact of developing the Capstone Valley. The proposed new develop of Capstone Valley does not bring any benefits for the existing local residents; it only brings destruction to the countryside and overcrowding of our amenities and infrastructure.

We are encouraged to get out and enjoy green spaces, walk amongst nature to help improve our mental well-being. And yet the council contradicts this by seeking to destroy and build over large swathes of bio-diverse countryside. Any proposed new developments in the Capstone Valley will rely on private car travel increasing considerably the traffic trying to get through the narrow unlit lanes which are already used as a cut through with a constant flow of traffic building to queues of vehicles at busy peak times.

A report from CPRE, the countryside charity states there is enough brownfield land for new homes. Their figures show there is already enough available and suitable land in the planning system to meet the Government's building quotas, calling into question the need to pass the proposed new planning applications in the Capstone Valley.

Medway has brownfield land, sites that have previously been built on and now sits derelict or vacant. Land such as this provides a valuable resource in protection of the greenfield site for the proposed development planning for Capstone Valley which contains ancient woodland which should be protected and preserved for future generations as I have enjoyed them throughout the years along with my children and now grandchildren.

Medway must adopt a 'brownfield first' approach by targeting brownfield areas to breathe new life into sometimes long forgotten, and derelict areas in the towns and villages within its local authority. This approach will deliver huge benefits building homes in areas where communities are already established.

I strongly urge Medway to promote a 'brownfield first' policy and bring forward neglected and often overlooked brownfield sites for development and regeneration, ensuring suitable previously developed or under used land is always prioritised for redevelopment over the much-needed green spaces and ancient countryside withing Capstone Valley we are extremely fortunate to enjoy within Medway.

Any proposed new development of Capstone Valley should be considered alongside recent existing new developments in this area as well as planning permission already granted for new developments not yet constructed, all of which collectively decimate the beautiful green lung of Capstone Valley that has stood untouched for centuries and should remain unspoilt and free from further development forevermore.

I quote David Attenborough from his "Wild Isles" series: *“In my long lifetime, I have travelled to almost every corner of our planet,” said Attenborough. “I can assure you that in the British Isles, as well as astonishing scenery, there are extraordinary animal dramas and wildlife spectacles to match anything I have seen on my global travels.”*

Say NO to future new development of Capstone Valley. Medway must preserve this area of outstanding natural beauty with its astonishing scenery, and protect the myriad of extraordinary animals and wildlife that reside and flourish there. If you decimate and concrete over anymore green and pleasant land in Capstone Valley it will be gone forever, we cannot bring it back. Akin to the destruction of the Rainforest. Medway must learn a lesson from that and move forward with the preservation of Capstone Valley your highest priority.

Regards
Debbie Williams
[redacted]
[redacted] ME5 [redacted]

From:	representations, planning
To:	policy, planning
Subject:	FW: Medway Planning consultation
Date:	09 September 2024 07:11:18

Hi
FYI

**[redacted]/Customer Contact Planning Officer /Medway Council
Gun Wharf Dock Road Chatham Kent ME4 4TR 01634 333333**

From: [redacted]
Sent: Sunday, September 8, 2024 1:16 PM
To: representations, planning <planning.representations@medway.gov.uk>
Subject: Medway Planning consultation

To whom it may concern.

I would like to raise my objections to the Medway Local Plan.
I am extremely concerned that there is a plan to cover working agricultural land surrounding Hempstead and Lordswood with houses, along with land that has always been known as 'the green lung' of Medway, the Capstone Valley.
At a time when working agricultural land should be welcomed to enable the UK to provide its own food source rather than relying on imports, it seems that Medway wants to concrete it.
The infrastructure of the local area is already vastly overstretched, with a lack of health care, and school places. A new nursery, school or health centre may well be in the planning, however, these as we well know will not be the first phase of building. Many hundreds of houses will be built first, and for families moving into the area will be looking to the local schools, who are already seriously oversubscribed. Our local healthcare is completely inadequate and again will not be able to cope with an increase in capacity.
Our roads are often at a standstill during the morning and afternoon school run and rush hours. Again, public transport will not be available to the residents of these new estates, so they have no option other than to drive. The so-called public transport we

