

Town and Parish Council Planning Service

23rd August 2024

Medway Council
Gun Wharf
Dock Road
Chatham
Kent
ME4 4TR

Dear Planning Policy Team

Town and Country Planning Act 1990
Planning and Compulsory Purchase Act 2004
Medway Local Plan

We have been asked to make representations on behalf of Hoo St Werburgh and Chattenden Parish Council (HSW&C) with regard to the Medway Local Plan Regulation 18 consultation.

Whilst recognising that some of the sites proposed in the previous consultation have been omitted, The Parish Council objects very strongly to the grossly disproportionate housing growth proposed for the Parish and the associated social, economic and environmental harm.

With the exception of Kingsnorth, which is a strategically important employment site, HSW&C Parish comprises small settlements in a predominantly rural setting. The proposal to accommodate a significant proportion of Medway's housing growth in one parish, with clear infrastructure deficiencies, predominantly on high grade agricultural land, defies any kind of

planning logic and is very clearly unsustainable and contrary to multiple aspects of national policy.

Collaborative working

It is important for different statutory plan making bodies to work closely together. In the preparation of the HSW&C Neighbourhood Plan, the Parish Council has been open and shared materials informally with Medway Council, rather than relying only on formal consultation stages.

This contrasts with Medway Council's approach. Medway Council has treated the Parish Council as a consultee, rather than a statutory plan making body. Unfortunately, this has contributed to the current situation, where Medway Council continues to promote disproportionate, unsustainable and unrealistic housing growth within the Parish.

Spatial growth options

The three spatial growth options are very misleading, with the descriptions in the consultation leaflet being at odds with the diagrams. Option 1 is described as an urban focus, but proposes housing growth on rural land in HSW&C parish. Option 2 proposes less housing growth for HSW&C Parish, but ignores Kingsnorth. Option 3, like Option 1, focuses housing growth on rural land in HSW&C Parish.

None of these are sustainable options for the parish and none reflect national planning policy. All three options would cause severe economic harm to the Parish and Options 1 and 3 would also create severe environmental damage.

Option 3 appears to allocate housing sites to accommodate over 40% of Medway's overall requirement in the rural part of HSW&C Parish. This is not made clear in the consultation document, and we consider it to be misleading as a consequence. At best this is very poor practice, at worst it makes the consultation unlawful against the context of consultation case law. We have expressed concern over the lawfulness of previous consultations and are disappointed that these concerns have not been addressed.

Option 3 is clearly an extreme and very harmful option, contrary to NPPF policies on growth, site selection, natural environment, food production, infrastructure and other matters. The Parish Council strongly objects to this option.

The following comments explain this objection in more detail.

Roads and transport infrastructure

The main route into and through the parish is the A228. This is used by domestic and commercial traffic and has been recognised by Medway's Planning Department as being over capacity. More development has taken place, and the road suffers from considerable congestion at peak times. Despite this, additional planning permissions are still being granted.

The proposed new Thames crossing will add an estimated 40% to traffic flows and it is unclear how this would or could be accommodated.

There are very limited sustainable transport options in the Parish. This appears to have been ignored.

Housing site allocations on the scale proposed are obviously unrealistic. Indeed, even modest housing growth would result in gridlock. This would affect not just domestic traffic, but also commercial traffic, with serious economic consequences (see later comments).

There are already serious problems with air quality and the proposed housing site allocations, far from addressing this problem, would make it worse and over a wider area.

Utilities

Medway already has capacity problems for both power and water and it is clear that the capital investment programmes of the utility providers have not been sufficient to keep up with the rate of development. This is manifested in power outages and sewage overflows.

The existing capacity problems would be made much worse if housing site allocations were made on the excessive scale proposed. The problem is already beyond the point where heads can remain buried in the sand.

Economy

The impact of Option 3 on the rural economy would be devastating. The housing site allocations proposed would lead to the destruction of large areas of high-grade agricultural land, reducing the area's food growing capacity. This has serious negative implications for the rural economy, rural employment and food security.

The economic harm is not limited to the rural economy. By adding to traffic congestion and creating gridlock, Kingsnorth would become much less attractive to investors and may become non-viable for some existing businesses. This harm to a strategically important employment site would damage the economy of the Parish and the wider Medway economy.

The Sites

Based on the negative impacts described previously, the Parish Council would object strongly to the allocation of the following sites: HHH3, HHH6, HHH8, HHH11, HHH12, HHH22, HHH33. Development on this scale is very clearly unrealistic.

The Parish Council could support in principle proportionate growth in the area through allocation of smaller sites, but only if the transport and highway capacity issues and utility capacity issues were first solved. No sites should be allocated until capacity issues are addressed satisfactorily.

The allocation of these sites contradicts almost all aspects of the third paragraph of the Vision on Page 19 of the Regulation 18 Local Plan. The site allocation harms intrinsic cultural and natural heritage and landscapes. They represent unsustainable growth and fail to consider climate change, transport, natural assets, biodiversity, air quality, public health, wildlife or heritage assets. The countryside is clearly not valued and not protected and enhanced.

Sustainability Appraisal

The huge negative impact of the proposed site allocations is made clear by the Sustainability Appraisal. The Hoo peninsula is one of the most damaging options in terms of impacts on climate change mitigation, biodiversity and geodiversity, landscape and townscape, pollution and waste, natural resources, health and wellbeing, cultural heritage, transport and accessibility.

The Sustainability Appraisal scores Hoo positively in terms of impacts on economy and employment, but this has failed to take account of the lack of transport capacity and negative impact of the proposed housing site allocations on the viability of Kingsnorth.

Policy S22

This is the key policy relating to the development in the Hoo Peninsula. The policy is undeliverable due to infrastructure deficiencies. It is also contrary to national policy, for the numerous reasons given previously. The wording of the policy does not reflect the scale of growth proposed.

Of most concern is Question 28, under the policy. Whilst the policy relates to disproportionate, unrealistic and undeliverable growth, the question relates to the provision of a supermarket. Many people would support a local supermarket, but very few would support Policy S22. We do think inclusion of this question under Policy 22 is misleading and cynical. On this basis, and on the basis of the misleading options previously mentioned, we would suggest that the consultation be withdrawn.

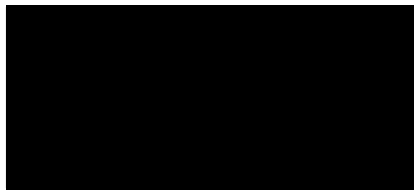
Conclusions

The Parish Council would object strongly to the proposed Local Plan, primarily on the basis of the unbalanced growth proposals for HSW&C Parish, for the reasons:

- Disproportionate growth is proposed for one Parish, causing very substantial harm in terms of climate change mitigation, biodiversity and geodiversity, landscape and townscape, pollution and waste, natural resources, health and wellbeing, cultural heritage, transport and accessibility (as confirmed in the Sustainability Appraisal).
- There would be substantial loss of high-grade agricultural land, causing substantial harm to the rural economy and food production capacity, in addition to substantial harm to the rural and natural environment, sensitive landscapes, habitats and biodiversity, all contrary to national policy.
- Transport infrastructure is already over-capacity, and the proposed site allocation would result in further congestion, gridlock and associated deterioration of air quality.
- Due to transport capacity, the proposed housing site allocations would cause substantial harm to the viability of Kingsnorth, a strategically important employment site, harming the economy of the Parish and the wider Medway economy.
- Water and energy infrastructure are already unable of insufficient capacity, so a substantial increase in housing proposed is unrealistic and undeliverable.

The proposed site allocations for the Parish represent an unbalanced, unrealistic and undeliverable growth strategy for housing, contrary to national policy. The proposed Local Plan fails to meet the requirements in Paragraph 16 of the National Planning Policy Framework December 2023 (and the draft NPPF that is currently subject to consultation).

Yours sincerely



Dave Chetwyn, MA, MRTPI, IHBC, FIoL, FRSA
Managing Director

[REDACTED]

From: [REDACTED]
Sent: 30 August 2024 18:06
To: policy, planning
Cc: [REDACTED]
Subject: Regulation 18 Planning Policy Consultation

Follow Up Flag: Follow up
Flag Status: Completed

Good afternoon

May I start by observing that your documents are far from clear where residents and interested parties wish to make comments concerning specific issues.

The document does go into a lot of detail but is not easy to place comments which will confuse those wishing to comment.

Looking at the possible spatial options available in your document then the third one would be my preferred option.

My comments on Site ID CHR4 Form submission ID 253 are as follows:

This site was allocated for a possible new cement works at a public inquiry with the proviso that when the works were finished it reverted back to its previous usage.

If a minimum of 1000 new dwellings are built on this site then Snodland and Halling are being physically joined into one urban area.

There will be a vast increase in the traffic volume traveling south along the Snodland Bypass which is only a single lane in places and already close to being overloaded.

As usual our doctor surgeries are extremely busy and its sometimes over a month to get a routine appointment. Also other developments have provided the necessary buildings or units but have failed to be able to find GPs to practice in them.

It's far from clear how a 10% biodiversity gain will be provided on this site.

Finally to describe this possible housing development as " part of a larger opportunity which includes land to the south within the Tonbridge and Malling administrative area. The larger opportunity could deliver an urban extension to Snodland providing up to 5000 homes, new schools, community and commercial facilities as well as extensive green infrastructure. The uploaded Prospectus describes both possibilities. "

While I appreciate neighbouring authorities need to communicate with each other this particular quote from Medways plan is most unwelcome!

This would destroy our greenbelt and Area of Outstanding Natural Beauty up to the North Downs and double our Town in size. All the Snodland Labour Borough Councillors were elected to oppose this massive area of possible development to the west of our Town.

Kind regards

Cllr Paul Hickmott
Labour Leader at Tonbridge and Malling Borough Council



From: [REDACTED]
Sent: Saturday, August 31, 2024 10:49 AM
To: [REDACTED]
Cc: [REDACTED]
Subject: Local plan Reg 18consultation

Local Plan Reg 18 Consultation

Whilst I applaud the work of the Planning team in producing the Local Plan documents, but in many ways, I get a feeling of Déjà vu. Where once again the plan contains totally unachievable housing targets and that our administration should, in fact must convey this message to the government in the strongest possible way.

I believe that a local plan needs adaptability, and this plan up to 2041 has none, things change, times change, people expectations change. I don't think we can allow long term visions to override the here and now.

- My belief that a local plan must be tailored to the needs of individual areas not some broad stroke one fix all solution, further I believe the most important thing this plan needs is community buy in, meeting the needs of each community, and those communities desires and unite communities to move together for a better tomorrow for those that will follow but just as important for us now. It requires Transparency, not to be misleading and in a form that everybody can understand.

The plan sets out to deliver sustainable communities however to destroy swathes of the rural areas of Medway with grossly disproportionate housing growth is in fact the exact opposite whilst I understand that meeting housing need and improving infrastructure whilst preserving our ecological, environmental, historical and heritage integrity is a fine balancing act I feel that is not achievable in this plan.

- The proposed site allocations especially for rural areas of Medway I believe represent an unbalanced, unrealistic and undeliverable strategy for housing contrary to National policy and that the proposed local plan fails to meet the requirements of paragraph 16 of NPPF December 2023 (and the draft NPPF that is currently subject to consultation).

The impact of the councils preferred option (3) on the rural economy would be devastating, leading to the destruction of large areas of high -grade agricultural land reducing the food growing area and food security with serious negative implications for the rural economy and employment.

Cllr Ron Sands

Ron sands



HOUSE OF COMMONS

LONDON SW1A 0AA

Medway Council
Gun Wharf
Dock Road
ME4 4TR

Our Ref: Local Plan 2041

5 September 2024

I am writing to contribute to the Regulation 18 consultation on the Medway Council Local Plan 2041. First and foremost, I want to express my formal gratitude to the dedicated staff at Medway Council who have worked tirelessly to engage the wider community in Chatham and Aylesford throughout this process. Their efforts, through both digital activities and in-person events, have been invaluable in ensuring broad participation and transparency.

The importance of this Local Plan cannot be overstated, as it will shape the future of our communities by balancing new housing needs with sustainability, placemaking, and investment opportunities. Without an up-to-date Local Plan, Medway remains vulnerable to speculative and predatory developments, as recently evidenced by the outline permission granted for 450 homes at Gibraltar Farm in Hempstead and Lordswood. The absence of a robust Local Plan was also highlighted by Shadow Housing Spokesperson, Cllr Andrew Lawrence, who noted that the lack of a Local Plan has undoubtedly undermined our position to oppose predatory developments including on Capstone Valley.

The failure to secure an approved Local Plan over the past 15 years, during successive Conservative-led administrations under Rodney Chambers OBE and Alan Jarrett, has been a costly setback for Medway. This failure, compounded by the actions of the former Rt Hon Kelly Tolhurst MP in undermining the prior Plan, led to the loss of £170 million in Housing Infrastructure Fund (HIF) funding—an outcome many regret.

I fully endorse Medway Council's vision for 2041, which seeks to enhance the area's economic and cultural position within the region while preserving its rich heritage and natural environment. The draft Local Plan's commitment to reducing carbon emissions, promoting sustainable development, and protecting both natural and cultural heritage is commendable. Medway's ambition to lead in green growth, supported by high standards of sustainable building, retrofitting, and adaptation, is a forward-thinking approach that will benefit our communities for generations to come.

The road ahead will undoubtedly be challenging. While the draft Local Plan addresses a wide range of issues, housing remains a particularly critical area of focus. House prices in Medway have surged by over 23% in the past five years, exacerbating an already severe affordability crisis. The private rented sector is under immense pressure, and the growing reliance on temporary accommodation underscores the urgent need for sustainable growth. To meet demand, Medway must build 1,658 homes annually, supported by vital infrastructure improvements to ensure the development of strong, resilient neighbourhoods.

Regarding the three spatial growth options presented in the consultation, I formally support Option 3: the Blended Strategy. This approach, which prioritises the use of brownfield sites before developing suburban and rural areas, strikes the right balance between meeting housing needs and preserving the environment. Approximately 50% of new development is expected to take place on brownfield sites by intensifying existing urban centres and waterfront locations. This strategy allows us to deliver the necessary housing and

infrastructure while maintaining the character and heritage of our area.

However, I would like to add three caveats to my support for Option 3:

Firstly, with regard to the spatial planning of sites in regards to the Capstone Valley corridor. The consultation document acknowledges that Capstone Valley, in particular, shares similar characteristics to the landscape of the Kent Downs and contributes to its setting. It is a 'gateway' to the Area of Outstanding Natural Beauty (AONB) and provides a key function as a transition zone between the AONB and built-up areas of Medway. The area is identified as a strategic component of green infrastructure in Medway, with the potential for strengthening cross border green networks. The broader Capstone Valley is already subject to a confirmed 2,000 home proposal on Lidsing; a further 450 home development on Gibraltar Farm; as well as granted appeal permission for the 800-home East Hill Development.

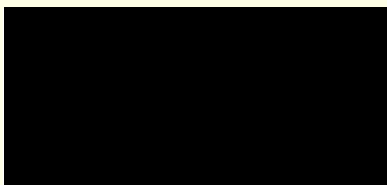
I believe that the context regarding Capstone Valley has now changed and it's currently more than fulfilling its fair allocation of housing with those permissions by both Maidstone and Medway Councils with shared Housing allocation a possibility with Lidsing. I am therefore requesting that in the spirit of fairness that no further sites on the Capstone Valley are considered adjacent to the North Dane Way Road.

Secondly, the neighbouring boroughs of Gravesham, and Tonbridge and Malling, have both undertaken Green Belt Reviews as part of their Local Plan processes. Green Belt adjacent to the Medway boundary forms part of their respective assessments. It is noted that there is a narrow gap between the urban areas of Snodland and Halling where there is the potential of greyfield development. I have grave concerns about any such urbanisation and the loss of identity of such an expansive proposal. I am therefore requesting protections for this specific location to stop any rural sprawl that would adjoin these two distinct areas; that exist across Local Authority boundaries and have entirely separate Local Governance models. In the consultation document it states that "The Council attaches great importance to the function provided by the green belt along its western boundary with neighbouring boroughs." and I would request this be the consistent and maintained position and that there is no agreement with Conservative-led Tonbridge and Malling Borough Council for any shared housing at this location.

Lastly, development can be a good thing and it's important for community confidence that developers communicate these important messages. During the construction phase, when hoarding or heras fencing is erected, developers should include displays which communicate the contributions they're making through the planning process to local infrastructure, e.g. schools, green spaces, etc.

In conclusion, the Blended Strategy offers a responsible and sustainable path forward for Medway. It reflects the shared responsibility of all areas within Medway to contribute to the solutions needed for growth while ensuring that development is guided by robust design principles, heritage and environmental considerations. I support the draft Local Plan 2041 and encourage Medway Council to adopt Option 3, with my caveats, as the preferred strategy for our future. Thank you for the opportunity to contribute to this consultation.

Kind regards,



Tris Osborne MP

Questions

Natural Environment

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

The Medway area includes much valued areas for environmental and historic areas. These can be affected by development close to their boundaries and more control is needed to protect them.

