

# Medway Local Plan Regulation 18 Consultation 2024

**Consultation Summary report** 

June 2025

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#### **Executive Summary**

This report summarises the outcomes of the Regulation 18 second consultation on the preparation of the Medway Local Plan 2041, which took place from 15<sup>th</sup> July to 8<sup>th</sup> September 2024. The consultation sought to gather feedback from the public, developers, voluntary and community organisations, businesses and other prescribed bodies on the direction and content of the emerging Local Plan. The consultation document included a proposed vision and objectives to shape the area's development over the plan period, draft policies in topic-based chapters, such as housing, natural environment and employment. It also set out options for Medway's growth strategy, and an indicative detailed development strategy.

Representations were received from 403 organisations and individuals. Nearly twothirds of the consultation responses were from local residents. Their views are reflected in the main issues raised most frequently. However wider interests such as developers, statutory bodies and voluntary organisations often had different perspectives. Some of the main issues raised during the consultation were:

- Housing: residents and community stakeholders noted concerns about the level of housing needs, and the scale and location of potential developments, and sought more affordable housing provision and wider mix of housing types.
- Infrastructure: Many respondents expressed concerns about the current state of infrastructure, and the potential strain from additional development, particularly on roads, schools and healthcare facilities.
- Environment: strong support for policies protecting green spaces, the green belt and enhancing biodiversity, with calls for more ambitious climate change mitigation measures.

The Regulation 18 consultation reached out to a range of different stakeholders and there was variation in the main matters of interest. However, some topics, such as housing, were commonly raised, with different aspects being important to the various respondents. For example, local residents were concerned with affordability of housing and the mix of housing types, whereas developers and their agents stressed the need to viably deliver more housing to meet high levels of need.

More details of the matters raised in the responses is set out in this report. The full comments are <u>published</u> on the Council's website with wider information about the new Local Plan.

This report also outlines the consultation programme, its promotion, and communication plan, and the activities and events organised, which included:

- Ten public exhibitions attended by 616 people.
- Five thematic meetings and workshops.
- Media, member and parish council briefings.
- A broad package of online resources and communication channels.

The feedback received has informed the next stage of the Local Plan's development, including amendment of drafted policies and identifying site allocations. The report outlines how comments raised have been considered in the preparation of the Pre-Submission Draft Local Plan.

#### Structure of Statement

This consultation report comprises five sections and appendices:

- Section 1 is an introduction.
- Sections 2 & 3 summarise the process followed, and the main issues raised in the 2024 consultation at Regulation 18b (Stage 2),
- Section 4 focuses on the Duty to Cooperate and how this has been fulfilled.
- Section 5 looks at how the Council has considered the issues raised in consultation.
- Appendix 1 supports Section 2 by setting out how consultation was undertaken
- Appendix 2 sets out the report on the outcomes of the 2023 Regulation 18 Consultation

#### 1. INTRODUCTION

#### Purpose

1.1. This Consultation Summary Report sets out how the Council has involved residents and key stakeholders in preparing the Medway Local Plan 2041 in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This report demonstrates that consultation on the preparation of the Local Plan has been undertaken in accordance with the relevant Regulations and the Statement of Community Involvement (SCI) May 2024. The Medway SCI sets out how the Council will consult and involve the public and statutory consultees in planning matters. The current adopted Medway SCI 2024 can be viewed <u>here</u>.

#### Background

- 1.2. This Consultation Summary Report describes how the Council has undertaken community participation and stakeholder involvement in the preparation of the Local Plan, setting out how such efforts have shaped the Plan and the main issues raised by consultation/representations.
- 1.3. Following earlier work in plan preparation, the Council began its formal consultation work on this Local Plan for Medway in 2023. There have been two rounds of Regulation 18 consultation. Stage 1 involved an initial round of consultation on a high-level version of the Local Plan: 'Setting the Direction for Medway 2040' which focussed on the proposed vision, strategic objectives and setting out the proposed broad locations for future growth. The consultation ran from 18 September to 31 October 2023. A consultation summary report on this Stage 1 of Regulation 18 consultation covering who was consulted, how, and the main issues raised is set out in Appendix 1, and is on the Council's website <u>here</u>.
- 1.4. The Council built upon this work and took account of comments received in the 2023 consultation in a second Regulation 18 consultation document. This was published for consultation with supporting evidence base materials from 15 July to 8 September 2024. The Medway Local Plan 2041 Regulation 18b consultation took the Plan period to 2041 and set out the strategic vision, objectives, growth options and a preferred spatial strategy for Medway, as well as draft planning policies to guide future development and identify the main areas for sustainable development growth. It proposed policies and guidance to ensure local development would be in accordance with the

principles set out in the National Planning Policy Framework (NPPF). This 2024 Consultation is the focus of this report.

- 1.5. The Council consulted specific consultation and statutory bodies, local amenity and residents' groups, businesses and individual residents in accordance with the Medway SCI. Through work on previous consultations, the Council has built up contacts of many residents, voluntary organisations and businesses interested in the Local Plan. These reflect different sectoral interests, such as the environment, transport, housing, health, and development.
- 1.6. On adoption, the new Local Plan will replace the current 2003 Medway Local Plan.

#### 2. Summary of Process and Main Issues

Summary of the consultation process for the Medway Local Plan 2041 Regulation 18 Consultation, Summer 2024

- 2.1. Public consultation under Regulation 18 of the Town and Country Planning (Local Plans) (England) Regulations 2012 took place in two stages.
  - Stage 1 initial round of consultation on issues for the 'Setting the Direction for Medway 2040' between 18 September and 31 October 2023. Details of the outcomes of this consultation are set out in a separate report, which has been reproduced at Appendix 2.
  - Stage 2 consultation on the Medway Local Plan 2041 and took place between 15 July and 8 September 2024.
- 2.2. A number of bodies and persons were invited directly and indirectly through pre-consultation publicity to comment on the Stage 2 consultation in accordance with the SCI. Appendix 1 provides details of how the relevant requirements have been met in relation to the Regulation 18 consultation, including which bodies and persons the local planning authority invited to make representations; and how they were invited to make representations.

# Main Issues raised in Stage 2 – consultation on Medway Local Plan 2041 (July - September 2024)

- 2.3. Analysis and categorisation of the responses received has been undertaken in different ways, to assess varying perspectives on the plan:
  - A summary providing an overview of the top three issues raised across all comments received is provided at 2.4 below;
  - A breakdown of the most frequently raised issues by thematic chapter of the Medway Local Plan 2041 can be found at 2.6 below;
  - Distinct stakeholders and respondents found different issues to be of importance. A breakdown of responses by respondent type is provided at 3.5 below.
- 2.4. In total over 2,400 specific comments were received from over 400 people or organisations during this round of consultation. The Medway Local Plan 2041 Consultation Document was set out in topic-based chapters. As illustrated in Figure 1 below the top three themes most frequently raised were:
  - Housing (including affordable/ social / level of need),
  - Infrastructure (including roads, schools and healthcare), and
  - Environment

Figure 1: Visual representation of main themes



2.5. The responses were also assessed by chapter of the Medway Local Plan 2041 Consultation Document. Some chapters received more comments than others, with the Natural Environment (chapter 4), Housing (chapter 6) and Vision and Strategic Objectives (chapter 2), Spatial Growth Options (chapter 3) and Retail and Town Centres (chapter 8) being the most commented on.

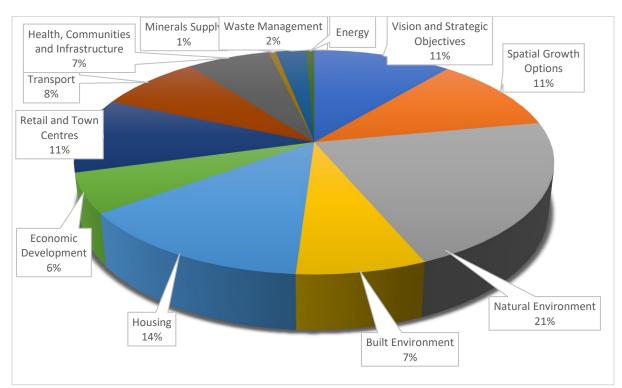


Figure 2: Pie chart showing chapter themes in representations

2.6. The main issues raised by chapter were:

#### Chapter 1 – Introduction

2.7. There were a small number of comments (1%) received on this section. Over 50% of these comments were from developers, with 27% from MPs, members or parish councils. Main comments were an overview, generally supportive, related to the spatial strategy, with a mixture of support and opposition to housing growth and targets or had such a varied nature they were hard to categorise.

#### Chapter 2 – Vision and Strategic Objectives

2.8. Approximately 75 % of comments were from Developer / agents and MPs, members and parish councils. There was broad support for the vision and strategic objectives, however there were a number of concerns raised which broadly covered the following areas:



- 2.9. Level of Housing need There were concerns, generally from the development sector, that the level of housing required to meet need and how this could be met was not clearly shown and this was not compliant with national planning policy. It was suggested a strategic objective specifically address this. The impact of new housing on existing communities and infrastructure was also a recurring theme, particularly from residents and community representatives.
- 2.10. **Spatial Strategy –** There was broad support for the vision and spatial strategy and growth options. Respondents viewed that the vision expressed was not fully captured by the spatial strategy and strategic objectives and it was suggested phasing of developments be shown.
- 2.11. Employment and Economic Development There were particular comments seeking a greater focus on employment and economic development that supports local businesses and creates job opportunities. Respondents viewed that infrastructure improvements were necessary to attract and retain businesses. There was also support for protecting existing employment areas and ensuring that new developments do not negatively impact local businesses.

#### **Chapter 3 – Spatial Growth Options**

- 2.12. The Council consulted on three broad Spatial Growth Options (SGOs):
  - SGO1 Urban focus which seeks to maximise development on brownfield sites in urban centres and waterfront sites, increasing the density in these urban areas.



- SGO2 Dispersed growth considers more limited land being provided through regeneration and excludes sites such as Chatham Docks and some town centres and waterfront opportunity sites that are not actively being promoted by landowners and involves a higher release of land on greenfield and Green Belt sites.
- SGO3 Blended strategy this option blends the above two options with a 'brownfield first' focus with regeneration in urban centres and waterfront locations, complemented by a range of sites in suburban and rural areas. This was presented as the Council's indicative preferred option.
- 2.13. Over half of the responses on the spatial growth options were detailed representations from developers or agents commenting on support for a particular spatial growth option and on specific sites which should be allocated.
- 2.14. **Support for Specific SGOs** Many representations expressed support for specific SGOs, particularly SGO3. Some respondents highlighted the importance of prioritising brownfield sites to meet housing needs and limit the release of greenfield sites. These issues were particularly raised by residents in rural areas, and peripheral suburban areas. Developers were more likely to support further development on greenfield sites.
- 2.15. Irrespective of the growth option chosen preferred there were some common concerns regarding growth and development impacts on Medway, as outlined below.
- 2.16. **Housing Need and Supply** While there was recognition of the need for more housing, developers questioned the level set out, whether this would meet the Objectively Assessed Need and whether the current housing supply was enough.
- 2.17. **Site Allocations** Developers or agents particularly also commented on the Interim Sustainability Appraisal scoring for particular sites and promoted sites as allocations.

