



Medway Liberal Democrats response to Regulation 18 Consultation for the Local Plan 2041

8th September 2024

Introduction

The consultation timespan of 8 weeks may have been within the legal requirements for public consultation, however the LGA recommendation of 12 weeks would have been appreciated by us since to have more time to work through a substantial consultation policy would have improved our response considerably. We have covered the questions, policies and spatial plans; however, we have not had sufficient time to comment on sections included in the consultation pack.

Response documents

Our response consists of several documents:

- Local Plan - Questions - MLD responses
 - Answer to policy question posed in the consultation
- LibDem Draft Local Plan Submission
 - Our response to the policies presented for consultation.
- Marked up plans commenting on Spatial proposals for housing, retail and leisure zones across Medway. Major comments are listed below.
 - North West
 - Protect land for Cooling Street Station.
 - Oppose extending High Halstow all the way to the A228.
 - Protection of the whole Grain Branch line.
 - Oppose extension of HHH12 south to woodland and to river, introduction of a reduced scale Cockham Wood Community Park.
 - Chattenden, poor infills on HHH6, oppose building on Recreation Ground and Sports Field HHH3.
 - North East
 - Extension of protection of railway to Grain.
 - Protection of road and rail inside the flood plain.
 - Rewilding some of the former industrial area near Grain.
 - South West
 - Broomhill to be a protected greenspace, like Rede Common.
 - Opposition to development on Cuxton Marina.
 - From Option 2, build around St Andrew's Lake.
 - Opposition to LW8 in its entirety.
 - Opposition to GS37 which is Gillingham Station Car Park and Signal Rail centre, owned by Network Rail.
 - Opposition to redevelopment of Chatham Docks SMI6.
 - GN15 appears to be Medway Cruising Club.
 - South East
 - GN13 – reservation about sea wall height.
 - Unreferenced plot in RSE, opposition to building between Moor Street and Whitegate Farm.
 - HW5 queried, includes Hempstead Valley Shopping Centre, which is not marked for Retail.
 - HW6 accepted, but extend woodland protection to the southern side of the site.



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- Urban Core
 - SNF15, SNF18 are currently the two major superstores in Strood redevelopment would require Residential Town Planning and relocation of the superstores.
 - SNF8, SNF13 is an industrial area, relocation plan is unclear.
 - SNF20 opposition, should become a Healthy Living Centre
 - SNF32 conditions to retain street scene needed
 - SNF35, SNF41 should be designated for apartments to increase density of house
 - SNF39 query, need to raise river wall along Canal Road toward Rochester Bridge, demolish of existing housing included.
 - We propose the compulsory purchase of the industrial site on Rochester Peninsula, and redevelop for housing. This section to be hatched for residential.
 - RWB9 accepted. site includes Rochester Registry Office which needs to be relocated.
 - RWB19 accept housing within the building plot zone, but hatching is on the existing roads and needs to be revised.
 - RWB12 hatching goes over access road and needs revising.
 - FP1 accepted with caveats, historic buildings and places of worship should not be redeveloped for housing and protected.
 - FP12 opposition to redevelopment of St George Hotel.
 - FP6 accept, remains of Fort Pitt need to be preserved.
 - FP18 accepted, but store needs to be relocated.
 - FP25 oppose, building over railway station and line.
 - CCB49 telephone exchange needs careful consideration over relocation and services.
 - Concerned over height of building on east end of Chatham High Street and The Brook.
 - CCB13 conflict between retail and housing maps, town planning design needed, pumping station to be retained.
 - CCB16, accepted but requires relocation of DSS and DWP.
 - CCB8, CCB11, CCB15 accepted for refurbishment only.
 - Current plan for Chatham High Street has multiple flaws including Car Parking provision.
 - Housing on Medway City Estate opposed, creation of disconnected communities with no shops or public transport.

Overall comments

Spatial plans are improved from the initial consultation. However, there are many issues with the hatching. The spatial plans have references to plots; however, we did not find any supporting documentation with the details of how many residences would be accommodated. This omission impacts the evidence supporting that the target number of residences has been met.

The only option with detailed maps was Option 3, consequently our mark up of plans containing proposals in Option 2 have been marked to the best of our ability with the available information.

All plans have flaws. The Urban Core plan has major and significant flaws. They need to be revised before the next round of consultation.

A significant number of policies also need revision and rewriting before the next round of consultation.



Local Plan – Second Consultation Questions and MLD Responses

23rd August 2024

Below are the responses to the questions posed in the second consultation of the Local Plan on behalf of Medway Liberal Democrats (MLD). Medway Liberal Democrats welcome the opportunity to respond to the latest consultation, even though the period in which to respond is a mere eight weeks.

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?

MLD response - We want to lower bills and lower consumption in the long-term. We would want to raise the standards of thermal, noise reduction, energy efficiency and set them above current national standards.

The minimum housing permitted should be Eco-houses, and PassivHaus where they can be shown to be economically possible.

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?

MLD response - Yes – raise to at least 15% - a prime example of this is Broomhill, where the initial biodiversity level was set at 15% and has now becoming a self-fulfilling action by ever increasing bio-diversity, which is being recorded by a third-party specialist.

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.

MLD response - In line with Bird Wise, we consider 6km to be a minimum, and we also agree with Bird Wise that the figure should be set at 8km.

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?

MLD response - Yes. Close to urban areas, important for farming.

Where and why?



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MLD response - Areas to be included are: Upper Bush, North Kent Fruit Belt, Cockham Wood, Cliffe Marshes.

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

MLD response – 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?

MLD response - No! – However, a full response is more than answering a single Yes/No question. The document was an appendix to the previous plan and states 2035 (rather than 2041) – thus out-of-date and doesn't cover the full period of the current Local Plan (2024). The base plan has two green hatches that have no legend in the key – much of the dark green hatch covers urban and suburban areas that have roofs and hardstanding areas, which cannot be deemed green. On Plan 1 the land designation is well out of date – particularly along the River Medway. Plan is out-of-date, e.g., the woodland near the Tithe Barn, Frindsbury Extra. Plan 3 has salt-marsh land where now there are buildings for gyms, cinema, restaurants, bowling alley. i.e., Medway Valley Park covers a substantial portion of the salt march zone. In summary the Green and Blue Infrastructure Plan is substantially out of date and needs a thorough review and update to be part of the 2024 Local Plan.

