

## **GRT Consulting Response to the Medway Local Plan with regards to Gypsy and Traveller accommodation needs and provision.**

GRT Consulting is comprised of Gypsy and Traveller community members; planning specialists; academics and works closely with Gypsy Roma and Traveller organisations. We have a wealth of experience working with Gypsy and Traveller communities particularly in Kent in accommodation and needs assessments, site planning, dispute resolution, cultural awareness training, health and education programmes and in providing training to local authorities, public and voluntary/third sector organisations.

Councils have a duty to provide sufficient land for Gypsy & Traveller sites which should underpin how authorities assess need and identify suitable sites.<sup>1</sup> The Local Plan identifies an immediate need for 31 additional pitches in Medway for those who meet the planning definition between 2022-2041 but takes no account of the 12 families currently residing at the Bredhurst Park and Ride site just off the M2 and their status is uncertain and that a planning application to convert it into a Gypsy and Traveller site has been submitted. The Plan assumes that '*need can be met through expansion of existing sites*' i.e., through Gypsy and Traveller's self-provision (private sites) and fails to identify any land suitable for local site provision. In addition, there is an unknown (though anecdotally and via our contacts) significant number of Gypsy and Traveller families living in bricks and mortar housing in Medway many of whom have entered housing unwillingly. A body of research has shown that Gypsies and Travellers have been placed in housing due to a lack of public site provision and difficulties getting planning permission for private sites. Many are isolated from their own communities, experience prejudice and hostility from their neighbours and have poor mental health outcomes.<sup>2</sup> Maidstone Council recently consulted their Gypsy and Traveller population to ascertain how many would like to move onto sites and free up housing for those who need them as part of their GTAA. We believe that a similar approach could be adopted by Medway if they committed to increase the supply of public sites. This would also increase the supply of available housing locally while providing an economic, low-cost and culturally appropriate alternative for those wishing to transfer out of housing and onto sites.

We note that while the Local Plan prioritises intensifying existing sites it notes that consideration will be made in cases of overcrowding and accessibility and scale of local amenities to meet the needs of site residents. Over three times more Gypsies and Travellers live in overcrowded conditions compared to the general population<sup>3</sup> and despite Medway Council's *Fair Access Diversity and Inclusion Policy* commitments to '*improve the quality of life for everyone living...in Medway*' ensure '*equality of opportunity*' and '*fair access and inclusion*' it has not applied these principles to its Gypsy and Traveller population through its failure to provide sufficient accommodation. Our experience of working with these communities indicates that there is severe overcrowding on every local authority site in Medway and in surrounding authorities. There

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<sup>1</sup> Local Government Association/Planning Advisory Service (2023) *Spaces and places for gypsies and travellers*. <https://www.local.gov.uk/sites/default/files/documents/spaces-and-places-gypsies-e2f.pdf>

<sup>2</sup> Smith, D. and Greenfields, M. (2013) *Gypsies and Travellers in Housing*; FFT (2022) *Briefing: Health Inequalities experienced by Gypsy Traveller and Roma communities*. [https://www.gypsy-traveller.org/wp-content/uploads/2022/11/Briefing\\_Health-inequalities-experienced-by-Gypsies-and-Travellers-in-England.pdf](https://www.gypsy-traveller.org/wp-content/uploads/2022/11/Briefing_Health-inequalities-experienced-by-Gypsies-and-Travellers-in-England.pdf)

<sup>3</sup> House of Commons Library (2024) *Gypsies and Travellers: Accommodation in England. Research Briefing*. <https://researchbriefings.files.parliament.uk/documents/CBP-10070/CBP-10070.pdf>

is serious need within Medway as well as nationally for more public site provision to relieve overcrowding, particularly at the Cuxton Site. No progress has been made in meeting the site provision laid out in the Medway Gypsy and Traveller Accommodation Assessment (2018) and this should be addressed as a matter of urgency as the situation around accommodation has got much worse in recent decades. Nationally, of 149 socially provided sites across 100 local planning authorities only 30 of these were built since 1994 when the statutory duty to provide sites was repealed. We would like to see Medway reverse this trend and, like councils such as Norwich who have just completed renovation of existing sites while providing 16 new pitches, lead the way in a more enlightened and positive approach towards its Gypsy and Traveller population. Doing this would ensure that equality of treatment, fairness and inclusion is embedded in Medway Councils' actions not just its words. The LGA report *Spaces and places for gypsies and travellers* notes that councils at the forefront of planning for the accommodation needs of Gypsies and Travellers are developing specific Development Plan Documents (DPDs) which set out location criteria and site allocations and we would recommend that such an approach be adopted in Medway in consultation with the local Gypsy and Traveller population and GRT Consulting who can organise and facilitate this process. We agree with the Medway GTAA that a managed approach to unauthorised encampments is preferable to providing a transit site currently but that this should be kept under review according to circumstances.

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Medway Local Plan  
Via email

3<sup>rd</sup> September 2024

Dear Planning Team,

## RE: Medway Council Local Plan Regulation 18 consultation

I am responding to this consultation on behalf of The British Horse Society, the UK's largest equestrian charity, representing the country's 3.2 million horse riders.

### Key information

- **Over 4300<sup>i</sup> passported horses** are owned by people living in the postcodes contained within Medway Council area, contributing in excess of **£29 million<sup>ii</sup>** to the economy per annum, much of which is spent locally (feed, bedding, farriers, vets, riding instructors and riding schools, etc.).
- In Medway, horse riders have the right to access just **16.9%<sup>1</sup> of the public rights of way network**, with substantially less for carriage drivers (**9.4%**). Many of these routes are inaccessible or disconnected as a result of increased traffic and/or development.
- Research undertaken by the University of Brighton and Plumpton College on behalf of The British Horse Society<sup>iii</sup> found that
  - More than two thirds (68%) of respondents participated in horse riding and associated activities for 30 minutes or more at least three times a week. **Sport England estimates that such a level of sporting activity will help an individual achieve or exceed the government's recommended minimum level of physical activity.**
  - A range of evidence indicates the vast majority (90% plus) of horse riders are female and more than a third (37%) of the female riders of respondents were above 45 years of age. **Horse riding is especially well placed to play a valuable role in initiatives to encourage increased physical activity amongst women of all ages.**
  - Amongst the horse riders who took part in the survey, 39% had taken no other form of physical activity in the last four weeks. This highlights the importance of riding to these people, who might otherwise be sedentary.
  - **Horse riders with a long-standing illness or disability** who took part in the survey **are able to undertake horse riding and associated activities at the same self-reported level of frequency and physical intensity as those without such an illness or disability.**

No-one is better qualified to demonstrate this than our new ambassador, six-time Paralympic Gold Medallist and World Champion, Natasha Baker OBE

<https://www.youtube.com/watch?v=pLi-89WWlkc>

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<sup>1</sup> % of total distance not number of paths

## Planning Policy, etc.

### National Planning Policy Framework

- Paragraph 96 (c) *"enable and support healthy lifestyles, especially where this would address identified local health and well-being needs"* Providing for equestrians helps to fulfil this requirement
- Paragraph 102 *"Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate."* The inclusion of equestrians within these assessments will bring the maximum benefit to the maximum number of people.
- 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."* Ensuring that **all** vulnerable road users, including equestrians, are contained within such facilities can only improve their effectiveness, the benefits to local people and their value for money.

### Medway Right of Way Improvement Plan (ROWIP)

*"Medway's public rights of way network has a lower proportion of paths with higher rights (bridleways, byways and restricted byways) than both the Kent County Council area and the national public rights of way network. The deficit is due to a lower proportion of bridleways. Priority areas identified by equestrians include areas around Upchurch, Rainham, Hoo St Werburgh, Cliffe and the Hoo Peninsula. **Routes with higher rights not only provide access for horses, but can provide safe, traffic-free routes for cyclists. Where any new routes are proposed, routes providing higher rights will be sought as a preference.**"*

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.

**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.

It is clear from the above that Medway Council understand the issues facing equestrians and their aspiration is to improve the situation for them.

It is evident from a health & well-being viewpoint, as well as an economic one, that the Council should include the needs of equestrians in every aspect of their plan but in particular those aspects involving active travel and health and wellbeing. *Most* walking and cycling journeys are made for leisure purposes and *most* journeys on horse-back or in a horse and carriage are also made for leisure purposes. Indeed, **Transport for South East defines Active Travel as including horse riding** and so AT routes should not preclude equestrians because few can ride or carriage drive to work or school.

*In our response to the Reg 18 consultation last year (copy attached) we made reference to specific areas within the plan. Unfortunately, this year we have been unable to download "the plan" as a whole; it*



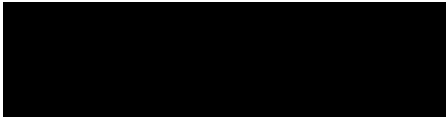
*appears to be in different segments on the website, much of which seemingly links to last year's draft. To that end, we have been able only to make general comments in respect of the plan as a whole:*

- The upgrading of existing footpaths to bridleways where onward connectivity is desirable (for equestrians as well as cyclists) to local roads and other bridleways and byways should form part of planning permission granted on all sites.
- Internal "loops"/green space should include equestrians by default.
- "Behind the hedge" paths should be provided next to roads to keep Non-Motorised Users (NMU)/Vulnerable Road Users (VRU) off the roads alongside new developments.
- Developer contributions should be sought to provide local equestrian light-controlled crossings (for the benefit of all NMU/VRUs) where required or *where likely to be required in the future with further development* thus improving and/or maintaining connectivity for all users.
- Bridleways and restricted byways must NOT be used as access roads
- The aspirations of Medway's ROWIP should be borne in mind in all applications. It is obvious for larger proposed developments but even quite small sites might provide key locations for improvement.

As always, we remain very willing to work with the Council and would be developers in providing these improvements for EVERY vulnerable road user.

Yours faithfully

Sarah Rayfield (Mrs.)  
Access Field Officer – London & South East



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<sup>i</sup> DEFRA FoI Request April 2021

<sup>ii</sup> BETA – The National Equestrian Survey 2023

<sup>iii</sup> <https://www.bhs.org.uk/media/ganngxh/health-benefits-of-riding-in-the-uk-full-report.pdf>

5<sup>th</sup> September 2024



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Dear Sir/Madam

**Re: Medway Local Plan – Regulation 18 (Development Options Consultation)**

**Introduction**

The Rochester Bridge Trust (the Trust) would like to thank Medway Council (MC) for the opportunity to comment on the Draft Medway Local Plan (Regulation 18 Consultation, 2024). This letter should be read in conjunction with previous Local Plan representations made by the Trust, including comments on the Strategic Land Availability Assessment (SLAA) and the Development Strategy in 2018. Copies of these letters can be provided on request.

**Background to the Rochester Bridge Trust**

Formally established by Richard II in 1399, the Trust provides three bridges over the Medway at Rochester, at no cost to the public. All its income is derived from 14<sup>th</sup> century endowments. Today, the Trust is a modern charity registered with the Charity Commission. It has a board of 13 unpaid trustees. Six of the trustees are nominated by Medway, Maidstone Borough and Kent County councils.

The Trust is a registered charity. It is a unique survivor of the medieval system of providing bridges and is the only major independent bridge trust still serving its original purpose – to provide river crossings free of charge to the public. This purpose is delivered through a long-term plan to maintain the bridges with careful planning and management. In addition, the Trust funds a series of educational initiatives and provides grant funding for a range of charitable projects. Rochester Bridge is a critically important piece of transport infrastructure which serves a public function and is the only crossing of the River Medway in the local authority area which accommodates all types of road user. It is also a highly-valued and treasured heritage asset.

The Trust is also a landowner with a land portfolio that extends around Kent, including land in the Medway Council area, notably in Rochester, Rainham, Cooling and Grain. The property portfolio is held primarily for investment purposes to fund the Trust's charitable objectives.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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Registered office: 33 Margaret Street, London, W1G 0JD

## **Draft National Planning Policy Framework**

A revised draft of the National Planning Policy Framework (NPPF) was published for consultation on 30<sup>th</sup> July 2024. At the current time the consultation draft has limited weight. However, it provides a clear statement of intent that the new Labour Government is looking to increase the supply of housing in England.

A new Standard Method for assessing housing need is also proposed which sets mandatory housing targets for each local authority. This revised method is to be used as part of the process of preparing local plans and will also be applicable where adopted plans are out of date. Under the revised Standard Method, MC will be required to deliver 1,658 new homes annually compared to 1,644 annually under the current Standard Method.

## **Comments on the Evidence Base**

As part of this Draft Local Plan consultation, MC has published an evidence base. Comments on two of these documents have been made as part of this representation. These documents are:

- Strategic Transport Assessment Forecasting Report (May 2024); and
- Medway Local Plan 2041 – Regulation 18 – July 2024 – Policies Map – South West

### Strategic Transport Assessment Forecasting Report (May 2024)

The Strategic Transport Assessment (STA), prepared by Jacobs, informs the preparation of the new Local Plan and is important in considering the strategic implications associated with transport growth.

The STA includes 2041 transport forecast results both with and without the proposed site allocations set out in the draft Policy Map. The modelling is based on:

- 11,753 dwellings and 912,901 sqm of employment floorspace from completed and committed developments;
- Infrastructure planned for the 2019-2041 growth period in Medway; and
- 33,282 dwellings and 29,443 jobs from ‘near certain’ developments<sup>1</sup> in neighbouring authorities.

The results refer specifically to the capacity of the junctions associated with the Rochester Bridge. The Junction and Link Volume Over Capacity Assessment found there are 50 junctions across Medway that have a worst-turn which deteriorates in the 2041 ‘Do Something’ scenario compared to the ‘Reference Case’ scenario, including the junctions along Rochester Bridge.