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

The provision of a minimum of 10% increase in the Biodiversity Net Gain is supported and needs to be documented, and maintained, for local residents alongside areas of public access (much of the current 'green space' is not accessible and can provide a barrier to active transport and use for leisure and access issues.

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

While this policy has been in place for some years, there does need to be more public involvement/transparency in understanding and helping to prioritise the allocation of these funds.

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

The previous Landscape Assessment does need to be reviewed and updated in light of potential developments, especially in the Rural Areas (coastal and riversides and areas of valuable sites, hills and valleys as appropriate.

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

Yes

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

Yes

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

Yes, there is little Green Belt allocated currently and boundaries with other local authorities should be seen as areas for protection, not development opportunities as this do have very limited community facilities.

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

Lack of existing Community Infrastructure and reliance on use of the car is generally more acute in most of these areas.

Built Environment

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

There may be examples where this would be appropriate, but it will need to be on a case-to-case basis. The change from conservation areas can be too stark currently.

Housing

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

This is currently being driven by economics of development schemes and is not delivering the mix that is required for Medway residents. This shortfall leads to even more future development requirements and the planned growth having a larger than planned need for inward migration into the Medway Towns.

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

The existing affordable housing requirements do not satisfy the local Medway needs and there need to be a move away from this as a standard and need for it to be a minimum in more cases. Use of Local Community Housing initiatives need to be used to give high priority to local people and those with an identifiable interest in the area. Housing should be retained in perpetuity.

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

This needs to be set on a case-by-case basis.

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

The current affordability criteria do not match the economic needs to local residents and prices are still many multiples of wages. More investment in Local Community

Housing initiatives is required that reduce the costs to prospective home owners and retain more housing stock in the local community for future generations.

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

The quality of HMOs in the community does need to be managed. That are not suitable for rural locations.

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

While some areas can be considered for self-build, this should not be used as a way of circumventing other allocations and higher development densities.

Retail and Town Centres

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

A balanced approach needs to be supported that allows ancillary development outside centres where this does not lead to pressures on town centre and local community centres.

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

Impact assessments should be required.

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

No specific comments offered, although the policy does appear acceptable.

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

No specific comments offered, although the policy does appear acceptable.

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

No specific comments offered, although the policy does appear acceptable.

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

No specific comments offered, although the policy does appear acceptable.

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

No specific comments offered, although the policy does appear acceptable.

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

No specific comments offered, although the policy does appear acceptable.

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

Over time the High Street area has become less useful with a reduction in banks and building societies and a reduction in food retail. Trading has moved to a smaller number of larger retail units outside of the Strood 'ring road'. The viability of the area inside the 'ring road' does need to be protected.

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

Subject to previous comment, yes.

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

No specific comments offered, although the policy does appear acceptable.

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

No specific comments offered, although the policy does appear acceptable.

Question 28: Would provision of a supermarket in Hoo be beneficial to residents to encourage sustainable travel patterns, convenience and sustainable lifestyles?

The provision of a larger, more cost effective, supermarket is required to reduce the need to travel, by car, into Strood, Rochester, Chatham, Gillingham and Gravesend. It also needs to be more accessible for pedestrians etc. But this is of limited value to local Cliffe and Cliffe Woods residents who would need to travel a similar distance to the town centres (and routed via local roads in Wainscott and Frindsbury Extra and the Four Elms Roundabout).

Question 29: Do you agree with the boundaries and retention of these listed local and rural centres?

There appears to be more reluctance by the large supermarkets to develop facilities due to the economic environment. Incentives may be required (cheaper land allocated from other developments etc.)

Question 30: Are there any other local and rural centres you may want to suggest for inclusion?

The Cliffe and Cliffe Woods facilities are inadequate (two convenience shops in Cliffe Woods and just one small and one 'lean to' facility in Cliffe). These are relatively expensive for main shopping requirements (increased cost of living) and lead to the need to travel into town centres (Strood, Gillingham Dockside and Gravesend) or delivery vans.

Question 31: Do you agree with the boundaries and retention of the listed shopping parades and neighbourhood centres?

In principle, agreed.

Question 32: Are there any further neighbourhood centres or shopping parades you may want to suggest for inclusion?

Case by case basis, depending on future development proposals in the future Draft Local Plan (e.g. Cliffe is a priority, but a requirement in Cliffe Woods as well (to support current and further development)).

Question 33: Do you agree with the proposed boundary for Dockside as a leisure destination? Please refer to the proposal map for the boundary suggestion.....

No specific comments offered, although the policy does appear acceptable.

Question 34: Do you support the percentage mix of uses proposed? If not, can you provide evidence for an alternate mix?

No specific comments offered, although the policy does appear acceptable.

Transport

Question 35: Adequate overnight lorry parking would reduce the risk of lorries parking in locations that lack proper facilities and/or cause a nuisance. Are there local shortages for overnight lorry parking in Medway?

Overnight parking by lorries is now exacerbated by the number of vans (small to large) which are 'taken home' and leading to significant pressures on local roads, often vehicles are parked on the pavements and severely restricting access for pedestrians (even without wheelchairs, buggies and other accessibility issues). This also leads to restricted access for other traffic, especially fire engines and ambulances - if a secure area could be provided, current parking habits could be changed and enforced.

Transport Extra Key Comments

The road system is under extreme pressure leading to congestion, delays and impacting on air quality. These will also be exacerbated by development pressures (during and after construction). Particular issues will be felt on the B200 (and Hollywood Lane, Cliffe and Cooling Roads in Frindsbury Extra/Wainscott). Improved public transport options will be required to support the local communities and provide any alternative to use of the car (and further congestion).

Health, Communities and Infrastructure

Question 36: Are there any core health and wellbeing issues or opportunities missing from the policy?

Historically rural areas have benefited from local village GP surgeries, but these have become parts of larger practices in locations that are not reachable by foot, public transport (routes and timing issues) - with some of these expanded to provide key facilities and health centres.

Additional pressures created by further development and the increased move towards more online consultancy and support has led to a serious issue with access to doctors. The change of regional policies has led to worries that current provision cannot provide the support and access required. This is a major problem for rural residents.

Question 37: What are examples of healthy development in Medway you would like to see more or less of?

More facilities need to be provided in local centres, there has been a tendency for facilities to be centralised in specific centre within a GP practice and these are not always accessible by foot or public transport (especially when there are hidden or actual accessibility issues).

Question 38: Of those health areas listed, what are the most important for the local plan to address?

Accessibility of a GP or qualified medical practitioner for consultation and advice (above and beyond 111).

Question 39: How can the local plan ensure that development is inclusive and accessible for all members of our community, including people with disabilities?

Audit and assessment of accessibility issues required and documented.

An audit of current facilities is required, and an action plan drawn up that can lead to improvements being funded from development.

Question 40: The designation of land as Local Green Space allows communities to identify and protect green areas of particular importance to them. The Local Green Space designation should only be used where the green space is: a) in reasonably proximity to the community it serves; b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and c) local in character and is not an extensive tract of land. Please use the online map to identify a green area for consideration as designated Local Green Space.

To be assessed.

Question 41: Sport England require an up-to-date PPS to justify the protection, enhancement and provision of playing pitches. Based on an audit and assessment of the supply and demand for existing and future playing pitches, the PPS provides recommendations and an action plan for addressing issues regarding the quantity, quality and accessibility of playing pitches and ancillary facilities. Medway Council's latest PPS was completed in October 2019 for the period 2018-35. Medway Council is inviting local clubs, national governing bodies of sport and other users and providers to review the latest PPS. More specifically, are there any matters in the latest PPS that should be updated?

More access to 4G pitch areas and suitable time-limited lighting is required in more villages. Reliance on Hoo and Strood is not adequate for most rural areas due to public transport limitations.

Question 42: Do you agree identifying the required infrastructure to support the scale and locations of growth within Medway is the correct approach? Would a 'mini IDP approach' focusing on broad locations and strategic sites be preferred? Or do you have an alternative suggested approach?

Agreed, full community infrastructure assessments are required, working with local parish councils.

Question 43: Align infrastructure provision in line with this growth – how can we balance growth and new infrastructure requirements with funding gap?.....

An adequate procedure for Enhanced Land Value capture is required at the earliest opportunity.

Waste Management

Question 44: In light of the geological/spatial constraints in Medway and predicted limited ongoing need, do you agree that it is appropriate for the Council to plan for the management of non-inert waste that may require landfill on the basis that it will be managed at landfill sites located outside Medway?.....

Yes

OTHER COMMENTS

The challenge of achieving the stated rate of build per year is in opposition to the Local Plan aims of sustainable development and quality of development and disruption to the existing built environment. There are already many examples of significant disruption with temporary closure and diversions which lead to a major degradation of air quality, disruption to public transport and delays to journeys (especially, but not limited to, rural areas). The impact of development does need to be quantitatively assessed, submitted as part of any planning submission and funds made available to centrally manage the impacts.

Abbreviations

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

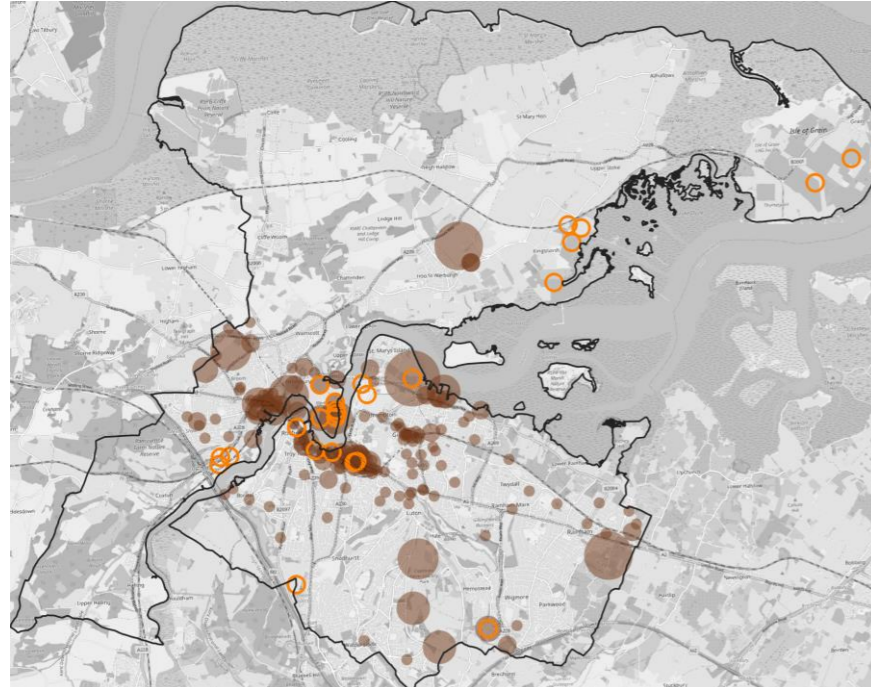
MCA	Minerals Consultation Area
MSA	Minerals Safeguarding Area
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1. Spatial Growth Options

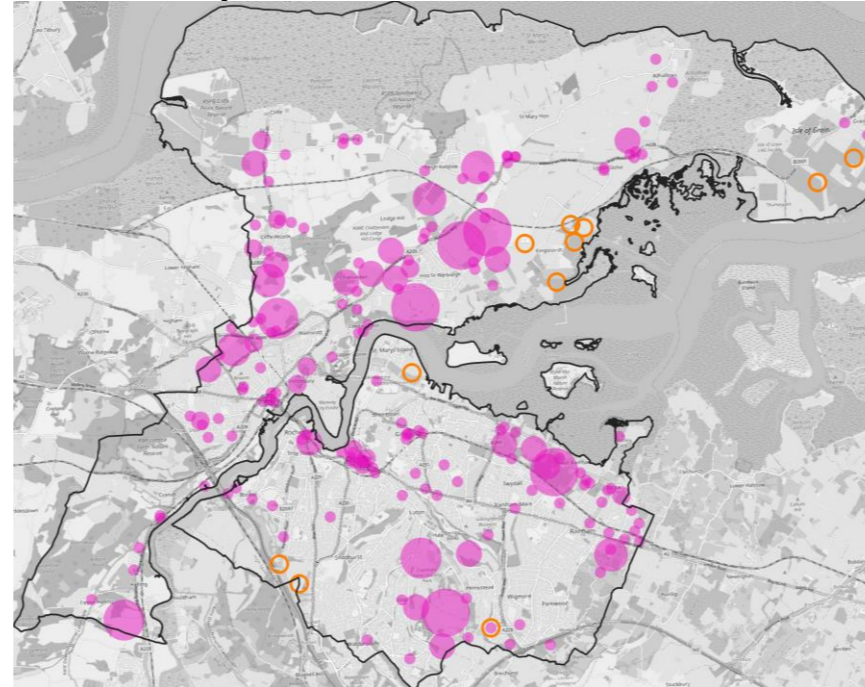
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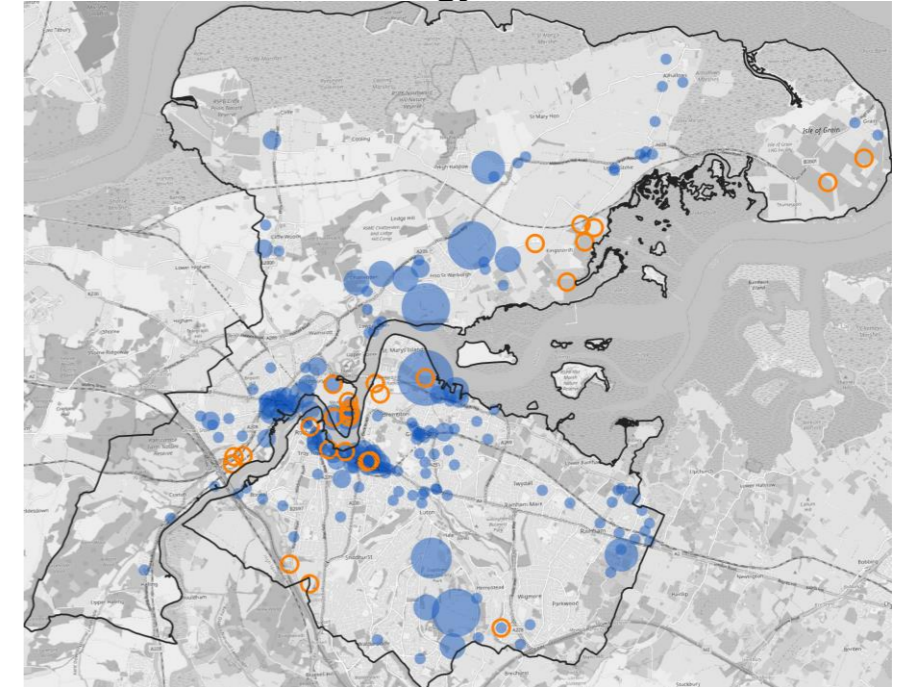
SGO 1 - Urban Focus



SGO 2 - Dispersed Growth



SGO 3 - Blended Strategy



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Figure 1: Spatial Growth Options

Questions

Natural Environment

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

The Medway area includes much valued areas for environmental and historic areas. These can be affected by development close to their boundaries and more control is needed to protect them.

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

The provision of a minimum of 10% increase in the Biodiversity Net Gain is supported and needs to be documented, and maintained, for local residents alongside areas of public access (much of the current 'green space' is not accessible and can provide a barrier to active transport and use for leisure and access issues.

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

While this policy has been in place for some years, there does need to be more public involvement/transparency in understanding and helping to prioritise the allocation of these funds.

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

The previous Landscape Assessment does need to be reviewed and updated in light of potential developments, especially in the Rural Areas (coastal and riversides and areas of valuable sites, hills and valleys as appropriate.

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

Yes

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

Yes, the importance of the River Medway is supported.

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

Yes, there is little Green Belt allocated currently and boundaries with other local authorities should be seen as areas for protection, not development opportunities as this do have very limited community facilities.

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

Lack of existing Community Infrastructure and reliance on use of the car is generally more acute in most of these areas.

Built Environment

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

There may be examples where this would be appropriate, but it will need to be on a case-to-case basis. The change from conservation areas can be too stark currently.

Housing

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

This is currently being driven by economics of development schemes and is not delivering the mix that is required for Medway residents. This shortfall leads to even more future development requirements and the planned growth having a larger than planned need for inward migration into the Medway Towns.

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

The existing affordable housing requirements do not satisfy the local Medway needs and there need to be a move away from this as a standard and need for it to be a minimum in more cases. Use of Local Community Housing initiatives need to be used to give high priority to local people and those with an identifiable interest in the area. Housing should be retained in perpetuity.

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

This needs to be set on a case-by-case basis.

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

The current affordability criteria do not match the economic needs to local residents and prices are still many multiples of wages. More investment in Local Community

Housing initiatives is required that reduce the costs to prospective home owners and retain more housing stock in the local community for future generations.

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

The quality of HMOs in the community does need to be managed. That are not suitable for rural locations.

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

While some areas can be considered for self-build, this should not be used as a way of circumventing other allocations and higher development densities.

Retail and Town Centres

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

A balanced approach needs to be supported that allows ancillary development outside centres where this does not lead to pressures on town centre and local community centres.

