

Medway Council  
Gun Wharf  
Dock Road  
Chatham  
Kent  
ME4 4TR

## **BY EMAIL ONLY**

24 July 2024

our ref: KCIIIECP/Medway\_LP/Reg\_18  
your ref:

Dear Sir/Madam,

### **Medway Local Plan Regulation 18 Consultation 2024**

Thank you for the opportunity to comment on this consultation.

As the National Trail Officer for the southeast section of the King Charles III England Coast Path (KCIIIECP), it is my responsibility to ensure the path is protected and seek opportunities to enhance the trail where possible.

The KCIIIECP is a new National Trail that will pass around the whole of the English coast. When it is complete, the KCIIIECP will be approximately 2700miles long, making it the longest managed coastal walking route in the world.

To help the trail deliver environmental, economic and health benefits to communities, the local plan should include policies that support the work of the KCIIIECP. While it is pleasing to note that the KCIIIECP has been referenced within the document, it is requested that the following specific Coastal Access Policy is included in the Medway Local Plan:

#### **Requested Policy: Coastal Access**

1. The King Charles III England Coast Path (KCIIIECP) National Trail shall be protected, with opportunities taken to enhance the route where appropriate (e.g., re-aligning the trail closer to the sea).
  2. Public access to the coast will be retained and improved where possible (e.g., through the creation of new path links).
  3. Planning applications must highlight the route of the KCIIIECP on their proposals, where it is affected by development, and demonstrate how the trail will be positively accommodated within the development site. Proposals that would adversely affect the KCIIIECP will not be permitted.
-

**Justification:**

The KCIIIECP is a national asset that links iconic places and heritage sites along the coast, enabling people to experience, recognise and value the benefits of our environment. Research has also shown that the Trail brings significant health and wellbeing benefits, boosting local economies and coastal communities.

For example, research has shown that when local coastal resident expenditure is excluded, an additional £334 million was spent in local economies by people walking on English coastal paths. This directly supported £167 million of output (gross value added) in local economies and 5,900 full time equivalent jobs (<https://publications.naturalengland.org.uk/publication/6476962745024512>).

Taking this evidence into consideration, it is imperative that the new Medway Local Plan includes a specific policy reference for the KCIIIECP.

In addition to this policy request, further comments for the proposed policies and supporting text are summarised below:

**Policy S5: Securing Strong Green and Blue Infrastructure (Pg 41)**

Reference to National Trails is welcomed and proposed text is supported.

**Paragraph 7.7.4 (Pg 111)**

Please note that the trail is called the 'King Charles III England Coast Path', not 'coastal' path. For the avoidance of doubt, it is requested that this text is corrected.

**Policy T13: Tourism, Culture and Visitor Accommodation (pg111)**

Proposed policy text is welcomed and supported.

**Paragraph 7.7.12 (Pg 113)**

Please note that the trail is called the 'King Charles III England Coast Path', not 'coastal' path. For the avoidance of doubt, it is requested that this text is corrected.

**Paragraph 9.3.4 (Pg 156)**

Please note that the trail is called the 'King Charles III England Coast Path', not 'coastal' path. For the avoidance of doubt, it is requested that this text is corrected.

**Policy T20: Riverside Path (pg156)**

It is requested that the following additional text is inserted into this policy:

'Proposals for new development along the riverside must demonstrate how the KCIIIECP National Trail will be positively accommodated within the development site. New development will support the enhancement of the KCIIIECP National trail and links to the coast path, providing opportunities for active travel and outdoor recreation. Proposals that would adversely affect the KCIIIECP will not be permitted.'

**Policy T27: Reducing Health Inequalities and Supporting Health and Wellbeing (Pg174)**

Proposed policy text is welcomed and supported

Comments are made in reference to the following planning policy;

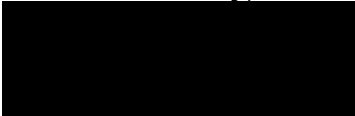
- **National Planning Policy Framework**

- **Paragraph 104** - Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.

- **Paragraph 124** - Planning policies and decisions should:
  - a) encourage 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 or improve public access to the countryside;
- **Paragraph 178** - Development in a Coastal Change Management Area will be appropriate only where it is demonstrated that:
  - d) the development does not hinder the creation and maintenance of a continuous signed and managed route around the coast.
- **Paragraph 180** - Planning policies and decisions should contribute to and enhance the natural and local environment by:
  - c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;

This response is made on behalf of the King Charles III England Coast Path National Trail. The views expressed should be considered only as the response of the National Trail officer in respect of King Charles III England Coast Path matters relating to the proposal.

Yours faithfully,



**Thomas Kennedy**

National Trail Officer for the King Charles III England Coast Path - South East

T: 

E: 

06 August 2024

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

**Re: Consultation regarding the Medway Local Plan 2041**

**Our Ref: LGW5595**

Thank you for your email dated 02 August 2024, regarding the above-mentioned consultation.

We have no aerodrome safeguarding concerns in relation to the Medway Local Plan 2041.

However, it is vital that the safe operation of the airport is not impacted upon by buildings, structures or works. Therefore, we would be grateful if we could be consulted on any proposed buildings or structures that will exceed 150m AGL, within the Medway Local Plan Area. This is to ensure that Instrument Flight Procedures (IFPs) that are utilised by Gatwick air traffic will not be impacted.

Aerodrome Safeguarding is a legislative requirement for officially safeguarded aerodromes of which London Gatwick is one. Aerodrome safeguarding is the process used to ensure the safety of aircraft while taking off and landing or flying in the vicinity of aerodromes.

If you have any queries, please do not hesitate to contact me.

Yours sincerely

Amanda Purdye, Aerodrome Safeguarding Officer  
For and on behalf of London Gatwick

4 September 2024



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Dear Sir/Madam,

## **REPRESENTATION ON BEHALF OF UNIVERSITY OF KENT IN RELATION TO MEDWAY COUNCIL'S REGULATION 18 (LOCAL PLAN) CONSULTATION**

We are instructed by University of Kent ('the University'), to submit representations to the Regulation 18 'Medway Local Plan 2041', which is subject to consultation until Sunday 8 September 2024. At this stage the Regulation 18 consultation includes details on proposed policies and potential areas for development, including three options for locating development across Medway over the emerging local plan period.

### **Background and Context**

University of Kent has been offering higher education in Medway for over twenty years, since 2005 as part of the 'Universities of Medway' initiative, with a mission to provide access to Higher Education in an area of disadvantage. Over this period, the University has worked with partner universities, Medway Council and the Historic Dockyard to bring about significant change and regeneration to the area, notably at the Pembroke Campus and at the Historic Dockyard.

The University's Strategy 2025 identifies a need to deliver a fresh and exciting vision for the Medway Campus which addresses current student recruitment challenges and staff and student experiences as well as a wider civic mission within the Medway region. The University has experienced an increase in the proportion of commuting students who do not live in Medway and consider the Medway Campus to be particularly attractive to professional and mature students. Therefore, the University's wider strategy seeks to create a distinct offer and identity which builds on the University's core strengths, and associated demand in:

- Creative and Digital Industries;
- Health and Wellbeing;
- Innovation and Business Orientated Programmes;
- Supporting Higher Degree Apprenticeships; and
- Help in work-based learning.

The Strategy provides for a distinct and professionally aligned market-led portfolio which retains the University's values and identity which is closely aligned to the regional needs of Medway. It also provides enhanced focus and purpose to the University's role as a civic and anchor institution that serves the local region, based in Canterbury and Medway respectively. The University are currently in the process of developing the 2030 Strategy which seeks to build upon the same core themes.

Key to the University's strategy has been the establishment of the Institute for Creative and Cultural Industries (iCCi), which builds on Kent's strengths in design, media, digital arts and human-computer interaction work with strategic bodies such as the Creative Industries Federation and Arts Council England, to equip students with the necessary skills to support the development of the creative and cultural industries in the region, be at the forefront of building the talent pipeline, and develop research and innovation capacity in this field. iCCi brings together a diverse and exciting community of academics and students and provides a focus for the

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creative industries, embedding business, digital and arts and humanities innovation to equip students with essential skills, engage communities and help small creative businesses to thrive. The establishment of iCCi comes at an opportune timing as the new Labour Government has unveiled a comprehensive strategy to bolster the UK's creative industries, working closely with key stakeholders, including the Creative Industries Council and Arts Councils, to develop a private finance model that attracts diverse funding sources, ensuring a sustainable future for arts organisations. The University is well placed to be a leading higher education institution to support Medway's role nationally for the creative industries.

At the forefront of the iCCi is 'The Docking Station,' an innovative project that will convert the former Police Section House and the land to the rear of the building into a 'creative industries' accelerator space, located on Chatham's Historic Dockyard. The Docking Station will provide a high-quality international creative digital hub cutting edge technologies, performance, and training opportunities. Its facilities will include a community café and social spaces, gallery and exhibition spaces, flexible teaching areas, co-working and incubation space and a suite of state-of-the-art Digital Production Studios. Medway Council have secured a £5.6 million share of the Government's Levelling Up Fund for the project and iCCi has secured £3.5 million from the Cultural Development Fund via Arts Council England. The project is also supported by the National Lottery Heritage Fund.