The Trust expects development proposals for the allocated residential and employment sites in the new Local Plan to be supported by robust Transport Assessments, that demonstrate the proposals will not significantly undermine the capacity of Rochester Bridge and the junctions that meet either end of the Bridge. The STA should also consider mitigating the effect on ‘pinch points’ in Medway, such as the Strood one way system which can cause queuing onto the Bridge.

It is noted that the STA is tentative in its conclusions (e.g. at section 7.2 where it states that no modal shift assumptions have been considered. It goes on to state that the effect of modal shift, and any potential improvements will be considered as part of the Regulation 19 Local Plan). The Trust looks forward to this further assessment work and how it is deployed in the selection of local plan allocations.

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<sup>1</sup> These results should be kept under review, particularly in relation to any increased growth as a result of the new Standard Method.

### Medway Local Plan 2041 Policies Map

Medway’s Draft Policy Map illustrates potential site allocations that will come forward as part of the adopted Local Plan. The map is divided into five parts based on geography. The map covering the south-east area is of most relevance to the Trust and its assets.

The Policy Map is in draft form for the Regulation 18 consultation and therefore includes a number of potential site allocations. Figure 1 below shows an option where residential development is heavily focused around Strood Train Station. Less residential development is proposed within Rochester because the town has a number of built environment constraints, principally in relation to heritage.

It is unclear at this stage how many of the residential-led draft site allocations will come forward as strategic sites in the Local Plan. Notwithstanding this, the Trust would like to highlight that the quantum of development proposed for the site allocations needs to be robustly tested from a transport perspective to ensure that it can be accommodated, without a significant impact on highways infrastructure. Alongside the fact that Rochester Bridge is a Grade II listed heritage asset, it is also a crucial piece of transport infrastructure connecting Strood and Rochester. The Trust has concerns that there is a risk the two junctions that meet the Bridge could become severely congested if all development were to come forward without sufficient mitigation measures being implemented by the Council.

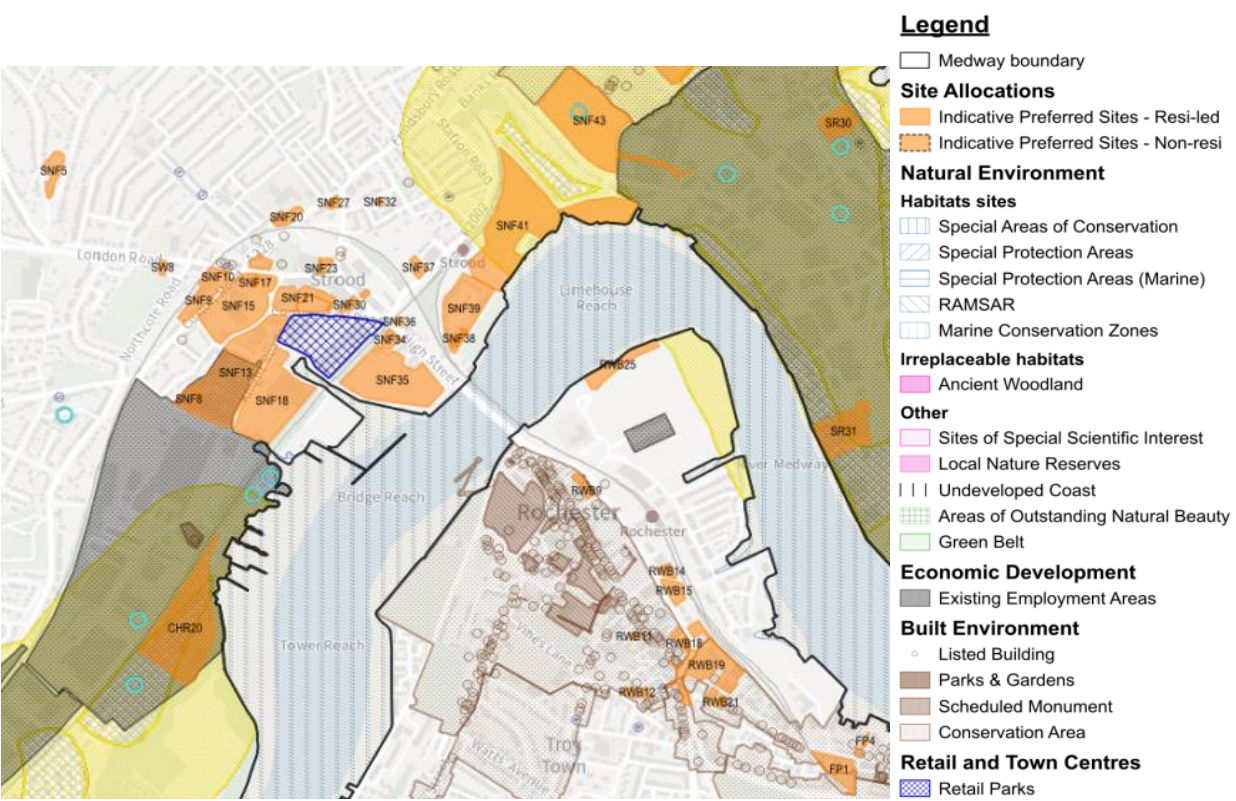


Figure 1 Draft Policy Map (South West) – Focused on Rochester and Strood

## Comments on Regulation 18 Local Plan

The current consultation document aims to build on the responses to the previous Regulation 18a consultation 'Setting the Direction for Medway 2040' in Autumn 2023, which set out to define the overarching vision and strategic objectives for the new Local Plan.

### Strategic Growth Options

Section 3 of the Regulation 18 Local Plan sets out three potential strategic growth options for Medway:

- SGO1 – Urban Focus - maximising development on brownfield sites in urban centres and waterfront sites.
- SGO2 – Dispersed Growth – much higher release of land on greenfield and Green Belt sites.
- SGO3 – Blended Strategy - brownfield first' focus with regeneration in urban centres and waterfront locations, complemented by range of sites in suburban and rural areas.

SGO1 and SGO2 could result in the Council relying heavily on a few large strategic allocations, in terms of housing delivery, which may place unsustainable pressure on local transport infrastructure. There is a risk SGO2 would not be capable of meeting the housing need identified for Medway and could result in increased unplanned development. SGO3 blends urban focus with greenfield development and is the Trust's preferred option. This is because SGO3 will provide an opportunity to spread development throughout the area, focussing it on sustainable locations.

### Policy S24: Infrastructure Delivery

Draft Policy S24 relates to the role planning obligations and contributions will have in supporting improvements to infrastructure across Medway. The Trust would encourage the Council to consider the use of Section 106 to fund junction improvements and ensure that sufficient capacity can be achieved and maintained. This principle should apply to both sides of the Rochester Bridge which can be subject to high traffic levels. There are few road crossings of the river in Medway, and only two which are available to all classes of road traffic. The strategic importance of Rochester Bridge, to the transport network of the area, should not be underestimated or undervalued within the Local Plan and future development associated with it.

MC has not adopted a Community Infrastructure Levy (CIL) but state in paragraph 10.5.10 of the draft Local Plan that they will consider any future funding mechanisms if they are published by government guidance and legislation, such as the proposed Infrastructure Levy (IL). The Trust would be happy engage in open dialogue with MC to discuss future transport provision in and around Strood and Rochester<sup>2</sup>.

### Policy T20: Riverside Path

Draft Policy T20 sets out that waterfront development proposals will incorporate public space to facilitate walking and cycling and demonstrate the highest design standards, including Local Transport Note 1/20 (Cycle Infrastructure Design) and Sport England's Active Design guidance.

The policy advises that opportunities to provide linkages with other path networks should be explored where these are compatible with other policies and do not result in impacts on coastal designated sites. Whilst the Trust supports MC's commitment to improve public accessibility, it would like to highlight that Rochester Bridge (Grade II listed) and the Esplanade (Grade II listed) are heritage assets and therefore any new pedestrian development will need to be sensitively designed. As landowner the Trust should be consulted and approve any future proposals effecting its property. As part of their charitable objectives, the Trust has previously invested in the public realm within close proximity to Rochester Bridge and along the Esplanade to maximise public path networks and open space provision.

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<sup>2</sup> Noting that the Bridge itself is the Trust's responsibility

### Policy T21: Riverside Infrastructure

Draft Policy T21 refers to infrastructure in conjunction with the transport of minerals, waste and other defined materials. For example, there is a network of piers, jetties, slipways and steps along the urban stretches of the River Medway, some of which are in a poor state of repair.

In relation to the Rochester Bridge (and its environs), the Trust uses land within its ownership at the Strood end as a site compound and operational working area for essential construction activities. It also requires unrestricted and unfettered access to this area, and to the Arches under the Old Bridge, in order to perform its duties and prevent unauthorised access to bridge and other critical service infrastructure.

The security of the area is sensitive and is properly maintained and deliberately kept clear of fixed infrastructure to allow good surveillance. It is private land, with no public rights of access and it would be most unhelpful and risky to encourage the public to linger there. The Trust has allowed a permissive path from the Old Bridge to connect with the Esplanade where it becomes public highway. In addition, statutory undertakers (e.g. utilities and service providers) also require access to this area under the provisions of the 1965 Rochester Bridge Act to maintain services at all times. These are important points that MC should be aware of when considering riverside infrastructure improvements around the Rochester Bridge.

### **Strood Flood Defences**

The Trust has previously raised strong concerns about the flood defence works taking place at Strood (e.g. through the draft Strood Riverside Development Brief SPD). In summary, the Trust's position is that MC has allowed a number of piecemeal flood defence schemes to come forward since the 1970s, typically associated with planning applications close to the waterfront. These schemes have resulted in an ineffective use of public funds and have not addressed the flood defence issues which blight the area to the detriment of the local community.

The Trust strongly feels that the multiple benefits associated with a strategic flood defence scheme should be identified in the draft Development Brief, to show a commitment to achieving such a scheme. This should include the identification of potential sources of funding to bring forward a strategic scheme.

The disbenefit of continuing to do nothing with the wider flood defence is that the residents and businesses of Strood continue to be at real risk of regular flooding, with associated financial and health risks. It will also mean that the full regenerative benefits are not accrued.

While the current Local Plan consultation does not specifically relate to the ongoing projects at Strood, the Trust would like these comments to be noted so that they can be incorporated in the Local Plan preparation process.

### **Housing Supply**

Paragraph 6.1.2 of the draft Local Plan shows that the Council is basing their Local Housing Need on the government's Standard Method. As of March 2024, this is defined as 1,658 homes a year which equates to a total of 28,000 homes over the plan period up to 2041. The Regulation 18 Local Plan does not include policies in relation to the proposed strategic site allocations. However, a Policy Map has been prepared to outline the indicative preferred residential-led sites. It is unclear at this stage whether these preferred sites will meet the local housing need in full, or if there will be a degree of unmet need to be addressed by windfall sites for example. Naturally, this will require further thought as part of the ongoing Local Plan process.



## Site Specific Comments – North of St James Church, Cooling

The 0.47 hectare site, which is currently in agricultural use, is situated within the village of Cooling to the north of the Church of St. James (Grade I Listed Building). Cooling is a small village located in the North Kent Marshes. The village comprises a number of detached dwellings with large gardens. Land to the east of the site is predominantly residential. Land to the north and west of the site is agricultural, comprising fields with associated agricultural development (e.g. polytunnels). St. James's Church is located to the south of the site. Access is currently obtained onto Main Road. The site lies immediately adjacent to the village Development Boundary.

In 2014, the site was submitted to the Strategic Housing and Economic Needs Assessment (SHENA). The SHENA identified the site as being suitable in terms of: highway capacity, landscape, heritage, site developability and open space. The site was considered suitable for development providing constraints relating to access, ecology, air quality, land contamination, agricultural land, facilities and services accessibility and public transport accessibility were addressed.

In 2018, the site was assessed within the Strategic Land Availability Assessment (SLAA) which concluded that it was unsuitable due to impact on agricultural land, heritage assets, landscape and isolation from local facilities and services. The site was then resubmitted to the 2019 SLAA which came to the same conclusion.

Most recently the site was submitted as part of MC's Call for Sites consultation in January 2023. The Call for Sites submission included a number of supporting technical documents demonstrating that the site is unconstrained and a suitable site allocation for sensitive development comprising a modest amount of housing. The Regulation 18 Local Plan includes an indicative selection of site allocations and therefore the Trust would advise MC to consider the site for a site allocation in the Regulation 19 Local Plan.

## Conclusion

The Trust would like to thank Medway Council for the opportunity to comment on and influence this important process. Should officers want to meet with the Trust's representatives to discuss this letter, we would be more than happy to do so.

Yours Sincerely



**Andrew Watson • MRTPI**  
Director



## **Chatham Maritime**

These representations relate to Chatham Maritime and are submitted on behalf of the Chatham Maritime Trust (CMT).

It is important to set out the background before outlining the CMT's representations on the draft Local Plan.

For the reasons that are set out below, CMT's representations address the first two questions in the summary version of the main Local Plan consultation document, namely:

1. What are the key issues that you want the plan to address, and how?
2. Which of the growth options do you prefer and why?

### **Background**

CMT is a unique organisation set up for a significant purpose that is to identify opportunities and enable and manage the growth of the Chatham Maritime Estate and to strengthen its community and environment making it a vibrant, thriving and sustainable place to live, work, study, play and visit.