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

MLD response - No – the only land that should be built on in current Green Belt land is that which is designated as Grey in the upcoming Grey Belt policy.

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

MLD response - No – it remains as per the response to Q7.

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.

MLD response – Yes. The periphery can negatively impact a conservation area, an example of this is the restricted Conservation Area around Rochester Cathedral and how it has impacted on recent planning submissions.



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Housing

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

MLD response – No – we believe the Tenure mix should be 70% owner-occupier, 20% affordable/social rent, 10% affordable to buy (with a slant for purchase by local people – based upon earnings rather rental costs).

The Dwelling Type mix and Dwelling Size mix are actually dependent upon where the proposed development is to be situated, e.g., the proposed development for Central Strood would require more apartment building well above the one third mix set in Dwelling Type mix, but in more suburban and rural zones, this would not be appropriate as density would be lower in these areas.

The Dwelling Type and Dwelling Size mixtures should be density driven.

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?

MLD response – No, we believe the mixture of social rent and affordable first ownership should be as per those values in Q10 and all across Medway.

Affordability should be based upon Medway median earnings and not based upon market rates.

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?

MLD response – Of the 70% owner occupied a reasonable percentage (15% for guidance) should be built for lower market value, thereby increasing the affordability to “move-up the housing ladder”.

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?

MLD response – There should be more council housing, as private companies will always try to wriggle out of affordable housing.

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



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MLD response – Reduce the license limit to 4 making more landlords register and making it easier to spot. Restrict planning permission for the number of rooms per property, restrict the minimal spatial requirements as per those specified by Greater London Authority.

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

MLD response – Yes – on the periphery of existing villages, which are mainly on the Hoo Peninsula.

Retail and Town Centres

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

MLD response – Yes, we agree with managed ancillary spaces. However, we feel more attention should be given to areas that are remote and they need drive long distances, to prevent such travel. Thus, there needs to be more retail units at Chattenden, Cliffe and High Halstow.

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

MLD response - Yes, but with the caveat that many retail parks and leisure areas are not fully identified as part of the Impact Assessment, e.g., Strood, Horsted, Hoath Lane (Gillingham Business Park), Chatham Maritime.

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

MLD response – We concur with the reduction and rationalization of the town boundary.

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

MLD response – It ought to go further east along the High Street to the White Lion pub.

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

MLD response – agreed.

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

MLD response – We think the primary shopping area should be extended north to George Lane and south to Blue Boar Lane.



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

MLD response – both A options (east and West) plus Option C, but not Option B.

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

MLD response – we would like the Primary Shopping extended west side of Skinner Street/Canterbury Street up to Britton Farm Mall

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

MLD response – we agree with the proposed Extension A (both east and west), but not to include Option B – we would like to better integration between the proposed retail area and Strood Retail Park and the two supermarkets (i.e., Tesco and Morrisons) – comment on the proposed health hub – this should be a healthy living centre and be transferred to section 10.2.

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

MLD response – concur with the proposal.

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

MLD response – Option A east and west – neither option B nor C.

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

MLD response – concur with the proposal.

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

MLD response – Yes – especially in light of the proposed extension of Hoo to become a rural town. A probable location could be off Ropers Lane near the junction with Peninsula Way and Ratcliffe Highway.

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

MLD response – Yes.



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

MLD response – Horsted Retail Park, Strood Retail Park.
Grain retail should be upgraded from Neighbourhood Centre (policy T18) to Rural Centre (policy DM12).

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

MLD response – Yes – but have severe reservations about the lack of protection for majority of rural areas – we think these areas should be updated to be included as rural centres and placed within DM12.

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

MLD response – No.

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.

MLD response – The singular hatching for leisure does not take into account the current retail use, nor the current housing on wharf and the multi-storey apartment buildings at the north end of two currently developed piers – the plan should have the hatching corrected to also show retail use rather than just leisure. This needs to include The Outlet Centre, Pier 5, Ship & Trades row of outlets, and Copper Rivet building. Leisure is currently the two Basins, Pier 5 and the Odeon (there is the building that was the Dickens Centre available for leisure use) – The final unused pier is also available for regeneration – this could be for leisure, but preferably a mixture of housing, retail and leisure.

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

MLD response – No – we do not agree with the percentage approach for the floor space usage - we believe that the figures seem arbitrary and therefore we propose that the Dockside area should be reviewed and re-zoned more appropriately for housing, retail and leisure.

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?



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MLD response – Yes – there needs to be facilities provided for overnight lorry parking – there needs to be measure introduced to prevent parking in inappropriate places e.g., Gillingham Business Park, Ratcliffe Highway, Lower Upnor, Hoath Way.

Health, Communities and Infrastructure

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

MLD response – Changing places facilities for adults (who need to change nappies) and some of these need to be made 24/7. Affordable retrofitting homes with double glazing and insulation to help lung problems. Nutrition standards for school meals. Cookery training in schools and youth groups

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

MLD response – Provision of healthy living centres in Strood and Hoo.

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

MLD response – Obesity, smoking, drugs and alcohol – mental health support/suicide support.

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

MLD response – Braille signage and appropriately textured and coloured signage.

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.

MLD response – Hook Meadow, Walderslade Road; Grain Village Green; Frindsbury Green and Gillingham Green, Grange Road, Gillingham

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



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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?

MLD response – No

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?

MLD response – No - Infrastructure Delivery needs to be co-ordinated and therefore should have its own section within the Local Plan – it needs to include all those elements as described in Planning Act 2008

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

MLD response – The large sums required for infrastructure work based upon the proposed works and their implementation ahead of being able to use Section 106 funding from such projects, is to apply for grants or very low interest rate loans from central government.

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?

MLD response – Yes – the non-inert waste should be disposed of correctly, but there are not the spaces available within Medway for the storage of such materials.