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

Impact assessments should be required.

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

No specific comments offered, although the policy does appear acceptable.

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

No specific comments offered, although the policy does appear acceptable.

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

No specific comments offered, although the policy does appear acceptable.

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

No specific comments offered, although the policy does appear acceptable.

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

No specific comments offered, although the policy does appear acceptable.

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

No specific comments offered, although the policy does appear acceptable.

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

Over time the High Street area has become less useful with a reduction in banks and building societies and a reduction in food retail. Trading has moved to a smaller number of larger retail units outside of the Strood 'ring road'. The viability of the area inside the 'ring road' does need to be protected.

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

Subject to previous comment, yes.

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

No specific comments offered, although the policy does appear acceptable.

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

No specific comments offered, although the policy does appear acceptable.

Question 28: Would provision of a supermarket in Hoo be beneficial to residents to encourage sustainable travel patterns, convenience and sustainable lifestyles?

The provision of a larger, more cost effective, supermarket is required to reduce the need to travel, by car, into Strood, Rochester, Chatham, Gillingham and Gravesend. It also needs to be more accessible for pedestrians etc.

Question 29: Do you agree with the boundaries and retention of these listed local and rural centres?

There appears to be more reluctance by the large supermarkets to develop facilities due to the economic environment. Incentives may be required (cheaper land allocated from other developments etc.)

Question 30: Are there any other local and rural centres you may want to suggest for inclusion?

Local convenience stores can be much more expensive than main shopping areas and affect the cost of living for many local residents or the need to travel/drive or use delivery vans for main shopping needs.

Halling residents also use Snodland, Holborough (fast food, convenience shopping), to a limited extent and Tesco Larkfield (Lunsford Park). There are local convenience shops in the village and a new Local Tesco Express (a model for many rural areas).

Question 31: Do you agree with the boundaries and retention of the listed shopping parades and neighbourhood centres?

In principle, agreed.

Question 32: Are there any further neighbourhood centres or shopping parades you may want to suggest for inclusion?

Case by case basis, depending on future development proposals in the future Draft Local Plan (e.g. possibly Halling South (to support any significant development on

the Snodland/Tonbridge & Malling area is included in their Local Plan (and leads to development within Medway).

Question 33: Do you agree with the proposed boundary for Dockside as a leisure destination? Please refer to the proposal map for the boundary suggestion.....

No specific comments offered, although the policy does appear acceptable.

Question 34: Do you support the percentage mix of uses proposed? If not, can you provide evidence for an alternate mix?.....

No specific comments offered, although the policy does appear acceptable.

Transport

Question 35: Adequate overnight lorry parking would reduce the risk of lorries parking in locations that lack proper facilities and/or cause a nuisance. Are there local shortages for overnight lorry parking in Medway?.....

Overnight parking by lorries is now exacerbated by the number of vans (small to large) which are 'taken home' and leading to significant pressures on local roads, often vehicles are parked on the pavements and severely restricting access for pedestrians (even without wheelchairs, buggies and other accessibility issues). This also leads to restricted access for other traffic, especially fire engines and ambulances - if a secure area could be provided, current parking habits could be changed and enforced.

Transport Extra Key Comments

The road system is under extreme pressure leading to congestion, delays and impacting on air quality. These will also be exacerbated by development pressures (during and after construction). Particular issues will be felt on the A228 with further pressures from the Lower Thames Crossing and between the M2 and M20. Improved public transport options will be required. Use of Enhanced Land Value Capture may be required to fund these.

Health, Communities and Infrastructure

Question 36: Are there any core health and wellbeing issues or opportunities missing from the policy?

Historically rural areas have benefited from local village GP surgeries, but these have become parts of larger practices in locations that are not reachable by foot, public transport (routes and timing issues) - with some of these expanded to provide key facilities and health centres.

Additional pressures created by further development and the increased move towards more online consultancy and support has led to a serious issue with access to doctors. The change of regional policies has led to worries that current provision cannot provide the support and access required. This is a major problem for rural residents.

Question 37: What are examples of healthy development in Medway you would like to see more or less of?

More facilities need to be provided in local centres, there has been a tendency for facilities to be centralised in specific centre within a GP practice and these are not always accessible by foot or public transport (especially when there are hidden or actual accessibility issues).

Question 38: Of those health areas listed, what are the most important for the local plan to address?

Accessibility of a GP or qualified medical practitioner for consultation and advice (above and beyond 111).

Question 39: How can the local plan ensure that development is inclusive and accessible for all members of our community, including people with disabilities?

Audit and assessment of accessibility issues required and documented.

An audit of current facilities is required, and an action plan drawn up that can lead to improvements being funded from development.

Question 40: The designation of land as Local Green Space allows communities to identify and protect green areas of particular importance to them. The Local Green Space designation should only be used where the green space is: a) in reasonably proximity to the community it serves; b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and c) local in character and is not an extensive tract of land. Please use the online map to identify a green area for consideration as designated Local Green Space.

Halling has a unique combination of the North Downs to the West and Marshes and River Medway to the East. There are some major areas of landscape significance and environmental significance that need better access for local residents and potential visitors but are not accessible.

Question 41: Sport England require an up-to-date PPS to justify the protection, enhancement and provision of playing pitches. Based on an audit and assessment of the supply and demand for existing and future playing pitches, the PPS provides recommendations and an action plan for addressing issues regarding the quantity, quality and accessibility of playing pitches and ancillary facilities. Medway Council's latest PPS was completed in October 2019 for the period 2018-35. Medway Council is inviting local clubs, national governing bodies of sport and other users and providers to review the latest PPS. More specifically, are there any matters in the latest PPS that should be updated?

More access to 4G pitch areas and suitable time-limited lighting is required in more villages. Reliance Strood is not adequate for most due to public transport limitations.

Question 42: Do you agree identifying the required infrastructure to support the scale and locations of growth within Medway is the correct approach? Would a 'mini IDP approach' focusing on broad locations and strategic sites be preferred? Or do you have an alternative suggested approach?

Agreed, full community infrastructure assessments are required, working with local parish councils.

Question 43: Align infrastructure provision in line with this growth – how can we balance growth and new infrastructure requirements with funding gap?.....

An adequate procedure for Enhanced Land Value capture is required at the earliest opportunity.

Waste Management

Question 44: In light of the geological/spatial constraints in Medway and predicted limited ongoing need, do you agree that it is appropriate for the Council to plan for the management of non-inert waste that may require landfill on the basis that it will be managed at landfill sites located outside Medway?.....

Yes

OTHER COMMENTS

The challenge of achieving the stated rate of build per year is in opposition to the Local Plan aims of sustainable development and quality of development and disruption to the existing built environment. There are already many examples of significant disruption with temporary closure and diversions which lead to a major degradation of air quality, disruption to public transport and delays to journeys (especially, but not limited to, rural areas). The impact of development does need to be quantitatively assessed, submitted as part of any planning submission and funds made available to centrally manage the impacts.

Abbreviations

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

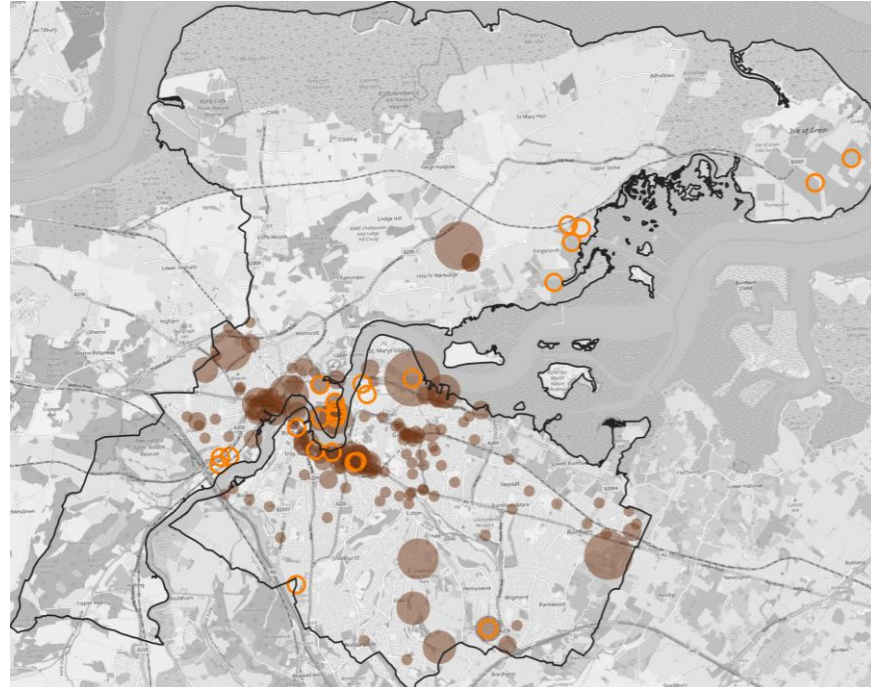
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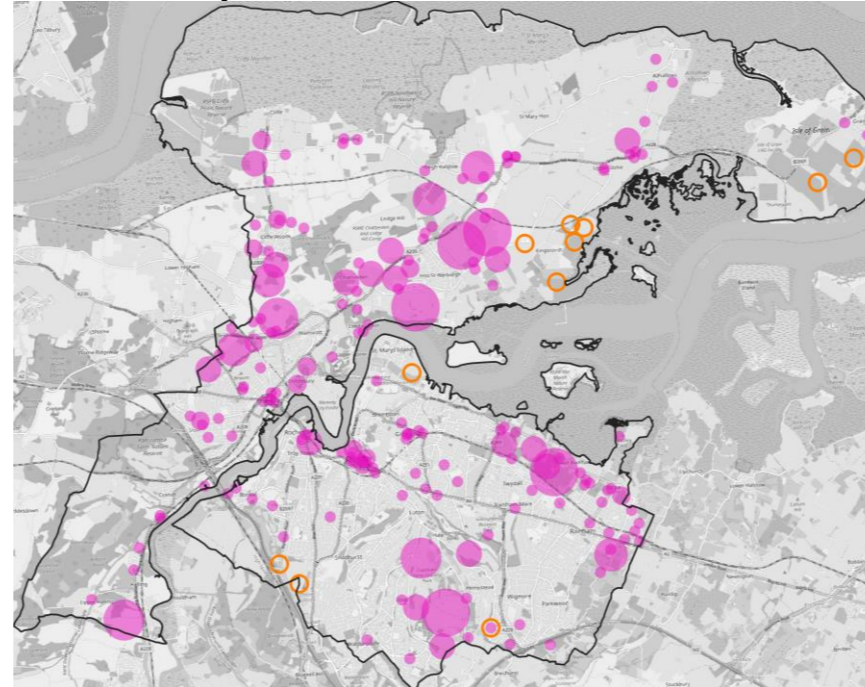
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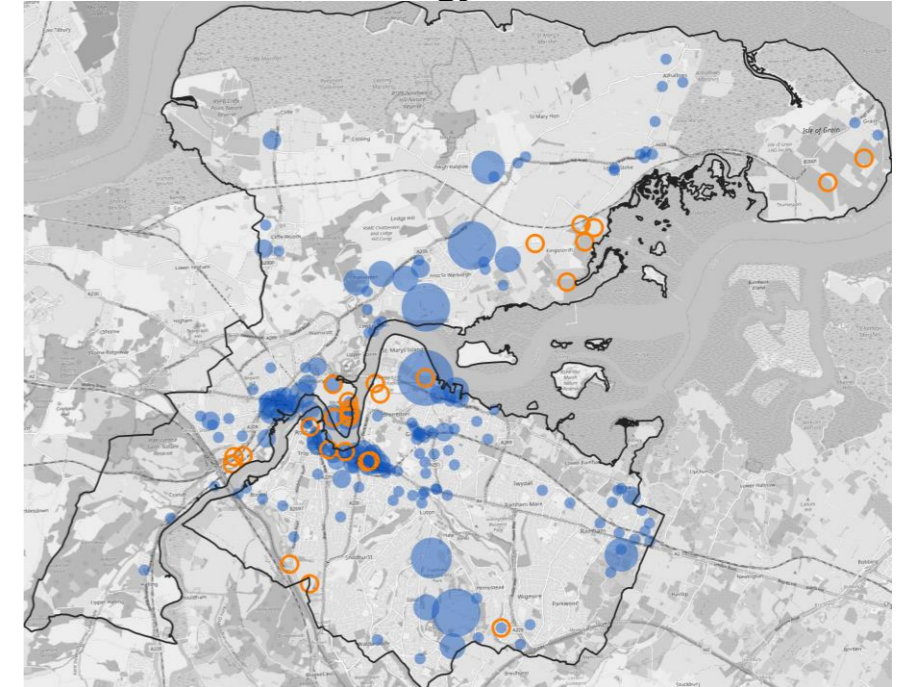
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Figure 1: Spatial Growth Options

High Halstow Parish Council



Tel: [REDACTED] • e-mail: [REDACTED]
Website : www.highhalstow-pc.gov.uk

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

Friday 6th September 2024,

Dear Sir / Madam,

RE: High Halstow Parish Council's response to the 'Local Plan Regulation 18 consultation',

Please find enclosed a copy of High Halstow Parish Council's response to your 'Local Plan Regulation 18 consultation'.

I hope this document outlines the Parish Council's views clearly however, should you require any further information then please do not hesitate to contact me.

Yours faithfully,

[REDACTED]

Mrs J. Allen

Clerk to High Halstow Parish Council



Response to the Local Plan Regulation 18 Consultation

Thank you for the opportunity to once again comment at the Regulation B stage of Medway's Local plan which set out its' vision for the medium term to establish how Medway will grow over the plan period to 2040.

The previous draft local plan allocated much of Medway's housing numbers to the Hoo Peninsula specifically the parishes of Hoo St Werburgh and High Halstow. Development on the Hoo Peninsula was deemed unsustainable by Medway Council without additional transport and Ecologic infrastructure. Sustainability relied on a Housing Infrastructure Fund (HIF) grant of £170m for improvements to the strategic A228 / A289 and further access to the Peninsula. It also included ecological mitigation for the damage to the internationally protected sites that surround and defined the Hoo Peninsula which has been recognised as an integral part of a bid to make the East coast of England a World Heritage Site. The HIF grant was withdrawn and this new draft local Plan is the response to that.

High Halstow remains unsustainable for development for lack of major transport infrastructure and the further three small restricted country lanes Dux Court, Christmas Lane and Britannia Road The Parish Council recognises that the parish will require some has growth in the period of the Plan having already grown by approximately 5% since 2017 following development of 67 dwellings at Walnut Tree farm Britannia road (MC/17/4408), 22 dwellings at the Hollies Sharnal Street (MC/21/2612) and 5 self-build dwellings to be added at Cooling road.

Having withdrawn its previous draft Neighbourhood plan following independent inspection and the cancelation of the HIF grant the Parish is now in the latter stage of preparing a new Plan including a specific housing needs assessment to make clear how the community would like to grow in the future. It currently also has an undetermined application for up to 790 dwellings on land South of Britannia Road which should now be withdrawn or refused.

National Planning Policy advises that planning policies should promote an effective use of land in meeting the needs for homes and other uses and should make as much use as possible of previously developed land. It encourages multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains, such as developments that would enable new habitat creation and or improve public access to the countryside;

The Hoo Peninsula clearly offers great opportunity to achieve net biodiversity gains for Medway and can enable new habitat creation and improve public access to the countryside as well as flood risk mitigation, production of green energy, carbon storage and food production.

We specifically note the three scenarios for growth set out in the document as :-

SGO 1 which seeks to maximise development on brownfield sites in urban centres and waterfront sites, benefitting from good transport links and accessible locations. There would be a focus on increasing density in these urban areas. The urban locations alone would not meet the full growth needed in Medway, so there would also be more limited greenfield development adjoining existing larger settlements, including Strood, Rainham, Lordswood and Hoo. There is strong support in national planning policy for the regeneration of previously developed land, and often a preference from the public for the development of brownfield sites.



However, such a reliance on the scale and density of development in urban centres and waterfronts raises issues with potential conflict with design guidance, such as the Chatham Design Code, and heritage constraints. This option also includes the proposed redevelopment of existing employment sites at Chatham Docks and areas of Medway City Estate to residential led mixed use growth. There are potential issues with viability on brownfield sites, and the reliance on this development approach would limit the range of housing types to meet the needs of Medway's communities, such as family homes.

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

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

Option SGO 1 should be the preferred option, it takes account of the guidance laid down by the National Planning Policy Framework by seeking to maximise use of existing brownfield sites in the urban and water front areas of Medway. Much needed regeneration has already begun and proving successful in Medway particularly lower Gillingham and increasingly Chatham town centre. This development is well suited to delivering and sustaining local amenities for local people and reducing car journeys. Site allocations should be criteria led. Providing public transport in the rural area is historically unsustainable and not profitable for operators. The local Plan and all three options are also under pressure from the possibility of the lower Thames crossing. The increase in traffic and disruption that will ensue will greatly affect M2 junction one and adjoining A289.