CMT was formed in 1997 to take on the long-term management and maintenance responsibilities of the Chatham Maritime Estate. The Trust has four member organisations: Medway Council, Homes England and the Estate's two occupier associations: St Mary's Island Residents Association Ltd (residential) and South Maritime Residents Ltd (non-residential).

The Trust owns significant parts of the Chatham Maritime Estate and as a landowner has a clear role to play in the development process. Chatham Maritime Trust also plays an important role in supporting the growing business, education and residential community at Chatham Maritime and community activities in the Medway Towns generally. These roles will only increase with time and therefore CMT is an important stakeholder in the future of Medway.

Chatham Maritime is now a varied development of homes on St. Mary's Island with office, leisure and retail at Dockside and universities Medway (Greenwich, Christchurch & Kent), Mid Kent College and the Waterfront University Technical College.

Chatham Maritime has rapidly been evolving into one of the most dynamic regions in the UK and this is reflective of the significant role CMT have played to date. The area has undergone major regeneration which is continuing.

CMT not only owns but maintains infrastructure on which the area depends, for example the flood defences, riverside walk, two dock basins and the Maritime Way bridge, open landscaped recreational spaces on the Island (Central West Bund, Central East Bund, Finsborough Down, Dock Square), in addition to play areas and a Community Centre.

CMT plays a major role in supporting initiatives for future investment in the Medway region and specifically to support growth in the Chatham Maritime area. The Trust is tasked with both long-term management and maintenance of the Chatham Maritime Estate in support of five key strategic objectives:

- ensure the Estate is maintained to a high standard
- deliver services that represent value for money
- act as a key partner representing Chatham Maritime
- engage with local communities
- ensure that Chatham Maritime Trust is sustainable

CMT exists and aims to ensure future viability, sustainability and growth of Chatham Maritime in a way that creates both opportunity and real legacy.

In Medway 2035 prepared by Medway Council, Chatham Maritime is identified as a key regeneration site in the district. Indeed, part of Chatham Maritime features on the cover of the document, both as a success story, but also highlighting a future opportunity. The Council acknowledges the leading role that it has played in planning for and securing Chatham Maritime's success. Additional plans include plans for a waterfront Creative Hub, uniting the Historic Dockyard and the Universities and higher education facilities, and also the development of the two parcels of the Interface Land development area for residential-led development and supporting commercial uses.

However, the extent of Chatham Maritime – described as approximately 350 acres – is not identified, nor is the role that the CMT will play in the growth of this area through its land ownership, management of the Chatham Maritime Estate and operation of the Estate.

The introduction to Medway 2035 confirms the relationship of the document to development plan documents for Medway where it states:

*“Medway Council is preparing a new Local Plan to provide direction for future growth for all ... Medway 2035 complements the Local Plan by developing a structured routemap in support of the policies which will frame expected growth, and setting out an exciting vision of the future Medway which these policies will help secure. If the Local Plan exists to manage growth, Medway 2035 exists to deliver it.”* (page 6)

In conclusion, it is clear that Chatham Maritime is an important asset to Medway and is capable of contributing towards the long-term goals for the area's growth and development, and the CMT is expected to play a major role in realising this.

## **Representations**

CMT's representations respond to two of the four questions set out in the summary document and each is addressed below.

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

The first point is the failure of the draft Local Plan to identify and specifically plan for the regeneration of Chatham Maritime.

Chatham Maritime is mentioned specifically 6 times in the draft Local Plan, but its importance to Chatham is evidenced throughout the draft Local Plan and in Medway 2035 and as such, its importance to the district as a whole cannot be overstated. The references in the draft Local Plan relate to:

- The Learning Quarter and Student Housing (para 6.5.3)
- Houseboats located in marinas (para 6.7.1)
- The learning cluster of further and higher education has been established in the Chatham Maritime area (7.6.3)
- Policy T12 explains that “the development and expansion of uses that facilitate further and higher education facilities within the ‘learning quarter’ at Chatham Maritime will be supported” (Policy T12)
- Dockside Outlet Centre is the main retail provider in the Chatham Maritime area (para 8.8.1)

These references should also include the complementary objectives set out in Medway 2035 to establish a Creative Hub and achieve residential and commercial development of the Interface Land. Medway 2025 references the emerging Local Plan but then fails to include two of that documents' central policy objectives in the draft Local Plan.

Moreover, the draft Plan confirms the opportunities for “*water-based recreation*” (para 7.7.4) and specifically the opportunities provided by Dockside's “*waterfront location for water-based leisure*” (para 8.18.2). Policy T13 provides general support for “*marine based tourism opportunities*”. Water-based recreation is important for the local community and not just as a tourism attraction, and the draft Plan fails to acknowledge the role, for example, of the Chatham Maritime Watersports Centre within Chatham Maritime.

As such, the failure to identify Chatham Maritime and reflect this in an allocation and with complementary policies means the draft Plan is not sound. We consider that in order for the plan to be sound and satisfy the relevant tests, the approach to Chatham Maritime needs to be:

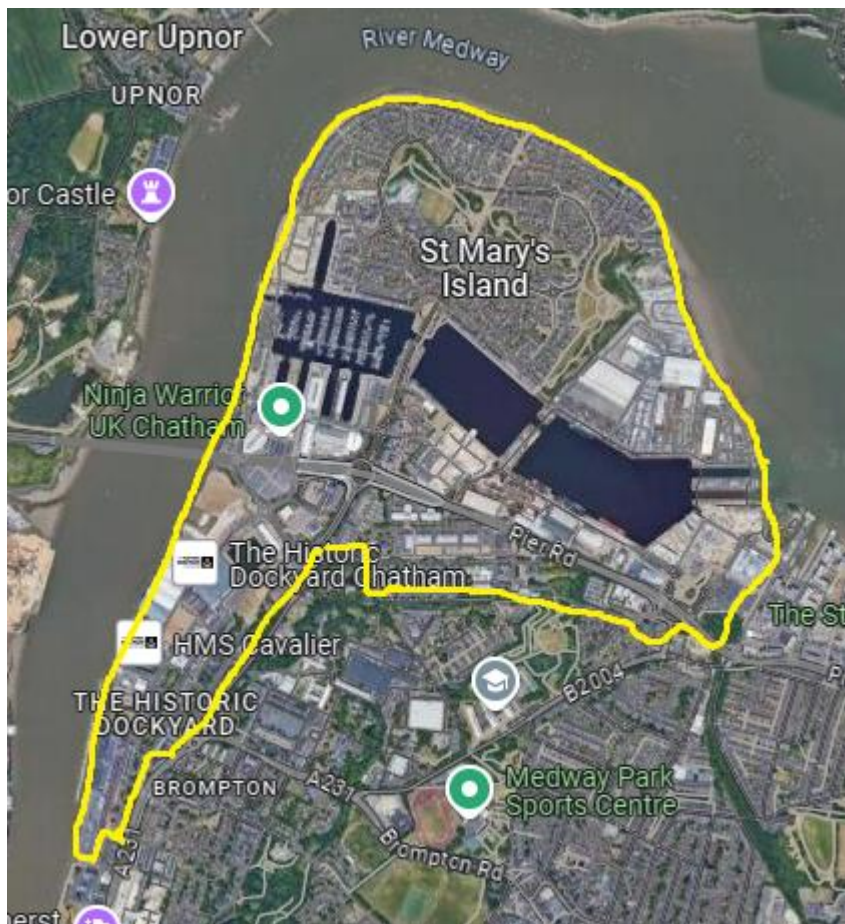
**Positively prepared** – this would occur by defining the area on the Proposals Map and alignment of the draft Local Plan with Medway 2035. This approach is consistent with the guidance in the NPPF that *“broad locations for development should be indicated on a key diagram, and land- use designations and allocations identified on a policies map. Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development.”* (para 23) As one of the key regeneration sites in the district, Chatham Maritime should be identified.

**Justified** – the NPPF requires that strategic policies in development plans should make sufficient provision for housing (including affordable housing), employment, retail, leisure and other commercial development (para 20). The draft Local Plan does this, although the uses and quantum of development potentially achievable on the two parcels of the Interface land is not quantified, and it should;

**Effective** – designating Chatham Maritime and the use of a specific policy will guide its growth and ensure that development is sustainable; and

**Consistent with national policy** – for the reasons set out above, designation of Chatham Maritime and setting out policy guidance for this area is consistent with guidance in the NPPF.

The extent of the allocation in the draft Plan is shown below and is consistent with the description in the document and also Medway 2035.



In order to be effective, the designation of this area needs to be accompanied by a specific policy dealing with its development. A draft policy is attached (see last page).

This is consistent with Medway's ambitious regeneration vision and its six priorities, namely:

- Being a destination and achieving placemaking
- Attract inward investment
- Innovation in everything achievable in Chatham Maritime
- Provide high quality business accommodation with digital connectivity
- Achieve growth across a range of sectors, including advanced engineering and manufacturing construction, creative and cultural, and health and social care, and IT and digital
- Improve employability working with the Universities, Medway Skills Board and Apprenticeship Academy

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

The Council's preferred Spatial Growth Option is 3 which blends regeneration and greenfield development. There is a 'brownfield first' focus with regeneration in urban centres and waterfront locations, complemented by range of sites in suburban and rural areas.

This continues the regeneration agenda that has been integral to Medway's change and growth in recent years, delivering new homes in accessible locations, and supporting economic growth and new services and facilities.

CMT supports this option.

This is because it is the most practical and realistically deliverable option in a district as diverse as Medway. Moreover, it aligns with other policies of the draft Plan and Medway 2035 and specifically the Medway Regeneration Delivery Plan which is the framework for translating ambition into prioritised actions. Its priorities and objectives align with CMT's vision for Chatham Maritime and draft Policy CM1.

CMT considers that with the identification of Chatham Maritime as a specific location on the Proposals Map with supporting Policy CM1, the draft Plan is sound because it will have been positively prepared, justified, effective and consistent with national policy.



## Policy CM 1 – Chatham Maritime

Chatham Maritime is identified as a broad location for change within this Local Plan. This policy identifies the regeneration proposals for Chatham Maritime that will be delivered over the plan period. The District Council will work with Chatham Maritime Trust, Medway Ports Authority, Kent County Council, higher education providers and other key partners to support the long term regeneration of Chatham Maritime and immediately surrounding areas.

It is envisaged that development briefs will be brought forward for key areas and sites, setting out guiding principles for development. Developments will be encouraged that are consistent with the objectives set out in Medway 2025 and the development briefs. The Council will facilitate the delivery of a minimum of \*\*\* new dwellings within Chatham Maritime over the plan period. A total of approximately \*\*\* sqm of employment generating uses will also be provided over the plan period. Public open space, community uses including water-based facilities and small-scale ancillary retail, restaurants and cafes, leisure, and tourism uses will also be provided as part of continued sustainable development within Chatham Maritime.

The Council will work closely with existing site owners and businesses to identify their needs, support their future aspirations and facilitate development. New development will be expected to meet high standards of environmental efficiency. Development will be expected to comply with energy and sustainability policies of this plan. All development will be required to protect and enhance the area's important environmental assets and wildlife habitats.

All new development proposals must take into account contaminated land, local noise and air quality impacts and improvements should be sought wherever possible.

\*\*\*

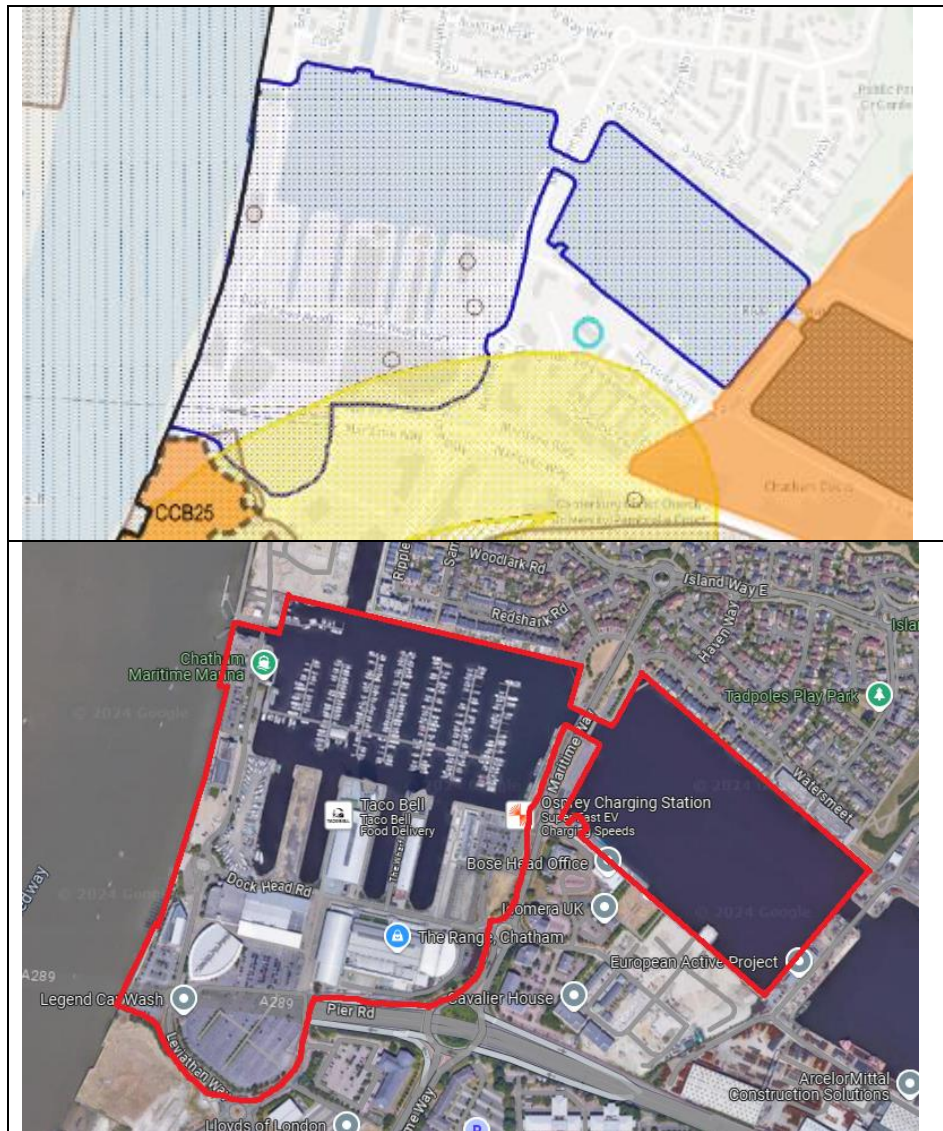
The number of dwellings and amount of employment space will be determined by future capacity testing by Medway Council, and therefore no figures are proposed at this stage

# Chatham Local Plan

The Council ask two specific questions in relation to Dockside and draft responses are provided below.