2.18. **Infrastructure and Services** – There were concerns about the adequacy of existing infrastructure to support new developments. Issues such as congestion on roads, insufficient public transport, healthcare facilities, and schools were frequently mentioned. Respondents stressed the need for infrastructure improvements in advance of new housing development.

#### Chapter 4 – Natural Environment

- 2.19. The top three matters commented on within this chapter were:
- 2.20. **Green Belt** Over 80% of comments on this chapter came from members of the public and developers or agents. The latter raised some concerns that Medway would be unable to meet its housing need without



some Green Belt / Grey Belt release and changes to the Green Belt boundaries. The majority of the public, conversely, wanted to maintain or increase the level of Green Belt.

- 2.21. **Green and Blue infrastructure** The preservation and enhancement of green and blue infrastructure were seen as important with support for principles in Natural England's Green Infrastructure Framework, although developers were concerned with impacts on viability. There was a strong call for protecting existing green areas, creating new green spaces, and ensuring that developments included accessible areas for recreation and nature. This was a key consideration for residents.
- 2.22. **Conservation & enhancement of the Natural Environment** Developers or agents and the public each provided almost a third of comments on this section. Many, in addition to statutory body responses supported the proposed policy and agreed to above 10% Biodiversity Net Gain (BNG) if it was viable. However, the development sector raised concerns on viability and evidence, should the policy go beyond the national level of 10% BNG.

#### Chapter 5 – Built Environment

- 2.23. The top three matters commented on within this chapter were:
- 2.24. **High-Quality Design** Developers and agents, MPs, members or Parish Councils made up over 50% of respondents on this chapter and emphasised the importance of high-

Conservation Design and Flexibility Policy Concerns Preservation of Local Character Local Infrastructure Affordability Environmental Sustainability High-Quality Design Heritage Accessibility Sustainability and Standards

quality design in new developments. This included considerations for aesthetics, functionality, and integration with the local character.

- 2.25. **Housing Design** Similar to the above over 75% of the comments raising this issue were from developers and agents questioning the viability impact of housing design and sustainable design and construction practices requirements on developments. Other developers suggested that the Housing Design policy should be less prescriptive.
- 2.26. **Preservation of Local Character and Heritage** The importance of preserving the local character and heritage was mentioned across all respondent types. Respondents advocated for developments that respect and enhance the historical and cultural significance of the area and all broadly supported the proposed policies relating to this area.

#### Chapter 6 – Housing

- 2.27. The top three matters commented on within this chapter were:
- 2.28. **Affordable Housing** Many members of the public respondents emphasised the need for a higher proportion of affordable housing in new developments. Concerns included the affordability of homes for local residents,



limiting access to the housing market. Developers or agents made detailed comments on policy requirements and were also supportive of the need for affordable housing, but subject to viability testing and an updated Viability Assessment.

2.29. **Housing Mix and Size** – There was a call for a diverse mix of housing types and sizes to meet the needs of different demographics, including families, single-person households, gypsy and traveller communities, students, and the elderly. The need for medium-sized homes and a balanced tenure mix was frequently mentioned. The role of SME developers was raised. HMOs were also mentioned, with concerns seeking to raise quality and amenity standards.

- 2.30. Self & Custom Build There was general support for this policy, however developers and agents in particular noted some sites would not be able to support the proposed amount, with concerns on flatted development. They requested more evidence and the policy be assessed against the viability assessment for the next consultation.
- 2.31. Concern was also raised generally in the Housing chapter about the strain on existing infrastructure and services, such as roads, schools, and healthcare, due to new housing developments, with a call for sufficient infrastructure to support the growing population. The development sector restated comments on the need for the plan to meet defined Local Housing Needs, and consider unmet need in neighbouring boroughs.

#### Chapter 7 – Economic Development

- 2.32. Nearly 60% of responses on this chapter came from developers and agents and MPs, members or Parish Councils. Their top three matters were:
- 2.33. Economic Strategy / Development There was broad agreement for the proposed strategy, and that there was significant potential for regeneration and redevelopment of employment sites, but it was noted that improved infrastructure was needed. Developers or agents also noted the need to balance housing and employment needs. There were particular representations in relation to creative and cultural industries.



#### 2.34. Existing Employment Land and Job Preservation – MPs,

members or parish councils, developers or agents and businesses each provided approximately one third of comments. Concerns were raised about the loss of employment land, and the impact on local jobs. There were particular comments made in relation to Chatham Docks, with some parties supporting the retention of the existing employment uses, to safeguard current jobs. Alternative views were promoted for mixed use redevelopment The need to balance employment and housing needs for the local communities was also noted under this section. 2.35. Supporting economic growth and new employment sites and - The need to balance housing developments with the creation of local jobs to reduce long commutes and support sustainable community growth was raised. There was specific reference of key employment sites, such as Grain and Kingsnorth on the Hoo Peninsula. Developers or agents promoted particular sites for inclusion in allocation policies. The strategic direction of aligning Medway's economy to high-value industry and services such as science, technology, arts, and culture was commented on. The land-based sector was also raised as an opportunity for further growth. There was a call for regeneration of brownfield sites to support higher productivity industries and attractive housing developments. Comments were made supporting a brownfield first approach to employment land, which was viewed to assist in retention of good quality agricultural land. Particular comments were made in relation to marketing tests to support rural services and facilities.

#### Chapter 8 – Retail and Town Centres

- Broadly 70% of responses on this chapter were from MPs, members or Parish 2.36. Councils and members of the public.
- 2.37. Chatham Town Centre Out of the five town centres, Chatham was commented on the most frequently. There was broad agreement, particularly amongst voluntary and community organisations, MPs, members or Parish Councils and members of the public with the town centre boundary. Some respondents suggested measures to improve visits to the town centre included free parking for a certain time and use of the river frontage in the regeneration of Chatham.
- 2.38. Hoo Peninsula Developers and agents, as well as MPs and members agreed with the co-location of services to support the community on the Peninsula, along with additional retail and supermarket provision, provided sufficient infrastructure accompanied it. However it was commented this should not come at the detriment of existing businesses on the Peninsula. The protection of wildlife



and designated landscape in this area was also raised.

2.39. **Town Centre Strategy** – Developers and agents, MPs, members or Parish Councils provided more comments on this and generally supported the approach. Economic Revitalisation with encouragement of unique, individual businesses and pop-up ventures to boost local economies and diversify retail options were given. The development of vibrant, safe, and welcoming environments in town centres as well as green spaces, and places for community and social interaction was also commented upon. It was suggested, mostly by developers and agents, that integration of residential spaces above retail units could help create this.

#### Chapter 9 – Transport

- 2.40. The top three areas of response in this chapter were:
- 2.41. **Public Transport Improvements** – There were widespread concerns about the inadequacy of public transport services. Issues included unreliable and expensive bus services, lack of direct bus routes, and insufficient frequency.



- 2.42. **Transport Infrastructure** The need for improved transport infrastructure, particularly cycling and walking was a recurring theme. Respondents noted the lack of safe cycling routes and pedestrian paths, making it difficult for residents to opt for these modes of transport. Several representations suggested utilising the River Medway for transport to alleviate road congestion. Ideas included river taxis and developing riverside infrastructure for transport and leisure.
- 2.43. **Traffic Congestion** Many respondents highlighted severe traffic congestion in various areas across Medway, particularly during peak times

#### Chapter 10 – Health, Communities and Infrastructure

- 2.44. The top three matters commented on within this chapter were:
- 2.45. **Inadequate Health Services** Many respondents highlighted the lack of sufficient health services, including hospitals, GP surgeries, and dental practices. There was a strong concern that the current infrastructure could not support increased population, leading to longer

Education provision Infrastructure Sustainable Development Cultural Facilities Community Facilities Improved Infrastructure Health Services Green Spaces waiting times and reduced access to healthcare.

- 2.46. **Need for Improved Infrastructure** There was a recurring theme about the necessity for better infrastructure in advance of new residential developments. This included roads, schools, shops, and community facilities to ensure that the existing and new residents have adequate support.
- 2.47. Preservation of Green Spaces Several comments emphasised the importance of preserving green spaces for mental and physical health. Respondents argued that building on these spaces would negatively impact community well-being and environmental sustainability.

#### Chapter 11 – Minerals Supply

2.48. The top three matters commented on within this chapter were:

#### 2.49. Safeguarding Mineral Resources

 There was a strong emphasis on the need to safeguard mineral resources to ensure their availability for future developments and local industries. This includes preventing unnecessary depletion and supporting sustainable planning.



#### 2.50. Transportation and Infrastructure

– Concerns were raised about the transportation of minerals, particularly the reliance on lorries which contributes to pollution, road damage, and congestion. There was a call for increased use of rail depots to mitigate these issues.

2.51. **Environmental and Economic Balance** – The importance of balancing growth with long-term environmental and economic benefits was highlighted. Responsible management and protection of mineral resources were seen as key to achieving this balance.

#### Chapter 12 – Waste Management

2.52. The top three matters commented on within this chapter were:

- 2.53. Infrastructure Capacity Issues with the capacity of existing waste management infrastructure, particularly sewage systems were raised, and the need for significant updates and upgrades to handle current and future demands.
- Health Impact Residential Development Recycling Reduction Waste Reduction Community Inclusion Pollution Sustainable Practices Community Involvement Air Quality Infrastructure Environmental Impact Waste Collection

**Energy** Projects

Environment

- 2.54. Recycling and Waste Reduction Waste Collection Emphasis was given to increasing recycling efforts, reducing overall waste, and introducing additional charges for unrecyclable waste.
- 2.55. **Air Quality and Pollution** Concerns were raised about air quality due to pollution from waste sites and other industries.

#### Chapter 13 – Energy

- 2.56. The top three matters commented on within this chapter were:
- 2.57. Integration of Renewable Energy in Developments Several respondents emphasised the need for new developments to incorporate renewable energy sources, such as solar panels and wind turbines, to promote sustainability and reduce reliance on non-renewable energy.
- 2.58. **Reliability of Energy Supply** Concerns were raised about the frequent power cuts and the reliability of the electricity supply in rural locations such as on the Hoo Peninsula, highlighting the need for improvements in infrastructure to ensure consistent energy availability.
- 2.59. **Impact on Landscape and Environment** There were significant concerns about the visual and environmental impacts of renewable energy projects, particularly wind farms and solar farms. Respondents stressed the importance of careful planning to minimise adverse effects on landscapes and natural habitats.
- 2.60. The responses to the Medway Local Plan 2041 consultation document were also grouped by respondent type and analysed showing the different perspectives on issues and the direction of the emerging plan. This is set out in further detail in Section 3.