Local Plan Submission

Policies Response Document

3 – Spatial Growth Plans

After consideration to the three primary options for spatial growth in Medway over the proposed Local Plan period (2025-2041), the Medway Liberal Democrats (MLD) are supporting Option 3, but with a distinct caveat: the removal of Chatham Docks from future residential development. Rather, we shall argue that their current designation as an industrial area should be retained and enhanced. We believe that any additional residential accommodation can be addressed using a matrices system within the overall plan, through using some of the sites identified for Option 2 (Dispersed Growth or Rural Option).

Below are sites that we have identified and discussed as having strong potential for absorbing the number of residences needed to meet the revised target using Option 3, without Chatham Docks.

Rochester Peninsula, Gas House Point

Currently a large area of the peninsula is not marked for houses, beyond the currently approved plans for the Acorn site. Refer to the MLD mark-up of Urban Core Plan.

We are recommending compulsory purchase of the industrial unit within that part of the peninsula. The site shall then be made available for a substantial number of flats and houses.

The current industry based here is relatively straightforward to relocate. Some of the industry could be transferred to an improved industrial zone at Chatham Docks.

St Andrew's Pit, North Halling

This is marked on the rural option. This area around St Andrew's Lake can be filled with relatively low-density housing, mostly houses, but with some two- or three-story apartment buildings.

It's well connected to bus services and there are already houses nearby. It's not green belt development.

Dillywood Lane

The area near the garden centre is marked on the rural option. It's not a massive number of houses, but it's not a controversial site for grey belt development between Strood and Higham.

Merryboys Road, Cliffe Woods

This site is marked on the rural option. Planning application has already been submitted. Not a massive number of houses, but also not controversial.

Strood Riverside

Sites marked for housing as NSF41 and NSF35 should be high density housing, through medium storey apartment buildings. This is a prime location; it's high value land and we'd want to see a lot of people housed in this area.

Refer to marked-up Urban Core plan.



4. Natural Environment

Policy S1 – Planning for Climate Change

Add:

1. Retrofitting older homes with insulation (roofs, floors, walls and windows via double glazing) and/or solar panels and heat source pumps – this policy should be widened and not just aimed at poorer households.
2. Carbon analysis of infrastructure maintenance and materials and methods used for undertaking the work.
3. Provision of more charging points across Medway.
4. Buses to be emissions free, either hydrogen or electric.

Policy S2 - Conservation and Enhancement of the Natural Environment

The wording of the policy should be rewritten to invoke actions and obligations, rather than “maybes”.

Challenge whole of final paragraph – it should be reworded to include “shall” in place of “could” and rephrase “Where developers can”. Otherwise, this shall be an escape route for developers to avoid BNG on-site. We request that it is raised to at least 15% and to be on site unless there are exceptional circumstances, for which there shall need to be robust evidence to substantiate why the BNG has to be off-site. A prime example of raising the BNG to 15% is Broomhill, where the initial biodiversity level was set at 15% and has now becoming a self-fulfilling action by ever increasing biodiversity. This is being recorded by a third-party specialist.

Policy S3: North Kent Estuary and Marshes designated sites

In line with Birdwise’s presentation to the Rural Liaison Committee, we consider 6km to be a minimum, and we also agree with Birdwise that the figure should be set at 8km.

Policy S4: Landscape Protection and Enhancement

No account is taken of sea level rise in allowing coastal development – challenge the proposed/alleged sea wall protection – seek clarity about the proposed future sea wall/defences and who shall be responsible for what portions of the sea wall – comment on sea level rise.

Close to urban areas, important for farming

Areas to be included are: Upper Bush, North Kent Fruit Belt, Cockham Wood, Cliffe Marshes

Page 39 Q4 - Would suggest Lower Rainham Road, Boxley Wood, Capstone Valley, Darland Banks, Rede Common, Nashenden Valley, Bridgewoods and Upper Bush.

S5: Securing Strong Green and Blue Infrastructure

Register historically proven commons and village greens as part of our historical infrastructure and provide suitable orientation boards e.g. Grain Village Green, Frindsbury Green, Rede Common, Hook Meadow and Gillingham Green.

S6: Kent Downs Area of Outstanding Natural Beauty National Landscape

Discourage building on AONB land.

4.8 Flood and Water Management, sub-sections:

4.8.2 at end add "and account should be taken of this when permitting new developments".

4.8.3 Add "It should be noted that some parts of the Peninsula are now counted as London's flood plain and further development in these areas should be avoided as the dykes will be allowed to fail."

4.8.7 after "sea level rise is possible by 2100" add aggravated by the topography of the Thames and Medway Estuaries.

4.8.8 "alongside an increased risk" add "of winter run off".



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DM1: Flood and Water Management

DM1 at end of adaptation to climate change add "Create a Medway Flood Plain".

DM2: Contaminated Land

Nothing to add, subtract or amend.

DM3: Air Quality

Increase air monitoring to determine where AQMAs should be extended.

DM4: Noise and Light Pollution

Support, but would like to have added the recommendations made by CPRE to achieve darker skies at night by reducing/eliminating light pollution in the countryside and lowers energy costs. Aim to use down-lighters to also reduce light pollution along with warmer feeling types of lighting – install LEDS that have a night-time value of 3000K or less – lighting should go to dimmed status after a certain (e.g. 11pm) and lighting hen activated by PIR sensors.

S7: Green Belt

The only land that should be built on in current Green Belt land is that which is designated as Grey in the forthcoming Grey Belt policy.

5. Built Environment

T1: Promoting High Quality Design

Add to ss 1 - We would recommend that Medway Council produces an overarching design that can be enhanced within Neighbourhood, but conflicts between the separate entities. The overarching design guide can ensure that applications are compliant with landscape and Visual Impact assessment. This can include the updating and enhancing of the Medway Housing Design Standard.

Rewrite of T1 subsection 5 and doesn't cover prevention of urban sprawl and subsection 8.

Support subsection 9.

Rewrite subsection 10.

Enhance subsections 11 & 12 with:

Design shall endeavour to ensure that distances to key services are no more than 15 minutes by active travel (cycling and walking). However, there may be good reasons to grant exceptions to this guiding principle. Key services shall include grocery shops, schools and healthcare services.