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

The proposed boundary of Dockside is shown below:



It is clear that the proposed boundary acknowledges the diverse retail and leisure offer of Medway and this part of Chatham because it is clear that the attractiveness of the area is much more than just leisure. Analysis of the land uses within the area confirm this and the aerial photograph aligns these boundaries to evidence this point.

It also acknowledges the continuing regeneration, change and growth of this part of Chatham and Medway, as well as the important role that Dockside has played and will continue to play in this process. The area has changed and is now a place for people to live, work and relax, and the draft Local Plan acknowledges this. This is welcomed.

Within the area as a whole, Dockside Shopping Centre is a key attraction. It is right that the proposed policy boundary for Dockside includes the building itself and the retail and leisure offer of the wider surrounding area. Consistent with how the area has changed, since Dockside Shopping Centre opened in July 2003, over the last 21 years its offer and attractiveness has been allowed to change with the full support of the Council.

This is reflected in the relaxation of restrictions on goods that can be sold and its operation, and therefore it is not correct for the draft Local Plan to refer to this as an Outlet Centre, it is now a Shopping Centre performing an important function for local residents and also visitors. All references to Dockside Outlet Centre should be changed to Dockside Shopping Centre.

The question posed seeks to define Dockside as a leisure location, it is clearly more than that, and we address this in the answer to Question 34.

In conclusion, the proposed boundary of Dockside as a whole is supported and the Council's positive support for it is welcomed, but the role of Dockside Shopping Centre needs to be addressed positively elsewhere in the draft Plan.

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

Our answer to this question is in two parts: an overview of retailing in the district as a whole, and then commentary on the mix of uses proposed, including proposing a change to the designation of Dockside Shopping Centre itself because we do not support the proposed percentages.

Retailing in the district

We support the Council's intention to protect main Town and District Centres such as Chatham Town Centre and Gillingham District Centre such that their role and function within the retail hierarchy is supported and maintained. We acknowledge Chatham as a primary centre and its prominent position in Medway and the importance of retaining its viability and vitality.

It is clear that Dockside Shopping Centre has co-existed alongside Chatham Town Centre for over 20 years, during which time, the Centre has changed and evolved without detriment to Chatham Town Centre or any other centre in the District.

This reflects the distinct roles that outlet centres perform in retail hierarchies, and in a local context of the wider regeneration of Chatham and Medway, shows how the evolution of the Shopping Centre has not been to the detriment of Chatham Town Centre (or any other centre). This changing role is acknowledged in the draft Plan at paragraphs 8.18.1-2 and this is welcomed.

The Centre's lack of impact on designated centres is verified independently in the 2016 Retail and Commercial Leisure Assessment produced by GVA for the Council. The assessment concluded that the nature and operation of Dockside Shopping Centre does not compete with the Town Centre for expenditure. GVA also observe that Dockside Shopping Centre (and the wider Dockside area) draw visitors into the area and it is mainly local residents who use Chatham Town Centre, meaning that the two locations co-exist because they perform different and also complementary functions.

It is clear that Dockside Shopping Centre is not a threat to Chatham Town Centre or any other centre and therefore the concept of seeking to control or restrict its future runs contrary to the guidance to local planning authorities on taking a sound approach to plan making.

Given the changes that have taken place in the Dockside area as a whole, we consider that in order for the plan to be sound and satisfy the relevant tests, the approach to the area needs to be:

**Positively prepared** – this would occur by acknowledging the role of Dockside Shopping Centre as a 'town centre' (ie district centre).

**Justified** – the available evidence supports Dockside's designation as a town centre/district centre. Local planning authorities are encouraged by the NPPF (paragraph 90) to define a network and

hierarchy of town centres for their areas and for the reasons set out above, this should include Dockside Shopping Centre within Medway. The Glossary in Annex 2 to the NPPF explains that the definition of town centres applies to city centres, town centres, district centres and local centres (our emphasis). Given the commercial and residential development in the surrounding area, in particular St Mary's Island, formal designation of Dockside as a town centre is justified and it should be known as Dockside Shopping Centre in a similar manner to Hempstead Valley Shopping Centre;

**Effective** – it will be a formal allocation and supported by other policies of the Plan, will promote further growth in complementary leisure and retail within the area serving the needs of local residents and visitors; and

**Consistent with national policy** – for the reasons set out above, designation of Dockside as a town centre/district centre is consistent with guidance in the NPPF.

We comment further on this below in response to Policy S16 and propose its designation as a District Centre within the context of the policy.

#### Appropriate percentages, impact assessment and sequential approach

The case for designating Dockside Shopping Centre as a town centre/district centre is robust.

If designated as a town centre, there would be no need for percentages, impact assessments or a sequential approach.

However, if the Council does not agree that Dockside should be designated as a town centre, we comment on each of these matters below.

##### (a) Percentages

The proposed retail cap is 30% of all floorspace in the designation and should be predominantly located in the Shopping Centre. It is suggested that this be increased to 40% and should be located 'around the Shopping Centre' but not located in it. This will allow for organic growth and is consistent with the approach proposed for leisure and food and beverage i.e. around the Shopping Centre but not necessarily in it.

The percentage of leisure floorspace is supported (50%) but the food and beverage should be increased to 25% to reflect the demand from visitors and the wider growth of Dockside as a retail and leisure destination.

##### (b) Impact assessments

Given the evidence is that the changes at Dockside Shopping Centre have not impacted Chatham Town Centre or any other centre, the requirement to provide an impact assessment is un-necessary.

We have commented separately on Policy T17 which requires the submission of impact assessments, and we contend either that the requirement should not apply to Dockside Shopping Centre or the thresholds are increased.

##### (c) Sequential approach

Policy T15 sets out the requirement for sequential assessments to be undertaken.

We have commented separately on Policy T15.

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

This response comprises comments on Policy S16, T15 and T16 and we deal with each below under separate headings.

However, if the Council does not agree that Dockside Shopping Centre should be designated as a town centre/district centre, we comment on each of these matters below.

(a) Policy S16

This submission proposes that Dockside Shopping Centre should be designated as a town centre/district centre, and therefore Policy S16 should be amended to

- b. District Centres: providing essential services, community uses to support sustainable living and creating efficiencies in linked trips. The Council will seek to maintain a balanced provision of uses appropriate and reflective of the character, scale and role of these centres (individually and in relation the Chatham to maintain the hierarchy): Strood, Gillingham, Rainham, Rochester, Hempstead Valley and Dockside Shopping Centre.*

(b) Policy T15

There are two areas in which the policy goes further than national guidance and is not evidenced/justified. First, on flexibility, it states this relates to scale and format. This is agreed. However, it goes on to add that *“flexibility includes locational requirements, in particular town centre sites are highly accessible, therefore car parking requirements are expected to be significantly reduced.”* This should be deleted because it is not justified.

Second, on the types of development to which this requirement relates, it states that the *“proposed use, scale and trade draw of the proposal will determine the appropriate location within the hierarchy of centres, e.g. city scale in Chatham, large scale specialised, evening economy and diversification of uses in main district/town centres and small scale within local centres”*. This prejudices the approach to be taken to a particular type of development and should be deleted. If appropriate, the approach to be taken should be scoped out with the applicant on a case-by-case basis.

(c) Policy T16

This relates to ancillary development and the examples of convenience retail in a petrol station and a climbing wall are given. The purpose of the policy is noted and one revision is proposed below.

*Ancillary development proposals for main town centre uses are required to be compliant with the sequential test policy T15 as set out above. To demonstrate and justify its ancillary nature, it must also satisfy the following:*

- a. *the scale of the proposal must be smaller than the predominant/main **use of the building, development or centre as a whole**. Where this is not possible, the proposal must satisfy all other criteria listed below from b. to f;*
- b. *the proposal must be demonstrated as necessary or complementary to the business operations;*
- c. *the type of use is secondary/dependent on and cannot function independently of the predominant/main use;*
- d. *it must be demonstrated that there are dependencies and a direct relationship between the ancillary proposal and the predominant/main use;*
- e. *access to the ancillary use is dependent on access used by the predominant use and where not feasible, all other criteria listed in a, b, c, d and f are satisfied; and*
- f. *consideration will be given to the physical location of the proposal in relation to the predominant/main use when assessing c, d and e above.*

If the additional text highlighted in yellow above is added to a. above, then the revised policy is supported.

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

The NPPF advises that impact assessments should be required for schemes over 2,500 sqm or a proportionate, locally set floorspace threshold can be used. The Council is proposing the following thresholds:



## Policy T17: Impact Assessment

Proposals that seek to provide or expand retail and leisure uses in edge or out of centre locations including retail parks, leisure designations and Hempstead Valley Shopping Centre will be permitted where:

- a. it is supported by an impact assessment where proposals for comparison, convenience retail, or leisure (including food and beverage and other large-scale facilities like bowling alleys and ice-skating rinks etc.). The scale of food and beverage proposals will be given locational consideration.

Thresholds trigger	Comparison (gross sqm)	Convenience (gross sqm)	Leisure (gross sqm)
Chatham	1,000	200	500
Gillingham	250	250	250
Strood	250	250	100
Rochester	200	200	500
Rainham	350	400	150

The relevant triggers for development near Chatham are not proportionate and are neither evidenced nor justified.

In respect of Dockside and Dockside Shopping Centre which the Council acknowledges is a 'family leisure and retail destination attracting visitors and residents', any proposal to expand and grow will be subject to an impact assessment if the scheme involves more than:

- 1,000 sqm of comparison
- 200 sqm of convenience
- 500 sqm of leisure

These limits are arbitrary and without justification.

We agree with the Council that a locally set threshold could be used, but given Dockside Shopping Centre's unique role in the retail hierarchy and the independent evidence from its own consultants that the Centre has not impacted on town centres:

- Either, the Council amends Policy T17 to make it clear that the requirement does not apply to proposals within Dockside Shopping Centre – thereby aligning with Hempstead Valley Shopping Centre - which is consistent with a separate submission that it should be designated as a town centre/district centre
- Or, the thresholds should be increased within Dockside to:
  - o 1,000 sqm of comparison
  - o 1,000 sqm of convenience
  - o 750 sqm of leisure

These increases for convenience and comparison are consistent with the character of the existing area.

We consider Policy T17 as drafted is not sound and requires revision as set out above.



PROJECT TITLE  
CHATHAM MARITIME TRUST  
DOCKSIDE SHOPPING CENTRE

DRAWING TITLE  
RED LINE PLAN

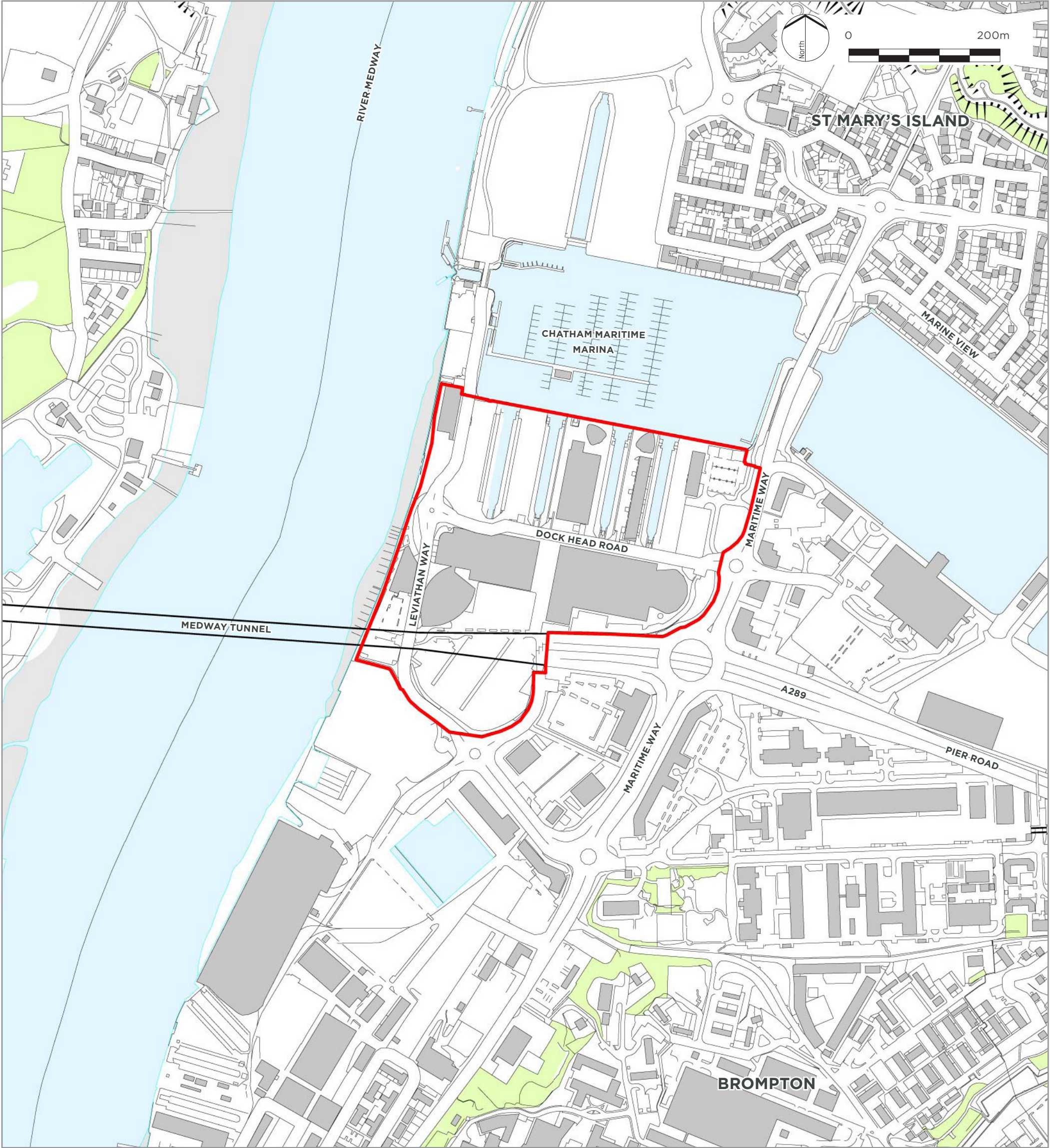
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DATE	September 2024	DRAWN	OT
SCALE@A3	1:5,000	CHECKED	JC
STATUS	Draft	APPROVED	JC