#### 3. RESPONSE ANALYSIS

#### **Overview of responses**

- 3.1 The Council invited comments on the matters set out in the 'Medway Local Plan 2041 consultation document. Views were sought on a vision, objectives, draft policies, and development scenarios for growth. Many respondents focused on specific areas of interest, rather than commenting on all themes.
- 3.2 The respondents fell into a number of broad categories of stakeholders, as listed in the table and pie chart below with the largest proportion of responses coming from the public at 63%, followed by developers / agents for developers 17%.

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Table 2: Breakdown	o number c	n responses	by responder	п туре.

Respondent type	Number of responses	Percentage of responses
Member of the public	255	(63%)
Developers / agent for developers	69	(17%)
MPs, Members and Parish Councils	31	(8%)
Statutory bodies	19	(5%)
Voluntary & community organisations	18	(4%)
Other	7	(2%)
Business	4	(1%)
Total	403	(100%)

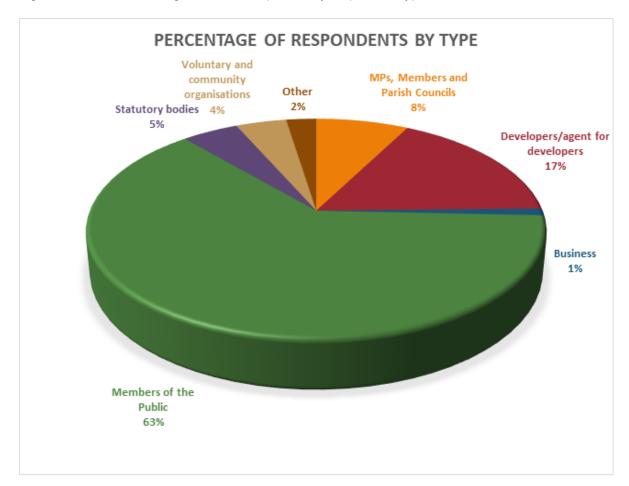


Figure 3: Pie chart showing number of responses by respondent type

3.3 The responses were submitted through the online consultation portal OpusConsult and/or by email/letter to the Council. The OpusConsult portal was most frequently used by members of the public (as seen in the table and pie chart below). Developers and statutory consultees generally submitted responses by email but also a combination of email and OpusConsult, focusing on specific matters of interest.

Table 3: Breakdown	of responses b	by response	method.
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Response method	Number of responses	Percentage of responses
OPUS	203	(50%)
Email	141	(35%)
Postal	40	(10%)
Email & Opus*	19	(5%)
Total	403	(100%)

\*19 respondents submitted representations via email and Opus which were very similar but contained differences to not be considered entirely duplicates. Due to the small number of these and inability to categorise as purely one method or

the other without effective double counting being a concern it was determined to have a separate category.

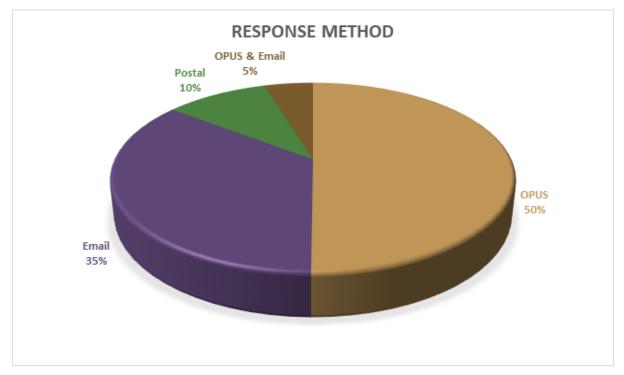


Figure 4: Pie chart showing breakdown of responses by response method

#### **Summary of Main Matters**

- 3.4 Stage 2 of the Medway Local Plan 2041 Regulation 18 consultation document generated a wide range of responses from the various stakeholders previously set out. Responses generally contained a number of comments, which were then broken down into the different component parts. Section 2 provides a summary of the key issues raised during the consultation and a brief analysis of the responses received by chapter. As noted above, the three main issues most frequently commented upon across the whole document were: Housing, Infrastructure and the Environment.
- 3.5 These main matters are explored in more detail in the following sections, which break down the responses by respondent type.

#### Summary of responses by respondent type

#### Members of the public

3.6 Residents' responses covered a wide range of topics, with some clear themes emerging; the top three were:



- Environment: The environment and environmental impact of development was a major concern, particularly given the scale of housing needs to be met in the plan. Representations discussed the need for sustainable development practices, conserving green spaces, protection of the Green Belt and wildlife, and measures to address climate change, flood risk and air quality.
- **Housing**: Housing, particularly the need for affordable housing was a recurring theme. Respondents highlighted the importance of providing affordable housing for local residents and key workers and suggested various percentages for social/affordable rent and low-cost home ownership. It was also commented that housing needed to be near infrastructure.
- Infrastructure and Services: Concerns about the adequacy of infrastructure and services to support new developments were frequently mentioned, similar to the first Regulation 18 consultation responses from members of the public. Issues such as road networks, healthcare facilities, and utilities were raised, with calls for improvements before any new housing is permitted.

#### Developers and agents for developers

3.7 Developers and agents for them raised several points regarding the Local Plan's approach and evidence base. The top three issues were: And the second state of th

 Housing Needs and Allocation: Many respondents emphasised the need for the Local Plan to meet the full housing needs of Medway, including addressing unmet needs from neighbouring areas like Gravesham and Tonbridge and Malling. There were concerns about the plan's ability to deliver the required number of homes, with suggestions to allocate additional sites and consider Green Belt release.

- Viability and Evidence Base: Several representations highlighted the necessity for an updated viability assessment and a comprehensive evidence base to support the proposed allocations. There were calls for more detailed assessments of site yields, infrastructure delivery plans, and the impact of policies like Biodiversity Net Gain (BNG) on site viability.
- Spatial Strategy and Growth Options: The indicative preferred blended strategy (SGO3) was generally supported, but there were concerns about its ability to deliver the required housing numbers. Some respondents suggested exploring additional options for development, through reconsidering certain sites.
- 3.8 In addition to the above, many of the developer comments advocated for development in certain areas, reflecting their interest in particular site promotions.

#### **Statutory Bodies**

3.9 Statutory bodies including neighbouring councils, utilities and key consultees such as Natural England, provided comprehensive commentary on various aspects of the consultation document. Detailed comments reflecting specific

Healthcare and Community Services Environment and Flood Risk Management Built and Historic Environments

interests and responsibilities were made by a number of bodies and these are reflected in the analysis, in comments raised by the Environment Agency, the NHS and Historic England:

• Environment and Flood Risk Management: Emphasis was placed on using Nature Flood Management techniques and soft-engineering approaches for riverbank protection. There were also suggestions for strategic development briefs for flood risk infrastructure projects, especially in areas such as: Strood, Chatham, and Medway City Estate. Respondents also wished for consideration of higher Biodiversity Net Gain (BNG) targets and their impact on flood risk management plans. It was also thought there were opportunities for tariff-based schemes to contribute to flood management and habitat restoration.

- Healthcare and Community Services: The timely delivery of healthcare infrastructure and financial developer contributions for offsite provision was raised, as was engagement with local NHS partners to address healthcare needs and affordable housing for NHS staff.
- **Built and historic environments**: Statutory bodies were overall supportive of the proposed policies subject to some amendments / clarifications, with some of them offering to work with Medway to develop them further.

#### Voluntary and community organisations

3.10 Community and voluntary organisations provided detailed feedback on various aspects of the plan. Representations came from groups with interests in the environment, culture, health and communities. The following were top three issues:



- **Community and Cultural Development**: Several responses suggested community and cultural development could be used to reinvigorate town centres and help Medway provide a unique offering, supported by s106 funding. They also promoted community-led housing and integrating cultural assets into planning.
- Environment: Responses supported a policy for over 10% Biodiversity Net Gain, that green spaces should be protected, more buffer zones between development, wildlife and protected species. Concern was also raised about potential water run-off and flooding
- Health and Wellbeing and Infrastructure: There were suggestions for health impact assessments, improving access to nature, and addressing health inequalities through community and cultural activities. Issues were raised related to housing levels, infrastructure improvements, and the impact of development on local communities.

#### Members, MPs, and Parish Councils

3.11 This sector raised several points; the top three concerns were:

Housing Development Infrastructure Strain Environmental Concerns

 Infrastructure: Many representations highlighted the existing strain on infrastructure, particularly roads like the A2 and A228, and the impact of further development on traffic congestion and air quality.

- Housing Development: The need for a balanced approach to housing development was emphasised, with calls for prioritising brownfield sites and ensuring a mix of housing types, including affordable and social housing.
- Environment: There were significant concerns about the impact of development on green spaces, wildlife, and designated and non-designated landscapes.

#### Business

3.12 Responses by this category of respondents were largely concerned with promoting economic development, in locations such as the Hoo Peninsula, and preservation of existing employment land and jobs. The top three topics in their responses were:

Health and Wellbeing Blue Infrastructure Existing Employment land and Jobs Leisure Facilities

- Existing employment land and jobs: Concerns were raised about the loss of employment land, and the impact on local jobs, with specific reference to Chatham Docks. There was a strong view that existing employment sites should be preserved to safeguard current jobs and support future economic growth. Businesses also suggested making housing and employment numbers clearer in the vision, as there was concern that new sites for housing would be detrimental to existing jobs and employment sites.
- **Blue infrastructure**: Many responses wished to protect green and blue infrastructure. There was concern that waterfront regeneration would particularly impact blue infrastructure and there were suggestions to make more use of the river, potentially with use of water-based sport & leisure along the river.
- Leisure facilities and health and wellbeing: Many representations wanted to save leisure facilities that promote health and wellbeing, and comments again encouraged protecting blue spaces in addition to green spaces.

#### Other

3.13 A range of additional comments and recommendations were received from various stakeholders that fell into the 'other' category. The top three chapters commented on were:



- **Environment**: There were suggestions to either expand existing policies or in some cases for additional policies to cover landscape, habitat protection, and more marine based issues.
- **Economic Development:** There was support for the learning and skills development policy, recognition of higher education's role in supporting cultural and creative industries in Medway and it was suggested that the learning quarter was clarified.
- **Transport**: It was suggested people be encouraged to use active travel with a regular express bus services to connect with existing train services. A riverside path and transporting minerals by river to alleviate traffic congestion were also suggested.