Substantial housing estates shall be connected to the bus network, and shall be accessible within a 15-minute walk. Developers shall ensure that access to train stations, either by public transport routes or walking and cycling routes, are incorporated within the design.

Enhance subsections 13 & 14 & 15 with:

Provision of green spaces is vital for the connection of wildlife spaces across Medway. On large developments, developers shall ensure that there is either a park included within the scheme or access to an existing park nearby with good walking routes. The park will include amenities for dog walking and children's play areas. Smaller developments shall take into consideration open community space for wildlife and amenities.

Support ss 16, 17 – the use of warmer feeling types of lighting – install LEDS that have a night-time value of 3000K or less – lighting should go to dimmed status after a certain (e.g. 11pm) and lighting hen activated by PIR sensors. This helps achieve a dark-sky policy, and lowers light pollution, and energy costs. Aim to use down-lighters to also reduce light pollution.

ss 20 change "may" for "shall".



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ss 22 include ducting in the description for ensuring discreet provision.

Support ss 23.

DM5: Housing Design

ss 1 – we would prefer the GLA recommended minimum spatial areas.

ss 2 – we would request that the Medway Housing Design Standard be updated to include the minimum internal spatial recommendations/parameters as directed by the GLA.

Support ss 4, 5, 6, 7, 8 (refer back to comments in Neighbourhood plans), 9, 10 & 11.

DM6: Sustainable Design & Construction

Support ss 1 & 2.

ss 3 – this ought “where possible” instead of “should include”.

ss 4 – we propose minimum standard of new housing should be Eco Homes, and preferably PassivHaus where economically viable.

Support ss 5, 6 & 7.

DM7: Shopfront Design & Security

Support with nothing to add or amend.

DM8: Advertisements

ss 1 & 2 – parameters to be set within the overarching Medway Design Guide (mentioned in response to T1 ss1) which prevents size creep.

Support ss 3 & 4.

S8: Historic Environment

Support with minimal amendment – except that the wording should include ancient monuments, even though there is a specific policy for ancient monuments.

Amend section 5.8.3 "Historic parks, gardens" add and "village greens" (pg. 71).

DM9: Heritage Assets

Para 2 – penultimate sentence after “and wider setting” add: Our historical village greens, such as Grain, Frindsbury, Gillingham Greens and Hook Meadow should be identified as heritage assets, as they are part of our historical landscape and as such they should be protected.

Rewrite para 3.

Para 5 - Rewrite the sentence to include permission to demolish and leave as an open space when the building is in an exceptional state of disrepair that it could collapse.

Add a paragraph that reminds the owner of the property that they maintain their buildings and not let them fall into a state of disrepair – especially when they are an historic asset.

No amendments to subsections.

Add a subsection regarding works on or to a listed buildings and assets.

S9: Star Hill to Sun Pier

Support with nothing to add or amend.

DM10: Conservation Areas

Add and/or cross-reference the green spaces and tree preservation order.

DM11: Scheduled Monuments and Archaeological

Nothing to add, but would request that:

Para 1 is rewritten as: Development that adversely affects Scheduled Monuments and other important archaeological sites and/or their setting will not be permitted.

Request para 3 is rewritten, as last sentence rambles on.



6. Housing

T2: Housing Mix

We are in agreement with the policies as listed, but are against the prescriptive listing in 6.2.3 – which make no sense – please refer to our response to Q10 in the questions response document.

T3: Affordable Housing

Para 2 – we believe the Tenure mix should be 70% owner-occupier, 20% affordable/social rent, 10% affordable to buy (with a slant for purchase by local people – based upon earnings rather rental costs).

The affordable housing prescriptions are too idealistic. Can't be binding future home ownership in perpetuity, shouldn't prescribe minimum spatial of housing to be the same as the marketed housing, rather it should be in compliance with the minimum housing parameters as set out by the GLA. ss 4 is an oxymoron of ss 2.

ss 5 – shouldn't be prescriptive for next 15 to 20 years regarding the breakdown/mix between renting and first-time buyers as currently stated – these values are based upon current LHNA and this could change over the period of the Local Plan.

Para 4 and its subsections - We recommend that as many applications as possible meet the original quotas and that a system of incremental payments of s.106 be released through the duration of the project to ensure there is no shortfall upon project completion. When social and affordable housing quotas are not met, we recommend the use of either sequestration orders or Community Infrastructure Levies by the Council to supply social and affordable housing.

T4: Supported Housing, Nursing Homes and Older Persons Accommodation

Retitle to “Accessible and Specialist Housing and Accommodation” and the policy needs “beefing-up” to include disabled people.

Houses shall be designed to enable them to be future-proofed for adaptability, which could include bathrooms, doorways and ramps.

Roads for adoption standard shall cover the requirements for dropped kerbs to ensure accessibility needs are met. Future needs for disabled parking bays shall also be covered by the requirements.

T5: Student Accommodation

Support with nothing to add or amend.

T6: Mobile Home Parks

Nothing to add or amend.

T7: Houseboats

Nothing to add or amend.

T8: Houses of Multiple Occupation

Do not include the word “favourably” as this gives impression that the council is encouraging their growth. Rather “shall be rejected unless they meet strict conditions”, The policy should include parameters so that residents and developers know the limitations of HMOs in a given area. HMOs should comply with the minimum living space parameters we have mentioned for new homes and flats. The licensing process should be made more rigorous with officers inspecting the final build before granting the license.

T9: Self-build and Custom Housebuilding

The proposal for 100+ units is a positive and is supported.

The sites for on the periphery of existing villages, which are mainly on the Hoo Peninsula. Support with nothing to add or amend.



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T10: Gypsy, Travellers & Travelling Showpeople

Support the policy – but would request that any temporary site should be considered for adoption and in the intervening period have potable water supply and sanitation.
Give due consideration to adding Wigmore Park and Ride site to the list of safeguarded sites.

T11: Small Sites and SME Housebuilders

The policy should have in addition:

Adequate site services and utilities, including potable water, sewerage, electricity and data/telecoms.

Provision for social housing included as per the principles used in policies T2 & T3.