Planning permission was granted by Medway Council on 2 July 2024 (ref: MC/23/1834) for The Docking Station and the University are intending to start construction on site later this year. The project aligns with the University's wider Estate Strategy to develop the University's estate in line with local masterplans, with reference to wider Kent and Medway infrastructure developments.

## **Representations**

This next section sets out our representations to the Regulation 18 'Medway Council Local Plan 2021.' Responses are provided, using the same chapter and policy numbering as the draft plan.

### **Chapter 2 (Vision and Strategic Objectives)**

The University welcomes the Vision's acknowledgement of the role higher and further education providers have had in raising skills levels across the workforce and recognition that graduates and the wider workforce can develop their future careers in quality jobs in Medway as a result. The University is a key anchor institution to support the raising of skills levels in Medway and retain Graduates in Medway.

A Strategic Objective of the draft Local Plan is '*Securing jobs and developing skills for a competitive economy*' (Page 23). The University welcomes the sub-objective to '*gain wide recognition of Medway as a centre for learning and its student base; and realise economic and place-making opportunities associated with the cluster of universities and colleges in Medway*' (Page 24). In order to realise the economic and place-making opportunities associated with the with the cluster of universities in Medway, wider planning policies must ensure support for investment in the infrastructure and place-making opportunities to make Medway an attractive and vibrant location for students and graduates to maximise the potential of this learning cluster. Investment is particularly required for improvements in place-making between student hubs, such as Pembroke Campus and student accommodation at Liberty Quay, to nearby town centres and train stations. Enhancements to the local environment, such as improved streetlighting, public realm and street furniture, will deliver a more attractive and welcoming environment for students, staff and visitors.

### **Chapter 3 (Spatial Growth Objectives)**

This Chapter seeks views on three options for the Spatial Development Strategy to guide where development across Medway should be located over the emerging local plan period. These options are for either an Urban Focus, Dispersed Growth or a Blended Strategy, with the Council identifying a preference for the Blended Strategy of a 'brownfield first' focus with regeneration in urban centres and waterfront locations, complemented by range of sites in suburban and rural areas.

Paragraph 123 of the National Planning Policy Framework (NPPF) (December 2023) sets out that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions through utilising as much use as possible of previously-developed or 'brownfield' land.

The proposed reforms to the NPPF and the accompanying Ministerial Statement is a material consideration, indicating the direction of travel of national planning policy, notably in regard to the need to increase the supply of new homes on both brownfield land and green belt land and realise the economic potential of key growth areas in the economy. It is considered that the Blended Strategy would be consistent with both adopted and draft NPPF policy, seeking to optimise brownfield land first, complemented by suburban and rural sites.

It is considered that the prioritisation of a 'brownfield first' focus, with regeneration in urban centres and waterfront locations, will support the University through delivering high-quality placemaking on large areas of brownfield land surrounding Pembroke Campus and at the Historic Dockyard, creating the opportunity to provide an attractive and vibrant setting for students and staff. In addition, the redevelopment of extensive brownfield land in Chatham Town Centre and the Chatham Maritime area will support housing and infrastructure needs of students and staff, maximising the potential for co-location of housing, leisure facilities and jobs in local industry to be located in close proximity to University facilities.

## **Chapter 6 (Housing)**

NPPF Paragraph 63 states that within the context of establishing housing need, the size, type and tenure of housing needed for different groups in the community, including students should be assessed and reflected in planning policies.

Draft Policy T5 (Student Accommodation) states that the Council will aim to ensure that student housing is provided in the most appropriate and accessible locations and has due consideration to surrounding land uses. Provision for students will be predominantly supported close to the higher and further education establishments and in town centres where the development can be shown to make a positive contribution to the vitality and sustainability of the centres. The University broadly supports this policy, particularly in regard to student accommodation needing to be well served by walking, cycling and/or public transport and accessible to a wide range of town centre, leisure and community uses. With students relying on facilities in the surrounding area, rather than on-site provision on the Campus, access the nearby leisure facilities such as gyms and cafes are important in enhancing the student experience and encouraging students to stay in Medway.

It is considered there are a number of benefits for student accommodation uses being located close to the established 'learning quarter' at Chatham Maritime and within town centres. Education and student accommodation uses will increase footfall in the town centre and Chatham Maritime areas through creating additional student residents and academic jobs. Those who live, study and work close to education facilities and the town centre will rely upon the shops and services within a convenient walking distance. Chatham is well served by public transport, particularly train and bus services and there is a need to maintain and enhance these services to encourage use of public transport, with public transport enhancements between Chatham Dockyard and the town centre identified and supported under draft Policy S17 (Chatham Town Centre).

The Council must ensure that planning obligations and/or contributions, as set out in the latest Medway Guide to Developer Contributions and Obligations, are secured to deliver public transport and public realm enhancements, to maximise the potential of higher education providers which are in close proximity to Chatham Town Centre. Securing obligations improvements in public-transport and place-making between student hubs, such as Pembroke Campus and student accommodation at Liberty Quay, to nearby town centres and train stations will create an environment which attracts and retains students. This is particularly important in the context of an increasing proportion of commuting students and professional and mature students attracted to courses offered in Medway. Obligations must also ensure that existing public transport services are maintained, notably services between existing student accommodation at Liberty Quay and the Campus.

Locating education and student accommodation uses within the town centre will encourage use of public transport, walking and cycling with educational facilities within an accessible and sustainable location from the town centre, encouraging a modal shift to sustainable transport modes. Where the student experience is enhanced through locating student accommodation in town centres and/or close to the 'learning quarter', this will encourage the retention of graduates within Medway following completion of higher education courses who enjoy the lifestyle and environment which Medway provides.

## **Chapter 7 (Economic Development)**

### **Policy T12 (Learning and Skills Development)**

The University supports draft Policy T12 (Learning and Skills Development) which sets out that the development and expansion of uses that facilitate further and higher education facilities within the 'learning quarter' at Chatham Maritime will be supported. The University's existing facilities are located at the Pembroke Campus, with future expansion comprising The Docking Station for the iCCi to be located at Chatham's Historic Dockyard. Therefore, it is considered this policy broadly captures and supports the University's strategy for Medway.

It is noted that the 'learning quarter' at Chatham Maritime is not identified on the draft Policies map and the area comprising the 'learning quarter' is not clarified or defined within the policy wording. It is requested that the 'learning quarter' is either identified on the draft Policies Map, to include the Pembroke Campus and Chatham Historic Dockyard, or clarification is provided within the policy wording on what land / area comprises the learning quarter. This will ensure there is a clear understanding of where development and expansion of uses that facilitate further and higher education facilities will be supported.

### **Policy S14 (Supporting Medway's culture and creative industries)**

Paragraph 87 of the NPPF (Dec 2023) states that planning policies and decisions should recognise and address the specific locational requirements of different sectors, including making the provision for clusters or networks of knowledge and data-driven, creative or high technology industries. The proposed reforms to the NPPF seek to vary the wording of Paragraph 87 (referred to as Paragraph 85 under the new draft NPPF) to make more explicit reference to planning policies and decisions making provision for new, expanded or upgraded facilities and infrastructure that are needed to support the growth of the creative industries. This aligns with the Labour Government's wider strategy for the creative industries to create a comprehensive strategy to bolster the UK's creative industries.

Policy S14 (Supporting Medway's culture and creative industries) seeks to ensure the continued growth and evolution of Medway's cultural infrastructure and states that the creative industries will be supported, enhanced and expanded to become a focus for culture. The policy aligns with Medway's Cultural Strategy's (2020) vision for Medway to be internationally recognised for its creativity and culture, with Arts Council England identifying Medway as a priority place for culture and heritage.

The University is well-positioned to support the aims of this policy and the wider Cultural Strategy for Medway as Creative and Digital industries form a key aspect of the University's wider strategy for Medway in order to create a distinct offer and identity which builds on the University's core strengths. The Docking Station will create links with industry and support business start-ups, forming a key node for the cultural and creative industries in Medway.

It is encouraged that the policy specifically recognises higher education's role in the creative industries to deliver continued growth in Medway's cultural and creative industries, notably in equipping local people with the skills and industry connections required to enter into the cultural and creative industries.

The new Local Plan presents a unique opportunity to position Medway as a key location as a creative industries cluster and include provision for facilities and infrastructure needed to support the growth of the creative industries. To deliver this, draft planning policy must identify support for infrastructure to support growth of the



creative industries, as well as the physical facilities. Under mounting financial challenges impacting institutions across the UK, including Universities and Council's alike, the Local Plan must ensure appropriate funding is secured under financial planning obligations and directed under the Infrastructure Delivery Plan to support the delivery of facilities and infrastructure required to support growth in the creative industries.

## **Chapter 8: Retail and Town Centres**

### Policy S17 (Chatham Town Centre)

The University welcomes Policy S17 (Chatham Town Centre) which seeks to support Chatham's high street offer of retail, community uses and services, commercial leisure (food and beverage), creative uses, culture and tourism. The University relies in the Town Centre to satisfy local student and staff need with an absence of on Campus facilities for retail and leisure uses such as gyms and cafes.

Continued support for the vitality of the town centre and enhancements to the town centre are wholly supported by the University to ensure this remains an attractive node for students to use local facilities, study in informal workspaces and socialise with peers.