#### 4. DUTY TO COOPERATE

- 4.1 The National Planning Policy Framework 2024 (NPPF) states that local planning authorities are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries, for example the provision of infrastructure or meeting housing needs.
- 4.2 The local planning authorities that share borders with Medway are:
  - Gravesham Borough Council,
  - Tonbridge and Malling Borough Council
  - Maidstone Borough Council
  - Swale Borough Council, and
  - Thurrock Council
- 4.3 The Council contacted all statutory consultees who represent interests on cross border strategic matters, including Kent County Council, (with discussion on waste, minerals, transport, and education amongst other issues) as part of the consultation on the Medway Local Plan 2041, seeking their comments to inform the development of the emerging Local Plan. The Council engaged on a regional basis on waste and mineral planning matters.
- 4.4 Specific meetings were held with statutory consultees such as Natural England as well as all of the above mentioned neighbouring local authorities. These meetings were held to understand progress on strategic plans and engage in collaborative evidence preparation, sharing baseline and analytical work on development needs, where appropriate as well as to discuss issues arising from the Medway Council Local Plan 2041 Stage 2 consultation document, and potential implications from plans in neighbouring areas.
- 4.5 Key matters included:
  - the accommodation of unmet housing needs;
  - higher levels of housing need;
  - employment land;
  - Green Belt;
  - demands on existing infrastructure arising from the impacts of development; and
  - the need for further critical transport infrastructure.
- 4.6 In addition, the following were identified as common issues for neighbouring authorities:

- Where opportunities existed for the provision of additional housing land -noting constraints within the respective authority boundaries and beginning discussions where options may need to be explored.
- Transport infrastructure requirements and capacity.
- The importance of addressing air quality.
- The Lower Thames Crossing and its impact on local authorities directly and indirectly affected and connections into the wider road network.
- The consideration and implication of Green Belt review and updated policy.
- Impacts of developments in proximity to borough boundaries.
- 4.7 The Council is continuing to engage with Duty to Cooperate bodies as an integral part of the preparation of the new Local Plan. Further specific discussions will be held, and Statements of Common Ground will be produced highlighting areas of agreement and difference between Medway Council and the relevant authorities and bodies.

### 5. CONSIDERATION OF ISSUES RAISED IN CONSULTATION

- 5.1 The Council has collated the responses received and identified the specific matters raised. The matters raised have been assessed with the plan and policies amended where necessary to take account of them. The representations are published on the Council's <u>Medway Local Plan 2041</u> webpage for wider review. The Council has prepared the Pre-Submission Draft Medway Local Plan 2041 for publication at Regulation in June 2025, subject to member approval.
- 5.2 The Council's responses to the representations are set out by chapter below.

#### Vision and Strategic Objectives

- 5.3 The proposed vision and strategic objectives of the new Local Plan reflect the components of sustainable development, with regard to the environment, economy and society. Comments were generally supportive, but where changes were sought, these reflected the development sector promoting growth, and local communities and interest groups raising concerns about impacts on the environment and infrastructure. In assessing the different viewpoints, the Council considers that the proposed vision and spatial objectives present an appropriate balance, and only minor amendments have been made to strengthen and clarify wording.
- 5.4 The updated vision and spatial development strategy makes specific reference to meeting objectively assessed needs for housing and employment, now that the plan has reached Regulation 19 stage, and is informed by a full evidence base. This was a recurrent matter raised by many representatives from the development sector.

#### **Spatial Growth Options**

- 5.5 Although there was more support for the 'blended option' SGO3, representations from rural and environmental interests generally supported higher levels of development on brownfield sites. Conversely most developers sought further allocations on greenfield sites. Many comments made were in relation to specific sites, either as objections, or promoting allocations.
- 5.6 The Council has considered the representations and assessed that a balanced development strategy including brownfield regeneration sites and greenfield allocations in suburban and rural areas is appropriate. The Council has made a number of amendments to the indicative preferred development

strategy that was consulted on in 2024. The main changes have related to reduction of development in smaller remote villages, and a greater focus on Hoo St Werburgh, as the largest village serving the wider peninsula. This responds to representations made by local communities and the development sector. The proposed growth strategy also includes an allocation to the west of Strood in the Green Belt. This is an anticipated cross-border allocation and has resulted from Duty to Cooperate discussions with Gravesham Borough Council, updated national planning policy, and representations to review the Green Belt. A further change has been to include land to the north of Rainham for a SME developer led scheme, that provides for greater housing mix and informed by a rural design code. Development to the east of Rainham has been reduced. This responds to representations to diversify the mix of housing and deliver improved design quality.

#### **Natural Environment**

- 5.7 Although there was general support for conserving and enhancing Medway's rich environment, there were clear differentials in the priorities and approach, reflecting the specific interests of representatives. Environmental groups and local residents generally sought high levels of protection and increased policy requirements. The development sector sought policies that did not increase costs by going beyond national standards. There were detailed comments made by key consultees in this section of plan, such as Natural England, Environment Agency and the Kent Downs National Landscape.
- 5.8 A number of the policies have been revised to reflect suggestions to strengthen and clarify the wording. Additional detail has been included in policies S2 and S3 to address comments made by key consultees, and recommendations in the Sustainability Appraisal and Habitats Regulation Assessment. The Council has confirmed that it will use the national policy requirements on BNG and sustainable construction. This is informed by the Local Plan Viability Assessment and evidence from recent planning applications and developments.
- 5.9 Comments raised on the contaminated land policy were addressed by reviewing the policy and ensuring it covered these issues appropriately and/or directing the reader to environmental legislation. In response to some queries, clarification is provided within the policy on the required evidence and information for development proposals at various stages within the development management process. Matters of water pollution are addressed in policy DM1 and additional wording provided in the preamble to policy DM2 to ensure the linkage and expectations of investigations and assessments required.

- 5.10 Some issues raised on air quality sat outside of the remit of planning such as monitoring of air quality or requesting on-going engagement on air pollution which could be handled through duty to cooperate meetings and other means. Reference in the policy has been amended to reflect 'low nitrogen oxides (Nox) boilers instead. Clarification was also sought on the required evidence and information for development proposals at various stages within the development management process. This has been clarified within the policy and/or supporting text.
- 5.11 The policy retains requiring development proposals to address air quality where it is existing and where the development itself is likely to cause air pollution.
- 5.12 Queries raised about light pollution are addressed in the policy and supported by the Institute of Lighting Professionals.
- 5.13 Minor changes were made to the Green Belt policy to ensure consistent with recent national policy changes.

#### **Built Environment**

- 5.14 The inclusion of requirements beyond building regulations were questioned. These have been amended in the accompanying design policies. The policies have been streamlined to reduce their length. The design policies have also been amended to take into account site constraints and utilities, climate change and the provision of open space. Discrepancies between the policies and supporting text have been amended and flexibility provided in certain parts of the policy with the use of 'where possible'.
- 5.15 Minor changes were made to heritage policies to provide clarity.

#### Housing

- 5.16 Queries were raised about the approach taken to meet the need for gypsy and traveller accommodation and PPTS paragraph 10 requirements. The approach for intensification and identifying new sites is supported by the G&T evidence. The policy responds by safeguarding all authorised sites and setting out a criteria for considering the expansion of sites and proposals for new sites. Other comments were helpful in refining the policy criteria and identifying unsuitable sites.
- 5.17 The small sites policy required minimal changes in response to comments requiring more weight to delivery of units by SME's and the requirement of affordable housing. There was general support for the policy.
- 5.18 Comments on the student accommodation policy were generally already covered by the policy, i.e. accommodation be accessible to a wide range of

town centre uses and that it ensures that development does not result in the loss of affordable homes. The only amended required was to ensure that there was no impact on environmental designated sites.

- 5.19 The correction to Allhallows Park was made to the policy on mobile homes. Further clarification has also been made to ensure proposals are tested against sustainability and impact.
- 5.20 Concern was expressed over the lack of quality regulation of HMOs. This is a licensing matter rather than planning policy. Support was also expressed for limits and thresholds to be applied. There is no evidence of harm that has been demonstrated that warrants this suggested approach. No policy amends have been made.
- 5.21 The policy on houseboats has been amended to cover BAP priority foreshore consideration.
- 5.22 The delivery of specialist housing with appropriate design considerations are covered by the design policies in the Local Plan.
- 5.23 The tenure mix including self-build is considered appropriate as per policy T2. This policy does include size requirements and is supported by the Local Housing Needs Assessment (LHNA), which has been completed since. Many of the queries raised required reference to the LHNA or updates to the policy based on the LHNA such as housing mix need and size of family accommodation.
- 5.24 Queries were raised about the viability of self build plots within larger developments in relation to the 4% requirement. The policy approach will require evidence to demonstrate this is not viable through robust evidence. Design requirements would be covered by the design policies in the Local Plan, i.e. policies should be read together. The cascade approach has been tested as part of the Local Plan's viability assessment and therefore justifies its inclusion.
- 5.25 Suggestions were made to reduce the marketing period to 6months. A 12 month marketing period as a minimum is considered an acceptable length of time to allow potential self/custom builders time to view the site, arrange finances and apply for planning permission to ensure that what they actually want to build on the site is acceptable. Policy T9 encourages self/custom build development in suitable and sustainable locations across Medway. There were concerns that this was a blanket approach that could result in greater provision. Teh approach should deliver sufficient numbers of serviced plots in areas preferred by those on the Register in order to meet the demand.

#### **Economic Development**

- 5.26 Minimal comments were received on the tourism policy. In the rural economy policy comments were made about the stance to protect agricultural land, some seeking a softer stance and others calling for protection. The Medway approach is to protect it. An additional amend to the policy focusses on encouraging the use of sustainable modes of transport.
- 5.27 Due to the change in approach, the discrete policy in the Innovation Park Medway has been removed and the direction included within a wider employment policy, i.e. strategic employment allocations policy.

#### **Retail and Town Centres**

5.28 Concerns were raised about the approaches to Dockside and Hempstead Valley district centre. These policy approaches have been amended to be more flexible and support these locations to grow in their own right but without impacting on other centres and therefore will need to satisfy certain tests. These tests need to be proportionate and are considered now to be appropriate given the context of the Local Plan strategy for growth, identifying Dockside as a leisure destination and recognising Hempstead Valley district centres ability to support growth. The threshold policy has been amended with justified threshold supported by the updated retail evidence. Minor changes were made to some policies to clarify and ensure completeness. Lower order centre boundaries have been amended to address comments received.

#### Transport

5.29 Changes were made to the riverside path and infrastructure policies to include the King Charles coastal path and in response to various stakeholders including the Rochester Bridge Trust and the London Port Authority. Minor amends were made to other policies in addressing strategic sites delivery.