Option SGO 2 prefers development predominantly on the Hoo Peninsula, North Rainham, Medway Valley and Darland, is out-with guidance from NPPF and un-sustainable for lack of transport infrastructure and the pressure it brings to bear on our ecology and green spaces.

Option SGO 3 (The Local Authorities preferred option) described as a blend between regeneration and Greenfield development continues to promote almost 50% of the allocation to the Hoo Peninsula which is similar to that put forward in the previous Local Plan which included transport and ecological infrastructure provided by the Housing infrastructure Fund Grant of £170m.

Medway faces several crises simultaneously: (1) a chronic housing crisis, with the Council unable to meet and deliver its own housing needs; (2) the Climate Change Emergency, with direct impacts on the living conditions of residents as more severe weather, particularly flooding, take place. (3) a Biodiversity Emergency, which affects Medway in that many of its protected sites, habitats and species are in poor condition.



Measures to provide flood protection and resilience will need to be identified and it is likely that renewable energy development will need to be accommodated on rural sites with consequent impacts on landscapes and living conditions.

The Plan preference for the SGO3 option is fundamentally flawed and suffers from the same failures to achieve sustainable development as its failed predecessors in early draft plans, which sought to promote major highway infrastructure as the principal means of overcoming its inadequacy in terms of remoteness from jobs, essential services, and facilities, and means of access to and from urban areas; an approach which we consider was fundamentally unsound and ultimately recognised as such by the withdrawal of its HIF funding.

The Hoo Peninsula is the most sensitive part of the entire Medway administrative area in terms of recognized protected areas, including SSSIs, SACs SPAs and wider areas which provide for a wide range of threatened species of birds, invertebrates and other biodiversity.

It is a matter of profound concern that none of the three options recognize the importance of the Hoo Peninsula as an internationally important area for biodiversity and landscape, underlined by the Council's unanimous vote to support the designation of a National Landscape (AONB) on the Peninsula and the proposals to include the Kent marshes in a UNESCO designation linked with the Broads and East Anglia. The effect of development on the Hoo Peninsula on the scale contemplated in the draft plan would be likely to be highly damaging to its mosaic of protected landscapes, creating permanent severance, rather than linking protected sites, habitats and species.

On the Peninsula, the emphasis should be on consolidating and enhancing the natural environment. New housing should be directed at meeting clear and specific local need, evidenced by an independent local housing needs assessment. New housing sites should be located in and around sustainable settlements and should only take place where transport and, in particular, public transport infrastructure can be delivered alongside any new development. The vision for development of the Hoo Peninsula should be landscape and biodiversity led, protecting it as a resource for the well-being of the Medway community. Choice of sites should be criteria based, with sustainable locations being the decisive criteria for building at any significant scale.

Option SGO 3 also fails to address the disappointing history of housing development which has taken place on the Peninsula and its failure to provide the kind of housing and the volumes of housing actually needed on the Peninsula.

The suburbanization of its villages continues apace with rampant urban sprawl from large scale development using house builders' house types to create out-of-scale car driven cul-de-sac enclaves and robbing our villages of their special identity and demonstrably failing to meet the acknowledged need for affordable housing in the right place - close to services, jobs and facilities.

MEDWAY LOCAL PLAN (REGULATION 18 2024)

RESPONSE OF COUNCILLOR SPALDING

WARD COUNCILLOR FOR ALL SAINTS WARD

PREAMBLE

All Saints Ward is located at the end of the peninsula and covers the villages of Allhallows, Grain, Stoke and the hamlet of St Mary Hoo. Within the ward is a mix of major industry, mainly located at Grain and large areas of prime farmland.

All Saints ward is also home to attractions such as the Fenn Bell Zoo and conservation project in St Mary Hoo, an Alpaca farm at Grain and Slough fort, a Victorian Artillery Fort overlooking the Thames Estuary in Allhallows. Within Allhallows also sits Haven Kent Coast holiday park and a mobile/park home community.

Until a few years ago, each village had its own school catering to ages up to eleven. Stoke Village School was closed leaving pupils having to travel to the building at Allhallows. It will soon reopen but as a specialist school as part of the Rivermead Establishment.

In addition to the main industrial area in Grain, the ward contains many small businesses including a private airfield in Middle Stoke and those located in a limited industrial estate in St Mary Hoo.

Due to its location, the ward has areas that sit within flood risk areas and flooding is a regular occurrence which is not assisted but antiquated and outdated water and sewage management systems.

All Saints is represented by a single independent councillor.

1. OVERVIEW AND VISION FOR MEDWAY

To achieve the ethos of the plan as indicated, vital components for achieving this outcome must be preserved without question and improved.

All Saints ward in Medway is an intrinsic example that employment providing industry can exist alongside a traditional rural environment.

Building thousands or even hundreds of houses on grade A first class farming land is not just ecological vandalism it is fundamentally perverse. Such farmland provides not only employment, regular and seasonal but also acts as a green lung for the area, essential in tackling climate change.

Not only that, but the removal of prime farmland and replacement with buildings decreases the provision for food supply while increasing the demand and removes employment. This aspect is recognized within the narrative.

Medway's farmland produces quality food and drink and is contributing to the management of natural resources.

Farmland also provides a natural means to prevent flooding and erosion. Replacing farmland with housing development removes this ecological benefit and dramatically increases the strain on existing flood prevention measures.

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

The proposals have no apparent provision for existing increased or improved infrastructure. Given there is only one main road connecting All Saints ward and other areas of the peninsula with the rest of Medway alternative transport solutions must be considered and those already in place safeguarded.

Transit by ship or marine means needs to be prioritized, not just for All Saints ward but for the whole of Medway. Chatham Docks should not just be preserved but expanded. Use of the natural resource that is the river Medway needs to be encouraged. These measures will reduce the need for motor vehicle traffic on the already congested roads.

All sectors and ages of the community can find decent places to live.

This statement is in my opinion, complete rubbish. Those raised in rural villages with strong family ties are forced to move away due to lack of provision, lack of choice and basic affordability while the lack of enforcement allows disreputable landlords to avoid their obligations. Many who desire a place to live are now forced to simply rent a room in a shared house. As a regular volunteer and supporter of a local homeless charity I have seen need for support increase.

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

This statement is again in my opinion flawed. There are no new roads. There is no new hospital. Existing provision and services are quite simply overwhelmed.

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

While this may be moderately true for the town centre and urban areas, the rural areas are simply forgotten. The bus service to and from areas of the peninsula is poor at best. Safe cycle provision is sporadic and reliance on cars remains for those in the outlying areas of Medway.

People can meet most of their daily needs in their local area, such as schools, grocery shopping and places to socialise and exercise, reducing the need to travel

People growing up and residing in rural villages and areas, in my opinion, gain a certain resilience from the community in which they live. Facilities are not as plentiful as those found in town centre and urban areas.

All Saints Ward is served by a single petrol station situated just outside the ward where old fashioned attendant service still thrives. Each Village has a selection of small shops but there is no medium to large supermarket in the area.

Medway is known for its innovation and creativity, with businesses adapted to changes in the economy and the environment, and leading in green growth and technology, benefitting from excellent digital connectivity.

Medway Council invested heavily in a so called 'innovation park' yet much of the land remains empty with no likely take up in the near future. That a similar scheme is proposed by the owners of Chatham Docks as replacement for the current industry and businesses and has the backing the of the current administration is sheer madness.

If you asked somebody what Medway is known for, I doubt the answer "Innovation and creativity" would trip off the lips or even be within the top one hundred responses.

High Streets are sought after locations for a range of businesses, providing space for start-ups and co-working facilities that reduce people's need to commute.

Medway high streets have seen considerable decline over recent years. Banks closing, shops and businesses shutting and moving out. To suggest these are sought after locations is in my opinion deluded. If they were then why are there so many empty units? Why are so many retail buildings being converted into housing?

I believe, the overview to the plan document paints a far more glossy picture than is the reality. That said, this is a golden opportunity to address the many issues that face Medway and it should be seized without reservation.

2. STRATEGIC OBJECTIVES

To say Medway needs to be prepared for a sustainable and green future appears to be a paradox. A Green future refers to a low carbon future yet this documents references achieving carbon zero. In any event the future must definitely be sustainable.

There is reference to reducing the risk of flooding and promoting the use of nature based solutions to climate change., management of natural resources including water and soil. Further reference is made about ensuring the effective management of natural resources including water and soil which will improve air quality.

Why then does this document contain options that see vast swathes of prime class one farmland removed and replaced with housing? Simply put, this is ecological vandalism.

Farmland is not only a source of producing food. Farmland acts as green lungs and has the ability to absorb natural rainfall thus improving air quality and preventing flooding.

I totally agree we should be supporting people to lead healthy lives and strengthening our communities and that should include provision for specialist housing. It is disappointing to note there is no mention of military veterans among the various categories listed.

Particular attention needs to be paid to the gypsy and traveller communities. Specific sites and arrangements must be put in place to accommodate those passing through Medway or visiting for reasons such as a wedding or funeral among those of this heritage who have settled in Medway.

This will not only alleviate the considerable distress to local residents in many locations when caravans arrive unannounced often on public land, there will be considerable cost savings from the removal of the need to take enforcement action and clean up costs.

In order to secure jobs and develop skills for a competitive economy, I believe Medway needs to consolidate what it has and must broaden its approach.

Changing the designation of Chatham Docks in any way that would facilitate the loss of the industry and jobs therein would be counterproductive to the aims set out in this document. The use of Chatham Docks waterway entrance and egress should be expanded and with that would come new job and apprenticeship potential not just for any land based businesses but also water borne opportunities.

There is a need to deliver the infrastructure needed for business growth, to provide accessible employment locations, and excellent high speed broadband services. Any new major infrastructure projects should include capacity for broadband and other utility provision.

If employment sites within All Saints ward and on the peninsula as a whole are to be expanded, improvements and upgrades to infrastructure are required. Alternatively, means of delivery to those locations by alternative means such as sea must be considered and encouraged.

3. SPATIAL DEVELOPMENT STRATEGY

One must suggest it would be incorrect to suggest SGO 3 has been identified as the Council's indicative preferred approach at this stage. The Council as a whole has not discussed nor debated nor voted upon the Regulation 18 consultation 18 document.

I find none of the three options entirely acceptable when considered on an option by option basis. That said, taking elements from each option and undertaking some mix and match, it would be possible to arrive at a best possible alternative.

Ward Councillors not only have a duty to their constituents but also a duty to the people of Medway as a whole.

Considering the three options presented, I note that of the three the so called preferred option has the least negativity narrative attached to it, while the option which appears most sensible in my opinion, option one, gets considerable slating.

Option 1 Urban Focus

Given the restrictions of the proposals in that no need major infrastructure or healthcare provision are proposed, the suggestion to concentrate development in urban areas is the most sensible. Urban areas have better transport facilities than rural ones. It is easier to instal cycle provisions and walkways. Facilities such as supermarkets and train stations are in much easier reach. The new Health hub at the Pentagon Centre in Chatham would be within easy reach.

The prevalence of maximising development on brownfield sites leaves prime grad1 farmland free for food production and climate benefit considerations already alluded to.

In respect of the negativity suggested by potential conflict with design guidance, one makes two points. It is guidance only and not statute. Secondary it is potential, not actual. If there was any actual conflict, the highly skilled and experienced council officers drafting this document would have stated this and identified it.

Redevelopment of Chatham Docks and Medway City Estate for housing is unacceptable. The upheaval and change completely unnecessary. In other words, if it is not broken, don't fix it.

I do not accept the notion reliance on development of brownfield site would limit the range of housing types. No evidence has been put forward for this.

As the All Saints ward councillor one notes no housing development is considered for the ward under option 1. There are two medium site developments current before planning both of which come to committee on 25 September 2024. These applications were known to those drafting this consultation document yet they these two sites have been omitted from inclusion on option one.

It is further noted that potential development that is in progress in other rural areas, has also been omitted from this option. The implication is obvious.

Option 2 Dispersed Growth

This, in my opinion, is the worst possible option. Prime class one farmland is lost to housing and the dispersal places additional burdens on already overstretched infrastructure, particularly Four Elms High and the single main route serving the Peninsula.

It is noted this option includes those developments already underway or which are currently before planning.

Option 3 Blended Strategy

This option is an improvement on option two and the inclusion of sites underway and within planning consideration is welcome. However, inclusion of areas alongside the single main route serving the peninsula is unacceptable unless brand new infrastructure is provided. The inclusion of Chatham Docks is for reasons already given undesirable.

4. NATURAL ENVIRONMENT

Given Policy S2 relates to the Conservation and Enhancement of the Natural Environment it begs the question why develop prime grade one farmland or even grade two farmland for that matter?

There are issues with wastewater disposal within All Saints Ward particularly in Stoke and St Mary Hoo where current facilities cannot cope.

Any new wastewater and drainage management plans must include upgrading facilities and mechanisms to cope with current overwhelming demand and future demand in order to address pollution and prevent flooding.

Water supply is also an issue. Residents, particularly in Grain are reporting low pressure such that basic amenities such as showers fail to function. Attention must be provided to ensuring that water supply can not only cope with current demand but also future demand.

Air quality continues to be an issue for resident in Medway. This will continue to be exacerbated by the continued transference of prime farmland and green fields for housing development. Consequently, development focus must be centred on existing brownfield sites.

5. BUILT ENVIRONMENT

I believe the approach to design, construction and sustainability is generally very good with many examples across Medway both historic and new. This approach must be continued and not allowed to slip.

6. HOUSING

I agree that Residential development should only be permitted if it encourages a sustainable mix of housing that includes an appropriate range of house types and size to address local requirements, and the mix must be appropriate to the size, location and characteristics of the site as well as to the established character and density of the neighbourhood.

In respect of affordable housing I agree that all developments in Medway of 10 or more residential units (net) will require the delivery of affordable housing.

That said attention must be provided to ensure developers purposely do not design so as to avoid this requirement, say by proposing nine units when ten could clearly be viable.

Further, for those smaller developments, ten or less, consideration should be given to potential financial contribution to a fund for future affordable/social housing.

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

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

I would suggest for brownfield sites a figure of 12.5% of units

I agree that when delivering affordable housing it is required to:

- Be provided and retained for an affordable use in perpetuity.
- Be designed to be indistinguishable from the market housing on site.
- Be of the same size and scale as market housing.
- Avoid being visibly distinguishable as different from the wider neighbourhood and be delivered across the site where appropriate.

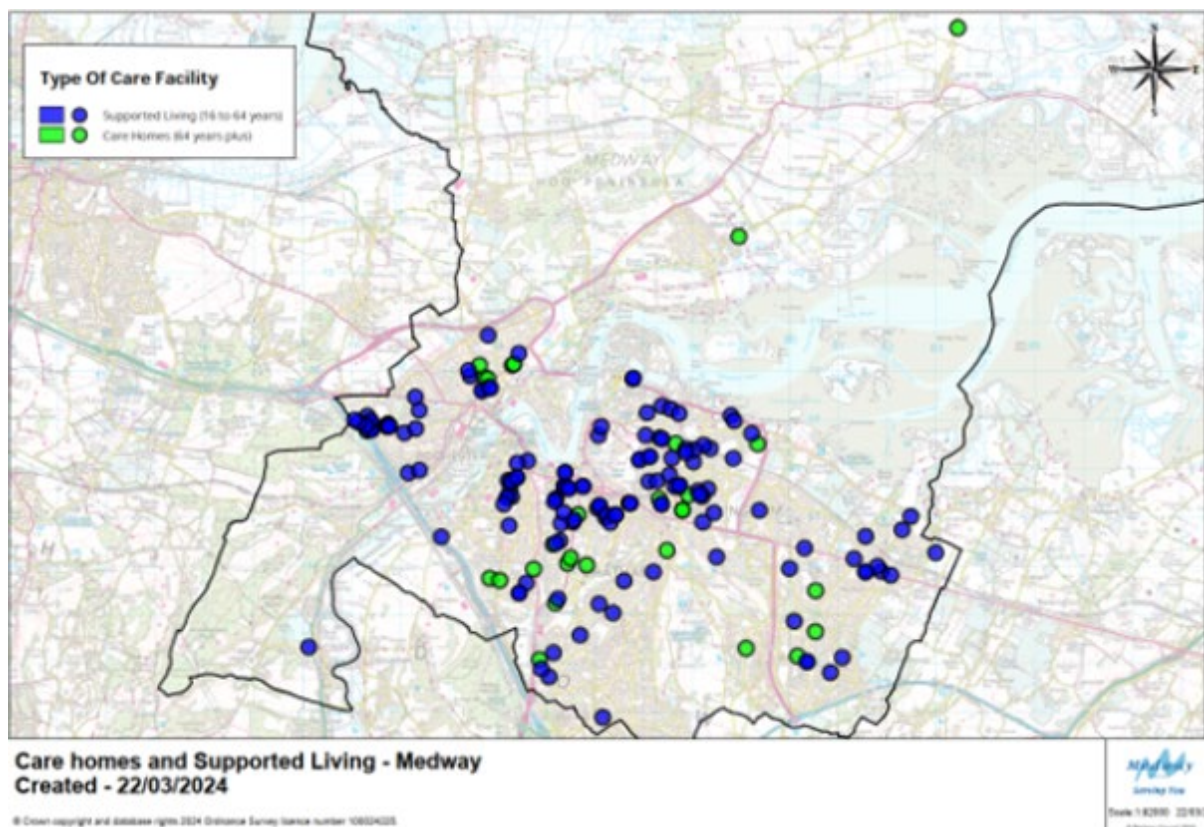
I believe the suggestion affordable housing should reflect the latest tenure mix as set out in the Local Housing Need Assessment needs to be reconsidered with more emphasis on affordable rental units for perpetuity.