### **Conclusion**

We are delighted to participate in the public consultation on the Regulation 18 Medway Local Plan 2041 and to submit these representations on behalf of University of Kent. Our client plays a fundamental role in to provide access to Higher Education in Medway, promote skills growth and contribute to key growth sectors in the local economy, notably the cultural and creative industries. Every effort should therefore be made to support a thriving hub of Universities in Medway which helps drive skills and economic growth in turn.

Please would you acknowledge receipt of this representation. We reserve the right to supplement this representation.

Please contact either myself or [REDACTED] should you have any queries.

Yours faithfully



**Ben Tattersall**  
**Senior Planner**

## SUBMISSIONS TO THE MEDWAY LOCAL PLAN REGULATION 18 2024

### INTRODUCTION

These submissions to the Regulation 18 version of the new Medway Local Plan are made on behalf of Endeavour Gillingham Limited, the new owners of the Hempstead Valley Shopping Centre, Hempstead Valley Drive, Hempstead, ME7 3PD.

The centre is located in a valley which runs along a north-south axis and is surrounded by mature vegetation along its major road frontages. Key vehicular and pedestrian access and egress is from Sharstead Way and Hempstead Valley Drive. The area surrounding the district centre is predominantly residential in character. The closest residential properties are on Sandy Dell to the south east of the centre, Kingsdown Close to the east and Tamarind Close to the north. Bus services enter the centre from the south with bus stops and stands between the South Mall entrance and the Venue (the main catering offer)

The development of Hempstead Valley began in 1974 and was planned as a major district centre, originally of some 23,226 sq m (250,000 sq ft). At no stage was the development envisaged as a local centre. In the early 1990s the Phase 1 extension was built including the M&S store. The centre today is around 44,750 sq m (480,000 sq ft) in some 60 units.

Hempstead Valley is now home to Sainsbury's, an M&S with Foodhall and to the south the centre is in the process of refurbishment and modernisation with a range of new catering offers and with the redevelopment of the former Food Court, a TK Maxx store, enlarged New Look and JD Sports have been created. The former Bhs store is now being refitted as a Home Bargains store .

The Centre is the second largest in Medway and performs both a local convenience function but it also provides a wider role within the Medway area for comparison shopping and services.

### RECENT PLANNING HISTORY

Following a number of earlier consents to extend the South Mall and East Mall areas, permission was granted in the alternative to application MC/12/1873 in April 2013. This involved the redevelopment of the former Exhibition centre in the red car park together with remodelling the former food court and the South Mall overall. Following a number of minor amendments this scheme was built out and resulted in the creation of The Venue, an award winning commercial scheme of restaurants, cafes and sandwich shops together with the Kent Invicta building society and on the upper floor a relocated and improved community hall facility and management offices.

Subsequently within the same permitted area, TK Maxx opened their store in what was previously in part the Food Court; via amendments to the permission New Look and JD Sports also opened new units.

In 2015 permission was granted for a development of new retail and leisure space within the yellow car park comprising up to 7,522 sq m of retail space although 1,904 sq m of this could alternatively be used for leisure purposes. The car parking lost on the yellow car park is principally replaced by way of a single decked car park on the blue and purple car parks together with some minor reconfiguration of the green car park. Although not completed, this permission remains extant.

In 2020, the then owners completed a new lease with Sainsburys; part of this allowed for the refurbishment of the Sainsburys store and the undercroft car park, releasing surplus space back to the landlord at the eastern end of the former store as well as vacating the former Argos which moved into the Sainsburys. Planning permission was not needed for these works but permission was sought for an alternative uses for the space released. Overall no significant new floor space was proposed but there was a shift away from A1 retail floor space to a wider range of leisure and community uses. Permission was subsequently granted for a range of Class E uses within the redeveloped Argos plus the creation of a gym.

Permission was granted on appeal in 2021 for the development of a drive thru Burger King unit on an area of underused car parking to the south of the M&S multi storey car park.

Most recently, permission has also been sought and approved to allow 2 of the restaurant units to operate a collection and delivery service from their existing units.

Finally, permission has been granted to allow external changes to the former BHS unit and the South Mall entrance to allow a letting to a new retailer; this unit had been vacant/underoccupied for some time, the new works will bring a new retailer, Home Bargains into this empty space during the course of 2025.

## FUTURE ASPIRATIONS

The owner's aspirations are to continue to improve and modernise the centre while responding to changing market and social dynamics and the needs of its catchment population. In the short term this involves completing the works for the former BHS unit and seeking new uses for a number of vacant areas within the existing centre. Previous ideas for a discount foodstore are being re-examined together with indoor leisure, medical treatment as well as facilities for children before a decision is made on whether to proceed.

However, it is more difficult to set out specific proposals which would fall within the much longer timescale of the new Local Plan; other uses such as residential or hotel uses may come forward and accordingly the owners seek a flexible planning policy which recognises the importance of the centre to Medway as a whole.

While there have been major new retail led schemes at the centre since the previous local plan was adopted in 2003, an equal and increasing emphasis has been placed on widening the range of facilities and services available at the centre, making it more like a "traditional" centre such as the catering offer at the Venue, inclusion of a building society, the gym, and medical facilities such as the Therapy Centre, Hearing Centre and discussion are in progress for a laser eye treatment centre while discussions have been held over the possibility of a GP surgery.

The concept of a traditional town centre as a location primarily driven by retailing no longer exists; rather the entire environment around shopping and leisure has changed and will continue to evolve and so the notion of a traditional centre being a fixed thing is open to challenge. Greater flexibility is required as evidenced by the changes to the Use Classes Order. For example centres become not just places to go and buy goods from – they are now nodes from where goods and services are distributed, recognising changing formats such as last mile delivery by the likes of Deliveroo linked to dark kitchens etc. To then try and restrict that evolution is counter productive.

## NATIONAL PLANNING GUIDANCE

There are of course consultations in progress for a review of the NPPF, an approved update being expected after the close of the regulation 18 consultation. The draft issued for comments is however a good indication of likely changes and is capable of being a material consideration; accordingly the assessment below is based on this but clearly the Council will want to reflect on the updated version in producing their regulation 19 plan.

The new Government's overall approach has been clearly set out as seeking to achieve growth in the national economy. The Chancellor in her first speech said the Government will be "Addressing the difficult economic inheritance this government faces...[and is] committed to taking immediate action to drive sustained economic growth" while the Deputy Prime Minister added "The Chancellor and I will work in lockstep to kickstart the economy, unleashing housebuilding and powering local growth." In addition she said that "Further announcements will be made in the coming weeks to accelerate the development of housing and infrastructure, including launching a landmark consultation on an updated, growth-focused National Planning Policy Framework"

(taken from <https://www.gov.uk/government/news/chancellor-unveils-a-new-era-for-economic-growth> )

The existing and draft NPPF seeks to support sustainable development, including economic, social and environmental factors. For plan making this means in part making provision to meet the economic needs of their area. Section 3 sets out guidance on plan making, this includes that plans should inter alia

- a) be prepared with the objective of contributing to the achievement of sustainable development;
- b) be prepared positively, in a way that is aspirational but deliverable;
- d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

These matters will be considered below. In terms of a sound local plan which can be adopted, the NPPF sets out the following requirements

- a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

Section 6 of the NPPF is concerned with building a strong competitive economy. It states that

Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. **Significant weight** should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should **allow each area to build on its strengths**, counter any weaknesses and address the challenges of the future. (my emphasis)

Hempstead Valley is a key element of the Medway economy, providing significant numbers of jobs and taxes; significant weight should be attached to encouraging it to continue to evolve to meet future aspirations.

Section 7 is concerned with town centres. This is unchanged in the draft NPPF from the current policy. This commences with the following text

“Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Planning policies should:

a) define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters;

b) define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre;”

It then goes on to talk about the sequential approach and impact assessments. Importantly it does not provide guidance on the definition of centres although some guidance can be gleaned from the glossary. This includes the following definition of a town centre

“Area defined on the local authority’s policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.”

## EMERGING LOCAL PLAN POLICIES

These comments will focus primarily on section 8 of the draft plan “Retail and Town Centres” but the position is reserved to comment on other aspects of the plan at regulation 19 stage.

The introduction to this chapter notes that “town centres play an essential role in community life and are intrinsic to perceptions of places. National planning policy states that town centres should be recognised as the heart of their communities, and Local Plans should pursue policies to support their viability and vitality. Town centres bring people together to shop, do business, and enjoy leisure time, and can also be a place to live. Medway has a complex geography with five traditional towns, and many neighbourhood, local and village centres at a smaller scale.

**Hempstead Valley Shopping Centre is a non-traditional District Centre**, which has a good presence of major retailers.” (my emphasis)

The Plan therefore goes on to set out in policy S15 a strategy to create a network of sustainable centres supporting and regenerating them. These should be inclusive places that can deliver services, community uses, culture and creative uses and food and beverage offers. Para 8.3 goes on to describe a hierarchy of centres by reference to the 2016 and 2018 retail studies and concludes that “each study had confirmed the hierarchy of centres with Chatham at the top, followed by the five district centres and numerous local centres, neighbourhood centres and village centres.” This would include Hempstead Valley as one of the 5 district centres and indeed it is listed in policy S16 as a district centre.