#### Health, Communities and Infrastructure

5.30 Recommendations were made to ensure the policy was inclusive, i.e. inclusion of culture, green and blue infrastructure and green space to support health objectives. Further clarity on the requirements of health impact assessments is clarified and supported by guidance in a separate supporting evidence base and toolkit. Other queries about inclusive design and the requirement for a new hospital are addressed in separate policy areas/themes.

5.31 The LNRS has been factored into the Green and Blue infrastructure policy and was not appropriate for inclusion in the open space policy. Various comments made on the existing and new open space policies were responded to stripping back the policy and referring to the Fields in Trust guidance. The Playing Pitch Strategy is underway, in liaison with Sport England.

#### **Minerals Supply**

5.32 Minor amends made to address comments on appropriate referencing and providing clarity.

#### Waste Management

5.33 Minor tweaks were made to policies to ensure that sites safeguarded can come forward for development but where it demonstrated that it is not needed to meet the objectives of the Local plan.

#### Energy

5.34 Minimal comments raised but did not require any changes to policies.

### Appendix 1

- 1. To accompany the Regulation 19 pre-submission consultation plan, we must include a consultation statement. This is:
- 2. "A statement setting out -
  - (i) which bodies and persons the local planning authority invited to make representations under Regulation 18
  - (ii) how those bodies and persons were invited to make representations,
  - (iii) a summary of the main issues raised by the representations, and how the main issues have been addressed in the local plan".

#### Introduction

- 3. Public consultation under Regulation 18 of the Town and Country Planning (Local Plans) (England) Regulations 2012 took place in two stages as explained at 1.2 above.
  - Stage 1 involved an initial round of consultation on the proposed vision, strategic objectives and proposed broad locations of future growth in 'Medway Local Plan Setting the Direction 2040' over eight weeks from 18 September to 31 October 2023. A summary of the consultation responses is included as Appendix 2.
  - Stage 2 involved consultation on a detailed document, which included proposed draft policies and development options. Other supporting documents were also published for comment, including the interim Sustainability Appraisal, indicative draft Policies Map and associated evidence base. This took place between 15 July and 8 September 2024. 403 representations were received from a wide range of stakeholders, covering over 2,400 different points.
- 4. This Appendix focuses on the Stage 2 consultation on the Medway Local Plan 2041 Consultation Document) and sets out which bodies and persons were consulted and how that was undertaken.

## Who was consulted under Regulation 18 Stage 2 – consultation on Medway Local Plan 2041 (July-September 2024) and how was that undertaken?

5. The Stage 2 consultation on the Medway Local Plan 2041 Consultation Document, included all statutory consultees, and a contact list of wider local interests and stakeholders, built up by the Council during the course of its work on the Local Plan<sup>1</sup>. These can be separated into a number of broad categories:

- Developer/agent for developer
- MPs, Members and Parish Councils
- Statutory Body
- Interest, voluntary and community organisations
- Members of the public
- Business
- Other

Promotion of the consultation period

- **6.** In accordance with the Council's SCI 2024, a wide range of methods were used to raise awareness about the consultation and to encourage people to respond, particularly harder to reach groups.
- 7. The publicity methods aimed to target the full range of stakeholders, including those who had been characterised as 'harder to engage'. In addition to more traditional publicity methods, ward councillors, community groups and networks were encouraged to raise awareness about the consultation.
- 8. In addition to the above, the following methods were used:
  - Direct correspondence (email / letter);
  - Publicity by the Council;
  - Press and social media;
  - Member & Parish Council briefing sessions;
  - Posters on village noticeboards notifying of the public exhibition events;
- 9. During the consultation period there were:
  - Public consultation exhibition events;
  - Specific sector workshops/meetings;
  - Publicity at Love Gillingham 'Big Day Out' event on 1 September 2024.

#### Direct correspondence

10. This included initial email notifications and letters (depending on stated preference) sent to organisations and individuals on the Council's planning policy

<sup>&</sup>lt;sup>1</sup> As described under Regulation 18 (1) & (2) Town & Country Planning (Local Planning) (England) Regulations 2012: <u>https://www.legislation.gov.uk/uksi/2012/767/part/6/made</u> - and in the Council's SCI 2024: https://www.medway.gov.uk/downloads/file/9156/medway\_statement\_of\_community\_involvement\_-

\_may\_2024

consultation database, 'OpusConsult' (Opus) and to wider lists of contacts (which includes the statutory, specific and general consultation bodies required by the Regulations, outlined in the broad categories above) at the start of the consultation, with follow up emails sent part-way through and towards the end of the consultation period. There were weekly e-bulletins issued by the Council's Communications team to relevant subscribers, covering different aspects of the Local Plan.

11. The Council organised and sent targeted emails to partnerships and stakeholder groups, such as health and voluntary sector organisations, provided through corporate services and external partners.

#### Publicity by the Council

- 12. This included broad pre-consultation awareness raising and website development in a number of ways highlighted below, resulting in over 20,000 visits to our Local Plan website on medway.gov.uk:
  - Consultation videos and podcast– 11,000 views of the podcast and over 50,000 views of our 2x main videos (produced by Lavender Blue and hosted on YouTube)
  - Weekly e-bulletins 8x editions reaching 3528 subscribers. with an average open rate of 48%
  - A final newsletter sent resulting in a 48% open rate and 500 people accessing the consultation portal.
  - A specific webpage of the Council's website dedicated to the Local Plan, hosting links to the above and the OpusConsult consultation portal.

#### Press and Social Media

- 13. At the start of the consultation period, the Council organised a briefing for local media. This informed an <u>article</u> on the Kent section of the BBC news website covering the Local Plan consultation. This was in addition to more local news outlets such as <u>Kent Messenger</u>, and online blogs. Details of the Local Plan and consultation also appeared in <u>Kent Property Market Report 2024</u>.
- 14. Over 50 social media posts were made via Medway Council's accounts on Facebook, X, LinkedIn and Instagram, alerting its followers to the both the videos on YouTube (see above) and the Local Plan public consultation exhibition events.

- 15. A half page advertisement was placed in Medway Messenger advertising the public consultation exhibition events and encouraging commenting on the Local Plan.
- 16. There was also a three week campaign of Kent Messenger mobile alerts.

Member and Parish Council Briefing sessions

- 17. Member briefing sessions were held advising all party and independent members of the content of the Local Plan. This enabled knowledge of the consultation through word of mouth, 'cascading' amongst their constituents and members with the aim to encourage attendance at the public consultation exhibition events, to ask questions of Council staff and participating in and commenting on the Local Plan to enable their views to be known.
- 18. A briefing session was also held for Parish Councils in Medway during the consultation, on 24 July 2024.

Public Consultation exhibition events

19. Ten staffed public exhibitions on the consultation took place at locations across Medway from Tuesday 16<sup>th</sup> July to Wednesday 4<sup>th</sup> September 2024 at different times during the day and evening, which enabled the Planning Service to engage with more people. Over 600 people attended the staffed exhibitions. Details of the events are set out below in Table 1.

Date	Time	Area	Venue	Attendance Numbers
Tuesday 16 July	17:30 – 20:30	Gillingham	Medway Park	23
Thursday 18 July	11:00 – 14:00	Chatham	Pentagon Shopping Centre	61
Monday 22 July	11:00 – 14:00	Halling	Halling Community Centre	16
Tuesday 23 July	17:30 – 20:00	Ноо	The Hundred of Hoo Academy	53
Tuesday 6 August	16:00 – 19:00	Rochester	The Rochester Corn Exchange	57
Thursday 8 August	17:00 – 20:00	Rainham	St Margarets Church Millenium Centre	56

Table 1 – Public exhibition consultation events:

Date	Time	Area	Venue	Attendance Numbers
Tuesday 13 August	15:00 – 18:00	Strood	St Nicholas Church	48
Thursday 29 August	11:00 – 14:00	Hempstead	Hempstead Valley Shopping Centre	200 (estimate)
Tuesday 3 September	11:00 – 14:00	Allhallows	Allhallows Village Hall	71
Wednesday 4 September	16:00 – 19:00	Chatham	Innovation Centre Medway	31

Specific sector workshops/meetings

- 20. Five workshops / meetings were held during the consultation to further encourage participation. This included specific workshops with:
  - major developers and planning consultancies,
  - Medway Youth Council,
  - Mid Kent College
  - voluntary sector (which included health representatives) and
  - BAME sector event
- 21. Local community-based publicity for workshops and exhibitions proved useful in increasing attendance.
- 22. Specific meetings were set up for 'Duty to Cooperate' discussions with neighbouring local planning authorities, and key consultees. Further details are set out in section 5.

#### Hard copies

23. The Council recognises that not everyone has access to online resources or was able to attend a staffed exhibition. The Planning Service used the network of public libraries and community centres across Medway as community-based venues where people could view details of the consultation documents. There were copies of the main consultation document, and the supporting indicative preferred growth option policies map available to view. The Planning Service also provided copies of a summary document for the public to take away, and a feedback form. The Council provided a hard copy of the consultation documents to all Parsh Councils across Medway.

24. This aimed to reach those in the community who might not have access to or could not easily use and navigate the internet to access the digital versions of the consultation materials. It also enabled those who may not be able to attend the public consultation exhibitions to take their time to read the hard copies of the documents.

#### Questionnaire and feedback form

- 25. Feedback from the community was sought primarily through Questionnaires (available both online on the Regulation 18 Consultation Local Plan website and in hard copy versions). Comments could be made online via the Council's consultation system, Opus, which allowed people to save their response and add or review it at a later stage rather than having to complete in one session. This also enabled any agents for developers or others to complete it and review with their client(s) before submitting it.
- 26. There was also a short feedback form which had four broader questions and allowed for any other comments, not captured by the main questionnaire, to be made. These were again available both online on the Draft Local Plan website and in hard copy at the public consultation exhibitions and could also be completed in Opus.
- 27. The main questionnaire contained 48 questions. The questions were grouped around common themes covered by the various chapters of the Local Plan and enabled more structured responses to the Plan.
- 28. Options for providing feedback and responses could be made via the online consultation platform OpusConsult (which also allowed respondents to relate their comments to specific sections or policies in the Medway Local Plan 2041), email and post. Respondents could also comment on the interim reports for the Sustainability Appraisal and the Habitats Regulations Assessment and other evidence base documents published in support of the Local Plan.

# **Setting the Direction for Medway 2040**

# **Report of Regulation 18 Consultation Autumn 2023**

July 2024



# **Executive Summary**

This report summarises the outcomes of the Regulation 18 consultation on the preparation of the Medway Local Plan, which took place from 18<sup>th</sup> September to 31<sup>st</sup> October 2023. The consultation sought to gather public feedback on the proposed vision and objectives that will shape the area's development over the plan period.