7. Economic Development

S10: Economic Strategy

ss 3 – the port at Grain has poor road connection from east of Hoo. Plus, the use of lorries shall expend more fuel than ships sailing further up the Medway to Chatham Docks, thus use along with failing the Net Zero target. The draft at Kingsnorth is too shallow for port facilities (hence why there was never any when there was a power station at Kingsnorth). Therefore, the most sensible means of delivering shipping and keeping to the aim of Net Zero with regards to shipping is to retain and utilise Chatham Docks.

Para 2 – ss 1 – in line with the aspiration of keeping as much employment land as possible, we request that Chatham Docks retain the economic labelling of industrial space.

Support the other subsections.

S11: Existing Employment Provision

There is no mention of improvement of existing employment areas, not Chatham Docks, nor Medway City Estate, nor Medway Innovation Centre, nor Gillingham Business Park. Rather the policy is aimed at change of use, primarily to housing.

The policy should first aim at identifying core industrial and employment areas and protect and invest. Prior to any consideration being given to change-of-use. An example being that too much current office space could be made change-of-use to residential, leaving inadequate provision in future.

S12: New Employment Sites

We have no addition site to add at this time.

S13: Innovation Park Medway

Para 2 – needs re-writing, incoherent.

Para 3 – describes a Design Guide – has this been published?

Support para 4.

T12: Learning and Skills Development

The policy is extremely bland and does not provide key points of how current and future sites are to be developed. There is no mention of the universities in Medway.

T13: Tourism, Culture and Visitor Accommodation

Support with nothing to add or amend.

S14: Supporting Medway's culture and creative industries

ss 1 – rewrite – clarification needed between town and district centres – Chatham Dockyard – assuming means Chatham Historic Dockyard. Assuming Chatham Town Centre includes Fort Amherst.

ss 2 - Chatham Docks is mentioned – we do not think it is a space that suitable for cultural use. It is best used for industry and manufacturing.

ss 5 – needs rewriting.

Support the other subsections.



T14: Rural Economy

The policy is primarily aimed at developers and not the existing rural economy. There is no mention of a support network for farmers and farm labourers, no mention of farmers' markets or other forms of assistance that could instigate organic growth in the rural economy. This policy needs re-consideration, as it doesn't address the current and future means of developing the rural economy.

It should include regenerative agriculture and other modern horticultures e.g. viticulture. The policy should give more consideration to and supporting of diversification of rural economies e.g. energy generation (c.f. Energy Policy). The re-written policy should emphasise rural economy on Hoo Peninsula, and land near Cuxton and Halling.

8. Retail and Town Centres

S15: Town Centres Strategy

ss 2 and 4 need re-writing – esp. ss 4 – an oxymoron.
ss 5 to 9 supported.

Include a ss policy for support of local and farmers' markets.

S16: Hierarchy of Centres

Question "immense"? otherwise support.

1. b. Hempstead Valley is not a district centre – rather Hempstead and should be in a new "out-of-town" shopping centre section and just below Chatham in priority
2. Dockside should be higher than other district centres.

Less 1. b. other subsections accepted.

T15: Sequential Assessment

No comment.

T16: Ancillary Development

Managed ancillary spaces, more attention should be given to areas that are remote to prevent long distance travel. Thus, there needs to be more retail units at Chattenden, Cliffe and High Halstow. Otherwise agree.

T17: Impact Assessment

Agree, however, many retail parks and leisure areas are not fully identified as part of the Impact Assessment, e.g., Strood, Horsted, Hoath Lane (Gillingham Business Park), Chatham Maritime.

S17: Chatham Town Centre

ss 5 needs rewriting – does not have principal aim.

ss 6 – do not permit ground floor residencies on the High Street within the prime shopping zone as shown on the town centre plan.

ss 9 needs re-writing.

The former "Debenhams" would not make a good place for a carpark, the other options are acceptable, preference being given to retail, then residential.

S18: Rochester District Centre

Accepted.

S19: Gillingham District Centre

Para 2 – needs redrafting – otherwise accepted.

S20: Strood District Centre

Accepted, less the proposed health hub – this should be revised to a healthy living centre and be transferred to section 10.2.

S21: Rainham District Centre

Accepted.



Medway Liberal Democrats

S22: Hoo Peninsula

Accepted – note typo in para 3 (“talking” should be “taking”).

S23: Hempstead Valley District Centre

We do not consider Hempstead Valley as a district centre. Rather it should be accurately described as out-of-town retail as it was so described when it was proposed by KCC in 1971. Then it can be enhanced at high priority just under Chatham.

DM12: Local and Rural Centres

Sub-policies accepted – typo in sub-policy 3, should read “1 b. to d.”

In addition to those retail areas listed we would like to add Horsted Retail Park and Strood Retail Park.

A further addition: Grain retail should be upgraded from Neighbourhood Centre (policy T18) to Rural Centre (policy DM12).

T18: Shopping Parades and Neighbourhood centres

We agree with the concept, but the policy needs redrafting to make sense.

We have severe reservations about the lack of protection for majority of rural areas – we think these areas should be uprated to be included as rural centres and placed within DM12.

T19: Meanwhile Uses

Accepted.

DM13: Medway Valley Leisure Park

Accepted.

DM14: Dockside

We consider Dockside to be a combination of leisure and retail. We do not agree with the blank zoning as currently shown and do not agree with the percentage zoning. The retail needs to include The Outlet Centre, Pier 5, Ship & Trades row of outlets, and Copper Rivet building.

Leisure is currently the two Basins, Pier 5 and the Odeon (there is the building that was the Dickens Centre available for leisure use) – The final unused pier is also available for regeneration – this could be for leisure, but preferably a mixture of housing, retail and leisure.

There is current housing on the wharf and the multi-storey apartment buildings at the north end of two currently developed piers and this could be expanded when the remaining unused pier is developed.

Page 77 6.1.2 at end "The Council will ensure there is adequate provision for schools and healthcare using Section 106 funding.

Page 78 6.2.3 Tenure mix, there should be more social rented and council housing.

Page 81 6.3.9 after "36% to be social rented " add "including council housing".

Page 83 Table 2 Why are we being asked to build 28,500 new homes if the population is expected to rise by less than 10,000?