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LEGEND			
	Site boundary		Building
	Water body		Woodland



PROJECT TITLE  
CHATHAM MARITIME TRUST  
LAND AT CHATHAM MARITIME

DRAWING TITLE  
WIDER RED LINE PLAN

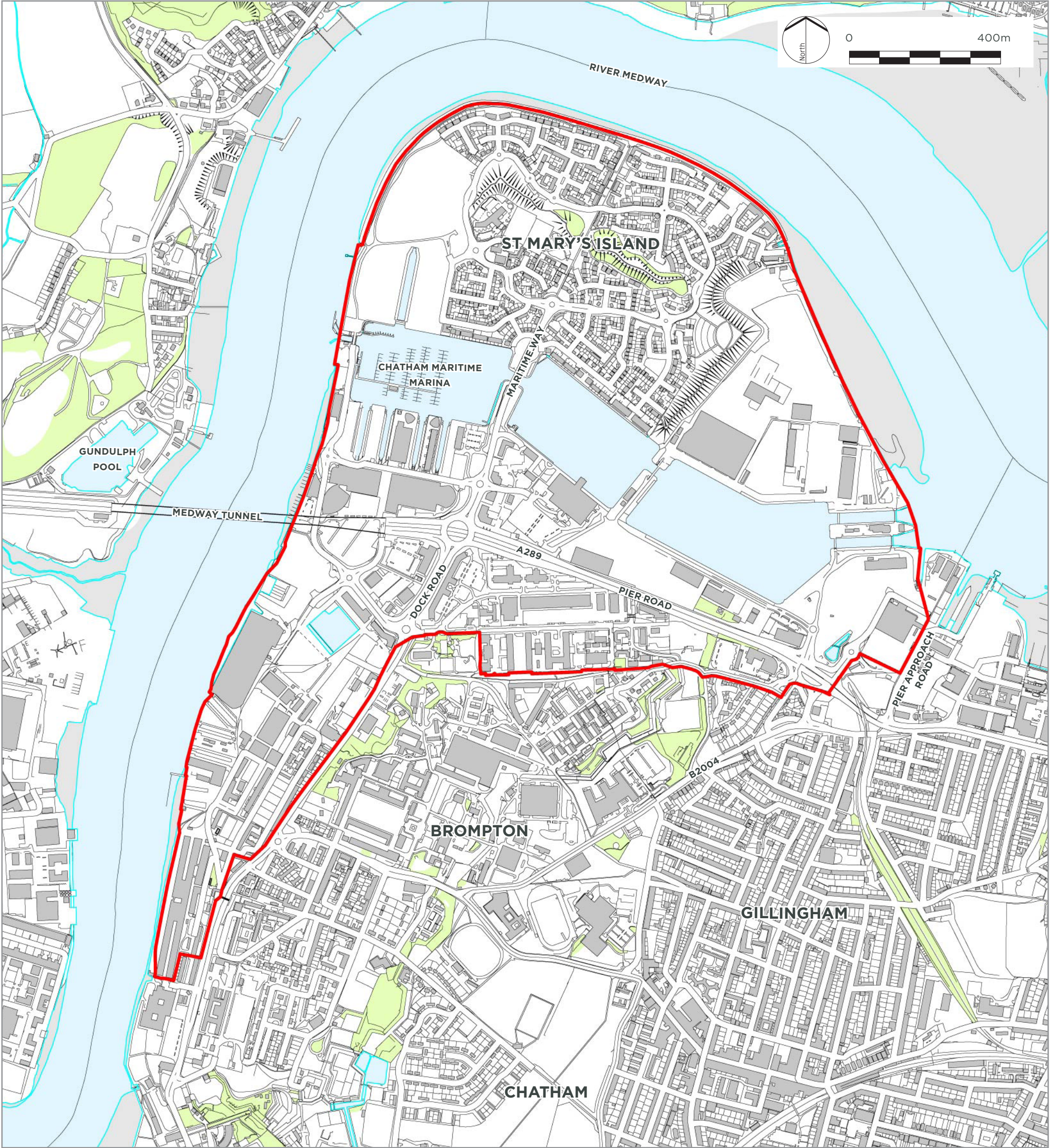
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LEGEND

Site boundary

Water body

Building

Woodland



Date: 6<sup>th</sup> September 2024

Medway Council

By email only: [planning.policy@medway.gov.uk](mailto:planning.policy@medway.gov.uk) and [futuremedway@medway.gov.uk](mailto:futuremedway@medway.gov.uk)



**Kent**  
Wildlife Trust

Dear Madam/Sir,

**RE: Consultation on the Medway Local Plan (Regulation 18, 2024)**

Kent Wildlife Trust (KWT) welcomes the opportunity to comment on the Medway Local Plan Regulation 18 consultation (2024). We have reviewed the documents online and have provided comments and recommendations below. Responses have only been provided to the set questions which fall within KWTs remit. To allow us to complete a comprehensive response to your consultation, please accept our comments in letter format.

Spatial Growth Options and Indicative Preferred Site Locations for Future Development

The preferred spatial growth option that has been put forward looks to take a brownfield first approach with development also taking place in suburban and rural areas. While the rationale for taking this approach is understood it is advised that a central focus of any final option should be to look at the ecological value of each site that is proposed to be allocated for development. Both brownfield and greenfield sites can be of high environmental value, supporting diverse and threatened species and a wider ecological network. Without in-depth ecological surveys and an assessment of a site's connectivity it cannot be assumed that green belt, greenfield, or brownfield land is of a higher or lower value for nature.

The supporting Policies Maps do not show the locations of Local Wildlife Sites (LWS), Priority Habitats, or sites not subject to designation but owned and managed for wildlife by environmental NGOs such as KWT and RSPB. This information is key when assessing the suitability of allocating residential and non-residential sites for development within the draft Local Plan.

It is concerning to see that there are indicative preferred sites identified on the Policies Maps which adjoin land which is designated as Special Protection Areas (SPA), Ramsar, Sites of Special Scientific Interest (SSSI), Marine Conservation Zones (MCZ), and Local Nature Reserves (LNR). Many of the sites also encroach on, contain, and / or adjoin priority habitats, ancient woodland, and Local Wildlife Sites (LWS).

Of particular concern is the amount of land indicated as being potentially suitable for development around Chattenden Woods and Lodge Hill SSSI; Tower Hill to Cockham Wood SSSI; Northward Hill SSSI; High Halstow NNR; Northward Hill RSPB reserve; Medway Estuary and Marshes SSSI, SPA, Ramsar; Medway Estuary MCZ; Thames Estuary and Marshes SSSI, SPA, Ramsar; Cliffe Pools RSPB Reserve; and River Medway between Cuxton and Temple Marsh LWS (for example sites HHH1-HHH39, SR14, SR16, SR18, SR22, SR24, SR41, SR51, and CHR14).

Taking into account the areas of land identified for potential development there are serious concerns about the negative impacts that will occur as a result of habitat loss, increased recreational disturbance, cat predation and detrimental disturbance arising from noise and light pollution. In respect of sites identified further to the north-east of the Hoo Peninsula there would also be impacts from the infrastructure works necessary to accommodate large numbers of additional homes or employment sites (for example sites AS21-AS28).

Where land identified as being potentially suitable for development adjoins sites which are particularly sensitive to the impacts of development, such as the Chattenden Woods and Lodge Hill SSSI, it is recommended that policies are included which require a minimum 400m graded buffer zone. A buffer zone of this size will work towards reducing disturbance to protected habitats and species from some of the development related issues listed above.

There is a lack of detail at this stage about the quantum and density of development being sought for each preferred site allocation and the criteria that will be used to assess the suitability of developments on these sites. It is therefore difficult to establish whether the preferred site allocations have been considered alongside their potential to enhance and connect habitats. It is clear from the Policies Maps that there are opportunities for existing isolated environments

to become connected through appropriate habitat creation thereby aiding nature's recovery and providing landscape scale benefits. For example, the preferred allocations for sites LW4, LW7, and LW8 present the opportunity to link up approximately 10 blocks of ancient woodland that have become isolated over time. Habitat fragmentation can hinder the movement of animal populations leading to a loss of genetic diversity and reduction in population size, leaving restricted species susceptible to disease. Fragmentation can also result in habitats becoming less resilient, particularly to invasive species and climate change. It is therefore important that opportunities to link up these habitats as part of proposed developments on allocated sites are identified at an early stage and that requirements to do so are included within site allocation policies.

Mitigation and enhancement measures identified as part of the site selection process, including requirements for landscape scale connectivity, must be clearly set out within site allocation policies to ensure that they are implemented.

It is recommended that detailed information on each of the preferred sites for residential and non-residential development is provided as part of a further Regulation 18 consultation so that structured feedback can be provided prior to the draft Local Plan progressing to the next stage. It is also requested that further information is provided in respect of the waste management facilities marked on the Policies Maps, particularly where these are shown to be situated within designated sites.

### Natural Environment

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

In addressing the impacts of climate change the Council should set ambitious local standards for development that go beyond national policies and regulations. The latest progress report from the Climate Change Committee (CCC) to Parliament<sup>1</sup> is clear that while some success has been achieved in reducing emissions urgent action is needed to ensure the UK meets its commitments. In order to adapt to the physical risks of climate change and work towards delivering on the Net Zero targets, policies within the development plan need to go beyond the standards set at a national level.

As this draft Local Plan makes clear '*Medway as a coastal area is particularly vulnerable to rising sea levels, and changes in temperature and precipitation have impacts for landscape, food production, nature and people.*' With the current national policies failing to keep the UK on track it is imperative that Medway pushes for developments to go further than what is normally required.

The CCC's progress report makes two clear recommendations, that developments are not reliant on a fossil-fuel boiler and that they provide electric vehicle charging points. However, it is recommended that in developing planning policies for climate change and design, those policies should be set against higher standards for new development and proposals involving the retrofitting of existing sites such as the Building with Nature standards<sup>2</sup>. This programme consists of a national framework of evidence-based, industry-tested standards that define high-quality green infrastructure, and enable planning policies to go beyond the statutory requirements to deliver more for people and wildlife. The inclusion of reference to the Building with Nature standards under draft Policy T1 in respect of promoting high quality design is welcome.

Good practice guidance on planning policies for climate change have also been published by the Town and Country Planning Association and Royal Town Planning Institute<sup>3</sup>. This guidance highlights how essential nature-based solutions and natural capital approaches are to climate change adaptation and promoting sustainable travel, urban cooling, and natural flood defence.

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

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<sup>1</sup> [Progress in reducing emissions 2024 – Report to Parliament](#)

<sup>2</sup> [Building with Nature](#)

<sup>3</sup> [The Climate Crisis – A Guide for Local Authorities on Planning for Climate Change](#)

The State of Nature report for 2023 shows that the abundance of species within England has declined on average by 32% since 1970<sup>4</sup>. The report also found that 16% of the 10,000 plus species surveyed risked being lost from Great Britain. The statutory minimum of 10% Biodiversity Net Gain (BNG) is not sufficient to meet the UK's commitments to nature's recovery and to aid in halting the biodiversity crisis. It is therefore imperative that Medway goes beyond this figure.

Kent's natural environment faces exceptional pressures, and it is considered that a 20% BNG target is a proportionate response to address this pressure. The Kent Nature Partnership has produced a report which sets out the justification for setting a target of 20% in Kent<sup>5</sup>. This report has been used by local authorities in other authorities who have successfully included a 20% BNG policy in their Local Plan.

Kent County Council has also produced a viability assessment of BNG in Kent<sup>6</sup>. This report highlights that a shift from 10% to 15% or 20% BNG will not materially affect viability in the majority of instances when delivered onsite or offsite. The report also establishes that the biggest cost in most cases is to get to the mandatory, minimum, 10% BNG and that an increase to 15% or 20% BNG costs much less and is generally negligible.