Para 8.3.9 then says “Medway has six main centres, with their own character, and role to play in supporting Medway's sustainability ambitions...” and 8.3.10 states that this approach is compliant with the NPPF which requires definition of a robust hierarchy that can respond to rapid economic changes, that is able to respond to people's needs and provide choice. It also supports easy, sustainable access to services and facilities, which will support environmental objectives of reducing carbon emissions and helping reducing movements on the road networks. The corollary of this then would be that an approach which doesn't allow for these changes is not compliant with the NPPF.

Policy T15 sets out the sequential approach. This is in accordance with the NPPF and common practice, however we object to the inclusion of Hempstead Valley with retail parks and other leisure destinations as being required to apply a sequential approach to new main town centre use proposals.

- Hempstead Valley has already been defined in a number of places as a district centre. Indeed it is so defined in the strategic policy S16. As such T15 is not in accordance with the strategic policy of the plan
- In any event, even if Hempstead Valley were considered a local centre (see below) such centres are defined in the NPPF as town centres and so again a sequential approach is not required
- Hempstead Valley functions as a district centre and can be distinguished from a retail park or leisure designation; it is far larger and increasingly has a wider range of services and facilities than a retail park. It is also the focus of numerous bus services, has EV charging, cycle parking and cycle routes and pedestrian access points than a retail park.
- The policy in general is overly restrictive and does not meet the NPPF guidance regarding building a strong economy and being flexible to encourage town centre vitality.
- Para 8.4.7 which supports the policy refers to six main town centres i.e. including Hempstead Valley
- The policy appears to attach weight to a centre being a “traditional centre”; in our view this is wrong, main centres (as defined by the NPPF) are not necessarily “traditional” centres but this has little bearing on whether a centre performs an important function,

meeting many or all of the features that such a centre might be expected to provide. That is a more important consideration than whether a centre is “traditional”.

Policy T17 sets out the threshold for and scope of necessary impact assessments to assess retail and leisure developments outside defined town centres. Again Hempstead Valley is included as a location where an impact assessment would be needed. The policy suffers many of the above criticisms of policy T15, chiefly that if Hempstead Valley is a defined centre, as per the NPPF definition, no impact assessment should be necessary.

In addition policy T16 is considered to apply far too small a threshold for requiring an assessment. However it is noted that the thresholds are subject to further review and accordingly this matter will not be considered further here but will be reviewed as part of the regulation 19 version. It is noted however that the two published topic papers

<https://medway.oc2.uk/docfiles/20/Retail%20Topic%20Paper%20-%20Definition%20of%20Town%20Centre%20Boundaries%20and%20Primary%20Shopping%20Areas.pdf> and

<https://medway.oc2.uk/docfiles/20/Retail%20Topic%20Paper%20-%20Definition%20of%20Town%20Centre%20Boundaries%20and%20Primary%20Shopping%20Areas.pdf>

do not contain any justification for the thresholds being put forward.

#### POLICY S23 HEMPSTEAD VALLEY SHOPPING CENTRE

The Plan has a specific section on each of its main centres, including Hempstead Valley. This notes that Hempstead Valley Shopping Centre has been successful and is a district centre in retailing terms. However, the relative lack of non retailing facilities makes it different to the traditional centres.

The policy itself includes “The Council recognises that it provides for local needs and therefore supports its modernisation and growth in appropriate circumstances, particularly proposals are supportive of its local function and role in the retail hierarchy.” However further retail and commercial leisure development will be supported only where the proposals pass the sequential and impact tests.

This is contrary to the NPPF; development within defined centres does not require to undertake such assessments; remembering that the local plan describes the centre as a district centre but even if it is not, the NPPF includes local centres as town centres. Policy S23 accepts that Hempstead at least provides a local function.

Further it is argued that the role that Hempstead Valley plays in the retail hierarchy includes the provision of modern large space retail units which it can be difficult to provide in a “traditional” centre; and thereby it provides a role for Medway to reduce leakage of retail spend to locations in Maidstone and Bluewater.

The plan suggests that part of the justification for the approach taken is the example of the Willows centre in Torbay (Torquay District). In that case an Inspector on examination supported a policy which states “Further retail development at The Willows (other than minor development) will only be permitted where it cannot be located within the three town centres, or the other district centres, and where it meets the tests for new out-of-centre retail

developments set out below.” It is noted firstly that the Medway proposed policy goes beyond the policy adopted in Torquay in that the latter only applies to retail development. The comparison between Hempstead Valley and the Willows is in any event flawed, given that the latter comprises a large M&S and Sainsbury stores (as at Hempstead Valley) but very little other retail development let alone any other services or facilities. Other retail facilities nearby are indeed in the form of retail parks. The Willows is indeed far more like a retail park than a defined centre.

In conclusion, the draft Plan fails to be sufficiently encouraging of the role of Hempstead Valley and instead presents unwarranted hurdles in the way of its continuing role in the retail hierarchy. Paragraphs 2 and 3 of policy S23, plus references to Hempstead Valley in policies T15 and T16 should be deleted. The proposals map should continue to show Hempstead Valley as a district centre with its current boundary retained.

Eric Hall MRTPI  
TDH Estates Ltd  
September 2024





To: Medway Council Planning Team  
From: Medway Local Access Forum (LAF)  
Date: 7 September 2024  
Subject: Local Plan Reg 18 P2 comments

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The following comments have been brought together from Medway's Local Access Forum (LAF). The Forum is made up of 16 members who represent different users of the public right of way network (PROW). These include; Ramblers, the British Horse Society, National Farmers Union, Volunteers, and representatives from the disabled community.

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The LAF's focus is about ensuring the protection, improvement and accessibility of the open spaces in Medway and how the future development could impact the existing spaces and network.

Members reviewed the local plan material supplied online, with a few members attending the live events and the comments are as follows:

### **The Consultation**

Initially there is an overwhelming amount of detail. Although we get caught up wanting to know the detail, the overall strategy should apply fluidity and adaptability.

In the live events it was identified that:

- Consultants were not local to the area
- Spatial plans already showing newly developed land.

### **The Strategy**

In conclusion we agree that the blended strategy was the most pragmatic way forward.

Noting that although the local plan should provide a strategy on how an area should develop over a period, an element of flexibility needs to remain. If too much detail is stipulated too early, it could restrict the actual needs of the area. This could also happen if a blanket approach is taken forward. The diverse landscapes and environments are regularly referred throughout the consultation.

The plan itself sets out to deliver sustainable communities, however, to destroy swathes of Medway with grossly disproportionate housing growth is the exact opposite. The proposed

housing targets and affordable home requirement are not proportionate to the size and current environment in Medway. Developments need community buy-in, uniting the existing and new communities to bring forward a great place to live, work and visit.

### **Public Transport:**

Lacking in vision. Public transport is key for sustainable transport in Medway. Existing services are extremely poor, with many cancelling or just not turning up. This is unacceptable, especially as the wider picture is to promote sustainable travel which links into air quality improvements and meeting climate change measures.

Currently Medway promotes a private car transport mode. New direct bus routes should be explored or implement experimental routes to identify the optimal solution.

Another transport issue is regarding the rail line to Grain. A more effective solution would be to have a regular express bus service to connect with existing train services. This could follow the rail line in places but also serve the locations where people want to join it. It would be more flexible than the train solution and could operate throughout the day and into the evenings. This option should be mentioned and explored. Express services linking bus and train could decrease commuter traffic on the roads.

It was disappointing the officers/ consultants had not considered transport advising it was out of their remit. With the loss of HIF, major strategic infrastructure improvements need to be considered for any growth to come forward in Medway. The A289 provides the contingency route if the M2 experiences any disruptions. With the strategic junctions already over capacity, the network collapses when an incident occurs, resulting in impacts on emergency services.

Human behaviours will never change if a service is not reliable. This includes the delivery of live information across various streams and has to offer value for money.

### **Access:**

In a bid to promote active travel a strong drive should be made to allow walkers and cyclists to travel more safely off our dangerous road systems. A combined footpath/cycle path river linkage from Strood through to Maidstone would make such travel far safer.

We need to consider that there are numerous "dead-end" paths going nowhere, or stop at road edges, and these should either be connectable, or discussions should be encouraged with landowners to use their roadside edges as safe walking strips to connect such paths. Many of our country roads are narrow and motorists do not necessarily keep to speed limits.

Developments in the rural areas should really be considering the countryside outside the red line boundary, link into the existing PROW network or creating new links and deliver.

It is established that walkers and cyclists are considered as part of the active travel requirements, but the public right of way network provide access for equestrians and off-roaders. These are two communities that rarely considered when looking at access.

The equestrian community has strong evidence, that the amount of physical activity required to maintain and ride a horse exceeds the governments recommended minimum level of physical activity. It demonstrates this through the fact that many are females over the age of 45 who regularly partake in these physically demanding activities.

However, recent developments have made bridleways inaccessible or disconnected. It is in the Rights of Way Improvement Plan (ROWIP) that:

T2C	To ensure that the network evolves to meet current and future needs and that connectivity is improved.	T2C.1	Assess the connectivity of <b>bridleways</b> and byways, considering road safety and areas for possible upgrade.
		T2C.2	Deliver new routes for equestrians, addressing fragmentation and improving safety.
		T2C.3	Seek to resolve dead-end routes and provide better connected access, particularly on the Hoo Peninsula and to connect to the England Coastal Path, as resources and opportunities allow.