Page 117 7.9.7 Reference should be made to the higher levels of unemployment, under employment due to seasonal work and resulting poverty on the Peninsula.

Page 118 T14 The council will create a network of farmers markets to promote local produce.

Page 122 S15 The Council will continue to support local markets and the development of farmers markets.

Page 124 8.3.5 The Council will encourage the creation of a network of farmers markets on the Peninsula at Chattenden, Hoo St Werburgh, High Halstow and Cliffe at Hoo to encourage people to buy more local.

Page 136 8.10.2 Reference should be made to the market.

Page 137 S20 Strood already has the Gun Lane health centre - surely there should be expansion here Page 139 8.12.3 Consideration should be given to creating more retain space in Cliffe Woods in the light of the latest developments.



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Page 150 DM14 reference should be made to Dockside being the retail destination for St Mary's Island, the occupants of the university site and the people working on the Pembroke site.

Page 153 The vision should use the future perfect tense rather than the present tense otherwise it is confusing.

9 – Transport

Vision for Access and Movement in Medway

To enlarge the Local Cycling and Walking Infrastructure Plan there needs to be more crossings of the River Medway – currently there is only Rochester Bridge and the cycle lane adjacent the M2 (east bound) that form a connection between east and west Medway. One location for a walking and cycle bridge is from Sun Pier to Medway City Estate. The current proposals for walking and cycling infrastructure are insufficient.

The use of past, present and future tenses within one section makes it extremely difficult to read and comprehend what the transport vision is for 2041.

DM15: Monitoring and Managing Development

Please use the full title rather than just the acronym within a policy! Strategic Transport Assessment (STA) & Community Infrastructure Levy (CIL).

On reviewing the available background documents, we note that there is no Strategic Transport Assessment. Therefore, we cannot make a comment against the first para of DM15. Another set of documents mentioned in this policy are also not available for background reading, i.e. a current Infrastructure Delivery Plan (IDP) or the outcome of a Medway-wide Monitor and Manage Mitigation Strategy. The only IDP that could be found was one dated 2005/2015, which is obviously out-of-date. Thus, we again we are unable to make comment about this subsection of policy DM15.

We are firmly against the proposal to exempt all urban centres from the managing and monitoring – as the areas need to comply with all the policies to even be given consideration for exemption. It thereby becomes an oxymoron.

The final paragraph needs rewriting to be comprehensible, therefore we are not passing comment on this part of the policy.

T20: Riverside Path

The policy does not mention the long-term aim of creating a Riverside Path. We support the use of Local Transport Note 1/20 (Cycle Infrastructure Design) and Sport England's Active Design guidance to deliver the aspiration. This is a worthwhile policy, but it needs "beefing up". And we support the final paragraph.

DM16: Chatham Waters Line

This is a noble aspiration, but we would like to see the policy describe how the Chatham Waters Line is to be incorporated into the active travel infrastructure, particularly the cycle network infrastructure.

DM17: Grain Branch

We request that Medway Council liaises with Gravesham Borough Council and discuss the safeguarding of land that is under the alignment of the Higham Curve – as this piece of the original proposal within the Hoo HIF – permits full rail integration within the Medway area from Grain to Rainham. Along with the opportunity of travelling along the Medway Valley line to Cuxton, Halling and onwards.

The safeguarding of the land at Cooling Street for the loop should be increased to safeguard land for a station at that location. As such a station permits access to the trainline from a number of local villages, Cliffe Woods, Cliffe, Cooling, Cooling Street and Spendiff.



Medway Liberal Democrats

Sharnal Street Station should not be designed as a terminus as we believe that the whole of the Grain line could one-day be open to passenger services.

Medway Council do call this policy the Grain Branch and not the Hoo/Sharnal Street branch! And therefore, we would like to see the line hatched red all the way to Grain, not stopping at Sharnal Street Station, as it does at present.

T21: Riverside Infrastructure

The policy lacks specificity. It needs re-writing with greater detail and specify the areas that need to be covered along the riverside. The important piece of riverside infrastructure that needs inclusion in the re-writing of the policy is Chatham Docks.

T22: Marinas and Moorings

Accepted, however there are some minor errors:

ss 4 – “sewage” needs to be changed to “sewerage”.

ss 5 – “environment” should read “environmental”.

ss 6 & 7 – more acronyms within a policy: SPA, RAMSAR, SAMMS.

T23: Aviation

Accepted.

T24: Urban Logistics

The policy needs “beefing-up” to incorporate the statements made in paragraphs 9.8.2, 9.8.4 and 9.8.6. The policy needs to identify the land which would address the shortfall of warehouse land mention in 9.8.6. Or set-out change of use conditions that would be acceptable.

T25: User Hierarchy and Street Design

Accepted.

T26: Accessibility Standards

Less the primary schools, all the other places should include cycling and public transport, but agree with the hierarchy. We would like all communities to be able to do top-up shopping within 15 minutes walking/cycling, but there are existing areas where this is not possible, and thus exceptions need to be granted for using public transport and even the private car.

We would strongly support a travel card scheme for use of public transport across the whole of Medway using both buses and trains.

We support the second portion of the policy, but know that there shall need to be more investment in public transport for buses to run more frequently for this policy to be achieved. There areas of Medway where this can't be achieved and therefore there needs to be provisions for exceptions and mitigations.

DM18: Transport Assessments, Transport Statements and Travel Plans

Accepted, but again use of acronyms without using the actual name, i.e. SRN in this instance.

DM19: Vehicle Parking

The bulk of the vehicle parking standard was written in 2001, revised in 2004, provided with an addendum in 2010. We think that this means that the parking plan is “out-of-date” and the policy does not contain a firm commitment to providing a revised standard to take the plan through to 2040.

The remaining portion of the policy is accepted, especially regarding EV charging points.

DM20: Cycle Parking and Storage

Supported.

Other comments on Transport

Page 165 9.10.3 Add at end “the age and mobility of the local population”.



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Page 171 9.12.12 No suggestions here as to how this problem is going to be solved - will the inspector be happy.