have in the area is not fit for purpose as the time it takes to get a bus from Hempstead to Medway Hospital is almost an hour, on a good day!
Your plan as it stands does also not take in to account the plan of Maidstone Council to build a further 2000 houses right up to the boundary of Medway at Lidsing. Again, this will put immeasurable strain on Medway's services without the additional council tax going Medway.
On speaking to a representative at the recent public exhibition, I was told that road infrastructure would be put on, when discussing this and then mentioning why small garden villages where not part of the plan for the Hoo Peninsula, I was told that the road infrastructure was not there! This is a complete contradiction of terms, obviously if the infrastructure allegedly can be put in around the Hempstead and Lordswood area, it can also be planned for the Peninsula.

We are getting to the stage where every patch of greenery or agricultural land will be concreted over, affecting the well-being and mental health of local residents, let alone our children being able to grow and thrive understanding where their food is grown and witnessing the joy of wildlife and wild flowers within walking distance, rather than joining the madness of our roads to try and find open space. I consider us lucky to see that Capstone Country Park has so far been protected but the road is not safe to be walked along with children and without a car, access is impossible, as public transport does not serve the park.

Please confirm by return email, that this email is included in your public consultation.

Kind regards,

Sue Noakes
Sent from [redacted]

From:	[redacted]
To:	policy, planning
Subject:	Medway Local Plan Regulation 18 Comment.
Date:	12 September 2024 08:42:04

Please accept my apology for the delay in providing comments and observations on the Medway Council Local Plan following the Regulation 18 consultation.

I would be grateful if you could notify me if my comments and observations will not be accepted for inclusion in the consultation responses.

Thank you for your help in this matter.

Mr. W. McLennan
[redacted]

Comments are catalogued under:

1. Communities and growing Medway sustainability.
2. Infrastructure
3. Environmental safeguarding.

Communities and growing Medway sustainability.

With the expected growth in population of the Medway Towns by 2040 to 330,000 to meet the community's needs and provide excellent healthcare it will be necessary to attract the best doctors and nurses to the area.

To do this Medway needs a modern NHS hospital rather than the expansion of the overcrowded landlocked Maritime Hospital site in Gillingham.

Whilst there appears an aspiration to provide excellent health and wellbeing services in the spatial growth options there is no identification of suitable land for a new hospital in the emerging Plan.

Medway Council within the new Plan must consider suitable land for a new Medway Hospital, including palliative care facilities.

An attractive proposition to the Labour Minister for Health in providing NHS funds for the construction of a new Medway hospital could be the identification of suitable Council land in the new Plan. The land could be leased to the NHS on a 999-year peppercorn lease.

The entirety of the Rochester Airfield land (including the mothballed proposed employment site would be ideal for a new hospital and certainly supported by the Medway community at large.

Infrastructure.

The adopted 2003 Medway Local Plan identified land for a business technology park at Rochester Airfield.

2003 Local Plan Policy 2. (2.5.47) States:
"To facilitate the development of the science and technology park the Council will, after the expiration of the current lease in January 2004, close one 35 of the airport runways. Rochester Airport, operating from a smaller site is intended to remain open and operational, at least for the period of this Local Plan."

The intended period of the 2003 Local Plan has expired. Without an adopted replacement the above obligation to retain an operational airfield to the expiry of the plan has been fulfilled despite its retention at considerable expense to the taxpayer or any meaningful benefit of the land use to the wider Medway community.

The Rochester Airport Masterplan from a financial perspective has been a fiduciary and employment disaster. Despite 4.3 million pounds of public money being invested in the airfield itself (phase 1), no significant employment increase has been achieved. With the full Non-Domestic Council tax increase for the new buildings now payable along with higher lease fees and lower flier patronage Rochester Airport Limited may become bankrupt.