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

KWT are supportive of the tariff based strategic approach being applied to development within 6 km of the designated areas and supporting the delivery of the Bird Wise SAMMS programme. With ongoing and ever-increasing development pressures in Medway and neighbouring authority areas it is imperative that the requirements for contributing to the SAMMS programme, including the set boundary of 6 km, are regularly reviewed to ensure that the programme remains effective.

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

A key factor in the designation of landscapes of local value should be the contribution that they can, or do, make to landscape scale nature recovery. Local Nature Recovery Strategies (LNRS) provides a means of creating a spatial strategy which can pinpoint key locations and priorities for those locations to improve nature. Landscapes of local value can have a dual purpose, providing a social or character protection benefit as well as other environmental benefits such as carbon sequestration. Therefore, the designation of these spaces should be linked to the LNRS, or with land identified within the LNRS, to ensure that landscape scale recovery is achieved. There are also existing sites, designated as Local Wildlife Sites, which are considered to be landscapes of local value and are in need of greater protection within Local Plan policies. These sites are of at least County importance to nature conservation and are at risk from being lost to development or mismanagement. While the introduction of new designations to protect landscapes of local value may be beneficial it is considered necessary to first protect and enhance sites already subject to ecological designations.

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

KWT are supportive of the Green Infrastructure Framework standards being promoted within the Local Plan. Key principles within the framework can provide a baseline for Medway to set strong policy requirements and push for new developments to deliver high quality and effective green and blue infrastructure. In providing evidence-based advice on designing and implementing good quality green infrastructure the standards can act as an effective framework for strategically planning large scale developments and creating masterplans. It is recommended that

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<sup>4</sup> [State of Nature \(2023\)](#)

<sup>5</sup> [Justification for a Biodiversity Net Gain Target of 20% in Kent](#)

<sup>6</sup> [Viability Assessment of Biodiversity Net Gain in Kent](#)



Medway uses the framework to set local green infrastructure targets that meet the standards thereby encouraging developments to provide multiple benefits for the environment, for the health and wellbeing of communities, and to tackle climate change.

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

The Green and Blue Infrastructure Framework identifies the key issues faced by each local area and makes strong recommendations within the list of priority actions. Further work could be done to translate these priorities into area specific policies that create a healthy and diverse green and blue infrastructure network. It is unclear from the Framework as to how green and blue infrastructure will be incorporated retrospectively into the denser and more urban areas of Medway to the benefit of people and wildlife.

It is recommended that the Framework includes set ecology buffer zones around key priority sites to enhance the biodiversity of those sites and ensure that they are protected from existing and future development pressures, thereby providing effective and robust green corridors. It is also advised that the Framework includes reference to Buglife's Important Invertebrate Areas<sup>7</sup> to better inform corridor opportunities across Medway.

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

The need to deliver new homes, and the significant pressure on Medway to do so, is recognised. However, any land released from the Green Belt should be strategically planned and must retain and improve green and blue infrastructure while creating high quality, nature-rich developments. Green Belt land should only be released for development where it is not of high environmental value. Detailed ecological surveys must be carried out and published for all land that is being looked at for potential release. Developments on land released from the Green Belt should be required to go above and beyond the local and national requirements for environmental enhancements, including providing a higher level of onsite BNG. In strategically planning for the release of Green Belt land greater protection should be given to sites where nature is in recovery and any land released should provide landscape scale enhancements for the natural environment while supporting the LNRS.

#### *Policy Comments*

Policy S1 – It is recommended that the wording of the policy is adapted so that developments which achieve zero-carbon are supported and encouraged.

Policy S5 – LWS are of great importance for wildlife and consist of the county's most valuable wildlife areas making them essential for nature's recovery. It is therefore recommended that greater protection should be given to these sites within Policy S5 and that developments are steered away from them.

Policy DM1 – Consideration should be given within the policy to the impacts from surface water runoff to sites of importance for biodiversity because of development taking place.

#### Housing

#### *Policy Comments*

Policy T5 – Due to the potential impacts on the natural environment from large scale proposals for student accommodation, and associated infrastructure, it is considered reasonable for the wording to draft Policy T5 to be amended to include a need to avoid impacts to designated sites and provide adequate measures to mitigate any potential impacts on the local environment.

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<sup>7</sup> [Important Invertebrate Areas](#)

Policy T10 – It is recommended that LWS are added to the list of locations where it would not be suitable for gypsy, traveller and travelling showperson sites (temporary or permanent) to be situated. Proposals for new sites should also provide adequate measures to mitigate any potential impacts on the local environment.

## Retail and Town Centres

### *Policy Comments*

Policy T17 – Edge or out of centre locations for retail and leisure uses may have a detrimental impact on the natural environment and the wider green infrastructure network. It is recognised that any proposals for these uses will need to adhere to other policies within the development plan, including draft Policies S1, S2, S5, and DM1. Notwithstanding this it is recommended that draft Policy T17 includes the requirement for edge and out of centre uses to provide green and blue infrastructure and enhance the wider network alongside public realm works and sustainable travel links.

Policies S17-S23 – Directing new growth to existing centres will require the provision of high-quality public realm. Effective public realm that is inclusive, enhances the experiences of residents, improves health and wellbeing, and addresses climate change and air pollution requires green and blue infrastructure. In directing growth to these existing centres, it is essential that the policies listed above include requirements for developments to provide green and blue infrastructure as part of the public realm and for this to be implemented, where practicable, as part of a masterplan process (it is noted that draft Policies S17, S19, and S20 do require compliance with existing masterplans).

## Health, Communities and Infrastructure

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

It is encouraging to see that improving the green and blue infrastructure network, enhancing and increasing access to nature, and creating a healthy food environment by increasing opportunities for growing food are at the core of Policy T27. It is recommended that the wording to the second part of the policy is strengthened by requiring the provision of these health and wellbeing opportunities to be integral to the design of all major developments if they are to be permitted.

It is also recommended that major developments contribute to or enhance facilities and opportunities for social prescribing. Social prescribing is a key component of the NHS' Universal Personalised Care. It is an approach that connects people to activities, groups, and services in their community to meet the practical, social and emotional needs that affect their health and wellbeing. Green prescribing is an evidence-based pillar of social prescribing that harnesses the health, well-being, and social benefits of spending time in nature. It enables GPs and other health care practitioners to refer people to nature-based programs to improve physical and mental health. A report from The Wildlife Trusts has demonstrated that if just one of the Trusts' green social prescribing programmes was adopted by the 1.2 million people who would be expected to participate the NHS could save approximately £635.6 million annually<sup>8</sup>.

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

Access to rich and diverse natural spaces for all residents and the provision of a robust and well connected green and blue infrastructure network are essential for improving physical and mental health as well as social wellbeing. Natural England's green infrastructure principles make clear that access to greenspace has been associated with improved relaxation, increased functioning of the immune system and better sleep patterns<sup>9</sup>. Accessible green and blue infrastructure close to the homes of those who do not have the resources to visit these types of spaces is also essential in addressing health inequalities, including those highlighted by the supporting text for draft Policy T27. It is therefore considered that the most important health areas listed for the local plan to address are improving access to nature and green spaces and improving the green and blue infrastructure network.

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<sup>8</sup> [A Natural Health Service](#)

<sup>9</sup> [Why GI Should Be Provided – The Benefits](#)

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

Policies within the local plan should ensure that inclusive design is central to all developments and that it extends to the creation of inclusive and accessible outdoor space. This should be clearly evidenced through the provision of a design and access statement and, for major developments, a masterplan. Policies could also require large scale developments to be subject to external design reviews where appropriate.

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

The opportunity to enable communities to identify and protect green areas as Local Green Space is welcome. A key factor in the designation of Local Green Spaces should be the contribution that they can, or do, make to landscape scale nature recovery. LNRS provide a means of creating a spatial strategy which can pinpoint key locations and priorities for those locations to improve nature. The types of green spaces listed above can have a dual purpose and may provide a public benefit as well as other environmental benefits such as reducing flood risk. Therefore, sites designated as Local Green Spaces should form part of the LNRS or link with land identified within the LNRS to ensure that landscape scale recovery is achieved.


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

The proposal to identify what infrastructure is needed to support growth within Medway through the implementation of an IDP is welcome. To be effective it is recommended that the IDP provides a framework for integrating necessary infrastructure, including green and blue infrastructure, to ensure that it is delivered in a coordinated way. The IDP should be revised annual so that it is better suited to respond to the evolving needs of Medway's population and a changing climate. The IDP should also identify how much the delivery of the necessary infrastructure will cost, how it will be funded and highlight any funding gaps. KWT Group are able to work with Medway to help deliver on green and blue infrastructure projects at the design, delivery, and operational stages.

We hope that the comments made within this letter prove useful in the formation of the Medway Local Plan. We would be more than happy to hold further discussion with you on any of these issues raised.

Yours sincerely,

**Nicholas Trower**  
Planning and Policy Officer  
Kent Wildlife Trust



**From:** [REDACTED]  
**To:** [policy, planning](#)  
**Subject:** Medway Local Plan Consultation.  
**Date:** 08 September 2024 11:45:00

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Dear Planning Committee,

In addition to our points submitted online, we would also like you to consider the following areas as part of the Local Plan consultation, these points are cut from the recent discussion with the council on the development of Stoke Parish, but also relate to all the communities on the Hoo Peninsula and needed to be addressed within future infrastructure and development plans to sustain the long term issues already existing with our communities.

We are keen to see a long term sustainable future for Medway and especially the Hoo Peninsula, where we would like to see a green, nature enhance and intertwined plan that promotes mental and physical health through engagement with nature. We welcome eco-tourism where supported with the correct planning and infrastructure to reduce the impact on local residents. We would also wish to see the local plan focus developments in the Hoo area to local population needs for housing and the transport links needed through active travel and rail use, over increased car use.

Topic's we wish to be included and addressed within the Local Plan:

- any development is undertaken in a manner to improve the lived experience of the community, not just to add housing.
- safe access to the wider communities of Allhallows, High Halstow and Hoo, via footpaths and cycle paths.
- safe routes for children and elderly to access the shops and bus stops (all are located in lower stoke).
- lack of facilities, we have lost the doctors and our school, the community is concerned an increase in housing will impact medical care and that the school at Allhallows will be merged into a new school at Higher Halstow, degrading the sense of community and easy access for families to drop off school children.
- flooding, that new housing location will increase flooding over addressing it, we also have a lack of sewage capacity in the area leading to flooding backing up sewage pipes.
- increased traffic within the village, we already have a lot of traffic cutting through the village and wish any new development to be designed to not increase traffic via Lower stoke centre.
- Parking and EV charging capability. There are no EV chargers on the peninsular and stoke has a lot of housing without off street parking, how can this be addressed within existing and new infrastructure. (we have had a 3 year running battle with the council to try and address this growing issue and still have no solution, they have proposed placing a single charger in the village carpark, which we welcome but this is unlikely to meet demand needs now and going forward).
- improved public transport and place bus stops in middle and upper stoke. Presently we have an unreliable bus service that only stops in Lower stoke.
- creating a central village green and community area, this could be located on one of the already proposed land areas and double up as surface water continuation for resilience for

existing flooding. We are also keen to exploit biodiversity net gains opportunities and creating nature strips between existing and new developments.

- preserving nature and our access to it, also addressing air quality, (we are a rural village but have no foot paths into the marsh that can be accessed from stoke, we also get a lot of air pollution from the main road, blow off from London and gas venting from grain's gas storage).

- Protecting historic views, the church in upper stoke is a historic landmark and listed in the doomsday book, it has view from the tower to allhallows, Hoo's and st mary's Hoos church's. We would like to protect these views as part of the areas landscape (and make them protected if possible).

- School catchment areas, Stoke is no longer in a catchment area for any grammar school's and no longer qualifies for a school bus pass to schools off the peninsular, placing the area in a second-class education system from the rest of Medway, this is a concern for many parents and will be a negative for any future families moving to this area.

- we have no remaining small or medium size commercial units or a hub for businesses to take on, or for community or youth activities. (presently we have no groups or areas for over 10 years olds this end of the peninsular).

- the village hall is at the end of its life and needs replacing, we expect it to be unusable within the next few years due to structural defects, the methodist church opposite is expected to close due to not having a flock or vicar, and it is suffering from lack of maintenance.

- energy security, we regularly get power cuts due to our above ground cable power supply, we would like where possible for new developments to have cables below ground to reduce any risk of causing a power failure and means to increase energy security included by design.

Looking forward to our continued engagement.

Regards

[Redacted Signature]

Peter Egan MSc MCGI CEng MIET CEnv FCIOB FInstRE

*Chair, Stoke Parish Council Neighbourhood Plan Committee*

/ [Redacted Address]



██████████  
Development Manager  
Medway Council  
Gun Wharf  
Dock Road,  
Chatham  
ME4 4TR

8<sup>th</sup> September 2024

Dear ██████████

**Re: Local Plan, Regulation 18 Consultation**

I am writing on behalf of Chatham Historic Dockyard Trust (the Trust) as part of the Regulation 18 Consultation for the development of Medway's Local Plan. The Trust is a longstanding and active partner with Medway Council, and deeply engaged in working to ensure that Medway is a great place to live, work, learn and visit.

We strongly support the vision for Medway which has been articulated, with the emphasis both on Medway's cultural and heritage assets as well as its natural assets, in particular the River which remains vastly underutilised. We strongly support the wider placemaking ambition, with the emphasis on the quality of development, and of a Medway which is healthy and vibrant, where its communities are connected. The emphasis on environmental sustainability is essential given the risk which the climate emergency presents to riverside and maritime communities.