Mass transit will become economically viable when population of Medway exceeds 300,00, which will not be during this local plan time period. However, it is very possible that the next local plan will need to make proposals for a mass transit system. One viable solution would be a light rail system connecting the urban conurbation, we propose lines between Rainham, Gillingham, SMI, Chatham, Intra, Rochester, Strood, and Frindsbury. Detailed proposed should be prepared before the next local plan is drawn up for such a transport system.

Bus routes heavily centred on Chatham, which makes some routes highly inefficient and pushes the cost up. We would like to see proposals for extended hours bus services on major routes particularly to Cuxton, Halling and Hoo Peninsula. An integrated bus and train pass allowing people to combine public transport journeys would be beneficial and promote greater use of public transport. A young person's bus pass would be beneficial. We believe a partnership between Medway Council and sponsors to deliver a hire system for cycles and e-scooters would also reduce car usage in the long term.

10. Health, Communities and Infrastructure

T27: Reducing Health Inequalities and Supporting Health and Wellbeing

Para 1

ss 1 – the Green and Blue Infrastructure Plan is out-of-date and needs revising (c.f. our response to Q6 in the Questions and Replies document) – the current walking and cycling plans issued for public consultation are lacking in detail and need improving/revising. And there are certainly not enough (at present) for there to be a strategic network.

Following on from ss 1 – we recommend that the Council support the development of a new Healthy Living Centres in Strood and on the Hoo Peninsula. (These are in addition to the existing Healthy Living Centres in other parts of Medway.)

ss 2 to 4 accepted, ss 5 to 7 – supported.

ss 8 – accepted, but with the addition that the policy should have support for teaching of healthy diets and cooking, and encourage the use of social prescribing (e.g joining a gym, going to classes) for those who are obese.

ss 9 – accepted.

Para 2 –

ss 1 and 2 – accepted.

ss 3 supported with the provision that developers assist the supply and/or funding of new allotment spaces.

ss 4 – we accept that there may be areas that could end up with over-provision, but refute the concept that the improvements are “lost” – rather the provision should be juxtaposed within Medway to an area where there is under-provision.

ss 5 – accepted.

ss 6 – the HIA should be raised up in the hierarchy and should be made mandatory (or have clear parameters) for all major developments as part of the development design process.

ss 7 – accepted.

ss 8 – accepted, however, (need to check the English and use of brackets) – we are skeptical about even permitting smoking facilities and shisha lounges.

ss 9 – accepted.

T28: Existing Open Space and Playing Pitches

Item a) – it is our opinion that reducing/removing public space always causes material harm – therefore this sub-item should be removed and b) should be the default position regarding existing open spaces.

Items b) to e) accepted.

Items f) to i) accepted.



Medway Liberal Democrats

Note that the final sentence in policy T28 is contradictory to item a), which substantiates our opinion that item a) should be removed.

DM21: New open space and playing pitches

Parameters accepted (in good faith) but would like to review the documents that form the basis of these parameters.

Items a) to f) accepted.

Items g) to j) supported – however, item j) needs rewording.

T29: Community and Cultural Facilities

Accepted.

S24: Infrastructure Delivery

Para 2

ss 1 to 3 – accepted.

ss 4 item b) – onsite phased infrastructure implies it could still need to be completed upon full occupation – this should not be permitted as there are many examples across Medway and rest of Kent where developers have “upped-sticks” and left vital infrastructure undelivered.

ss 4 – item a) supported, item c) accepted – we would like to see the council using sequestration orders or the CIL as means of ensuring that items of infrastructure are in place prior to full occupation. This could be added to ss 4 c) or as another sub-item.

We reject para 3 and its sub-section policies.

Rest of policy paragraphs accepted. However, the final paragraph needs rewriting to be coherent and easier to read.

10.4.11 The Council will encourage places of worship to remain open particularly where they are providing important community functions like foodbanks, debt counselling, warm places and polling stations as well as a home for community groups particularly where there is no alternative site nearby.

DM22: Digital Communications

Para 2 sub-section 3 – technology has the tendency to adopt new standards over time. 5G and gigabit technology may not be relevant in 2041. Therefore, this sub-section needs to accommodate future requirements. We do not know whether and where this would be irrelevant.

Para 4 – this is describing short-term issues and does not address the digital infrastructure that should have been installed in the period of the plan. The paragraph needs re-writing to accommodate future as well as current digital infrastructure. And we believe there is no justification for any area of Medway not being accessible to digital infrastructure by 2041.

Para 5 – accepted.

12. Waste Management

Vision for Waste Management

Accepted.

DM23: Waste Prevention

Items a) to c) accepted. However, the policy is geared towards new development and does not provide additional sub-sections that address waste prevention in residential, commercial and industrial sectors. We request that the policy is widened to cover these sectors, addressing prevention, improving the re-use and recycling of waste.

T34: Safeguarding of Existing Waste Management Facilities

Accepted – however the policy needs re-writing ensuring non-repeat of sub-item letters and comprehensible.

T35: Provision of Additional Waste Management Capacity

Accepted.



Medway Liberal Democrats

T36: Location of Waste Management Facilities

ss 1 to 3 accepted.

ss 4 a) to c) accepted.

ss 4 d) add wording “in exceptional circumstance with robust evidence”.

T37: Other Recovery

Supported

T38: Non-inert Landfill

Para 1

ss a) & b) accepted.

ss c) insert item i) the landfill site is to be correctly lined with engineered non-porous geotextile before starting any landfill.

insert item ii) upon completion the landfill site is to be correctly capped with non-porous geotextile liner and overlaid with clay liner.

make current items i) and ii) to iii) and iv) – but accepted.

Para 2 subsections to be made d) and e) to make easier to read and reference.

T39: Beneficial Use of Inert Waste by Permanent Deposit

Accepted – along with ss a) and d) being supported.

T40: Wastewater Treatment

The policy needs “beefing-up” to address the current under-capacity and to address the future capacity. Medway Council should undertake assessments to have sufficient data to put pressure upon developers, the EA and Southern Water in addressing the future water management and sewage treatment.