Representations were received from 396 organisations and individuals. Some of the main issues raised during the consultation were:

- Housing: concerns about the size and location of potential developments, with a focus on affordable housing provision and infrastructure capacity.
- Environment: strong support for policies protecting green spaces, the green belt and enhancing biodiversity, with calls for more ambitious climate change mitigation measures.
- Transport: mixed views on transport, with general support for sustainable travel options but concerns about increased congestion.
- Employment: broad agreement on the need for economic growth, with a campaign showing strong support for the safeguarding of Chatham Docks.
- Regeneration: support for urban regeneration, alongside calls for protecting Medway's heritage.

More details of the matters raised in the responses is set out in this report. The full comments are published on the Council's website with wider information about the new Local Plan.

The report also outlines the consultation programme, and the activities and events organised, which included:

- Seven public exhibitions attended by 240 residents.
- Six thematic meetings and workshops.

The feedback received has informed the next stage of the Local Plan's development, including drafting of policies and identifying site allocations. The next step in the Local Plan process is a further Regulation 18 consultation in Summer 2024, prior to finalising the content of the Draft Plan for publication in 2025.

## 3. INTRODUCTION

- 3.1. Medway Council is preparing a new Local Plan which covers the period to 2041 and upon adoption, will replace the existing 2003 Medway Local Plan. The Local Plan aims to deliver the sustainable growth of the Medway area, providing a healthy balance of homes, jobs, services whilst maintaining and enhancing the natural and historic environment. The Council is working to a plan preparation programme that will see the draft plan submitted to the Secretary of State in 2025 for independent Examination. Work to date has involved the collation of a broad evidence base, including but not limited to the assessments of development needs for housing, employment and retail uses, land availability and a strategic transport assessment.
- 3.2. This report provides a record of the Regulation 18 consultation 'Setting the Direction for Medway 2040' undertaken from 18<sup>th</sup> September to 31<sup>st</sup> October 2023. It outlines the consultation process and highlights the main themes emerging from the responses. The Council has considered the comments made in preparing the next stage of the Local Plan. Full copies of all written responses to the consultation have been published on the Council's <u>Medway Local Plan 2041</u> webpage.
- 3.3. The Regulation 18 document was focussed on the proposed vision, strategic objectives and setting out the proposed broad locations for future growth within the Medway area.
- 3.4. The consultation was largely managed through online resources, using the OpusConsult platform via the Council's website. Planning officers also arranged consultation events to support further discussions on key issues and wider participation in the development of the new Medway Local Plan. Further details of the consultation programme are set out in section 3 of this report.
- 3.5. The Council received individual comments from just under 400 respondents. During the consultation, the Council engaged with various stakeholders, including statutory bodies and local communities, to gather feedback on the draft Vision and Objectives outlined in the summary document.
- 3.6. The information and comments provided at the Regulation 18 stage of the preparation of the Medway Local Plan have been taken into account in drafting the next Regulation 18 Consultation document, published for consultation in July 2024.

## 4. COMPLIANCE WITH THE STATEMENT OF COMMUNITY INVOLVEMENT

- 4.1. The consultation carried out by the Council has complied with the statutory requirements of the plan making process under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The legislation defines 'specific' consultation bodies that are statutory consultees, and 'general' consultation bodies that cover wider stakeholders and residents. The consultation design was therefore mindful of the legal requirements that it needs to satisfy.
- 4.2. Medway Council updated its Statement of Community Involvement (SCI) in October 2022. This statutory document sets out the approaches and standards to be followed in carrying out consultation on planning matters. The SCI provides a basis for how the Council will involve the community in the preparation of planning policy documents, such as the Local Plan, and how it consults on planning applications. The document covers consultation and engagement methods, who will be consulted and the role of elected Councillors.
- 4.3. A wide range of engagement methods, compliant with the adopted 2022 SCI, were used to promote the 'Local Plan Setting the Direction for Medway 2040' consultation in order to make contact with a cross-section of stakeholders, this included:
  - Online resources
  - Direct e-mail correspondence
  - Press and social media
  - Stakeholder engagement meetings/thematic workshops
  - Public exhibition events
  - Materials available for viewing at libraries
- 4.4. Stakeholders could respond to the consultation in different ways. Written comments could be made via the bespoke online consultation platform OpusConsult -, email or postal letter. Local people were most likely to use Opus or post. Statutory and voluntary organisations, developers and planning agents were most likely to submit their responses by Opus and email. Many of the written responses received were in relation to Chatham Docks.

#### Use of information gathered

4.5. All written comments, information and personal contact details, submitted as part of the Regulation 18 consultation were recorded as formal responses to this stage of preparation of the emerging Local Plan. The information was

added to the consultation recording system for both documentation and analysis purposes.

- 4.6. Respondents' contact details are held by the Council in accordance with data privacy requirements in the Local Plan consultation database (where consented) for the sole purpose of planning policy work and will not be shared with any other Council services or used for purposes other than Planning Policy.
  - 2.7 The written representations, excluding sensitive personal contact details, have been published on the Council's website on the Planning Policy pages, as part of a formal record of plan preparation. Information will be held until an appropriate period after the adoption of the Local Plan. Further details are available on the Council's <u>Planning Service privacy notice</u>.

# 5. CONSULTATION PROGRAMME

5.1. The Council wishes to reach a broad range and cross section of organisations, businesses, and residents, and others with an interest in Medway, in preparing the content and direction of the Local Plan to ensure that it effectively considers wider views of how Medway should develop. This section outlines how the Council carried out consultation on the 2023 Regulation 18 document and the different interests contacted.

#### **Consultation database**

- 5.2. A key tool in managing consultation on planning policy documents in Medway is the Medway Local Plan consultation database. This includes contact details of a wide range of organisations and people with an interest in Medway's development, and those who have responded to earlier consultations and agreed for the Council to notify them of further planning policy consultations. These contacts include statutory organisations, voluntary and community groups; individuals, many of whom live in Medway; businesses, developers, landowners, planning consultants and representatives of partnerships. The OpusConsult consultation platform is the primary resource for contacts. Additional contacts have been gathered from people who have signed up to the Council's updates on planning and regeneration matters.
- 5.3. The Council used the database to send notification of the start of the Regulation 18 consultation directly by email or letter to over 1,000 organisations and people registered for updates. In addition to use of the Local Plan database, the Council organised targeted emails to partnerships and stakeholder groups, provided through corporate services and external partners. The Planning Service has worked with colleagues to speak directly to different groups through agenda slots on pre-arranged meetings, such as organising thematic based consultation events.

#### Audiences/stakeholders

- 5.4. The various interests in the preparation of the Medway Local Plan can be considered under a number of broad categories:
  - MPs, Members and Parish Councils
  - Statutory Body (defined in planning legislation)
  - Developer/agent for developer
  - Interest, voluntary and community organisations
  - Members of the public
  - Business
  - Other
- 5.5. Elected Member engagement is critical to ensure the democratic basis of the plan, and to input members' views and knowledge into the new Local Plan. The

plan needs civic leadership and wide ownership for the vision and development strategy being promoted. Engagement was undertaken through:

- Formal decision making Cabinet approval for the 'Setting the Direction for Medway 2040' consultation document
- Briefings for members prior to the start of the consultation programme
- Invites for members to attend public exhibitions, particularly those organised in their local wards
- Updated briefings during the consultation on emerging issues.
- 5.6. Statutory consultees are organisations defined in legislation. The government requires certain organisations, such as Natural England and the Environment Agency, to be consulted during the preparation of planning policy. This is a technical audience that will seek opportunities to influence policy formulation in key thematic areas and ensure that the local plan is consistent with national policy. The Council sought the views of these organisations on the 'Setting the Direction for Medway 2040' consultation document. Specific meetings were set up for 'Duty to Cooperate' discussions with neighbouring local planning authorities, and key consultees. Further details on this specific legal requirement of plan preparation is set out in section 4. This work built on ongoing liaison with these organisations throughout the plan preparation work, and this will continue in the refinement of development allocations and policies.
- 5.7. The Council must also work with Neighbourhood Planning Groups active in the area, to ensure coordination between the two tiers of plan making.
- 5.8. Developers are a key sector to engage in the preparation of the Local Plan. Details of developers and planning agents with an interest in Medway are held on the Local Plan consultation database. The government seeks for Councils to work constructively with the development industry to identify potential sites and input to the preparation of policies. Developers and landowners were asked to submit details of sites that they wish to promote for development. Planning officers carried out an assessment of these sites and presented the information in a Land Availability Assessment (LAA), published alongside the 'Setting the Direction for Medway 2040' consultation document.
- 5.9. Interest and Community Groups form a core set of the 'general consultation bodies' that Councils must involve in the plan preparation process. The Local Plan consultation database includes a number of these groups with interests in Medway. The main areas of representation cover:
  - Interest groups these include environmental and amenity groups, arts and heritage groups, and social welfare organisations; and organisations with specific interests – eg, housing associations, services and facilities.

- Community sectors eg, young people, older people, faith communities, people with disabilities, minority ethnic communities.
- 5.10. Medway's residents are directly affected by Planning and the approach taken to development in the Local Plan. The Local Plan database contains contact details for a number of residents who have asked to be kept updated on planning policy issues, and they have been directly invited to respond to the Regulation 18 consultation. However, this represents only a very small number of the local population. Strategic planning over a wide area, extended timeframe and the technical requirements of the local plan process can also present potential barriers to wider engagement in consultation. The Council therefore sought to promote work on the consultation broadly and the public exhibitions were particularly aimed at local people.
- 5.11. The wider business community is important to a strong local economy, which is a key objective for the Local Plan. The Planning Service has contact details for many local and sectoral businesses, they were directly invited to respond to the consultation. In addition, specific consultation events were arranged on employment issues.

#### **Communications and Notification**

- 5.12. The consultation was largely managed through online resources and email in line with corporate communications protocol, and the digitalisation agenda for Planning. The consultation document was available to view on the Council's website and responses could be made via email, letter response and on the bespoke consultation platform OpusConsult. There was a strong presence on the Council's website, with information on the front page of the website. A programme of workshops and events were held during the consultation to further encourage participation, especially of local people.
- 5.13. A Public Notice was placed in the Kent Messenger to alert people to the consultation. The Council contacted stakeholders on its Local Plan consultation database. The Planning Service placed copies of the consultation document in public libraries and community hubs across Medway. Copies of the document were also sent to all Medway Parish Councils.