I agree in Medway there is a significant need for affordable housing and such a requirement needs to be deliverable by demonstrating the viability of such a policy. Every effort should be made to ensure this viability is shown.

Having benefitted from supported housing, nursing homes and older persons accommodation when my father aged and suffered medical conditions including dementia, I am aware of the value of such housing

It is correct the health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support and similarly, people with disabilities can include, but are not limited to, people with ambulatory difficulties, blindness, learning difficulties, autism and mental health needs, which may generate a range of housing requirements which can change over time.

There is a disparity in the locations of these facilities between urban and rural areas that perhaps apparently does not address the locational needs of those requiring this accommodation and importantly their families. This needs to be considered and addressed.



Regarding Houses of multiple occupation, one must note this description not only includes those licensed units but the plethora of properties where rooms are rented alone, with facilities such as kitchen bathroom being share and residents, often unfamiliar to each other.

Landlords often neglect to upgrade the accommodation to allow for such occupation. Further, these types of letting place additional strain on already over stretch resources such as parking and rubbish/recycling collection without any additional contribution through council tax.

Indeed, it is not uncommon for these type dwellings to be listed as student accommodation in order to gain financial advantages.

Stricter controls and licensing are required to include additional financial contribution where appropriate.

Medway does not appear to have enough Self-build and custom housebuilding opportunities when these could clearly exist. Sites that scream suitable for self build/custom in order to stay in keeping with the local area are instead overwhelmed by maximum number of unit applications. A prime example of this is the proposed development at Fenn Corner for forty four units on a single field totally out of character with the surrounding area.

Regarding Gypsy, Travellers and Travelling Showpeople housing please refer to my previous comments.

Small sites and SME housebuilders need to be encouraged, but only where such development is appropriate. The benefits are evident in that these developments are not usually held as land banks. The developments are commenced relatively quickly after permission is given and completed in a relatively short space of time thus reducing the disruption to local communities that large scale long term sites bring.

7. ECONOMIC DEVELOPMENT

Apprenticeships need to be encouraged, especially marine apprenticeships which not only provide local opportunities but also worldwide and I agree new employment opportunities should be supported in sustainable locations, especially where they can foster a critical clustering of economic activity.

Given, new employment proposals will be directed in the first instance towards areas of existing business and commercial activity, the proposals to redesignate Chatham Docks make no sense at all.

The only reason town centres have opportunities for the redevelopment of several smaller, centrally located sites is the number of businesses and service providers that have left. This trend must be reversed.

One notes in Medway are also several large-scale business and industrial estates across Medway, including Medway City Estate, Innovation Park

Medway, Gillingham Business Park, and Knight Road, Rochester. However, on visiting these or driving through them empty areas abound, particularly the Innovation Park which seems to have failed spectacularly.

Before any new such proposed provisions are even considered, these vacant lots need to be filled, especially those owned and managed by Medway Council.

I agree there is significant potential for regeneration, and redevelopment, of employment sites on the Hoo Peninsula, in particular at the Isle of Grain, and the site of the former Kingsnorth Power Station. However, the existing road infrastructure is at capacity. Attention needs to be given to alternative transport means such as sea.

I agree that to ensure a balanced development plan, which meets both housing and employment needs, it is important that we manage existing employment space where we can.

I also agree Medway Council should be protecting viable employment sites to help Medway to grow and consequently oppose any redesignation of Chatham Docks.

Regarding a Local Development Order for Innovation Park Medway if limiting uses to B2 and E(G) designation means areas remain empty and unused as they currently are, the policy should not proceed. It would be better to have these areas in use for a wide variety of business rather than keeping a white elephant as a vanity project.

Turning to early years and schools, the lack of a cohesive village school system particularly with admissions causes problems. This, in All Saints ward has been exacerbated by the close of Stoke village school. Some parents in one village are now in the situation that their children of different ages all attend schools in different locations rather than being educated at a single school. The implications are obvious and this needs to be addressed.

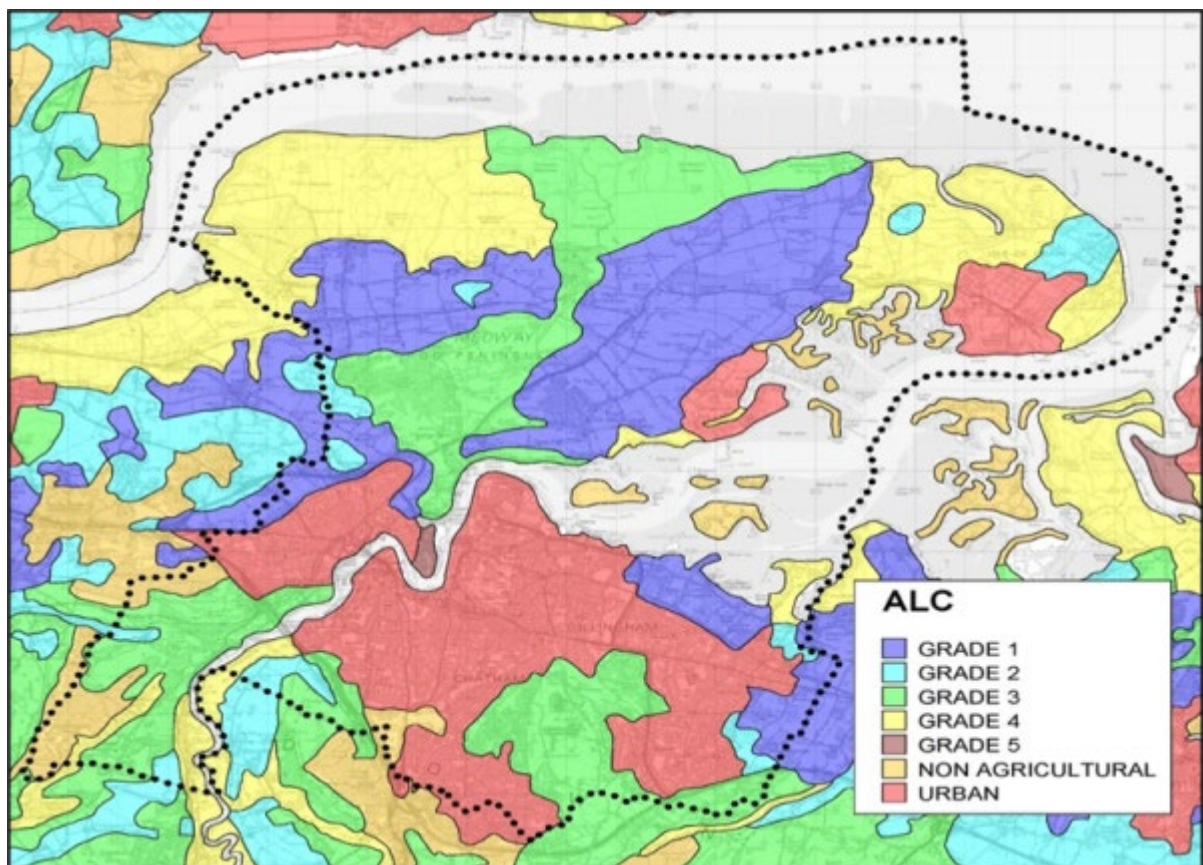
Medway has a wealth of Tourism, culture and visitor accommodation and while Medway offers visitors and residents a wealth of heritage, riverside and countryside settings, parks and open spaces, and free festivals and events each year, the emphasis is on those centrally located attractions rather than those in rural areas such as Slough Fort and the Fenn Bell Zoo.

More needs to be done to promote rural attractions and events.

The rural economy, particularly in All Saints ward and on the peninsula as a whole is vital to the economy of Medway given the abundance of prime farmland as indicated by the map provided.

This needs to be protected. Not only does it offer food production, but it also provides a green lung that contributes to climate control and the natural resource of soil assists with drainage and flood prevention.

It is noted the South East's horticultural production accounts for 1.6% of the total farmed area but delivers around a third of the region's entire agricultural output value. The region grows 40% of the nation's top fruit and soft fruit, much of it in Kent.



Because infrastructure within the countryside is designed for a sparser population, the area is not suitable to development, in particular housing. Any proposals whatsoever need to ensure they do not impact adversely on the environment and existing communities, particularly where it is not appropriate to upgrade infrastructure to facilitate the development.

8. RETAIL AND TOWN CENTRES

While these do not primarily affect All Saints ward, I have commented elsewhere on town centres and those comments apply here.

Rural areas would benefit from a medium sized supermarket accessible for all.

9. TRANSPORT

I have already commented on transport links elsewhere and those comments apply here.

Specifically, the river represents an important transport corridor for commercial and leisure traffic as does the sea. I agree the introduction of a new river crossing and a riverside path could facilitate sustainable transport and address the restrictions that apply to pedestrians and cyclists who are unable to use the Medway Tunnel, or where the local road network is not conducive to walking and cycling.

The Grain Branch Line

Serious consideration should be given to the reintroduction of passenger services on the Grain branch line.

It could be modelled on the service that currently runs from Sittingbourne to the Isle of Sheppey.

The benefits are obvious.

In respect of Riverside infrastructure, one notes that London Thamesport and Medway's docks and wharves are of regional importance, facilitating the bulk transport, handling and processing of minerals, waste and other defined materials.

Yet again one cannot fathom why Chatham Docks should be redesignated

I further note there exists already a network of piers, jetties, slipways, steps and stairs are interspersed along the urban stretches of the river but some of these facilities are in a poor state of repair.

Attention needs to be focused on having excellent access points to the river with a view to greatly increasing river traffic.

In addition, access to shared mobility, such as e-bikes, e-scooters and electric vehicle car clubs is to be encouraged through a Travel Plan for medium and longer distance journeys.

10. HEALTH AND COMMUNITIES

I agree the Local Plan has a key role to play in reducing health inequalities to improve health and wellbeing through the planning process by setting out objectives which aim to mitigate against these inequalities. For these reasons a more urban focus to housing development is desirable.

In respect of recreational spaces and facilities, where possible, existing facilities that are underused should be offered to local clubs or organisations on a partnership basis.

There should be equal attention to Council owned facilities such as sports centres. Council owned pitches should be maintained to best possible standards, and not treated as income generating cash cows. Clubs pay for those facilities, and they have a right to expect them to be maintained.

There should be more cooperation with parish councils, many of who are responsible for play parks and facilities such as villages halls and some sports pavilions.

CONCLUSION

I cannot endorse any of the three growth options as they stand. Each has flaws in my opinion.

Small scale development in rural areas and villages is not unreasonable particularly if it is of a social housing nature for people of those areas and communities, or those wishing to move to that area for reasons of employment or closer family ties.

Pressure needs to be applied to Government for the provision of new GPs, associated staff and major medical facilities. Similarly, funds for larger scale infrastructure projects asl need to be sought.

I would support the Urban focus option with some changes.

Chatham Docks should be removed from any housing development designation and remain a primary source of employment and industry.

The potential housing shortfall this may entail would be taken up by those developments already in the pipeline but not shown on that particular map, along with small development parcels in the rural areas as indicated above for the reasons indicated above.

It is appreciated a considerable amount of development befalls Hoo under the urban focus option, but continuing the expansion there, does safeguard the village of High Halstow and other rural areas from any significant development.

In any event, Hoo is well on the way to being the latest town within Medway. Things could have been considerably different had a local councillor not made certain choices a few years back. It would seem perverse to come this far and then stop. Furthermore, if any major infrastructure funding comes along, as was shown with the aborted HIF project, very little would make it past Hoo.

For the reasons above I prefer an urban focus led option but with the changes mentioned.



Councillor Christopher Spalding
Member for All Saints Ward

Medway Green Party – Council Local Plan Response

Collated Big Picture Questions

1. *What are the key issues that you want the plan to address and how?*

- Climate change resilience by planning for increased storm water run-off, protecting low-lying land from flooding and thoroughly insulating existing and new dwellings against excessive cold and heat.
- Homes for everyone by providing the right dwellings, in the right places and in the right numbers.
- Conduct our own Housing Needs Assessments on a ward-by-ward basis and reject national formulas that do not appreciate the nuances of Medway.
- Prioritise Council and social housing, conversion of homes for the elderly and disabled.
- Equality for everyone by providing employment opportunities, transport, services and community facilities for all the people of Medway.
- 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.
- Protection of much needed farmland by realising that food security is of paramount importance and good agricultural land is irreplaceable.
- No new developments on Grade One agricultural land or flood plains, as this cannot be undone, and such actions will have repercussions to future generations ability to tolerate pressure from climate change.
- Address the dramatic and tragic decline in Medway's cultural space. For example, people moving into the area for commuting must be encouraged and enabled to spend their money here.
- Arts venues and entry into the creative arts for local people must be supported.

2. *Which of the growth options do you prefer, and why?*

- Urban Focus is the primary option for Medway.
- The indicative sites identified under the Urban Focus provide easily sufficient capacity for a managed and sustainable development, and focus on development on brownfield sites in keeping with NPPF guidelines.
- Under the rural or blended options, the use of high-grade agricultural lands and flood plains would have major negative long-term consequences for Medway's residents by depleting our environmental resilience.
- Sites listed for development in the rural or blended areas have vastly insufficient road access, poor public transport connectivity and require significant new supporting infrastructure coming at significant economic and environmental cost.
- Prioritise urban and brownfield sites and only when that is reasonably exhausted, and there is strong evidence of the need for more development, should we consider developing in more rural areas.

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

- To combine the traditional town planning skills of forward thinking and data handling with our current technological knowledge to use for the common good of the residents of Medway and the wider community.
- New Houses should be built to the equivalent of Code 6 of the Code for Sustainable Homes.
- 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.
- Avoiding agricultural land and flood plains.
- Ensuring that capacity of local services such as GPs, dentists, schools and public transport, is increased before any major new housing. 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?*

- It is important to look at the bigger picture which could include looking at the developments in the whole of the South East of England. It is evident from population density figures that some areas have historically had far fewer people per square kilometre than others.
- Maidstone Borough Council, for example, has had 395 people per square kilometre while Medway has had 1,454 people per square kilometre. Therefore, Medway has 3.68 times the density of population that Maidstone has. Similar density disparities exist between Medway and both Tonbridge and Malling Borough Council and Sevenoaks District Council.
- Medway Council must bring this issue to the attention of the new Labour Government. Housing targets for different areas in Kent need to take this situation into consideration.
- Medway Council needs to challenge the new Labour Government's continuing use of the Standard Method. The National Census of 2021 population growth projection until 2040 indicated that in Medway we need to build 442 dwellings for households with 2 plus members and not the 1,816 suggested by the Standard method.

1. Natural Environment

1.1 S1 – PLANNING FOR CLIMATE CHANGE

- 1.1.1** Development should actively involve local communities in decision-making processes to ensure that climate adaptation and mitigation strategies reflect the priorities and needs of local populations. This engagement will promote democratic, community-led planning, ensuring that residents have influence over spatial planning, green infrastructure, and local service provision.
- 1.1.2** Encourage the establishment of community-owned renewable energy projects, cooperative housing developments, and local production systems. This will decentralise energy and resource control, support local economies, and reduce emissions through the collective ownership and operation of low-carbon infrastructure and services.
- 1.1.3** Prioritise the implementation of green infrastructure in low-income, flood-prone communities to enhance resilience and protect vulnerable populations. This infrastructure should be designed to

serve multiple functions, including carbon sequestration, local food production through community gardens, allotments, and biodiversity support.

1.2 POLICY S2 – CONSERVATION AND ENHANCEMENT OF THE NATURAL ENVIRONMENT

- 1.2.1** The Council will support the establishment of community-led conservation efforts, encouraging residents to support the stewardship of nature reserves, wildlife sites, and habitat restoration efforts. This will foster long-term, sustainable management of natural resources and promote environmental awareness.
- 1.2.2** Development should prioritise the enhancement and restoration of ecosystems that contribute to climate resilience, including wetlands, salt marshes, and ancient woodlands, which play a critical role in carbon sequestration, flood management, and temperature regulation. The Council will promote nature-based solutions, such as rewilding and afforestation, to mitigate the impacts of climate change and reduce flood risks, while ensuring biodiversity is able to thrive.