We support the proposed Spatial Growth Plan and the proposed blended growth strategy SGO3. The adoption of a brownfield first approach, utilising urban and waterfront areas, will maximise Medway's ongoing regeneration and focus development towards previously developed sites. This must be balanced with the reality of the scale of development required and strategic development to meet the needs of Medway's communities.

The Trust collaborated with Homes England, Medway Council, and Historic England to prepare the Interface Land Development Brief in 2018. This Brief established that any development of the Interface Land must prioritise respecting and enhancing the setting and integrity of the Historic Dockyard. While residential development was considered a potential land use for the sites, other uses such as leisure, commercial, educational, and recreational were also deemed acceptable. We note that the proposed sites CC825 and CC835, which are functionally and physically part of The Historic Dockyard Chatham estate and a vital part of the wider heritage setting, remain designated for non-residential use. The proposed non-residential determination of these sites will support their future use as employment sites which



support business growth, maximising the potential benefit of the close proximity and relationship with the Universities and College.

The Trust has formally expressed its opposition to a residential led development scheme for the Interface Land sites (CC825 and CC835). The Trust maintains that any future development proposals for these sites must prioritise the preservation and enhancement of the heritage integrity of the Historic Dockyard Chatham.

We strongly support the emphasis placed on the importance of the historic environment and the need to appropriately integrate heritage into planning policy and decision making. Medway's heritage, of which The Historic Dockyard Chatham is a vital component, contributes an irreplaceable resource which is at the heart of Medway's character. For 400-years, The Historic Dockyard was the home of the Royal Navy in Chatham and today is a vital asset and key part of Medway's story and distinctiveness, whilst contributing significantly to tourism, leisure, education, and employment. Within Policy S8, we strongly support the requirement that development 'maintains and enhances the significance of designated and non-designated heritage assets' and that 'all new development positively contributes to local distinctiveness and character'; and that the 'sensitive re-use of heritage assets' is encouraged. The Trust has been a leading proponent of the reuse of heritage assets over the last 40 years and believe that historic buildings require a viable modern-day reuse.

We strongly support the emphasis placed upon the importance of heritage assets, their conservation and enhancement, and the role which these assets play in placemaking. Within Policy D9, we strongly support the requirement that 'development that impacts a heritage asset, or its setting, should achieve a high quality of design which will conserve or enhance the asset's significance and setting'. Furthermore, that 'development that causes loss or significant harm to the significance of a heritage assets will only be permitted where it can be demonstrated that substantial public benefits will result that outweigh the harm or loss.' The protection of heritage assets and their setting is a vital component of any future sustainable development and placemaking.

We welcome the opportunity to have reviewed and responded to the emerging Local Plan through the consultation process and look forward to continuing to engage through the further stages of its development.

Yours sincerely



Richard Morsley  
Chief Executive



Creative Medway response has been translated into a table format as a means of displaying the representations.

Respondee 20	LP Policy/LP section	Summary of issue raised	
Creative Medway	Vision	Vision (suggested amendment) – Our high streets and centres have developed new uses and attractions in response to changes in retail, leisure and work patterns ( <b>and powering regeneration</b> ).	
	Vision	Vision - High Streets are sought after locations for a range of businesses, providing space for start-ups and co-working ( <b>include fabrication</b> – [cofabbing]) facilities that reduce people’s need to commute.	
	Vision	Vision – include cultural assets as key infrastructural facilities...	
	Strategic objectives	Strategic objectives/Supporting people to lead healthy lives and strengthening our communities/ To strengthen the role of Medway’s urban, neighbourhood and village centres,.....’ <b>include manufacturing and fabrication</b> ’ alongside retail and start-ups.	
	centres,... .....’include manufacturing and fabrication’ alongside retail and start-ups.	Spatial Development Strategy – change ‘Chatham Intra Heritage Action Zone (HAZ) to ‘Old High Street Intra Heritage Action Zone’.	
	Spatial Development Strategy – change	Policy S1 - Question 1 – Go beyond national policy for addressing climate change. Evidence – public engagement from Creative Medway Cultural Strategy.	

	‘Chatham Intra Heritage Action Zone (HAZ) to ‘Old High Street Intra Heritage Action Zone’.		
	Policy S1 - Question 2	Policy S2 - Question 2 – Go beyond 10% minimum requirements to support health determinants as supported by public engagement feedback.	
		Policy S4 - Question 4 - Yes and in particular, those of special natural and/or heritage significance. We would encourage the Council to consider criteria along the lines of: 1. Uniqueness 2. Landscapes under threat 3. Need to maintain community access to natural spaces	
	Policy S4 - Question 4 -	5.1.1 The Council will also seek to create a destination of choice to support businesses and employment creation. <b>‘Greater clarity required’.</b>	
	5.1.2	5.1.2 New development should respect the area’s heritage, reflecting distinctiveness across Medway, and conserving and enhancing valued aspects of the historic environment. <i>‘Enhancing is too weak amend to <b>‘enhancing, preserving and developing’.</b> ‘Careful attention’ is vague and very much open to interpretation – greater clarity required</i>	
	5.2.1	5.2.1 <b>‘Good design’</b> – greater clarity required.	
	5.2.2	5.2.2 <b>‘Adherence to guidance’</b> - what provision is in place to ensure developers do adhere to this guidance?	
	5.2.3	5.2.3 <b>‘Attractiveness’</b> – greater clarity required.	
	5.2.6	5.2.6 <b>‘regard should be given to heritage assets.....’</b> - [rephrase as open to interpretation]	
	T1	Policy T1 – <b>‘High quality design’</b> – [greater clarity required].	

	T1	Policy T1 - How does the plan ensure the integration of existing communities, especially where they have supported and driven the regeneration and are looking to ensure they can continue to reap the benefits of their efforts (eg. Old High Street Chatham Intra)?	
	T1	Policy T1 Criteria point – ‘There is good connectivity and permeability.....’ - There does need to be adequate parking within new developments, or we will see existing infrastructure overwhelmed	
		Criteria point – ‘There is demonstration of provision and/or access to essential services.....’ - Essential that this be funded at first phase.	
	T1	Policy T1 Criteria point - There is high quality landscaping, public art and areas of public realm.....demonstrating linkages....’ <b>Add- in line with the Creative Medway Cultural Strategy, in collaboration with local bodies such as Creative Medway and the Intra Community Trust.</b>	
	Policy T1	Policy T1 Criteria point - There is the establishment of healthy communities.... <b>include ‘Ensuring community safety and provision of community spaces’.</b>	
	Policy T1	Policy T1 Criteria point - The inclusion, design and thoughtful use of shared spaces in housing developments may be used to create an environment which is supportive of social connection and encourage more incidental encounters. - <i>Essential that this be delivered in the first phase.</i>	
	5.2.10	5.2.10 – include consideration of community safety	
	5.3.5	5.3.5 – ‘include maintenance of public art’ under topics listed.	
	5.4.6 -.	5.4.6 - When preparing proposals that incorporate heritage assets, applicants are expected to consider the latest Historic England (or successor body) advice - <b>We would encourage proposals to consult with community trust bodies focused on heritage. Most relevant at the moment is the Intra Community Trust (with Heritage Development Trust status). Proposals within the Star Hill to Sun Pier conservation zone should be in alignment with the Trust's priorities.</b>	
	5.5.10	5.5.10 to be continued	
	7.1.5	7.1.5 A core ambition of the Local Plan is to strengthen the performance of Medway’s economy, securing quality jobs in the local area, capitalising on the further and higher education offer, and realising the area’s strategic potential. <b>‘Can we specifically mention developing high performing industries here?’TS</b>	

		see if we can find MC key growth sectors for Reg 19 LP. High value and high performing sectors are very difficult to define. We do need ambition based on evidence. The updated ELNA may shed light on this.	
	7.1.7	<p>7.1.7 However, recent years have been very challenging for the local, national, and global economy. There have been rapid and significant changes in employment practices and commercial land needs, in response to the COVID-19 pandemic, global instability and political changes. These are reflected in the demand for commercial land, including office space*, retail and warehousing and distribution. The Council recognises the importance of a resilient employment land strategy that is flexible to market and structural changes.</p> <p><b>* can we also include manufacturing, making, and fabrication here to reflect the needs of the creative industries too?</b></p>	<p>Ts – how is this defined as a sector? We have forecasting for B1/B2/B8 however at sector level we would need to work out how we can measure demand for this according to how this sector is made up. The existing description is covering much broader sectors.</p>
	7.2.3/7.2.4	<p>7.2.3 Our town centres have a resilient business presence and there are opportunities for the redevelopment of several smaller, centrally located sites with good accessibility for office and related activities.</p> <p>7.2.4 There* are also several large-scale business and industrial estates across Medway, including Medway City Estate, Innovation Park Medway, Gillingham Business Park, and Knight Road, Rochester.</p> <p><b><i>Worth emphasising that not all fabrication and manufacturing will be taking place in these locations – especially in relation to the creative industries (which includes tech).</i></b></p>	<p>TS This point may link to para.7.2.2 in relation to clustering however this section is not industry specific. The emphasis across this paras seems to be around the range of scales of activity and across sites and locations. Creatives mentioned under 7.2.6 see below.</p>
	7.2.5	<p>7.2.5 There is significant potential for the regeneration, and redevelopment, of employment sites on the Hoo Peninsula, in particular at the Isle of Grain, and the site of the former Kingsnorth Power Station.</p> <p><b>Transport funding required</b></p>	
	7.2.6	<p>7.2.6 Creative and cultural industry start-ups and newly establishing businesses for example, often emerge in unplanned urban locations due to a range of factors, including clustering of talent, ideas and flexible and cheap accommodation. Related*activity needs to be supported, particularly in the area’s town centres and regeneration areas,.....</p>	

		<p><i>*Tech infrastructure needs to be considered as part of this. Seed funding should also be considered as part of Section 106 agreements and can be managed by bodies such as Creative Medway.....</i></p>	
	7.7.1	<p><b>Tourism, culture and visitor accommodation</b></p> <p>7.7.1 The tourism and cultural economy plays an important role in raising Medway's image and profile, and supporting employment, business, creative and leisure opportunities. Tourism, arts and culture*, are therefore central to the Council's ambitions for the area and sit at the heart of the Medway Council Plan, its Regeneration Strategy – Medway 2035, the Medway Cultural Strategy# (2020 – 2030), Thames Estuary Production Corridor, and as part of the Creative Estuary Initiative....</p> <p><b>* Does your definition of culture include heritage? If not, can you include separately?</b>  <b># Should read 'the Creative Medway Cultural Strategy'</b></p>	
	T13	<p><b>Policy T13:</b> The provision* of new, and the enhancement of existing cultural assets and visitor facilities, will be supported, where they respect the integrity of their surrounding area and local historic environment.</p> <p><b>*Section 106 support to community management or ownership of those assets, and funding to deliver essential cultural interventions is necessary and should come in first phase</b></p>	
	7.7.10	<p><i>7.7.10 creative Medway's public engagement highlights an ongoing issue with lack of public transport access to culture and leisure facilities in Medway. A significant proportion of Medway's communities are unable to participate or attend cultural and leisure offer locally because of limited public transport options, in particular lack of evening and weekend service. What can the Local Plan do to support public transport access to leisure and cultural facilities?</i></p>	
	7.7.10	<p>7.7.10 What commitments can be made to support cultural and creative faculties in rural areas as well as within every new development?</p>	

	7.8.2	7.8.2 This is <b>incorrect</b> , Arts Council England have identified Medway as a Priority Place for arts and creativity and The National Lottery Heritage Fund have identified Medway as one of their focus 'Heritage Places'.	
	7.8.4	7.8.4 This can only be achieved through funding support, and should therefore require developments to contribute to the wider cultural and heritage funding of Medway. Said funding should be set aside at the starting point of developments rather than being triggered by minimum occupancy agreements. A percentage of profits should be funneled back into the development of communities, something the creative sector is uniquely placed to do.	
	S14	S14 Can this Local Plan go further in highlighting the role of local creativity and culture in attracting people to live in and move to the area (as well as visit the area)?	
	S14	<p>S14 (bulletpoint 4) Can we go further and adopt the model developed in York where new developments over a certain size need to produce a 'Cultural Wellbeing Plan' to demonstrate how they will meet the needs of the community?</p> <p>Can we replicate the policy stipulation in Milton Keynes that:</p> <p>'A minimum of 0.5% of the gross development cost of proposals for 11 or more dwellings or non-residential development of 1,000sqm or more should, subject to viability, be allocated towards cultural wellbeing. This includes public art that enhances the cultural offer and appearance of the development, its surroundings and Milton Keynes as a whole, and engaging local residents throughout.'</p>	
	S14	<b>S14 (bulletpoint 5)</b> Many Local Plans contain a stipulation that public spaces in new developments must contain world class public art. Can we replicate this as national best practice? Milton Keynes' Local Plan contains a particularly good example emphasising the benefits of public art, the need for public art to connect to local themes and heritage and stipulates the need for public engagement in the selection and commissioning of public art. The plan also outlines acceptable approaches alongside sculptural public art including artists in residence and long term creative programmes.	