### Off-road community

The users of off-road vehicles seem to be labelled as ‘nuisance riders’ and are being squeezed off the network, resulting in them going anywhere, including Beaching’s way in Gillingham, areas of Lordswood and Nashenden Lane, which is part of the national North Downs Way trail. It is imperative that Medway retain existing byways and similar to bridleways, make connections to provide useable routes.

When looking to utilise the PROW network, we have to remember that cyclists are not permitted on a footpath therefore, when new routes are created, it is more cost effective to provide a path with a higher status for all to use.

**More ‘higher status’ routes and address the needs of horse riders** - More bridleways, byways and restricted byways and better-connected routes will help horse riders, cyclists and motorised vehicle drivers (byways only). New routes coming from housing development should allow as many types of users as possible. Issues including fly tipping, overgrown routes, busy and dangerous roads, better crossing points or paths on verges and better gates and surfacing also need to be addressed.

The aspirations of Medway’s ROWIP should be considered in all applications. It is obvious in larger proposed developments, but even small sites can provide key locations for improvement.

### Tourism:

There is mention of the KCIIECP, although seems like a last-minute addition. If Medway is serious about tourism, then its national trails (North Downs Way and the KCIIECP) should be an integral part of the offer. Having clear signs at key arrival points e.g. Rail and Bus Stations.

Easily accessible information could be provided about other access points as few walkers would want to walk more than 10 miles at a time. This is just one aspect of making visitors welcome especially after the Tourist Information Centre has closed.

Information boards and signs should be provided at those key arrival points. An example of where this has worked well is, Harrogate. Recently visited to see a relative in hospital, at the rail station there was clear signs and information about key things to see - as well as clear signs about their bus services. This made the town feel very welcoming.

### Environment

Under landscape protection and enhancement, when is the updated Medway Landscape Assessment due and will this be publicly available.

As a ramblor I was pleased to see the material on protecting open spaces which are an essential part of making Medway a good place to live in and visit.

A newly designated chalk stream, the River Wain running from Chattenden Woods through the pond at Islingham Farm Pond, and on to Upnor.

The last national government upgraded the UK’s Areas of Outstanding Beauty (AONB) to a National Landscape (NL) category, with enhanced protection being afforded to their status.

Increased biodiversity is now a priority issue, so disturbance of our local countryside is to be avoided. I consider it imperative that this NL enhancement is included in this plan and hope that the Medway Planning Committee make the appropriate decisions where any NL in their protection is considered to be under threat. Our superb countryside features, once damaged, can never be repaired. Although the comment is raised due to concerns at Bush Valley, the message should be applied across Medway's AONB and NL.

## **Conclusion**

The LAF appreciate having the chance to comment on the local plan progression and whilst it is understood that improving housing need and improving infrastructure whilst preserving not only our ecological future, but our historical and heritage integrity is a fine balancing act.

However, members of the LAF believe that this administration should, in fact MUST convey the message to the government in the strongest possible way that their housing targets are totally unachievable and unacceptable to the people of Medway.

We must do everything possible to ensure that open space is protected, enhanced and accessible for all users and members of Medway's communities.

Sent by email to: [planning.policy@medway.gov.uk](mailto:planning.policy@medway.gov.uk)

06/09/2024

Dear Sir/ Madam

### **Medway Local Plan**

1. Thank you for consulting the Home Builders Federation (HBF) on the Medway Local Plan. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.
2. Before providing detailed comments on the proposed plan the HBF welcomes the positive approach the Council have taken in seeking to meet housing needs in full. We recognise that the preparation of a plan that seeks to deliver a significant number of new homes and their supporting infrastructure has been challenging and encourage the Council to move quickly to regulation 19 and submission of the local plan for examination.
3. However, before moving forward with the local plan there are, as the Council will no doubt be aware, still significant gaps in the evidence base that will need to be addressed. The Council are still to publish a Transport Assessment, Infrastructure Delivery Plan, up to date viability assessment or a cumulative ecological assessment to support the HRA. Alongside this the evidence on housing land supply was limited and provided limited evidence as to the deliverability of the council's chosen spatial strategy over the plan period. Therefore, whilst HBF urges the Council to move forward quickly it must still have the requisite evidence to support the plan if it is to ensure the plan is sound.

### **Consultation on the NPPF**

4. At the end of July, the Government commenced a consultation on a number of amendments to the NPPF. The proposed revisions will make significant changes to the current document and there is a strong possibility that Medway and many of its neighbours will be required to prepare plans that are consistent with the changes being proposed, should they be adopted. In particular, the Council will need to consider how the proposed policy changes to Green Belt will need to be taken into account and any decision that is made with regard to reviewing the Green Belt in Medway. Alongside the changes to the NPPF the Government have consulted on a new standard method. This will see Medway's local housing needs assessment stay broadly similar at 1,644 dwellings per annum (dpa). However, in the neighbouring authorities of Gravesham and Tonbridge and Malling would see their LHNA increases by 32 dpa and 237 dpa and the Council will need to work with these authorities to ensure housing needs across the sub-regional housing market are met in full.

### **Plan period**

5. HBF considers a plan period ending in 2041 will not be consistent with paragraph 22 of the NPPF which requires local plans to look forward for at least 15 years from the point of adoption. The Council's Local Development Scheme (LDS) states that the Council expect the plan to be adopted in Autumn of 2026 will mean that the plan looks forward for slightly less than 15 years and as such the plan period should be extended to 2042 to ensure consistency with national policy.

### **Housing needs and requirement**

6. The Council state that using the standard method the housing need for Medway is 1,658 dwellings per annum (dpa). This results in a housing need across the plan period of 26,528 homes. While HBF support the Council's decision to meet this level of housing need, which is consistent with current standard set out planning practice guidance, the Council will need to:
  - a) Increase overall all supply by a year to reflect the longer plan period required by national policy. This would increase overall need to 28,186; and
  - b) Consider, as required by paragraph 11 and 60 of the NPPF, whether there are unmet needs arising in other neighbouring areas and if additional land can be identified in order to meet some of these housing needs.
7. The issue of unmet housing needs is not one considered in the local plan but is mentioned in the Sustainability Assessment (SA) with one of the growth options considered including

an uplift to minimum, needs of 2,000 homes to meet some of Gravesham Borough Council's (GBC) unmet housing needs. It is not clear whether this is the most up to date figure supplied by GBC, as no statement on the duty to co-operate or Statement of Common Ground with Gravesham has been published as part of this consultation. However, given the constrained nature of GBC and scale of their housing needs the Council will need to give full consideration as to whether additional land could be allocated to accommodate some of Gravesham need.

8. However, alongside considering GBC's unmet needs the Council will also need to work with other neighbouring authorities where unmet housing needs may arise. For example, Tonbridge and Malling Borough Council (TMBC) is currently preparing a new local plan and is constrained by the Green Belt and the Kent Downs National Landscape. Given that TMBC are midway through the preparation of their new plan with a housing need that will increase by over 400 dpa if the new standard method is adopted, the Council will need to have discussions with TMBC to ascertain their position with regard to housing delivery and consider whether some of these unmet needs could be addressed in Medway.
9. In her letter to Local Planning Authorities the Deputy Prime Minister has stated that the Government want to ensure that that the right engagement is occurring to address any unmet housing needs that may arise. It is therefore vital that the Councils co-operate and work proactively to consider all options for meeting housing needs in full. This work will need to include considerations as to the potential for Green Belt boundaries to be amended in the most sustainable locations in order meet housing needs – a point we will return to later on in this response.

### **Housing supply and spatial growth options**

10. The Council state that SGO3 is their preferred option at this stage. This is a blended strategy and could deliver, according to the Sustainability Appraisal (SA), an additional 23,733 homes over the plan period. When this is added to the roughly 4,000 homes from windfall and sites with existing planning permission<sup>1</sup> it is expected that supply over the plan period would be circa 27,700 homes – roughly 4% more than the 26,528 homes needed across the proposed plan period but nearly 500 homes short of housing need across a policy compliant plan period.

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<sup>1</sup> Based on data in paragraph 3.1.2 of the Sustainability Appraisal.