1.3 S3 – NORTH KENT ESTUARY AND MARSHES DESIGNATED SITES

- 1.3.1** Prioritise the restoration and expansion of degraded natural habitats, such as wetlands, marshes, and mudflats, in addition to their conservation. Restoration projects must aim to rewild degraded areas, improve habitat connectivity, and enhance biodiversity corridors to support a wider range of species.
- 1.3.2** Development proposals near the North Kent Estuary and Marshes must integrate adaptive management strategies that enhance the resilience of ecosystems to climate change. Measures may include the protection of coastal wetlands from sea level rise, promoting species diversity to strengthen ecosystem stability, and creating buffer zones to accommodate shifting habitats. Regular monitoring will ensure that ecosystems can adapt dynamically to environmental changes, ensuring their long-term health and function.
- 1.3.3** All new developments within the 6km Zone of Influence must integrate green infrastructure solutions that complement and enhance natural ecosystems. These measures include the use of rain gardens, bioswales, permeable surfaces, and green roofs to reduce runoff and improve water quality. By mimicking natural processes, green infrastructure will support biodiversity, reduce the pressure on wetlands and estuaries, and help manage the effects of increased rainfall and flooding due to climate change.

1.4 S4 – LANDSCAPE PROTECTION AND ENHANCEMENT

- 1.4.1** Development proposals must integrate strategies to strengthen biodiversity corridors and ecological networks within Medway's landscape. This includes preserving existing natural habitats and creating new connections between them, ensuring wildlife can thrive and adapt to climate change. Native vegetation must be considered in landscape designs, particularly along key ecological corridors, to enhance species diversity, protect against habitat fragmentation, and improve the resilience of local ecosystems to environmental changes.
- 1.4.2** Proposals must demonstrate how they incorporate green and blue infrastructure to improve the landscape's resilience to climate change. In coastal marshes, river valleys, and other sensitive areas, nature-based solutions, such as wetlands restoration and rainwater harvesting systems,

should be implemented to manage flood risks, reduce water pollution, and enhance biodiversity. These climate-resilient features must contribute to both the ecological integrity of the landscape and the well-being of local communities by providing sustainable, multi-functional landscapes.

- 1.4.3** Prioritise the restoration of degraded coastal and wetland ecosystems, including salt marshes and inter-tidal areas, to increase their resilience to sea level rise and other climate change impacts. Restoration efforts must aim to enhance biodiversity, improve flood defences, and sequester carbon. Development in these areas should incorporate adaptive measures that protect coastal habitats from future climate risks, ensuring long-term ecological health and landscape integrity.

1.5 S5 – SECURING STRONG GREEN AND BLUE INFRASTRUCTURE

- 1.5.1** Focus on the restoration of degraded ecosystems and support the creation of Nature Recovery Networks across urban and rural Medway. Development proposals must integrate habitat restoration plans and rewilding initiatives, aimed at enhancing biodiversity and promoting species recovery. These networks will be strategically aligned with the Kent and Medway Local Nature Recovery Strategy to ensure connectivity between habitats, enabling species migration and climate adaptation. Proposals must also include measures to enhance natural habitats in existing urban areas through retrofitting nature-based solutions, such as green roofs, wildlife corridors, and pollinator-friendly planting.

- 1.5.2** Ensure that all new development incorporates climate-resilient green and blue infrastructure. This includes the use of sustainable drainage systems (SuDS), wetland creation, and floodplain restoration to manage flood risks and improve water quality. Urban areas must integrate green spaces designed to combat heat island effects, enhance stormwater management, and create microclimates that benefit both people and wildlife. Green infrastructure plans should consider the protection of water bodies, riverbanks, and coastal areas to enhance ecosystem services and mitigate the effects of sea level rise.

- 1.5.3** Support expanding public access to high-quality green and blue spaces, including riversides, parks, and wildlife corridors, while ensuring sensitive ecosystems are protected from overuse. Development proposals must provide for improved connectivity through well-maintained walking and cycling routes, enhancing public access to nature. However, in areas of ecological sensitivity, such as wetlands, marshes, and ancient woodlands, zoning and management plans must be implemented to protect biodiversity from visitor pressure. Low-impact recreation, nature education, and community stewardship will be encouraged to foster a culture of conservation while promoting public health and well-being.

1.6 S6 – KENT DOWNS AREA OF OUTSTANDING NATURAL BEAUTY NATIONAL LANDSCAPE

- 1.6.1** Focus on the integration of climate change mitigation and adaptation measures within the Kent Downs AONB. Proposals must demonstrate how development will contribute to climate resilience, including the expansion of woodland and tree cover, restoration of natural habitats, and promotion of sustainable agricultural practices. Solutions, such as increasing carbon sequestration through reforestation and enhancing natural water management systems, should be central to all major development proposals. Strategic landscape management will aim to mitigate the impacts of climate change, including droughts, floods, and heatwaves, to ensure the long-term sustainability of the landscape.

1.6.2 Development within and surrounding the Kent Downs AONB must contribute to the enhancement of biodiversity through targeted restoration efforts. Priority will be given to projects that restore degraded landscapes and ecosystems, such as grasslands, wetlands, and ancient woodlands, while also promoting rewilding initiatives and habitat creation to support species recovery. The Council should encourage the reintroduction of native species and the connection of fragmented habitats to create functional ecological corridors. Proposals should integrate habitat restoration plans in line with the Kent Downs AONB Management Plan and the Kent and Medway Local Nature Recovery Strategy, ensuring that the natural capital of the landscape is maintained and enhanced.

1.6.3 Safeguard the tranquillity and distinctive rural character of the Kent Downs AONB from development pressures, ensuring that light pollution, noise, and inappropriate urban expansion are minimised. Development proposals must respect the visual integrity of the landscape, protecting long-distance views, particularly from key vantage points, and ensuring that the design, scale, and materials used in any construction are in keeping with the traditional aesthetic and natural beauty of the area. The Council should enforce strict guidelines on lighting to prevent light pollution and should encourage the use of natural and locally sourced materials to preserve the area's heritage and sense of place.

1.7 DM1 – FLOOD AND WATER MANAGEMENT

1.7.1 Promote the creation of multifunctional green corridors and blue infrastructure (e.g. wetlands, urban forests, rain gardens) that not only manage flood risk but also enhance biodiversity, improve air and water quality, and provide public recreation spaces. This would encourage a nature-based solution approach, contributing to both ecological preservation and community well-being.

1.7.2 Mandate that, where possible, flood risk management infrastructure and new developments utilise renewable energy sources (e.g. solar panels, wind power) and energy-efficient designs to minimise emissions.

1.7.3 Introduce a community-focused flood risk management strategy, fostering collaboration between residents, businesses, and authorities to co-design and co-manage flood defence systems.

1.8 DM2 – CONTAMINATED LAND

1.8.1 Encourage the use of bioremediation and phytoremediation techniques that utilise plants, fungi, and microbes to naturally clean contaminated soil and water. These methods can improve biodiversity by creating green spaces that enhance the ecosystem while mitigating pollution.

1.8.2 Involve local communities in the redevelopment process, offering opportunities for co-ownership of remediated brownfield sites and prioritising community-driven projects that cater to local needs, such as affordable housing, public green spaces, and community centres.

1.8.3 Require all remediation and development activities on contaminated land to follow low-emission construction practices, including the use of electric or hybrid machinery, waste reduction strategies, and the minimisation of greenhouse gas emissions.

1.9 DM3 – AIR QUALITY

- 1.9.1** Incorporate requirements for urban greening initiatives and the enhancement of green infrastructure as a core part of air quality management. This includes expanding tree canopies, creating green walls, and developing urban parks and green corridors which can help absorb pollutants, provide cooling effects, and improve overall air quality.
- 1.9.2** Develop and support community-led air quality improvement programs that engage residents in monitoring, reporting, and improving air quality. This could include science projects, air quality monitoring networks, and local workshops to educate and involve residents in air quality management.
- 1.9.3** Implement climate-responsive development standards that mandate specific targets for reducing emissions and improving air quality. This includes setting stringent requirements for low-emission construction practices, renewable energy use, and energy efficiency.

1.10 NOISE AND LIGHT POLLUTION

DM4 –

- 1.10.1** Enhance the policy by incorporating nature-based solutions for noise and light pollution mitigation. For example, integrating vegetative barriers like trees and shrubs can effectively reduce noise and light spill, while also contributing to local biodiversity.
- 1.10.2** Develop community engagement and education programs to involve residents in understanding and addressing noise and light pollution. This can enhance public awareness and participation in creating a healthier environment.
- 1.10.3** Strengthen the connection between noise and light pollution controls and broader climate and health strategies. Incorporate specific requirements for sustainable design practices that align with climate resilience and public health objectives.
- 1.10.4** Light pollution has the potential to devastate wildlife, and poor outdoor lighting decreases safety by making victims and property more visible. It affects human health, can cause sleep disorders, depression, diabetes, some cancers and more. Reduce glare, shield lights, use motion sensors where possible and reduce harmful blue wavelengths.

1.11 GREEN BELT

S7 –

- 1.11.1** Integrate specific measures to enhance biodiversity and ecosystem services within the Green Belt. This can involve identifying key areas for ecological restoration, enhancing wildlife corridors, and improving habitats for native species.
- 1.11.2** Focus on community involvement in the management and enhancement of the Green Belt. This can involve local engagement in conservation efforts, educational programs, and volunteer opportunities.
- 1.11.3** Strengthen the policy by incorporating strategies for climate resilience and adaptation within the Green Belt. This includes promoting land management practices that enhance the Green Belt's ability to mitigate climate impacts.

2. Built Environment

2.1 Urgent, coordinated action is needed to improve community cohesion. The violence and fear of the summer has shown the risks of ignoring community tensions and not effectively challenging racism, Islamophobia and xenophobia.

2.2 It is important to note the role of substance abuse and social media disinformation and to proactively address them in Medway.

2.3 Focus on flexibility and multi-purpose use of cultural spaces. Commit to using these spaces to celebrate our fascinating history and diverse communities, and to support community building.

2.4 Resilient development means avoiding grade 1 agricultural and flood risk land.

2.5 T1 – PROMOTING HIGH QUALITY DESIGN

2.5.1 Implement sustainable drainage systems (SuDS) to manage flood risks and enhance water conservation. Promote the use of energy-efficient building technologies and renewable energy sources. Include design features that reduce exposure to air pollution and noise, such as buffer zones and green walls. Ensure new developments are designed to promote physical activity by integrating walkable urban layouts and accessible green spaces.

2.5.2 Mandate that a proportion of new housing units be affordable and socially rented, aligning with local housing needs assessments. Design shared community spaces and multi-functional public areas to encourage social interaction and inclusivity. Promote mixed-use developments that integrate residential, commercial, and community facilities to create vibrant, cohesive communities. Ensure that all new developments include accessible housing for people with disabilities and adaptable features to accommodate changing needs.

2.6 DM5 – HOUSING DESIGN

2.6.1 New housing developments must integrate green infrastructure to support nature preservation and biodiversity. This includes incorporating features such as green roofs, walls, and hedges, as well as creating habitat corridors and local wildlife refuges. The design should support biodiversity net gain (BNG) principles, ensuring that developments contribute positively to local ecosystems. Measures should include the planting of native species, creating pollinator-friendly spaces, and maintaining or enhancing natural water management systems to mitigate flood risks.

2.6.2 All new developments must include provisions for affordable housing that meets the specific needs of the community, including low-income and vulnerable populations. Additionally, developers must engage with local communities through consultation processes to ensure developments meet their needs and preferences. This should include providing space for community facilities, promoting mixed-use developments, and supporting local economic activities.

2.6.3 Developments must prioritise sustainability by integrating renewable energy sources, such as solar panels, and incorporating energy-efficient designs to minimise carbon emissions. Housing designs should include features for natural ventilation, daylighting, and thermal comfort to improve residents' health and reduce reliance on artificial heating and cooling. Additionally, developments should provide access to green spaces and recreational areas to promote physical and mental well-being. Measures to address air quality, such as reducing emissions from construction activities and promoting non-motorised transport options, should be included.

2.7 DM6 – SUSTAINABLE DESIGN AND CONSTRUCTION

- 2.7.1** All new developments must incorporate green infrastructure elements, such as green roofs, walls, and permeable landscaping, to enhance local biodiversity and contribute to flood prevention. Developments should integrate habitat creation features, like bird and bat boxes, and native plant species to support local wildlife and ecosystems. A biodiversity management plan should be submitted with planning applications to demonstrate how the development will positively impact local flora and fauna, contributing to biodiversity net gain (BNG).
- 2.7.2** Developments must incorporate climate resilience strategies, such as passive design techniques to minimise energy use, and renewable energy systems like solar panels and rainwater harvesting. Design should include measures for climate adaptation, such as flood-resistant construction and heat mitigation through green roofs or reflective materials. All new buildings should be designed to meet or exceed net-zero carbon standards, considering both operational and embodied carbon impacts. Where applicable, the use of circular economy principles should be integrated, including the reuse and recycling of materials.
- 2.7.3** Developments must ensure affordability and inclusivity by incorporating accessible design features for people with disabilities and providing affordable housing options in line with local needs. Engagement with local communities should be part of the planning process to ensure developments meet the diverse needs of residents and foster community cohesion. Proposals should include measures to support public health, such as access to green spaces, recreational facilities, and safe, walkable environments. Designs should also facilitate remote working by including infrastructure for high-speed internet access.

2.8 DM7 – SHOPFRONT DESIGN AND SECURITY

- 2.8.1** Proposals for new shopfronts should integrate green design elements where possible, such as vertical gardens, green walls, or planters, to enhance urban biodiversity and contribute to the overall environmental sustainability of the street scene. Materials used should be sustainably sourced and environmentally friendly. Additionally, where feasible, shopfronts should include measures to improve energy efficiency, such as LED lighting and solar panels, while maintaining the aesthetic integrity of the building.
- 2.8.2** Shopfront designs should contribute to the vibrancy and safety of the street by incorporating features that enhance public health and community cohesion. This includes providing clear, well-lit shopfronts that contribute to a sense of security and encourage foot traffic. Designs should also consider accessibility for all users, including those with disabilities. Where possible, shopfronts should incorporate features that facilitate social interaction and community engagement, such as spaces for local art displays or community notice boards.
- 2.8.3** Shopfront proposals should include considerations for climate resilience and flood prevention. This includes using materials and design techniques that can withstand extreme weather conditions and reduce the risk of flooding. Features such as permeable paving, flood-resistant materials, and drainage systems should be considered in the design process. Proposals should also integrate rainwater harvesting systems where feasible and include sustainable drainage solutions to manage stormwater effectively.

2.9 DM8 – ADVERTISEMENTS

- 2.9.1** Advertisements and signage must prioritise eco-friendly design principles, including the use of sustainable materials and energy-efficient lighting. Proposals should incorporate low-energy LED lighting and ensure that any illumination is designed to minimise light pollution and avoid disruption to local wildlife. Where possible, advertisements should be made from recycled or recyclable materials.
- 2.9.2** Applications for advertisements should include a community consultation process to gather feedback on the proposed design's impact on local amenity and character. This process should involve engaging with residents and businesses to ensure that advertisements contribute positively to the vibrancy and cohesion of the area. Advertisements should also be designed to enhance public spaces, such as incorporating elements that promote local events, public health messages, or community initiatives.

2.10

S8 –

HISTORIC ENVIRONMENT

- 2.10.1** Encourage community involvement in the conservation and interpretation of heritage assets by facilitating workshops, educational programs, and public events that highlight the value of the historic environment. Developments should ensure that heritage assets are accessible to all members of the community.
- 2.10.2** Promote the integration of heritage assets into affordable housing projects where feasible, ensuring that historic buildings are considered in the provision of housing that meets council needs.

2.11

DM9 –

HERITAGE ASSETS

- 2.11.1** Development proposals affecting heritage assets should integrate measures that enhance environmental sustainability and biodiversity. This includes incorporating green infrastructure such as vegetation, wildlife habitats, and sustainable drainage systems to improve the ecological value of the site. Proposals should also consider the use of environmentally friendly materials and techniques that minimise ecological impact.
- 2.11.2** Development proposals should involve community engagement processes, particularly in areas surrounding heritage assets, this may include public consultations and partnerships with local organisations. Improvements to public access and the incorporation of health-promoting features, such as green spaces and recreational areas, should be included in the development of historic parks and gardens.

2.12

S9 –

STAR HILL TO SUN PIER

- 2.12.1** Proposals within the Star Hill to Sun Pier area should adhere to high standards of sustainable development and promote public health. This includes implementing energy-efficient building practices, reducing harmful emissions, and enhancing pedestrian and cyclist access to encourage active lifestyles.

2.13

DM10 –

CONSERVATION AREAS

- 2.13.1** Proposals for development within Conservation Areas must demonstrate active community engagement throughout the design and planning process. This includes consulting with residents, businesses, and heritage groups to ensure that development aligns with the community's needs.
- 2.13.2** Development proposals within Conservation Areas should prioritise public health and sustainable design principles. This includes incorporating features that promote active lifestyles, such as pedestrian-friendly paths and accessible green spaces. Additionally, developments should adhere to high standards of sustainability, including energy-efficient building practices and low-emission materials, to reduce environmental impact and support overall public well-being.

2.14 SCHEDULED MONUMENTS AND ARCHAEOLOGICAL SITES

DM11 –

- 2.14.1** Development proposals that may impact Scheduled Monuments or Archaeological Sites must also consider environmental and biodiversity impacts. This includes conducting environmental impact assessments that evaluate potential effects on local ecosystems and biodiversity. Developers should incorporate measures to enhance local habitats and wildlife corridors as part of their plans, ensuring that any archaeological work does not negatively impact the surrounding natural environment.