It would be fiduciary recklessness of Medway Council to have any commitment in the new Local Plan to safeguard or commit to the retention of the airfield as it would lose public money and deny any future determination on better use for the Council-owned land.

All three spatial growth options outlined in the consultation literature show the Rochester Airfield development land recovered by the closure of the 16/34 runway as "Proposed employment Land." The former Medway Council vision of a high-tech business park is unlikely with the airfield remaining operational.

The original design of the airfield reconfiguration modelled noise levels based on 4 metre high bund between the airfield runway and the technology park. The reduced scope of works for the airfield reconfiguration ratified by SELEP removed the bund from the works rendering the value of the recovered land directly adjacent to the operational runway worthless for a high-quality business park due to high noise levels from aircraft.

After the former Council spent 3.1 million pounds on the recovered airfield land road infrastructure (RATP phase 2) it is likely, that the land will not attract business investment rendering it more suitable for warehousing and storage with low employment levels.

The retention of an operational airfield's visible cost to the taxpayer is likely to be dwarfed by the loss in adjacent land value and return on investment for the Council and taxpayers.
It is fiduciary prudent to ensure the taxpayer is not encumbered with liability for airport financial losses or denied a determination on better use of the land for the community at a future date.

It would be reckless of the Council to incorporate any safeguarding for an operational Rochester airfield in the emerging Local Plan. The site must not hold the taxpayer ransom to further direct or indirect financial losses towards retaining the needless facility.

The entire airfield land including the adjacent employment site is four times the size of the existing Medway Maritime Hospital with excellent road infrastructure and bus routes.

Environmental safeguarding

Environmental Issue 1.

Medway Council Planning Authority set case law in a legal hearing on solar panels. The outcome forces all local UK planning authorities to consider the impact on existing residential solar panels in shadowing from nearby proposed structures.

The ruling determination stated, "However small the contribution of microgeneration solar panels they provide a valuable contribution to our overall energy strategy."

The emerging Local plan needs to consider safeguarding residential solar panels.

Medway Council through a discount scheme with preferred solar panel providers rightly encourages residents to install solar panels. This encouragement has a financial liability given that the NPPF Permitted Development allows builders to significantly enlarge and extend existing properties without planning approval. All that is required is building regulation compliance.

The uncontrolled roof enlargement or alteration undermines the Council's desire to increase the installed residential solar panel base. Residents' financial investment and environment need protection in the emerging Local Plan to consider residential solar panels as an Amenity (Policy BNE2).

Builders and developers under permitted development must consider policies within the Local Plan for any alterations. Solar Panels recognised under Amenity Protection will not only safeguard residents' investment but also support the UK green energy strategy.

<u>Environmental Issue 2.</u>

I consider it imperative that we all protect our environment by enhancing biodiversity and protecting wildlife. The Medway towns have tens of miles of communal passages at the rear of many properties typically 4 feet in width.

These natural soil pathways are part of the estate design and infrastructure requiring planning permission for a change of use. Any arbitrary change by a property owner of their boundary to take the passageway as part of their garden without authorisation is a planning infringement.

Most residents respect the passages and pathways despite many today becoming overgrown and impassable for human use. However, a small number of unscrupulous property owners remove their fences and incorporate the overgrown pathways as part of their gardens, ignorant of the environmental consequences and damage.

The overgrown natural surface pathways with nettles, brambles, bushes, trees etc. are a haven for wildlife, birds, foxes, hedgehogs and the like not only providing biodiversity but a vital food source of bugs and insects for many animals. They provide an urban thoroughfare for wildlife now constrained by high garden fencing.

The Council cannot police the continuation of these vital passages. However, the Council should give them a level of protection/safeguarding for environmental purposes in the emerging Local Plan to strengthen legal recourse or action should an infringement be reported by a concerned neighbour.

------End------