11. Firstly, the Council will need to ensure that it has sufficient land and flexibility in supply to ensure that housing needs to 2042 are met in full. This will require the council to ensure that there is not only sufficient land to meet needs over this amended plan period but also that there is a buffer of between 10% and 20% to ensure that any delays in the delivery of strategic sites or under delivery on those sites does not compromise the soundness and deliverability of the local plan. As the Council will be aware strategic developments, that will form a significant part of the council's land supply, are rarely built out as expected. Therefore, in order to ensure the plan is effective and deliverable across its plan period there must be sufficient flexibility in land supply to take account of the uncertainties arising from such sites.
12. Secondly, the Council have stated in the SA that the proposed growth option will deliver up to 23,733 new homes. However, HBF could not find any evidence as to when delivery on these sites is expected to start and the number of homes these sites are expected to deliver each year. Without this information it is impossible to say whether the Council's expectations are realistic. The Council must provide a trajectory for each of the sites that are expected to deliver homes over the plan period showing when they will start and how many homes, they will deliver each year. These estimates must be realistic and that the Council does not seek to overstate start times and delivery rates in order to reduce the number of sites that are required to meet needs.
13. In particular the Council will need to provide detailed justification as to the potential for urban regeneration to deliver over 7,000 new homes across the plan period. HBF is supportive of such schemes and local plans proactively promoting regeneration, but such schemes are difficult to deliver with multiple land owners, high development costs and challenging viability that can delay the delivery of new homes in complex urban environments. HBF would therefore suggest that the Council is cautious as to how many homes will be delivered through urban regeneration as it moves forward with this local plan.
14. Thirdly, when considering the number of homes that can be delivered on each site the Council will also need to ensure that it has fully considered the implications of sites delivering a 10% net gain in biodiversity. HBF understand that that Natural England would like to see more robust assessments as to how BNG will be delivered on allocated sites and while our concerns are different, we would agree with this position. Delivery of this statutory requirement on site can impact on the number of homes that can be built and it will be



important that this is properly assessed in order to justify the capacities of each site and their overall deliverability.

15. Finally, the chosen spatial strategy should seek deliver homes consistently across the plan period and not push back housing delivery to the back end of the plan; in order to meet acute levels of housing need that exist in Medway now. While HBF recognise that PPG permits the use of stepped trajectories, this is only in very specific circumstances. The aim of any spatial strategy should be to avoid pushing back delivery until later in the plan period reducing the impact of any uplift in supply required by the standard method. Even if a step is required this should be minimised with the Council seeking to allocate small and mediums sized sites that deliver early in the plan period.
16. To conclude, HBF are concerned that the Council have not provided sufficient evidence to conclude that the chosen spatial strategy will deliver the number of homes required to meet Medway's housing needs. While HBF would not disagree with the blended strategy being proposed by the Council it will be necessary for further sites to be allocated in order to ensure Medway's housing needs are met in full across a policy compliant plan period. In preparing the next iteration of the local plan it will therefore be essential that:
  - There is full transparency on the site selection process that informs the spatial strategy adopted.
  - That the site selection process is linked to back to the SA and the assessment of sites and any evidence that support their availability and whether they are developable or deliverable.
  - That the approach consistent and based on the application of specified criteria to ensure that all interested parties understand why particular sites have been selected. This will in turn ensure that the chosen spatial strategy comprises the most sustainable sites, which in turn ensure vision put forward in the local plan is deliverable.
  - The Council considers how the chosen strategy could address any unmet needs that arise in neighbouring areas - including amendments to Green Belt boundaries.

#### *Green Belt boundaries amendments*

17. Question 8 in the consultation document asks whether consultees consider exceptional circumstances exist to justify a review of the Green Belt. This question is asked in relation to policy S7, however HBF consider it more appropriate to respond to this question in

relation to chosen spatial strategy. In considering this question it is necessary to consider two issues:

- Can Medway realistically meet its own needs without amending Green Belt boundaries
- Whether exceptional circumstances exist within a wider sub regional to support boundary amendments given the green belt washes across the boundary between GBC, TMBC and Medway.

18. As set out above HBF are concerned that Medway will, on the basis of the proposed spatial strategy, have insufficient land to meet its own housing needs in full. There is a lack of evidence to support ambitious delivery expectations on key brownfield sites and limited understanding as to how biodiversity net gain for example will impact on the developable area of allocated sites. As such there is a strong likelihood that the Council will not meet its housing needs in full and should, as a matter of course, undertake a Green Belt boundary Review to identify additional sites that could be allocated in the local plan. While HBF consider a shortfall in housing needs should be considered sufficient justification for amending Green Belt boundaries it is also important to note that such sites are likely to deliver greater benefits to Medway such as affordable housing.
19. The Council note in paragraph 6.3.8 of the regulation 18 local plan that the LHNA identified affordable housing need to be around 55% of total housing needs in Medway. While the HBF does not expect the council to meet this level of need it is important for the council to recognise that more could be done to meet those needs if more land were allocated on green field sites. The Council acknowledges in policy T3 that brownfield urban sites, a focus for much development in Medway, will at best deliver 10% of those homes as affordable units. Given the difficulties faced by the council in securing sufficient affordable homes to meet needs HBF argue that the ability of green field sites to deliver more affordable homes is additional justification to undertake a Green Belt review and amend Greenbelt boundaries.
20. With regard to unmet housing needs it appears that both GBC and TMBC will struggle to meet their own needs. Medway have considered, and rejected, an option to increase supply to meet some of Gravesham's unmet housing needs. This suggests that on the basis of the chosen strategy it would not be possible to address the unmet needs of neighbouring areas solely from sites in Medway which are outside the Green Belt and, in accordance with

paragraph 146 of the NPPF consideration can be given as to whether exceptional circumstance exist to amend Green belt boundaries.

21. Both these areas face issue of affordability and struggle to meet the need for more affordable homes. For example, in GBC median house prices are 9 times the median income with this increasing to 12 in TMBC. A failure to increase housing supply will inevitably see this worsening as well as placing additional pressure on housing markets in adjacent areas such as Medway where the median affordability ratio has risen from 6 in 2013 to 8.5 in 2023. HBF therefore consider that exceptional circumstances arise justifying amendments to the Green Belt boundaries in all three LPAs to ensure housing needs are met in full. As such it will be incumbent not only on GBC and TMBC but also Medway to consider where the Green Belt can be amended to deliver sustainable development that will ensure housing needs are met in full.
22. While it will be important for Medway to co-operate with GBC and TMBC on these matters, the Council must ensure that this does not slow plan preparation. Amending Green Belt boundaries does not necessarily need a joint evidence base as long as there is consistency between the approaches taken between neighbouring authorities. It is possible for Medway to progress its local plan with amendments to the Green Belt boundary without undertaking a joint Green Belt Review.

*Supply on sites of less than one hectare.*

23. As the Council will be aware paragraph 70a) of the NPPF states that local planning authorities should: *"identify through the development plan and brownfield registers land to accommodate at least 10% of their housing requirement on sites of less than 1ha"*. However, it is not clear from the plan or supporting evidence whether this requirement will be met.
24. In meeting this requirement, the Council will need to ensure that these are identified with as an allocation in the local plan or in the Brownfield Register and does not consider small site windfalls as contributing to the 10% requirement. Whilst it will be important to promote more small sites to come forward over the plan period as windfall, as mentioned in part d of paragraph 70 of the NPPF, this is distinct from the 10% requirement set out in part a of paragraph 70 of the NPPF. Further clarification that the 10% should not include windfall

development is in the glossary where windfall is defined as “*Sites not specifically identified in the development plan*”. (our emphasis)

25. It is important to recognise that the allocation of small sites is a priority for the Government and stems from the Government’s desire to support small house builders by ensuring that they benefit from having their sites identified for development either through the local plan or brownfield register. The effect of an allocation is to take some of the risk out of that development and provide greater certainty that those sites come forward. This in turn will allow the SME sector to grow, deliver homes that will increase the diversity of the new homes that are available as well as bring those homes forward earlier in the plan period.
26. The Council should also recognise that allocating small sites and supporting SME house builders not only ensures a stronger supply in the short term but also improves the diversity of choice within local housing markets, support local and regional supply chains and are often pivotal in bring forward innovation and supporting jobs growth locally, with 1 in 5 of the SME work force comprising of apprentices. A failure to allocate small sites will contribute to the continued decline in small and medium sized house builders. Recent research by the HBF has found that there are 85% fewer small house builders today than there was 20 years ago and that of a survey of SME house builders 93% said that planning was a major barrier to SME growth. Whilst this decline is due to a range of factors more allocations of small sites would ease the burden on many SME developers and provide more certainty that their scheme will be permitted, allowing them to secure the necessary finance that is often unavailable to SMEs until permission is granted.
27. Therefore, in order for the plan to be consistent with national policy the Council should not just seek to maximise delivery from the small sites that do come forward but to actively promote these through allocations in the local plan.

## **Development Management Policies**

### **S2: Conservation and enhancement of the natural environment**

28. In response to Q2 HBF do not consider it justified or necessary for the Council to go beyond the 10% minimum Biodiversity Net Gain (BNG). There is still significant uncertainty as to how the 10% minimum will impact on viability both in terms of direct costs and, as mentioned above, the developable area of a site and in many areas where offsite credits will be

delivered and how much these will cost. For example, many viability assessments for local plans base their costs on the Government's Impact Assessment undertaken in 2019. This included costs for offsite delivery at around £11,000 per biodiversity credit. However, our members are experiencing much higher costs with units selling between £30,000 and £50,000. The expectation is that these costs will reduce but if Council's require a higher level of BNG demand for credits will increase limiting, or negating, any expected reduction in price. Rather than seek to push beyond what will for some development be a challenging target we would suggest that the council seeks to support the delivery of 10% BNG before seeking to go beyond this statutory minimum.