3. Housing

- 3.1** Preferred spatial growth option – Urban Focus.
- 3.2** The indicative sites provide easily sufficient capacity for a managed and sustainable development, focussing on brownfield sites (as per NPPF) and only when that is reasonably exhausted, and there is strong evidence of the need for more, should we consider developing in more rural areas.
- 3.3** Under the rural or blended options, the use of high-grade agricultural and flood risk land would have major negative long-term consequences for Medway's residents, depleting our environmental resilience.
- 3.4** Many sites listed in the rural or blended options have vastly insufficient road access, poor public transport and would require significant new infrastructure at significant economic and environmental cost.
- 3.5** These are worthwhile objectives, but they will not be met if we allow development on Grade 1 agricultural land or flood-risk areas.
- 3.6** To help ensure policy making and funding supports these objectives the Plan should recognise that these actions will improve residents' mental and physical health resulting in financial benefit to the Council through increased economic productivity and reduced demand on services.
- 3.7** Delivering on these objectives will require new jobs and skills, so our employment and learning strategy should prioritise our green future, and busses are the most important public transport for equitable travel.
- 3.8** T2 – HOUSING MIX

3.8.1 The Standard Method does not reflect the latest 2021 population growth projections. In light of those projections, the Council should challenge the number of houses required to central government. In addition, the Council should be highlighting the fact that we have 3 times the density of population as Maidstone and many other surrounding areas.

3.8.2 Development will only be approved if they fully comply with the Local Housing Needs Assessment as determined by a ward-by-ward Housing Needs Assessment.

3.8.3 Neighbourhood plans should be encouraged to include Housing Needs Assessments.

3.9 T3 – AFFORDABLE HOUSING

3.9.1 There shouldn't be any housing development on Greenfield sites. Affordable housing should be on brownfield sites close to transport links and local facilities.

3.9.2 Truly affordable housing is essential to offset the historic damage that has been done to our social housing inheritance by selling off our nations hard-won social housing stock at knock down prices.

3.9.3 Affordable housing is an essential part of the housing market facilitating flexibility of movement onto and within the market.

3.9.4 In terms of delivering low-cost affordable housing, an in-depth housing need assessment at ward or Neighbourhood plan level would indicate the necessary split needed between social affordable rent and intermediate low-cost home ownership.

3.9.5 The Council needs to be urging central government to scrap the 'Right To Buy' immediately.

3.10 T4 – SUPPORTIVE HOUSING

3.10.1 Encourage the conversion of underused or vacant properties into various types of supported housing for older adults. This could include converting large family homes into multiple self-contained units or adapting existing buildings into care homes or assisted living facilities. Provide incentives for property owners and developers to undertake these conversions, such as grants, tax breaks, or streamlined planning permissions.

3.10.2 Integrate flexible design standards into new developments and renovations that allow properties to be easily adapted to different needs over time. This includes features like wider doorways, step-free access, and adaptable layouts that can be modified as residents' needs change. Establish guidelines for retrofitting existing properties with these adaptable features to ensure they remain suitable for older residents.

3.10.3 Create community-based housing solutions that integrate older adults into the wider community while providing necessary support services. This could involve developing mixed-use housing projects that include affordable and supported housing options alongside community facilities like healthcare centres, recreational spaces, and social services. Engage with local communities to identify their specific needs and preferences for supported housing solutions.

3.11 T5 – STUDENT ACCOMMODATION

3.11.1 Ensure that student accommodation developments are designed to integrate seamlessly into the surrounding community by including mixed-use elements that benefit residents. This could involve ground-floor retail spaces, community facilities, or affordable housing units within or near the student accommodation. Additionally, establish policies to prevent the displacement of

existing residents by ensuring that the development does not lead to the loss of affordable or family housing.

- 3.11.2 Establish a formal collaboration framework with local educational institutions to regularly assess and forecast student accommodation needs. This can be achieved through annual or bi-annual meetings with universities and colleges, as well as integrating their input into the planning process.

3.12 T6 – MOBILE HOMES

- 3.12.1 Additional trading standards resources are needed to prevent mis-selling of park homes as bungalows by agents and platforms.
- 3.12.2 A comprehensive community engagement plan must be developed for all new mobile home park developments and expansions. This plan should involve current and prospective residents in the planning process, ensuring their needs and rights are considered. Engagement should include consultations and feedback mechanisms to address any concerns and align developments with community interests

3.13 T7 – HOUSEBOATS

- 3.13.1 Understand the extent of privately rented houseboats and ensure that residents understand their rights as licensees rather than tenants.
- 3.13.2 A community engagement strategy must be developed for all proposals affecting houseboats. This strategy should involve current and prospective residents in the planning process, addressing their concerns and needs. Proposals must ensure access to adequate sanitation facilities, emergency services, and other public health requirements. Developments should respect the rights of residents to a safe and healthy living environment.

3.14 T8 – HOUSES OF MULTIPLE OCCUPATION

- 3.14.1 An in-depth ward-by-ward Housing Need Assessment leading to delivering appropriate actual housing need would result in Houses of Multiple Occupation being about resident's choice and not about their limited options.
- 3.14.2 HMOs can be a valuable part of the housing mix, but they can also have the worst standards and be home to exploitation.
- 3.14.3 Medway needs more Environmental Health Officers, Tenancy Relations Officers and wider housing enforcement team, not least to help properly enforce the new Renters Rights Bill.

3.15 T9 – SELF-BUILD

- 3.15.1 Include specific environmental and biodiversity standards for self-build and custom housebuilding projects. This can involve mandating features such as green roofs, wildlife-friendly landscaping, and the use of sustainable materials. The policy should also encourage self-builders to adhere to best practices for minimising ecological impact.
- 3.15.2 Self-build and custom build homes must meet high standards for climate resilience and energy efficiency. Developments should integrate renewable energy sources, such as solar panels or heat pumps. All new builds should adhere to the latest energy efficiency regulations and aim for net-zero carbon emissions. Applicants should be encouraged to provide evidence of these measures in their planning applications.

3.16 T10 – GYPSY, TRAVELLERS and TRAVELLING SHOWPEOPLET

- 3.16.1 Proposals for new Gypsy, Traveller, and Travelling Showpeople sites must include a community engagement plan. Site management plans should address potential conflicts and promote social cohesion by providing appropriate amenities and services. Additionally, measures should be included to ensure respect for the individual rights of all residents and to create a positive relationship with the settled community.
- 3.16.2 New and existing sites for Gypsy, Traveller, and Travelling Showpeople must include provisions for integrated health and social support services. This includes ensuring access to on-site health facilities, mental health support, and community liaison services. The Council will work with local health providers to ensure that these services are culturally sensitive and meet the specific needs of these communities.

3.17 T11 – SMALL SITES AND SME HOUSEBUILDERS

- 3.17.1 Developments on small sites must include measures to enhance and preserve local biodiversity. This includes creating green corridors, incorporating native plant species, and providing habitats for local wildlife. Developers are required to submit a biodiversity management plan as part of their application, demonstrating how their project will contribute to local nature preservation and improve ecological value.
- 3.17.2 All new developments must meet or exceed the latest energy efficiency standards, such as those outlined in the Future Homes Standard. This includes high-quality insulation, energy-efficient windows, and low-energy appliances. Developers must provide an energy performance certificate (EPC) demonstrating that the development meets the required standards.

4. Economic Development

- 4.1 Green skills and jobs must be the top priority, including retrofit, community energy and environmental management. There should be an additional focus on data literacy and technology skills, to better protect and empower people.
 - 4.2 To better help people back to work, we should focus on strengths-based support rather than the standard punitive approach, improve mental and physical healthcare and recognise volunteering as a step towards employment.
 - 4.3 Given demographic changes, we should future-proof our employment to help older people retain fulfilling roles in our economy.
 - 4.4 Improved childcare and adult social care will help many under-employed people and full time carers to increase or restart work.
- ### 4.5 S10 – ECONOMIC STRATEGY
- 4.5.1 Prioritise employment developments that align with net-zero carbon targets, such as those in the renewable energy, green construction, and low-carbon technology sectors. The development of green industries will be promoted in Innovation Park Medway and Hoo Peninsula, with a focus on utilising clean technologies and reducing emissions to ensure future generations have the skills and knowledge to adapt to a changing climate.
 - 4.5.2 New employment developments, especially in regeneration areas, must integrate accessible, affordable housing options, alongside pedestrian-friendly infrastructure and reliable public transport. This will reduce commuting-related emissions, promote social cohesion, and support a balanced and inclusive economy.

4.5.3 Encourage businesses to adopt flexible working arrangements, offering tax incentives, grants, or subsidies for companies that reduce commuting through remote work practices. This initiative aims to decrease transport-related emissions, ease traffic congestion, and promote sustainable living in Medway.

4.5.4 Establish Community Employment and Engagement Hubs in each town or neighbourhood, with a focus on supporting lower-income families and underserved areas. These hubs will provide tailored job training, career support, and facilitate local engagement initiatives, ensuring that the specific employment needs of each community are met, and that no areas are left behind.

4.6 S11 – EXISTING EMPLOYMENT PROVISION

4.6.1 Proposals for the redevelopment of employment land must demonstrate how the design will contribute to biodiversity net gain, nature preservation, and green infrastructure. This could include, where possible, urban greening, tree planting, natural landscaping, and provisions for local wildlife.

4.6.2 Redevelopment proposals must include a community engagement plan that identifies and addresses the employment needs of local communities, especially underserved or low-income areas. The plan should outline strategies to create local job opportunities, skills development initiatives, and partnerships with community organisations.

4.7 S12 – NEW EMPLOYMENT SITES

4.7.1 Development on the Hoo Peninsula should be aligned with net-zero transition targets, and consider nature depletion and community impacts from infrastructure, like road development.

4.7.2 New employment sites must incorporate green infrastructure and biodiversity enhancement measures, such as urban greening, tree planting, and wildlife corridors.

4.7.3 The Council should consider incentives or preferential treatment spontaneous spaces for creative sectors that thrive on lower-cost, informal spaces. The future economy should not only focus on jobs that create an immediate economic return, but also jobs that help create diverse business activities that contribute to a long-term community and social vibrancy.

4.8 S13 – INNOVATION PARK MEDWAY

4.8.1 Add requirements for developments in the park to include climate change adaptation features such as permeable surfaces. Additionally, ensure all new buildings meet high energy efficiency standards and integrate renewable energy sources like solar panels.

4.9 T12 – LEARNING AND SKILLS DEVELOPMENT

4.9.1 Expand the focus on adult education and apprenticeship schemes to explicitly target underserved and low-income communities. This could involve the creation of community learning hubs in lower-income neighbourhoods, providing free or subsidized access to courses that improve employability, such as digital skills, green technologies, or healthcare training.

4.9.2 Promote sustainable and active travel (cycling, walking, public transport) for students and staff. Incentives for schools and higher education institutions to adopt comprehensive travel plans that focus on low-carbon transport options should be introduced. This includes installing secure bicycle parking, providing e-bike schemes, and ensuring campuses are accessible via public transportation.

4.9.3 Partner with local employers and Medway Council to create a formal graduate retention program, offering recent graduates employment opportunities within the council or local businesses.

- 4.9.4 Develop partnerships between universities, colleges, and local businesses to provide students with internships and apprenticeships that offer hands-on experience in industries critical to Medway's economy (e.g. technology, healthcare, green industries, and creative sectors).
- 4.9.5 Provide vocational training programs within prisons that focus on developing in-demand skills, such as carpentry, plumbing, welding, coding, renewable energy installation, and other technical trades. Ensure these programs offer industry-recognised certifications that can be applied directly to post-release employment.
- 4.9.6 Implement transitional employment programs that offer paid work experience to prisoners nearing the end of their sentences.

4.10 T13 – TOURISM, CULTURE AND VISITOR ACCOMMODATION

- 4.10.1 Developments must include community-focused elements, such as affordable cultural and recreational activities, and community spaces accessible to residents. Measures should also be taken to ensure that tourism opportunities are inclusive and accessible to low-income families.
- 4.10.2 Encourage the development of ecotourism initiatives and rewilding projects that promote environmental stewardship and biodiversity. These initiatives should be integrated into the broader tourism strategy to create sustainable, low-impact tourism experiences that benefit both local ecosystems and communities.

4.11 S14 – SUPPORTING MEDWAY'S CULTURE AND CREATIVE INDUSTRIES

- 4.11.1 Support the creation of affordable and sustainable creative spaces, including studios, workshops, and performance venues, that cater to emerging artists and small creative businesses. Encourage developments to incorporate flexible spaces that can adapt to various uses and ensure that new creative facilities are designed to minimise their carbon footprint and energy consumption.
- 4.11.2 Cultural and creative developments should actively partner with local addiction recovery organisations to design and manage dedicated recovery spaces.

4.12 T14 – RURAL ECONOMY

- 4.12.1 Add a requirement for flood risk assessments and prioritise alternative sites that do not compromise high-quality agricultural land or areas prone to flooding.
- 4.12.2 Develop a standardised framework or guidelines for evaluating and mitigating environmental impacts, ensuring that all developments contribute positively to biodiversity and heritage conservation.
- 4.12.3 Establish clear standards or targets for broadband improvements, ensuring that rural communities benefit from better digital infrastructure, which is crucial for economic and social development.

5. Retail and Town Centres

5.1 S15 – TOWN CENTRES STRATEGY

- 5.1.1** Implement measures to reduce harmful emissions by encouraging the use of electric vehicle charging points, promoting energy-efficient public transport links, and requiring new developments to meet high sustainability standards. Consider incorporating strategies for flood

prevention and climate resilience, such as permeable surfaces and rain gardens, in the town centre planning process.

5.1.2 Include provisions for community-focused engagement, such as public consultations and feedback mechanisms, to ensure that developments meet the needs of diverse populations.

5.1.3 Ensure that town centres have facilities and services that address social isolation and promote community health. For example, designate spaces for health-related activities such as blood donation centres, health screenings, mental health first aid stations, and community health workshops. Encourage the establishment of community hubs that provide access to health services, support groups, and social activities to combat isolation.

5.1.4 Mandate the inclusion of community health and wellness facilities in new town centre developments.

5.2 S16 – HIERARCHY OF CENTRES

5.2.1 Ensure that all centres in the hierarchy incorporate green infrastructure and biodiversity-enhancing features.

5.2.2 Include requirements for all new and existing centres to implement energy-efficient technologies, such as renewable energy sources and low-carbon heating systems.

5.3 T15 – SEQUENTIAL ASSESSMENT

5.3.1 Ensure that the sequential assessment not only prioritises in-centre locations but also evaluates environmental and community impacts.

5.3.2 Ensure that the sequential assessment supports inclusive and accessible development.

5.4 T16 – ANCILLARY DEVELOPMENT

5.4.1 Proposals should demonstrate how they will adapt to and mitigate the impacts of climate change. This will ensure that ancillary developments contribute to the overall resilience of the area and do not exacerbate flood risks.

5.5 T17 – IMPACT ASSESSMENT

5.5.1 Mandate that all impact assessments for retail and leisure developments in edge or out-of-centre locations include evaluations of environmental impacts (e.g. effects on local biodiversity, emissions, and flood risks) and social impacts (e.g. effects on community health and well-being, accessibility for underserved communities). This ensures that the development does not adversely affect local ecosystems or community cohesion, and supports sustainable development goals.

5.5.2 Developers should be required to provide clear, accessible reports on how community feedback has been incorporated into their proposals. Additionally, establish mechanisms for residents to continue providing feedback throughout the development process. This transparency helps build trust and ensures that community concerns are continuously addressed.

5.5.3 Form advisory panels consisting of residents, community leaders, and representatives from relevant organisations. These panels would review impact assessments and provide recommendations on how proposals can better meet community needs and address concerns.

5.6 S17 – CHATHAM TOWN CENTRE

- 5.6.1** Create open community health spaces similar to the open gym in Rochester Riverfront, the skate park in Jacksons, etc...
- 5.7 DM12 – LOCAL AND RURAL CENTRES**
 - 5.7.1** Mandate that any new developments or refurbishments in local and rural centres include green infrastructure elements such as community gardens, green roofs, or rain gardens. These features will contribute to local environmental sustainability and improve the aesthetic and functional value of the centres.
 - 5.7.2** Encourage developments to integrate biodiversity-friendly features, such as native plantings and habitats for wildlife, to support local ecosystems and promote ecological health.
- 5.8 T18 – SHOPPING PARADES AND NEIGHBOURHOOD CENTRES**
 - 5.8.1** Encourage the inclusion of native plants and pollinator-friendly landscaping in and around these centres to support local wildlife and enhance urban biodiversity.
 - 5.8.2** Encourage the integration of community-based services and businesses, such as farmer's markets, local craft shops, and co-operatives, to strengthen the local economy and keep economic benefits within the community.
 - 5.8.3** Encourage businesses within shopping parades and neighbourhood centres to source their products and services locally. This reduces transportation emissions and supports other local businesses, creating a more resilient and sustainable local economy.
- 5.9 T19 – MEANWHILE USES**
 - 5.9.1** Provide incentives for meanwhile uses that offer affordable space to local startups, community groups, and non-profits.
 - 5.9.2** Require that any structures or fixtures associated with temporary uses be made from sustainable or recycled materials. Temporary uses should aim to have a minimal environmental footprint.