13. Energy

S25: Energy Supply

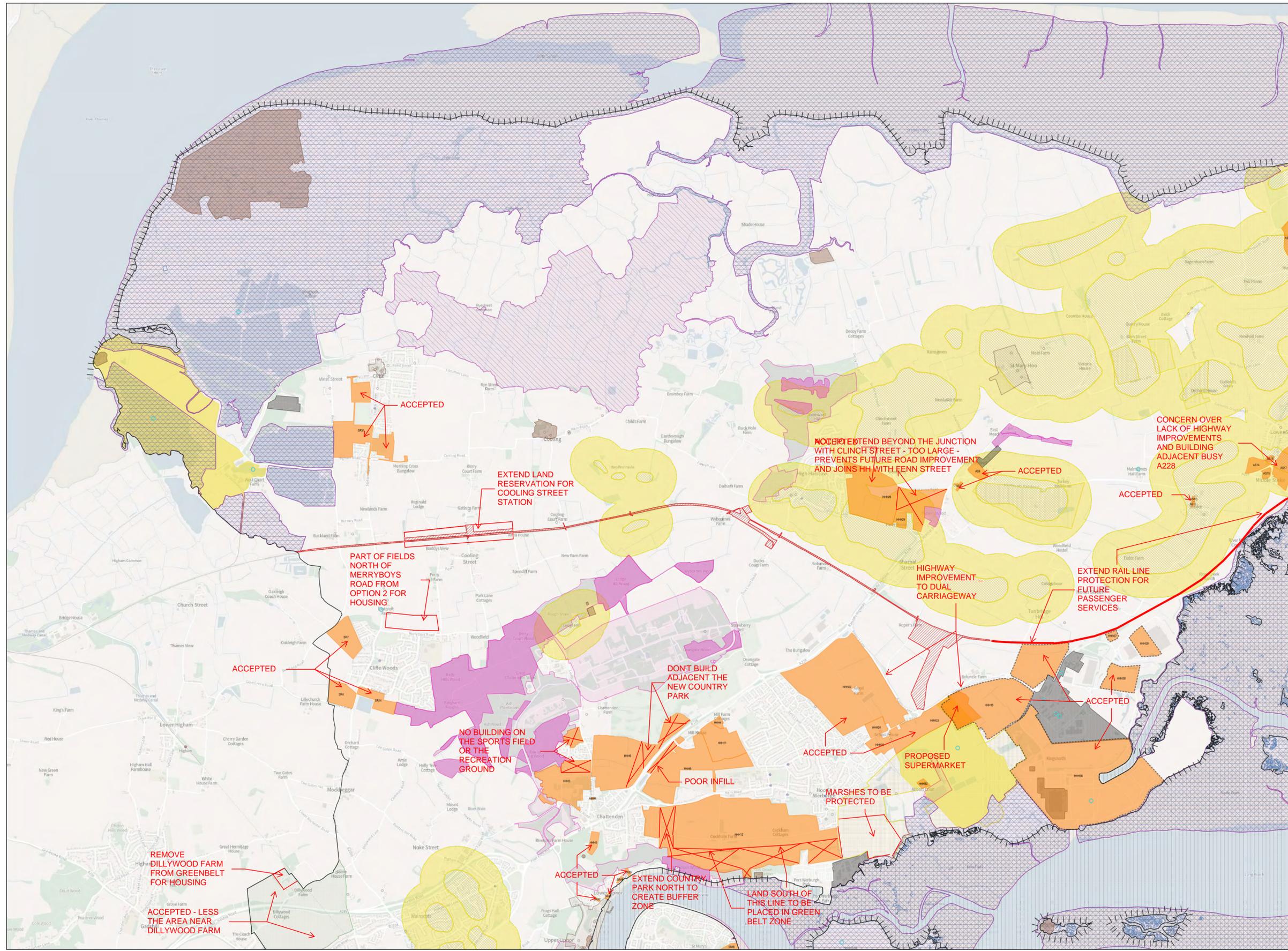
Para 1 – needs rethinking - Isle of Grain and Kingsnorth are/were locations for energy production when using carbon-based fuels (now gas, previously oil and coal), but are not suitable for the current regenerative forms of energy, i.e. wind farms and solar panels. We would like there to be more emphasis on more wind farms and solar panels – the latter being installed on people’s homes, large depots and other large roof community buildings and solar farms on low grade agricultural land. When these are placed on medium height frames, they allow the land to be used by sheep and other ruminants, allowing farmers to create double income of their land.

We would also like to see the policy cover both blue and green hydrogen production and its use in place of natural gas. We currently don’t have enough electricity storage capacity – this needs to be addressed so that there is sufficient electricity production in times of no wind and little day-light.

Para 2 onwards accepted.

T41: Heat Networks

We suggest that T41 and the whole of Section 13.3 is removed, as from experience combined heat and power networks have not worked at the efficiency and scale proposed by mechanical and electrical engineers (e.g. CHP project in Stoke Newington). We are of the opinion that if houses are built to PassivHaus, or Eco-House standard and have solar panels, then this is much more beneficial and economically viable than heat networks.



Legend

- Medway boundary
- Site Allocations**
 - Indicative Preferred Sites - Res-led
 - Indicative Preferred Sites - Non-resi
- Natural Environment**
 - Habitats sites**
 - Special Areas of Conservation
 - Special Protection Areas
 - Special Protection Areas (Marine)
 - RAMSAR
 - Marine Conservation Zones
 - Irreplaceable habitats**
 - Ancient Woodland
 - Other**
 - Sites of Special Scientific Interest
 - Local Nature Reserves
 - Undeveloped Coast
 - Areas of Outstanding Natural Beauty
 - Green Belt
- Economic Development**
 - Existing Employment Areas
- Built Environment**
 - Listed Building
 - Parks & Gardens
 - Scheduled Monument
 - Conservation Area
- Retail and Town Centres**
 - Retail Parks
 - Local Centres (LC)
 - Rural Centre (RC)
 - Neighbourhood Centres (NC)
 - Shopping Parade (SP)
 - Leisure
- Transport**
 - Grain Branch (Permanent works)
 - Grain Branch (Temporary works)
 - Chatham Waters Line
- Minerals**
 - Minerals Supply Sites
 - Minerals Safeguarding Areas
 - Minerals Consultation Areas
 - Areas of Search
- Waste Management**
 - Waste Management Facilities