### **Policy T1: Promoting High Quality Design**

29. HBF are concerned that the Council are proposing to require development to fully embrace the National Model Design Code. Whilst this may be a reasonable starting point for more urban forms of development it champions higher densities that are often not appropriate for a development on greenfield, suburban and rural sites and can impact on the housing mix of some sites. As such the HBF would suggest that development should have regard to the aims of the NMDC rather than fully embrace its contents.
30. The final bullet point of this policy is suggesting that development demonstrates its "sustainability criteria" by meet a range of different requirements including BREEAM very good for energy and water efficiency and Building with Nature Standards. HBF consider this to be unnecessary given that development coming forward under this plan will already achieve a high level of energy efficiency by being built to the Future Homes Standard, meet the higher water efficiency target of 110 l/p/d as defined in building regulations and deliver a 10% net gain in biodiversity. As such it is not clear what additional benefit will be achieved from meeting the criteria in this bullet point. It is therefore considered to be ineffective and unjustified and should be deleted.

### **Policy DM6: Sustainable design and construction**

31. The third bullet point will require developers to use design principles founded on locally sourced and or recycled material. HBF understand the council's desire to support these principles but there must be flexibility where it is not possible to deliver this approach and result in a significant increase in costs and/or delays. HBF would suggest that the bullet

point is amended to read “*Where possible design principles should be founded on local sourced and/or recycled materials*”.

32. The final bullet requires all residential development to detail in their application how they are seeking facilitate working from home including access to high-speed broadband/internet. The Council are no doubt aware that Part R of the Building Regulations: Physical Infrastructure and network connections to new dwellings (2022 edition) require all new build dwellings to be installed with the gigabit-ready physical infrastructure connections subject to a cost cap of £2,000 per dwelling. These requirements mean that it is unnecessary for the Council to include policies in the local plan relating to new broadband or telecommunications infrastructure. As for the provision of high-speed internet connections to the development itself this is for the infrastructure providers to deliver and for the council to facilitate through the local plan as it is beyond the developers control to delivery these improvements.

### **Policy T3: Affordable housing**

33. In response to Q11, HBF supports the Council’s general approach to include a differential affordable housing rate between greenfield sites and brownfield sites. However, we are concerned that this is based on a viability assessment from 2021 that does not reflect the costs facing development coming forward under this local plan. Most significantly the plan viability assessment was undertaken prior to the removal of the £170m that was expected from the Housing Infrastructure Fund to deliver key infrastructure improvements in Medway. Without this funding these costs are likely to fall on development across the Borough, significantly altering the viability of development and potentially its ability to delivery affordable housing at the rate set out in policy T3. The Council must update the viability evidence and the IDP to reflect this position, as well as reconsidering its costs relating to BNG and the Future Homes Standard, and where necessary reduce contributions for affordable housing in order to ensure that the plan as a whole remains deliverable.

### **T9 – Self build and custom housebuilding**

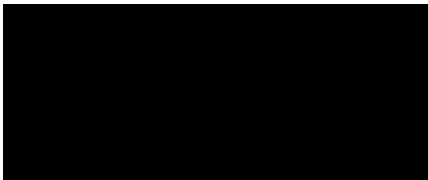
34. HBF welcome the decision to allocate sites for self-build development. However, in addition the Council are proposing to require sites for 100 or more unit to provide 4% of plots as self-build units. However, there appears to be limited evidence to support such an approach in future. On the basis of the self-build register demand for self-build in Medway is not strong

with on average 16 new requests to join the register each year since 2016. In addition, the Council do not appear to have reviewed this list to understand whether anyone on the register is still looking to build their own home or indeed actually has the financial resources to build their own home. In order to justify the proposed approach, the Council will need to provide further evidence as to the demand for self-build in Medway alongside the number of self-build plots that it would expect to be delivered from this policy to ensure that there is no oversupply with plots being left unnecessarily empty. With this in mind HBF would also suggest that the marketing period is reduced to 6 months. If the Council are confident that there is demand for self-build plots, then the 12-month marketing period can be reduced.

### **Future engagement**

35. I trust that the Council will find these comments useful. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry if that would be helpful. The HBF would like to be kept informed of the progress and adoption of the Local Plan. Please use the contact details provided below for future correspondence.

Yours faithfully



Mark Behrendt MRTPI  
Planning Manager – Local Plans  
Home Builders Federation





Marine  
Management  
Organisation

Seacole Building  
2 Marsham Street  
London  
SW1P 4DF

  
[www.gov.uk/mmo](http://www.gov.uk/mmo)

Our ref: ID 571

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

05/09/2024

Dear Sir/Madam,

**MMO Marine Planning and Marine Licensing response to Medway Local Plan  
(Regulation 18, 2024)**

Thank you for giving us the opportunity to comment on the Medway Local Plan. The comments provided within this letter refer to the document entitled Medway Local Plan (Regulation 18, 2024).

As the marine planning authority for England, the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent the Marine Plan boundaries extend up to the level of the mean high water spring tides mark (which includes the tidal extent of any rivers), there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark.

Marine plans will inform and guide decision makers on development in marine and coastal areas. Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure the necessary considerations are included. In the case of the document stated above, the [South East Marine Plan](#) is of relevance. The plan was published for public consultation on 14<sup>th</sup> January 2020, at which point it became material for consideration. The South East Marine Plan was adopted June 2021, alongside the North East, North West, and South West. The South East Marine Plan covers the area from Landguard Point in Felixstowe to Samphire Hoe near Dover, including the tidal extent of any rivers within this area.

All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access



ENVIRONMENT  
**ISO 14001**  
CERTIFIED



QUALITY  
**ISO 9001**  
CERTIFIED



INVESTORS  
IN PEOPLE

Bronze



Act 2009 and any relevant adopted Marine Plan, in this case the [South East Marine Plan](#), or the [UK Marine Policy Statement](#) (MPS) unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our [online guidance](#), [Explore Marine Plans](#) and the [Planning Advisory Service soundness self-assessment checklist](#).

## Marine Licensing

The Marine and Coastal Access Act 2009 states that a marine licence is required for certain activities carried out within the [UK marine area](#).

The MMO is responsible for [marine licensing](#) in English waters and for Northern Ireland offshore waters.

The marine licensing team are responsible for consenting and regulating any activity that occurs “below mean high water springs” level that would require a marine licence. These activities can range from mooring private jetties to nuclear power plants and offshore windfarms.

## Summary notes

Please see below suggested policies from the South East Inshore Marine Plan that we feel are most relevant to your Medway Local Plan.

These suggested policies have been identified based on the activities and content within the document entitled above. They are provided only as a recommendation and we would suggest your own interpretation of the South East Marine Plan is completed:

- **SE-INF-1:** Appropriate land-based infrastructure which facilitates marine activity (and vice versa) should be supported.
- **SE-INF-2:** (1) Proposals for alternative development at existing safeguarded landing facilities will not be supported.  
(2) Proposals adjacent and opposite existing safeguarded landing facilities must demonstrate that they avoid significant adverse impacts on existing safeguarded landing facilities.  
(3) Proposals for alternative development at existing landing facilities (excluding safeguarded sites) should not be supported unless that facility is no longer viable or capable of being made viable for waterborne transport.  
(4) Proposals adjacent and opposite existing landing facilities (excluding safeguarded sites) should demonstrate that they will in order of preference:
  - a) avoid
  - b) minimise
  - c) mitigate significant adverse impacts on existing landing facilities
- **SE-AGG-1:** Proposals in areas where a licence for extraction of aggregates has been granted or formally applied for should not be authorised, unless it is demonstrated that the other development or activity is compatible with aggregate extraction.
- **SE-AGG-2:** Proposals within an area subject to an Exploration and Option Agreement with The Crown Estate should not be supported unless it is

demonstrated that the other development or activity is compatible with aggregate extraction.

- **SE-AGG-3:** Proposals in areas where high potential aggregate resource occurs should demonstrate that they will, in order of preference:
  - a) avoid
  - b) minimise
  - c) mitigate significant adverse impacts on aggregate extraction
  - d) if it is not possible to mitigate significant adverse impacts, proposals should state the case for proceeding.
- **SE-PS-1:** Only proposals demonstrating compatibility with current activity and future opportunity for sustainable expansion of port and harbour activities will be supported. Proposals that may have a significant adverse impact upon current activity and future opportunity for expansion of port and harbour activities must demonstrate that they will, in order of preference:
  - a) avoid
  - b) minimise
  - c) mitigate significant adverse impacts
  - d) if it is not possible to mitigate significant adverse impacts, proposals should state the case for proceeding.
- **SE-PS-4:** Proposals promoting or facilitating sustainable coastal and/or short sea shipping as an alternative to road, rail or air transport will be supported where appropriate.
- **SE-HER-1:** Proposals that demonstrate they will conserve and enhance elements contributing to the significance of heritage assets will be supported. Proposals unable to conserve and enhance elements contributing to the significance of heritage assets will only be supported if they demonstrate that they will, in order of preference:
  - a) avoid
  - b) minimise
  - c) mitigate harm to those elements contributing to the significance of heritage assets
  - d) if it is not possible to mitigate, then public benefits for proceeding with the proposal must outweigh the harm to the significance of heritage assets.
- **SE-SCP-1:** Proposals that may have a significant adverse impact upon the seascapes and landscapes of an area should only be supported if they demonstrate that they will, in order of preference:
  - a) avoid
  - b) minimise
  - c) mitigate
  - d) if it is not possible to mitigate, the public benefits for proceeding with the proposal must outweigh significant adverse impacts to the seascapes and landscapes of an area. Where possible, proposals should demonstrate that they have considered how highly the seascapes and landscapes of an area is valued, its quality, and the

areas potential for change. In addition, the scale and design of the proposal should be compatible with its surroundings, and not have a significant adverse impact on the seascapes and landscapes of an area.