6. Transport

- 6.1 DM15 – MONITORING AND MANAGING DEVELOPMENT**
 - 6.1.1** Require that development proposals include climate resilience assessments to evaluate how they will address potential climate impacts, such as flooding, heatwaves, and severe weather events. These assessments should be integrated into the Strategic Transport Assessment (STA) and the Medway-wide Monitor and Manage Mitigation Strategy.
 - 6.1.2** Encourage development proposals to incorporate principles of inclusive design, ensuring that all developments are accessible to people of all abilities. This should include considerations for public transport access and pedestrian-friendly environments.
 - 6.1.3** Require developers to engage with local communities in the planning process to ensure that developments align with local needs and preferences.
- 6.2 T22 – MARINAS AND MOORINGS**
 - 6.2.1** Applications for new or upgraded marina facilities must include a Climate Impact Assessment, detailing how the development will mitigate climate change impacts. Measures could include energy-efficient infrastructure, renewable energy sources, and low-emission transportation

options. Additionally, developers must engage with the local community throughout the planning process to address concerns, ensure the project meets local needs, and promote inclusivity. A Community Impact Statement should be submitted alongside the application.

6.3 T23 – AVIATION

- 6.3.1** Development and operations at Rochester Airport must incorporate measures to reduce greenhouse gas emissions and improve energy efficiency. This includes promoting the use of low-emission aircraft.

6.4 T24 – URBAN LOGISTICS

- 6.4.1** New or expanded logistics facilities must incorporate green building practices and environmental sustainability measures.
- 6.4.2** Developers must engage with local communities to address their concerns and ensure that logistics facilities do not adversely affect their quality of life.
- 6.4.3** Where feasible, developments involving the loss of B8 (storage or distribution) uses should include provisions for affordable housing or contribute to local housing initiatives.

6.5 T25 – USER HIERARCHY AND STREET DESIGN

- 6.5.1** Design and Access Statements must demonstrate how street design will integrate sustainable urban drainage systems (SuDS) to manage flood risks.
- 6.5.2** Street designs must consider accessibility for all users.

6.6 T26 – ACCESSIBILITY STANDARDS

- 6.6.1** A Community Accessibility Assessment should be included in the Design and Access Statement to evaluate how the development meets the needs of diverse populations.
- 6.6.2** Developments must demonstrate how they will support public health by promoting active transportation options and reducing vehicular emissions. This includes creating safe, well-lit pedestrian and cycling routes, providing access to local amenities, and incorporating features that encourage physical activity.

6.7 DM16 – TRANSPORT ASSESSMENTS, TRANSPORT STATEMENTS AND TRAVEL PLANS

- 6.7.1** All Transport Assessments, Transport Statements, and Travel Plans must include an Environmental Impact Assessment (EIA) and a Climate Impact Assessment. These assessments should evaluate the potential effects of the development on local ecosystems, air and water quality, and climate resilience. Measures to mitigate negative impacts should be integrated into the planning and design stages, including strategies to reduce emissions, manage stormwater, and enhance green spaces. Developers must outline how the project will contribute to biodiversity enhancement and climate adaptation.
- 6.7.2** Travel Plans must specifically address how the development will improve transportation accessibility for underserved and low-income communities. This includes providing affordable public transportation options, ensuring access to key amenities, and designing infrastructure that accommodates individuals with disabilities.

6.7.3 Transport Assessments and Travel Plans should prioritise the integration of green transportation solutions such as electric vehicle charging infrastructure, bike-sharing programs, and pedestrian-friendly pathways.

6.8 DM19 – VEHICLE PARKING

6.8.1 Parking areas should accommodate diverse transportation needs, including bike parking, car-sharing spaces, and electric vehicle charging points.

6.8.2 Developments must include provisions for cycling infrastructure such as secure bike parking, bike repair stations, and connectivity to local cycle networks. The policy should also encourage the use of shared mobility solutions by setting aside parking bays for car-sharing and bike-sharing schemes. For residential developments, integrate measures that reduce the need for personal vehicle use, such as proximity to local amenities and public transport options.

6.9 DM20 – CYCLE PARKING AND STORAGE

6.9.1 Require cycle parking facilities to be designed with flood resilience in mind, using materials and construction methods that can withstand occasional flooding.

6.9.2 Mandate that cycle parking facilities include adaptable designs for individuals with disabilities, such as wider access paths and easy-to-use secure storage.

7. Health, Communities and Infrastructure

7.1 Include greater preventative community mental and physical healthcare including high-quality social prescribing, not just improving access to healthy food and spaces but proactively reducing or disincentivising the most harmful foods and vapes.

7.2 Improving the efficacy of services by prioritising strengths-based, holistic and outcomes-focussed approaches.

7.3 Taking coordinated action to address the epidemic of alcohol and cocaine abuse which causes such violence, abuse, NHS and police costs; this must include expanding mental health provision and services like Open Road.

7.4 Support young people by expanding mental health and gender services and tackling unhealthy smartphone use.

7.5 T27 – REDUCING HEALTH INEQUALITIES AND SUPPORTING HEALTH AND WELLBEING

7.5.1 Expand the policy to include requirements for integrating green infrastructure into new developments. This could involve mandates for creating or enhancing urban green spaces, such as parks and community gardens, that support local biodiversity and provide residents with accessible nature.

7.5.2 Introduce specific measures to address health inequalities among Black and Brown communities.

7.6 T28 – EXISTING OPEN SPACE AND PLAYING PITCHES

7.6.1 Mandate that new or replacement open spaces must be designed to address health disparities and cater to the needs of underserved or low-income communities. This includes ensuring that

open spaces are accessible, safe, and equipped with facilities that promote physical activity and social interaction.

- 7.6.2** Require that any development involving the loss or alteration of open space includes climate resilience measures, such as flood prevention infrastructure (e.g. permeable surfaces, rain gardens) and strategies to mitigate heat island effects (e.g. shaded areas, green corridors). The policy should also mandate that any loss of open space is compensated by creating or enhancing climate-resilient spaces elsewhere.

7.7 S24 – INFRASTRUCTURE DELIVERY

- 7.7.1** Include requirements for infrastructure projects to incorporate measures that improve public health and reduce harmful emissions.

8. Mineral Supply

- 8.1** Introduce specific goals for reducing the carbon footprint of mineral extraction, processing, and transportation activities.
- 8.2** Prioritise sustainable mining practices that minimise disruption to local ecosystems, reduce water usage, and use renewable energy sources.
- 8.3** Ensure that the legacy of mineral supply developments includes not only environmental restoration but also tangible long-term benefits for local communities, such as green spaces, community facilities, or renewable energy projects.

8.4 T30 – SAFEGUARDING MINERAL RESOURCE

- 8.4.1** This policy is crucial for protecting mineral resources from incompatible developments, but it should more explicitly consider the long-term environmental impacts and the need to align with climate resilience goals.
- 8.4.2** Require that any proposed development in safeguarded areas include a comprehensive environmental impact assessment that considers climate resilience and biodiversity.
- 8.4.3** Ensure that the assessment of "material considerations" includes the needs of local communities and prioritises public access to green spaces or other community benefits over purely economic considerations.
- 8.4.4** Enhance transparency and public involvement in decisions regarding temporary developments, with clear timelines for restoration and community use after mineral extraction.

8.5 T31 – SAFEGUARDING OF EXISTING MINERAL SUPPLY INFRASTRUCTURE

- 8.5.1** This policy effectively safeguards essential infrastructure but could better emphasise the importance of maintaining sustainable supply chains and reducing carbon emissions from transportation.
- 8.5.2** Encourage the use of low-emission transportation methods, such as electrified rail or green shipping, for the distribution of minerals to reduce carbon footprints.
- 8.5.3** Implement regular public consultations to ensure that infrastructure safeguarding decisions reflect community needs and sustainability goals.

8.5.4 In cases where infrastructure is no longer required, mandate that the sites be repurposed for community use or environmental restoration rather than other industrial uses.

8.6 T32 – SUPPLY OF RECYCLED AND SECONDARY AGGREGATES

8.6.1 This policy supports the increased use of recycled materials, which is vital for sustainability. However, it should include stronger incentives and clearer guidelines for reducing the reliance on primary aggregates.

8.6.2 Establish clear targets for the percentage of recycled aggregates to be used in all new developments, aiming to gradually reduce the reliance on primary aggregates.

8.6.3 Provide incentives for adopting innovative recycling technologies that improve efficiency and reduce the environmental impact of aggregate production.

8.6.4 Ensure that facilities for recycled and secondary aggregates are distributed equitably across Medway, with a focus on supporting underserved areas and minimising transport distances.

8.7 T33 – EXTRACTION OF LAND WON MINERALS

8.7.1 This policy acknowledges the need for mineral extraction but could better address the balance between meeting economic needs and safeguarding environmental and community well-being.

8.7.2 Require that all new extraction proposals meet stringent sustainability criteria, including water conservation, habitat protection, and carbon reduction.

8.7.3 Ensure that extraction sites are integrated into the local community with comprehensive plans for noise reduction, dust control, and traffic management, alongside long-term benefits like community projects.

8.7.4 Mandate detailed, publicly accessible restoration and aftercare plans that outline how sites will be rehabilitated to provide ongoing benefits, such as biodiversity enhancements or community recreation areas.

9. Waste Management – Jeremy Spyby-Stearns and Matthew Nightingale

9.1 The Council must do more to push the government to incentivise the development of recycling facilities.

9.2 Ensure local communities are consulted with, engaged and aware of the impacts of any future additional waste management facilities.

9.3 DM23 – WASTE PREVENTION

9.3.1 Incorporate requirements for community consultation in the design phase, ensuring local needs and knowledge are included in waste minimisation efforts. This can also foster communal ownership of waste reduction initiatives.

9.3.2 Add incentives for using locally sourced recycled materials and discourage the use of virgin materials by imposing higher fees or restrictions on their use.

9.3.3 Expand the Circular Economy Statement to include a section on how the development will contribute to a local circular economy, including opportunities for local businesses and community-led recycling initiatives.

9.4 T34 – SAFEGUARDING OF EXISTING WASTE MANAGEMENT FACILITIES

- 9.4.1 Introduce clauses that require safeguarded facilities to enter into community benefit agreements (CBAs) with local residents, ensuring the community shares in the benefits of these facilities, such as through funding for local environmental projects or improved public services.
- 9.4.2 Ensure that the safeguarding of facilities considers environmental justice, with specific attention to communities that may be disproportionately affected by waste management activities. Require additional mitigation measures in these areas.
- 9.4.3 Confirm that existing waste management sites complete Climate Change Risk Assessments, and must develop and maintain climate resilience plans to ensure their operations remain viable and safe in the face of climate change.
- 9.4.4 Ensure that new residential developments do not encroach upon existing waste management facilities, as where there exists odour, dust, or noise pollution this may lead to unfavourable living conditions or expensive remediation that creates unworkable conditions for business.

9.5 T35 – PROVISION OF ADDITIONAL WASTE MANAGEMENT CAPACITY

- 9.5.1 Prioritise the development of additional capacity that supports local recycling cooperatives and community-led waste management initiatives.
- 9.5.2 Require new facilities to integrate renewable energy sources, such as solar panels or wind turbines, to reduce their carbon footprint and contribute to local energy resilience.
- 9.5.3 Mandate social impact assessments that evaluate how new waste management facilities will benefit the local community, particularly in terms of job creation, skills development, and public health improvements.

9.6 T36 – LOCATION OF WASTE MANAGEMENT FACILITIES

- 9.6.1 Prohibit the siting of new waste management facilities near low-income communities unless there is clear evidence of significant community benefits and no viable alternative locations. This ensures equitable distribution of waste-related impacts.
- 9.6.2 Encourage the integration of green infrastructure (e.g. green roofs, urban gardens) in waste management facilities to enhance local biodiversity, contribute to climate resilience, and improve the aesthetics and social value of these sites.
- 9.6.3 Include a provision to minimise transport-related emissions by locating new facilities near strong public transport links and factoring in transport costs to low-paid workers.
- 9.6.4 The development of on-site facilities may help to reduce the need for transportation.
- 9.6.5 Regardless of industrial estate plot ownership, the Council must ensure the roads, air pollution and other areas of the overall site management are kept to high set of standards.

9.7 T37 – OTHER RECOVERY

- 9.7.1 Focus on smaller-scale, decentralised energy-from-waste facilities that can directly supply local communities with energy, reducing transmission losses and empowering local energy independence.

- 9.7.2 Encourage the development of community heat networks utilising surplus heat from energy-from-waste facilities, ensuring that the benefits of recovered energy are directly shared with residents.
- 9.7.3 Strengthen the requirement for carbon capture by making it mandatory for all new energy-from-waste facilities, with an emphasis on technologies that allow for the utilisation of captured carbon in local industries.
- 9.7.4 Ensure that energy generated by incineration is not slipped into the category of 'clean', 'green' or 'renewable energy'.
- 9.7.5 Safeguard residential and sensitive areas from sites processing Incinerator Bottom Ash, but explore it's use in road construction.
- 9.8 T38 – NON-INERT LANDFILL
 - 9.8.1 Include requirements for long-term environmental monitoring and community oversight of landfill sites, ensuring transparency and accountability in the management and eventual closure of these sites.
 - 9.8.2 Mandate that restored landfill sites are converted into community assets, such as parks, community gardens, or renewable energy projects, providing lasting benefits to residents.
 - 9.8.3 Require that proposals for non-inert landfill demonstrate a comprehensive plan to reduce the amount of waste being landfilled over time, aligning with broader goals of waste minimisation and climate resilience.
- 9.9 T39 – BENEFICIAL USE OF INERT WASTE BY PERMANENT DEPOSIT
 - 9.9.1 Prioritise projects where the inert waste deposit supports community-led land restoration initiatives, such as the creation of public green spaces, community farms, or recreational areas.
 - 9.9.2 Ensure that the implementation of these projects includes local employment and training opportunities, particularly for disadvantaged groups, fostering community development alongside environmental improvement.
 - 9.9.3 Strengthen the requirement for ecological enhancements, such as habitat creation or the restoration of natural watercourses, to ensure that the use of inert waste contributes positively to local biodiversity and ecosystem services.
- 9.10 T40 – WASTEWATER TREATMENT
 - 9.10.1 Require new or extended wastewater treatment facilities to involve local communities in the planning process, ensuring that their needs and concerns are addressed, particularly in relation to odour, noise, and traffic impacts.
 - 9.10.2 Encourage the development of innovative, decentralised wastewater treatment solutions that can be managed at the community level, reducing the environmental footprint and empowering local stewardship of water resources.
 - 9.10.3 Assist the water treatment facilities by taking surface water away from the sewage network in new and existing developments and reducing the amount of material that is needed for treatment.

- 9.10.4 Enhance the focus on resource recovery from wastewater, such as the extraction of nutrients for local agriculture or the use of treated water for irrigation, supporting a circular economy and local food production.
- 9.10.5 Support the development of Sustainable Urban Drainage, Bioswales and other schemes which contain surface water, trap pollutants and release water back into the ground or river.

10. Energy

10.1 We need to reduce energy use wherever possible and phase out fossil fuel production and usage.

10.2 Programmes for insulating homes and businesses should be encouraged, as well as new buildings being built to a high standard of insulation. Therefore, we can reduce energy demand and help residents of Medway save money.

10.3 S25 – ENERGY SUPPLY

10.3.1 Public and community-owned renewable energy initiatives, such as energy cooperative projects, will be prioritised and supported through neighbourhood planning and direct investment.

10.3.2 Low carbon hydrogen production will be prioritised alongside a phased reduction in Liquid Natural Gas infrastructure, with clear timelines for transitioning to fully renewable energy sources, contributing to Medway's role in the green economy.

10.3.3 Explore the feasibility of community-owned tidal power barrages along the River Medway and the Thames Estuary. These barrages would harness the natural tidal flow to generate renewable electricity while being owned and managed by the local authority. This approach would ensure that the benefits of tidal energy are socialised, providing affordable power to residents and reinvesting profits into community infrastructure and services.

10.3.4 Combine any potential tidal energy generation with coastal defence systems, protecting local communities from the impacts of climate change while reducing carbon emissions.

10.3.5 Explore the feasibility of tidal lagoons in areas that are underutilised or prone to flooding, transforming them into multi-purpose assets that generate renewable energy, protect against sea-level rise, and provide wildlife habitats.

10.4 T41 – HEAT NETWORKS

10.4.1 Collaborate with neighbouring development sites and/or existing heat sources to develop community-owned or publicly controlled shared heat networks, ensuring that the benefits of sustainable energy are shared equitably and reinvested into the local community.

10.4.2 Construct a heat network served by 100% renewable energy sources such as geothermal, solar thermal, or waste heat from industrial processes, prioritising the elimination of carbon emissions and maximising climate adaptation through sustainable energy.