# Engagement

- 5.14. Seven public exhibitions were organised as part of the consultation to broaden engagement in the Local Plan preparation work and provide residents with an opportunity to directly discuss the proposals with a Planning officer. These events were held at varying times of the week, including weekday daytimes and evenings and Saturday mornings to accommodate people's availability to attend. Further events were held on specific themes and under the specific 'Duty to Cooperate' requirements on cross border strategic matters. The events included:
  - Staffed public exhibitions across the authority in community venues
  - Thematic workshops & meetings with invited technical audiences
  - Duty to cooperate meetings with neighbouring Local Authorities and statutory organisations.
- 5.15. A schedule of the public exhibition events held during the consultation is set out in Appendix 1. These events were held in order to share information from the consultation document, to promote discussion and gather comments on how the new Local Plan should address the area's economic, social and environmental needs, and to seek opinion on the document and identify areas for improvement.
- 5.16. Planning officers staffed exhibitions in community venues, including leisure centres, shopping centres, country parks and community centres across Medway, where people were able to find out more about the Local Plan and speak to officers. The Council also organised a number of meetings focusing on specific themes within the consultation. These themes included issues of housing, health and wellbeing, employment, and the environment. These workshops provided opportunities to discuss thematic and technical issues in more detail. Further information is provided in section 5 of this report.
- 5.17. Briefings were held for Medway Councillors in advance of and during the consultation. A briefing session was also held for Parish Councils in Medway during the consultation, through the Rural Liaison Committee.
- 5.18. These various methods of publicising the consultation enabled a range of people to express their views and opinions on development options within Medway. Local community-based publicity for workshops and exhibitions proved useful in increasing attendance.

# 6. DUTY TO COOPERATE

- 6.1. The emerging Medway Local Plan is being prepared within the context of the National Planning Policy Framework, the Localism Act 2011 and other relevant legislation. In support of the preparation of the new Medway Local Plan, the Council is committed to 'engage constructively, actively and on an ongoing basis' with other Local Planning Authorities and public bodies and services to address 'strategic matters'. This legal obligation is known as the 'Duty to Cooperate'. In particular, the Duty to Cooperate requires the Council to work with neighbouring authorities, including Kent County Council, to discuss strategic issues that 'cross administrative boundaries' for example the provision of infrastructure or meeting housing needs.
- 6.2. The Duty to Cooperate on cross boundary strategic issues is embedded in Medway's plan making process and this duty has informed preparation of the 'Setting the Direction for Medway 2040' consultation document as well as the requirement for further evidence base work.
- 6.3. Medway Council has engaged with relevant Local Authorities in collaborative evidence preparation and sharing baseline and analytical work on development needs.

#### Consulting on Setting the Direction for Medway 2040 document

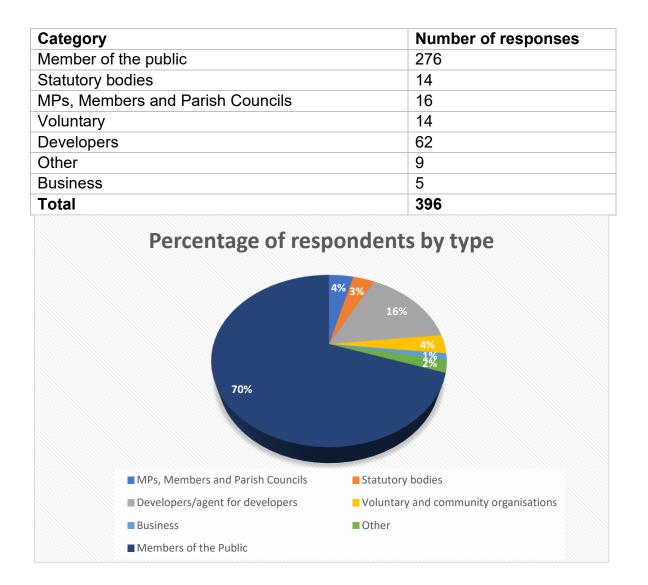
- 6.4. The Council contacted all statutory consultees who represent interests on cross border strategic matters as part of the consultation on the 'Setting the Direction for Medway 2040' document, seeking their comments to inform the development of the emerging Local Plan.
- 6.5. Specific meetings were held with:
  - Tonbridge and Malling Borough Council
  - Swale Borough Council
  - Gravesham Borough Council
  - Maidstone Borough Council
- 6.6. These meetings were held to understand progress on strategic plans and evidence gathering as well as to discuss issues arising from the Setting the Direction for Medway 2040 document.
- 6.7. Other key matters included the accommodation of unmet housing needs, higher levels of housing need, employment land, demands on existing infrastructure arising from the impacts of development, and the need for further critical transport infrastructure. In addition, the following were identified as common issues for neighbouring authorities:

- Where opportunities existed for the provision of additional housing land -noting constraints within the respective authority boundaries and beginning discussions where options may need to be explored.
- Transport infrastructure requirements and capacity.
- The importance of addressing air quality.
- The Lower Thames Crossing and its impact on local authorities directly and indirectly affected and connections into the wider road network.
- The consideration and implication of Green Belt review.
- Impacts of developments in proximity to borough boundaries.
- 6.8. The Council is continuing to engage with Duty to Cooperate bodies as an integral part of the preparation of the new Local Plan. Further specific engagement activities will be held in conjunction with the further Regulation 18 consultation in summer 2024.

#### 5. RESPONSE ANALYSIS

#### **Overview of responses**

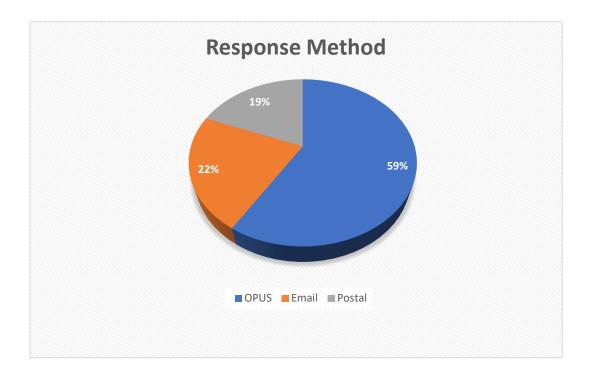
- 5.1 The Council invited comments on the matters set out in the 'Setting the Direction for Medway 2040' document. Views were sought on a vision, objectives and development scenarios for growth. Many respondents focused on specific areas of interest, rather than commenting on all themes.
- 5.2 The respondents fell into a number of broad categories of stakeholders listed in the table and pie chart below with the largest proportion of responses coming from the public at 74% followed by developers16%.



5.3 The responses were submitted through OpusConsult and by email/letter to the Council. The OpusConsult portal was most frequently used by members of the public (as seen in the table and pie chart below). Developers and statutory consultees generally submitted responses by email but also a combination of email and OpusConsult, focusing on specific matters of interest.

Category	Number of responses
OPUS	233
Email	88
Postal	75
Total	396

\*35 respondents submitted representations via email and Opus



5.4 The responses were also categorised under 'Document Content', these categories correspond with the various sections of the 'Setting the Direction for Medway 2040' document. The table below shows the matters that were frequently commented on.

Respondent type	Key Matters	Number of times raised 96	
Members of the public	Safeguard or against residential development at Chatham Docks		
	Support for the vision	23	
	Support for the protection of green spaces	20	
	Support for urban regeneration	20	
	Improve transport, cycling and public transport	18	
Developers	Green Belt release	9	
	Chatham Docks	5	
	Housing supply	12	

Statutory Bodies	Infrastructure	11
	Heritage	13
	Transport	3
	Green Belt	3
Voluntary and Community	Vision	3
	Economy	3
	Infrastructure	8
	Climate	4
Members, MPs and Parish Councils	Climate	5
	Housing	26
	Chatham Docks	9
Other	Area of Outstanding Natural Beauty	4
	Housing	3
	Flooding	2

\*All business representations referred to safeguarding Chatham Docks

#### **Summary of Main Matters**

- 5.5 The Regulation 18 consultation for the Medway Local Plan generated a wide range of responses from various stakeholders, including developers, agents, members of the public, community and voluntary organisations, businesses, elected members, MPs, parish councils, and statutory bodies. This section provides an analysis and summary of the key issues raised during the consultation.
- 5.6 Housing was most raised issue by members of the public followed by concerns over infrastructure delivery.
- 5.7 For statutory bodies, strategic objectives attracted the most comments followed by environmental observations.
- 5.8 Businesses made comments about issues relating to employment, then infrastructure.
- 5.9 The main matters raised across all respondent types can be summarised as follows:
  - Housing supply and delivery: concerns about the feasibility of housing targets, the need for affordable housing, and the balance between brownfield and greenfield development.
  - Environmental protection: strong emphasis on preserving green spaces, protecting biodiversity, agricultural land and addressing climate change concerns.

- Infrastructure and services: widespread calls for improved infrastructure to support new development, particularly in terms of transport, healthcare, and education.
- Employment and economy: debates over the future of key employment sites such as Chatham Docks and Medway City Estate and calls for a sustainable economic strategy. A number of responses were also received regarding the protection of Chatham Docks. Some of the key concerns are as follows, with Chatham Docks being a primary focus of about 124 representations, reflecting a local campaign on this matter:
  - The economic, social and environmental implications of relocation of business away from Chatham Docks, including the extent to which new employment locations may be less sustainably located or may even be beyond the authority boundary and therefore represent a loss of employment.
  - Loss of Chatham Docks employment impacting waste management cycle in the area.
  - $\circ$  Chatham Docks should be on the employment sites map.
- Development strategy: discussions about the spatial distribution of development, particularly regarding urban regeneration and rural protection.
- Evidence base: requests for updated assessments and additional studies to support the plan's proposals.
- 5.10 These main matters are explored in more detail in the following sections, which break down the responses by stakeholder group.

#### Summary of responses by respondent type

Developers and agents for developers

- 5.11 Developers raised several points regarding the Local Plan's approach and evidence base. There were suggestions to extend the plan period, which was considered tight by some respondents. Concerns were expressed about the potential loss of Green Belt, with calls for a full, up-to-date Green Belt review to justify any potential release. Many emphasised that Green Belt release should be a last resort.
- 5.12 Several developers advocated that any assessment reviewing the relocation of businesses from Chatham Docks and Medway City Estate should carefully consider the economic, social, and environmental implications of such relocation. Developers felt that employment locations in less accessible areas or outside the authority boundary may represent a loss of local employment opportunities.
- 5.13 Regarding housing supply and delivery, there were recommendations for a larger buffer in housing supply (5-10% instead of 2-3%). Questions were raised about the reliability of windfall projections and pipeline figures, and concerns were expressed about the feasibility of delivering a third of growth through regeneration. Several respondents requested updates to the Local Housing Needs Assessment and Land Availability Assessment.
- 5.14 Some comments were raised about the concentration of employment opportunities north of the river and the potential redevelopment of Chatham Docks and Medway City Estate, and there were calls for a robust and sustainable employment strategy. Queries were raised about the highway capacity of M2 Junction 1. A number of responses stated that the protection of Chatham Docks should be considered. Some responses sought an update to the Employment Land Needs Assessment (ELNA) as part of the plan's evidence base.
- 5.15 Many of the developer comments reflected their interests in particular site promotions. Some developers advocated for the Capstone area, as an area that presents an opportunity for comprehensive master planning, incorporating new permissions and the Lidsing development in Maidstone borough. They felt the master planning approach would ensure that infrastructure is in place to support growth in a coordinated manner, rather than piecemeal development. A concern raised is the potential exacerbation of ribbon development from Lidsing, which could lead to an undesirable pattern of sprawl.
- 5.16 There were concerns raised regarding the viability of regeneration sites in town centres due to significant costs, infrastructure requirements, and the potential impact on the delivery of affordable housing. These factors were

considered by developers to possibly render town centre regeneration projects unviable and a basis for them to promote development on greenfield sites.