		<a href="https://www.milton-keynes.gov.uk/sites/default/files/2022-05/PlanMK%20Adoption%20Version%20%28March%202019%29.pdf">https://www.milton-keynes.gov.uk/sites/default/files/2022-05/PlanMK%20Adoption%20Version%20%28March%202019%29.pdf</a>	
	<b>S14</b>	<b>S14 (bulletpoint 6)</b> Please can we amend to stipulate that this should also support local makers, creatives and businesses?	
		Stray comment – linked to 7.9.2? n partnership with Creative Medway and other relevant sector/community bodies?	
	8.2.1	<b>8.2.1</b> Medway’s Cultural Strategy to The ‘Creative Medway Cultural Strategy’	
	8.2.4	<b>8.2.4</b> Enabling production and retail spaces within this is essential, as is enabling affordable spaces for creative businesses to thrive.	
	8.2.4	<p><b>8.2.4</b> Evaluation undertaken by Historic England and Live Music Now, after IntraFest (a council commission grassroots music festival) and 'Round Here (a Historic England commissioned project) reported that:</p> <ul style="list-style-type: none"> <li>- 74% of audiences for performances were hyper-local, travelling less than 4 miles to attend, a further 11% travelled up to 9 miles, with the remainder coming from further afield</li> <li>- 16% of audiences identified as disabled, against the national average of 12% of arts audiences identifying as disabled</li> <li>- 63% of audiences were in the 45-64 age bracket, with 21% from the 31-45 age bracket</li> <li>- 95% of audiences rated the quality of the experience either good or very good, with 26% stating that they had learned new stories or history about their local area. Of these audiences, 69% visited the high street particularly to attend ‘Round Here events, with 79% of audiences also visiting local shops and businesses while they were there</li> <li>- 79% of audiences said they would like to attend similar events on the high street again, 58% said the event made them feel closer to their local community and 84% said the events made them feel more positive about the local area</li> </ul> <p>This indicates that funding mechanisms from Section 106 can have a powerful role in supporting thriving town centres, and support for local retail.</p>	
	S15	<b>S15 Bullet point 3</b> - Specifically, Section 106 should support interventions that support engagement with town centres.	



	S16	<b>S16 1c</b> - Our respondents stressed that community use is as important in rural centres as it is in the district or principal centre.	
	8.7.1	<b>8.7.1</b> It is also compromised by public safety. Further proposals should address public safety concerns.	
	8.7.2	<b>8.7.2</b> Our respondents felt that this will require community and culture led interventions, improvement in perception of safety and development of civic pride.	
	8.7.3	<b>8.7.3</b> The 'Creative Medway Cultural Strategy'	
	S17	<b>S17 Para 3</b> - These are essential, and the routes should be accessible and safe, with support for historic and tourist trails between them through to Rochester.	
	S17	<b>S17 bullet 8</b> We should be explicit about funding in this bullet point, with the mechanisms in place with the start of developments and with developers obliged to work in partnership with Creative Medway.	
	S17	<b>S17 bullet 10</b> With commissioning priority given to local artists and businesses.	
	S19	<b>S19</b> This is an opportunity to include culture as a means of regenerating the town centre. Funding and space provision to support should be drawn from Section 106.	
	S22	<b>S22</b> This also requires community assets and infrastructure, with support for interventions to avoid designing in isolation of communities.	
	DM12 1a -	<b>DM12 1a</b> - Our respondents also did not feel that transportation needs were adequately addressed here.	
	T19	<b>T19</b> 'up to six months' - is there a reason for this limit? We would support reduction to barriers to meanwhile use to support business growth?	
	T19	<b>T19</b> And should require consultation of community bodies such as the Intra Community Trust, and overarching bodies like Creative Medway.	
	Vision for Access and Movement in Medway	<b>Vision for Access and Movement in Medway</b> This policy addresses how to reduce car use but does not set forward a vision for how to increase public transport in service of the cultural, evening and leisure economy outlined and supported elsewhere in this document.	
		<b>Vision for Access and Movement in Medway</b> – 'places...' And meet their cultural needs?	

	<b>T21</b>	<b>T21</b> - We would welcome reference to the role of riverside infrastructure in supporting heritage uses too. Commercial piers should be maintained, with infrastructure to support the marine heritage sector. There needs to be dry dock space for larger local historic vessels to avoid relocation to Ramsgate, and areas in which development, restoration and protective work can be undertaken on historic vessels. In particular Sun Pier and Gillingham Pier should be maintained as commercial piers accessible for and supporting large historic vessels.	
	<b>9.5.5</b>	<b>9.5.5</b> This should include the restoration and mooring of historic vessels outside of the dockyard.	
	<b>9.6.1</b>	<b>9.6.1</b> And residential moorings.	
	<b>T22</b>	<b>T22</b> One respondent felt this should be in line with the requirements for housing rather than a specific requirement for marinas.	
	<b>9.6.5</b>	<b>9.6.5</b> It is important to retain commercial moorings and moorings that facilitate restoration of historic vessels and access to them.	
	<b>9.6.6</b>	<b>9.6.6</b> This is not universally true, and provision under this code to require residential marinas to have facilities could mitigate much of this. They also provide essential affordable housing.	
	<b>9.9.1</b>	<b>9.9.1</b> Retail also requires loading access and this should be considered.	
	<b>T26</b>	<b>T26</b> We would encourage the 15 minute principle to be extended to (i) cultural provision and (ii) provision for Disabled residents and for older adults, especially in relation to reducing isolation and loneliness. Would also be good to consider disabled access here too.	
	<b>9.10.6</b>	<b>9.10.6</b> And toilet facilities. (Within brackets list)	
	<b>9.12.1</b>	<b>9.12.1</b> And it does not have a negative impact on parking beyond the development? One example would be Victory Pier which has impacted on parking in neighbouring communities.	
	<b>Q35</b>	<b>Q35</b> - There is a shortage of commercial vehicle parking in Medway. Local tradespeople cannot park commercial vehicles in new developments like Victory Pier and this penalises local and small business owners.	
	<b>10.1.2</b>	<b>10.1.2</b> and cultural interventions	
		10.2.3 include cultural provision in 'for example' list.	

	<b>T27</b>	<b>T27</b> This list should also include ‘enabling funding to support interventions that reduce health inequalities’ and ‘co-location with cultural activities and interventions which have a proven impact on reducing health inequalities’.	
P175	<b>T27</b>	<b>‘Major development must ensure...’ policy point could be expanded to reference cultural interventions and social prescribing</b>	
P175	<b>T27</b>	<b>‘Exceptional circumstances...’ policy point to be expanded to include culture</b>	
P177	<b>10.2.11</b>	<b>‘Focus groups...’ point to include reference that community interventions require financial support and cultural interventions are an established way of building community connections</b>	
P178	<b>10.2.14</b>	<b>Please can we expand this list to include culture</b>	
Q36		<b>There is an opportunity to include a reference to the role that creative and cultural interventions can play in supporting individual and community health and wellbeing. Available programmes mentioned within full comment</b>	
Q38		<b>Based on the statistics in the JSNA and Public Health Survey we would have expected to see a greater emphasis on reducing loneliness and social isolation.</b>	
Q39		<b>It should include support for interventions that directly engage with these groups via section 106 funding and also by the development of fully accessible community assets including Changing Rooms Toilets and integrated tech infrastructure.</b>	
P185	<b>10.4.2</b>	<b>Correct name of document to The Creative Medway Cultural Strategy</b>	
P185	<b>10.4.3</b>	<b>There is a need to support older people and Disabled people to access them however.</b>	
P185	<b>10.4.5</b>	<b>These contributions need to be larger in terms of total value and also to be delivered at the start of development and not triggered by minimum occupancy clauses. A minimum of 10% profit should be allocated to funding</b>	

		that comes from the developments. Further explanation of money that could be raised and impact in full comment.	
P185	<b>10.4.7</b>	And funding to support the increased demand for interventions at the other facilities.	
P185	<b>10.4.8</b>	Please can developers also be required to consult with either Creative Medway or another relevant body?	Possible addition to consultation list, discussion with Stacey and DM officers of appropriateness
P186	<b>T29: Communi ty Facilities</b>	Minimum requirements of funding/provision must be established. We would propose at least 10% of direct profits, and tied to the start of developments rather than later phases and that all developments regardless of scale (except for single self-build family homes) should have to contribute.	Is this appropriate?
P186	<b>T29: Communi ty Facilities</b>	‘All developments over 10 homes.’ What proportion of this contribution will be dedicated to cultural facilities?	
P188	<b>10.5.6</b>	This should be enforced with the start of developments and not in later phases.	Can this be done, is it appropriate
P189	<b>S24: Infrastruc ture Delivery</b>	Comment for second bullet point. This should be at the beginning of development rather than at phase 3. Otherwise this creates long delays and allows the building which should be a community asset to degrade, and detracts from the area. Further explanation why in policy comment	
P190	<b>S24: Infrastruc ture Delivery</b>	Comment on bullet point ‘Financial developer contribution...’ And should be upfront.	
P208	<b>12.1.23</b>	Currently waste from public events cannot be recycled because the Council’s contractor does not offer commercial recycling. Is there provision within this	

		<b>plan to make it possible that public realm festival/event waste can be recycled?</b>	
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## **Medway Local Plan Review 2024**

### **Regulation 18 Consultation**

#### **Representations by**

#### **The Dickens' Country Protection Society**

##### **1. Introduction**

- a). The Society was formed on 10<sup>th</sup> February 1972 with the object of improving, protecting and preserving for the benefit of the public its area of benefit, which is that of the former Strood Rural District together with the eastern part of the ecclesiastical parish of Chalk. For this purpose, but not otherwise, the Society aims to:-
- i) arouse, form and educate public opinion in order to ensure the promotion of the aforesaid object,
  - ii) make representations at Public Inquiries or in such other ways as shall from time to time appear necessary, and,
  - iii) take such other lawful action as shall be considered appropriate to promote the aforesaid object.

The Society is a registered charity affiliated to the Council for the Protection of Rural England (Kent Branch), and the London Green Belt Council. The Society currently has some 45 members.

- b). The Society's Area of Benefit includes the civil Parishes of Higham, Cobham, Meopham, Shorne and Luddesdown together with the eastern part of the ecclesiastical Parish of Chalk (all in the Borough of Gravesham) and the civil Parishes of Cuxton, Frindsbury Extra, Hoo St.Werburgh, High Halstow, Cooling, Cliffe, Hoo St.Mary, Stoke, Allhallows and Grain (all in the Medway Unitary Authority area).
- c). The Society's primary objective is the preservation of the countryside including the Green Belt and those areas which carry special designation.

##### **2 General Principals**

- a). The Society recognises the demands being made on Medway Council by central government regarding the supply of land for housing. In the Sociey's view the targets being set almost certainly exceed local need. There are issues over the capacity and motivation of the building industry to build what is demanded. Meeting the target could result in more land being identified than is needed. There is likely to be an issue over building rates, which are not under the control of the local authority. It is not in the building industry's interest to over provide. If more land is identified than is really needed there is a risk of developers 'cherry picking' the most profitable sites rather than use the most suitable.

- b). Of the options put forward in the discussion document the Society regards the "Blended Strategy" as the most viable. It is recognised that the capacity of sites within the urban area is limited, but these should be developed first in preference to green-field sites. In the Society's view it is important that settlements remain separate and identifiable, and are not allowed to coalesce. In the Society's view, it is important that the objectives of the Green Belt are recognised and that development in the Green Belt is avoided.
- c). The Society is concerned at the proposed development on the Hoo Peninsula. Large tracts of the peninsula are recognised as high grade agricultural land and in the Society's view this should be used to grow food not as sites for building houses. In this context the Society would look to responding to the Regulation 19 consultation when specific sites and policies are identified. In the Society's view before the inclusion of any agricultural land comprising more than five hectares as a development site on the proposals map, a soil survey should be undertaken to ensure that the appropriate hierarchical approach is taken to preserve the best land.
- d). In identifying sites for employment, consideration should be given to the available infrastructure. In general, industrial sites should be located within easy reach of the primary road network unless materials and finished products have direct access to the rail network and can use it. Sites should not be located which would make it necessary for heavy goods vehicles to use local roads with the resulting increasing congestion.
- e). If further development on the Hoo Peninsula is to be considered, the current road infrastructure needs to be improved. The Four Elms Hill roundabout in particular needs to be replaced by a grade separated junction and free flow slip lanes. Other more local improvements will also be required.
- f). In the Society's view, infrastructure improvements must precede development. Energy supplies, drainage and water supplies cannot be assumed to be adequate to service additional housing. The same is the case with educational and medical facilities. When necessary, this should be drawn to the attention of central government.



# MEDWAY LOCAL PLAN 2041 - EVENTS COMMENTS FORM

Your Name: John Noley

Contact Details (Email):

The council is consulting on potential options for development and policies, as part of our work on a new Local Plan for Medway. Your comments will help us to prepare our draft Local Plan that will be published in 2025. We will record your comments and hold your contact details as part of our work on the Local Plan.

You can view more information on our website at: [medway.gov.uk/FutureMedway](https://medway.gov.uk/FutureMedway) and make detailed comments online. You can also see how we use your details in this work on the Local Plan.

<p>What are the key issues that you want the plan to address, and how?</p>	<p>Consideration of Density in urban areas + suitable Family Housing.</p> <p>- Flats don't encourage families in longer term, so urban development should also provide community facilities and employment centres to attract people to centres, including business, social activities etc.</p>
<p>What are the most important issues for you in planning new developments?</p>	<p>Balance of Development in terms of Type and location.</p> <p>Planning infrastructure too, community, Health, Education, transport etc. environment.</p>
<p>Which of the growth options do you prefer and why?</p>	<p>Option 3 - Sensible balance of urban + suburban space to permit mixed housing types.</p>
<p>Do you have any wider comments on the plan?</p>	