- **SE-EMP-1:** Proposals that result in a net increase to marine related employment will be supported, particularly where they meet one or more of the following:
  - i) create employment in areas identified as the most deprived, or
  - ii) support and are aligned with local skills strategies and the skills available in and adjacent to the south east inshore marine plan area, or
  - iii) create a diversity of opportunities, or
  - iv) implement new technologies.
- **SE-CC-1:** Proposals which enhance habitats that provide flood defence or carbon sequestration will be supported. Proposals that may have significant adverse impacts on habitats that provide a flood defence or carbon sequestration ecosystem service must demonstrate that they will, in order of preference:
  - a) avoid
  - b) minimise
  - c) mitigate significant adverse impacts, or, as a last resort,
  - d) compensate and deliver environmental net gains in line with and where required in current legislation.
- **SE-CC-2:** Proposals in the south east marine plan area should demonstrate for the lifetime of the project that they are resilient to the impacts of climate change and coastal change.
- **SE-CC-3:** Proposals in the south east marine plan area and adjacent marine plan areas that are likely to have significant adverse impacts on coastal change should not be supported. Proposals that may have significant adverse impacts on climate change adaptation measures outside of the proposed project area must demonstrate that they will, in order of preference:
  - a) avoid
  - b) minimise
  - c) mitigate the significant adverse impacts upon these climate change adaptation measures.
- **SE-AIR-1:** Proposals must assess their direct and indirect impacts upon air quality and emissions of greenhouse gases and air pollutants. Where proposals are likely to result in air pollution or increased greenhouse gas emissions, they must demonstrate that they will, in order of preference:
  - a) avoid
  - b) minimise
  - c) mitigate air pollution and or greenhouse gas emissions in line with current national and local air quality objectives and legal requirements.
- **SE-ML-1:** Public authorities must make adequate provision for the prevention, re-use, recycling and disposal of waste to reduce and prevent marine litter. Public authorities should aspire to undertake measures to remove marine litter within their jurisdiction.

- **SE-ML-2:** Proposals that facilitate waste re-use or recycling to reduce or remove marine litter will be supported. Proposals that could potentially increase the amount of marine litter in the marine plan area, must include measures to:
  - a) avoid
  - b) minimise
  - c) mitigate waste entering the marine environment.
- **SE-WQ-1:** Proposals that enhance and restore water quality will be supported. Proposals that cause deterioration of water quality must demonstrate that they will, in order of preference:
  - a) avoid
  - b) minimise
  - c) mitigate deterioration of water quality in the marine environment.
- **SE-ACC-1:** Proposals demonstrating appropriate enhanced and inclusive public access to and within the marine area, and also demonstrate the future provision of services for tourism and recreation activities, will be supported. Where appropriate and inclusive enhanced public access cannot be provided, proposals should demonstrate that they will, in order of preference:
  - a) avoid
  - b) minimise
  - c) mitigate significant adverse impacts on public access.
- **SE-TR-1:** Proposals that promote or facilitate sustainable tourism and recreation activities, or that create appropriate opportunities to expand or diversify the current use of facilities, should be supported. Where proposals may have a significant adverse impact on tourism and recreation activities they must demonstrate that they will, in order of preference:
  - a) avoid
  - b) minimise
  - c) mitigate that impact.
- **SE-SOC-1:** Those bringing forward proposals are encouraged to consider and enhance public knowledge, understanding, appreciation and enjoyment of the marine environment as part of (the design of) the proposal.
- **SE-MPA-1:** Proposals that support the objectives of marine protected areas and the ecological coherence of the marine protected area network will be supported. Proposals that may have adverse impacts on the objectives of marine protected areas must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate adverse impacts, with due regard given to statutory advice on an ecologically coherent network.
- **SE-MPA-2:** Proposals that enhance a marine protected area's ability to adapt to climate change, enhancing the resilience of the marine protected area network will be supported. Proposals that may have adverse impacts on an individual marine protected area's ability to adapt to the effects of climate change and so reduce the resilience of the marine protected area network, must demonstrate that they will, in

order of preference:

- a) avoid
- b) minimise
- c) mitigate adverse impacts.

- **SE-MPA-3:** Where statutory advice states that a marine protected area site condition is deteriorating or that features are moving or changing due to climate change, a suitable boundary change to ensure continued protection of the site and coherence of the overall network should be considered.
- **SE-MPA-4:** Proposals must demonstrate that they will, in order of preference:
  - a) avoid
  - b) minimise
  - c) mitigate significant adverse impacts on designated geodiversity.
- **SE-BIO-1:** Proposals that enhance the distribution of priority habitats and priority species will be supported. Proposals that may have significant adverse impacts on the distribution of priority habitats and priority species must demonstrate that they will, in order of preference:
  - a) avoid
  - b) minimise
  - c) mitigate
  - d) compensate for significant adverse impacts.
- **SE-BIO-2:** Proposals that enhance or facilitate native species or habitat adaptation or connectivity, or native species migration will be supported. Proposals that may cause significant adverse impacts on native species or habitat adaptation or connectivity, or native species migration must demonstrate that they will, in order of preference:
  - a) avoid
  - b) minimise
  - c) mitigate significant adverse impacts
  - d) compensate for significant adverse impacts.
- **SE-BIO-3:** Proposals that deliver environmental net gain for coastal habitats where important in their own right and/or for ecosystem functioning and provision of ecosystem services will be supported. Proposals must take account of the space required for coastal habitats where important in their own right and/or for ecosystem functioning and provision of ecosystem services, and demonstrate that they will in order of preference:
  - a) avoid
  - b) minimise
  - c) mitigate
  - d) compensate for net habitat loss and deliver environmental net gain.
- **SE-INNS-1:** Proposals that reduce the risk of introduction and/or spread of invasive non-native species should be supported. Proposals must put in place appropriate measures to avoid or minimise significant adverse impacts that would arise through the introduction and transport of invasive non-native species, particularly when:

- 1) moving equipment, boats or livestock (for example fish or shellfish) from one water body to another
  - 2) introducing structures suitable for settlement of invasive non-native species, or the spread of invasive non-native species known to exist in the area.
- **SE-INNS-2:** Public authorities with functions to manage activities that could potentially introduce, transport or spread invasive non-native species should implement adequate biosecurity measures to avoid or minimise the risk of introducing, transporting or spreading invasive non-native species.
  - **SE-DIST-1:** Proposals that may have significant adverse impacts on highly mobile species through disturbance or displacement must demonstrate that they will, in order of preference:
    - a) avoid
    - b) minimise
    - c) mitigate significant adverse impacts.

### Further points to note

We would recommend you mention the [South East Marine Plan](#) in the Medway Local Plan. Alongside this, you could refer to the South East Marine Plan remit which ranges from Mean High Water Springs (MHWS) or the tidal limit out to the territorial limit. This remit covers both the marine area and tidal rivers, and extends up to MHWS where there is an overlap with terrestrial planning. We would also recommend a reference to the requirement of a marine licence for certain activities carried out within the UK marine area.

Within the mention of your policies we would recommend reference to the marine/coastal/intertidal element of the policy area, particularly where both terrestrial and marine habitats have the potential to be impacted by the policy.

Many of your strategic policies align with south east marine plan policy suggestions given above. These include but are not limited to those referenced in the following sections of the Medway Local Plan:

- 4.5 Landscape protection and enhancement (SE-CC-1/2/3, SE-INF-1/2, SE-BIO-1/2/3, SE-AIR-1, SE-SCP-1, SE-MPA-1/2/3)
- 7.2 Employment strategy (SE-EMP-1, SE-SOC-1)
- 7.7 Tourism, culture and visitor accommodation (SE-TR-1, SE-HER-1)
- 9.5 Riverside infrastructure (SE-INF-1/2, SE-EMP-1, SE-AGG-1/2/3)
- 11. Minerals Supply (SE-INF-1/2, SE-AGG-1/2/3)

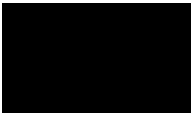
We would recommend you use the south east marine plan policies as evidence to support your local plans policies above. This would add additional evidence to your plan policies and ensure alignment with the South East Marine Plan.

I believe your council did attend a Marine Plan Implementation Training session in November/December 2022. This provided an introduction to marine planning, and I would suggest re-visiting the material in our recorded [webinar](#) which supported the Consultation of the South East Marine Plan. We will be running Marine Plan Implementation Training again this November/December. Please let me know if you have any questions regarding implementation of the marine plan and/or if your team would like to join these sessions.

As previously stated, these are recommendations and we suggest that your own interpretation of the South East Marine Plan is completed. We would also recommend you consult the following references for further information:

[South East Marine Plan](#) and [Explore Marine Plans](#).

Yours sincerely,



Marie Canny  
Marine Planning Officer (South East)

[Redacted]  
[Redacted] [Redacted]  
[Redacted] [Redacted]