#### Members of the public

- 5.17 Public responses covered a wide range of topics, with some clear themes emerging. Employment considerations included safeguarding Chatham Docks and Medway City Estate from residential development, locating distribution facilities near motorway junctions rather than the Hoo Peninsula and ensuring employment sites are suitably located.
- 5.18 Many expressed concerns about Green Belt release and loss of agricultural land, with calls to protect green spaces, including Capstone and the Hoo Peninsula. A number of comments were received supporting the vision. Concerns have been raised about the potential conflict between city status and the impact on the area's historic character.
- 5.19 Infrastructure and services were a major concern for the public. There were widespread concerns about infrastructure capacity, particularly in rural areas, and calls for improved public transport, cycling facilities, and sustainable travel options. Many requested better health infrastructure to support new development.
- 5.20 Views on housing and employment were mixed. While some supported more homes, others opposed large-scale developments. There were calls for affordable housing that meets local needs. Many expressed support for developing green technologies and sustainable industries.
- 5.21 Environmental and sustainability issues were prominent in public responses. There was a strong emphasis on protecting wildlife, biodiversity, and environmental designations. Many supported energy-efficient homes and sustainable development practices, while expressing concerns about air quality and pollution from increased development.

#### Statutory Bodies

- 5.22 Statutory bodies provided comprehensive commentary on various aspects of the consultation document. The Council also wrote to statutory consultees to request comments on scoping reports for the Sustainability Appraisal and the Habitats Regulations Assessment in support of the Local Plan.
- 5.23 There were calls for additional content to be included, such as Sport England's 10 Active Design principles and a range of reasonable strategy options or a preferred option with details on delivery.

- 5.24 There were requests from the Environment Agency for greater emphasis on blue-green infrastructure, waste management, and surface water systems. Statutory bodies recommended a more robust approach to sustainability, including a thorough screening of sites using comprehensive indicators and consideration of mitigation for sites along waterways.
- 5.25 Support for protecting Medway's heritage was a significant focus, with calls for a clear commitment to protecting and enhancing Medway's heritage. Suggestions included incorporating heritage into the plan's objectives, using historic landscape characterisation research, and considering the impact of development on designated heritage assets.
- 5.26 Transport was another key area, with emphasis on the importance of existing strategic transport corridors and the need for enhanced passenger links, particularly if large-scale housing is proposed on the Hoo Peninsula. There were also calls for higher residential densities close to stations and support for the rail network to reduce larger vehicle movements.
- 5.27 Several statutory bodies highlighted the need for updated evidence, including a playing pitch strategy, sports facility strategy, and conservation area appraisals. There were also requests for a cultural strategy and an updated Tall Buildings strategy.
- 5.28 Cross-border issues were raised, including Gravesham's unmet housing need request under the Duty to Cooperate and the need for stronger joint working on air quality issues. Support was expressed for cross-border cooperation on strategic infrastructure issues with neighbouring authorities.

Voluntary and community organisations

- 5.29 Community and voluntary organisations provided detailed feedback on various aspects of the plan. Regarding the vision and strategy, there were calls for more detailed actions, goals, and strategies in the vision, and support for a 'brownfield first' approach to development.
- 5.30 On environment and sustainability, these groups recommended stronger policies on climate change and carbon neutrality. There were suggestions for enhanced protection and expansion of green and blue infrastructure and calls for comprehensive biodiversity net gain policies as well as support for a greater emphasis on public transport and protecting agricultural land.
- 5.31 In terms of economy and culture, there was support for policies promoting the green economy and cultural infrastructure and green tourism. Recommendations were made for employment policies that do not impact on biodiversity.

5.32 Several organisations suggested additions to the evidence base, including an Ancient Tree Inventory. There were also calls to update the Local Housing Needs Assessment and Employment Land Needs Assessment.

#### Business

5.33 Responses in this section were largely reflecting the issues on the potential redevelopment of Chatham Docks and support for the existing land uses.

#### Members, MPs, and Parish Councils

- 5.34 This group raised several points about housing and development. There was an emphasis on meeting local housing needs before accommodating migration from London, and objections to assisting Gravesham in meeting its housing needs. Concerns were raised about the cost and viability of development on the Hoo Peninsula.
- 5.35 Environment and infrastructure were key concerns for this group. There were calls for protection of specific areas from excessive development and emphasis on providing appropriate infrastructure alongside new development. Recommendations were made for environmental protections, particularly for the Hoo Peninsula as well as the safeguarding of Chatham Docks, Medway City Estate and agricultural land.
- 5.36 Several queries were raised about the consultation process. There were objections to the spatial strategy from some parish councils and calls for clarification on how previous consultations relate to the current process.

#### Other

- 5.37 A range of additional comments and recommendations were received from various stakeholders that fell into the 'other' category. The Kent Downs Area of Outstanding Natural Beauty (AONB) was a focus for some representations, with suggestions to consider it as a constraint in assessing strategic scale development. Flooding was addressed, with suggestions to consider alternative ways of seeking betterment that offer multiple benefits.
- 5.38 On employment matters, concerns were expressed over business relocation and compensation. Some respondents highlighted the need for more industrial employment land, largely but not exclusively for logistics.
- 5.39 There was support for more emphasis on affordable housing in the plan, including encouragement for retrofitting and town centre living, not just riverside locations. The concept of 15-minute neighbourhoods received support from some respondents.

#### 6. NEXT STEPS

- 6.1 The Council has collated the responses received and identified the specific matters raised. The representations have been published on the Council's website for wider review. The matters raised have been assessed and the Council has taken these into account in preparing for the next stage of plan preparation. This includes the further development of the evidence base for the Local Plan.
- 6.2 The Council is consulting in summer 2024 (a further regulation 18 stage). The consultation programme will build on the work carried out to date, and the Council will continue to engage with neighbouring local authorities and statutory consultees on cross border strategic matters as part of the Duty to Cooperate.
- 6.3 Outcomes of the next consultation stage will be published with the Draft Local Plan in early 2025, with further work on the Council's new Local Plan for Medway.

#### CONSULTATION EVENTS PROGRAMME

#### Overview

1.1 The Council held 'drop in' style exhibitions on the 'Setting the Direction for Medway 2040' document in community venues across Medway, open to all to attend. It also organised a series of thematic workshops to consider key issues in more detail.

#### Exhibitions

1.2 The Council organised 7 events at community venues across urban and rural Medway. These attracted 240 people. A briefing was arranged for parish councillors in advance of the community events. The table below shows the level of attendance to the exhibitions, with the highest attendance in Chatham at 51 people.

Date	Time	Area	Venue	Attendance numbers
Tuesday 3 October	15:30 - 18:00	Strood	Strood Library	17
Thursday 5 October	16:30 - 19:00	Rochester	Corn Exchange	32
Tuesday 10 October	15:30 - 18:00	Gillingham	Medway Park	38
Thursday 12 October	11:00 - 13:30	Rainham	Riverside Country Park	27
Saturday 14 October	9:30 - 12:00	Chatham	Pentagon Centre (unit to left of Wilkos, Ground Floor)	51
Tuesday 17 October	16:30 - 19:00	Hempstead/Capstone	Lordswood Leisure Centre	30
Thursday 19 October	17:30 - 20:00	Hoo Peninsula	Hundred of Hoo Secondary School	45

1.3 Key matters arising from the exhibition events include the need for improved infrastructure, concerns over the impact on the environment, and the view that

the housing needs formula does not adequately account for the characteristics of the local area. Clarity was sought over the housing numbers, and people wanted to see that increased homebuilding would be accompanied by further provision for social infrastructure. The plan should encourage a safe High Street and improvements to parks. Specific housing provision for older people, families, and younger people was recommended. An improved evening and night-time economy was desired. A new footpath/cycle route following the old railway line from Gillingham to Strood Castle was proposed. There were concerns over the lack of support for businesses and the potential loss of green space. Strong support was expressed for the protection of the Green Belt. Overall, there is a desire for an improved perception of Medway through the Local Plan.

#### Thematic meetings/workshops

- 1.4 The Planning Service organised a number of thematic workshops, with an invited range of stakeholders, which also helped to engage a range of organisations, community groups and businesses in the development of the Local Plan. These included events on the topics of the Environment, Housing and Employment.
- 1.5 The meetings took the format of a short presentation on the Direction for Medway 2040 document, followed by a discussion on key issues to be considered. The thematic based events were useful in gathering detailed information, to determine components of the plan's vision and objectives and support the development of policies. A schedule of meetings held during the consultation is set out in the table below.

Date	Time	Theme
Wednesday 20 September	19:00 - 21:00	Rural Liaison Committee
Monday 16 October	18:00 - 19:00	Medway Council member briefing
Tuesday 17 October	9:30- 12:30	Health & Wellbeing workshop
Monday 16 October PM	14:00 - 16:15	Housing workshop
Monday 30 October PM	14:00 - 16:15	Employment workshop
Thursday 26 October PM	14:00 - 16:15	Environment workshop

- 1.6 Key themes emerging from the stakeholder engagement workshops included discussions around housing targets and the need for Medway to assess all options to meet these targets within constraints. The protection of greenfield sites was highlighted as a priority, alongside the challenges and potential of brownfield sites for development. Protecting and expanding industrial land, particularly with existing resources, and although potential was seen as highly important there were calls to preserve Medway's industrial heritage while accommodating modern manufacturing.
- 1.7 The increasing pressure on services due to more residential development and addressing the inadequacies of public transport on the Peninsula is crucial. Encouraging sustainable transportation options, reducing reliance on cars, and improving public transport infrastructure can enhance accessibility.
- 1.8 Additionally, there is a strong focus on environmental considerations such as tree preservation, biodiversity, sustainable locations, and climate resilience. The integration of green infrastructure, wildlife habitats, and biodiversity into planning is seen as crucial for fostering pride, tourism, and community well-being.
- 1.9 Opinions that touched upon social aspects like community engagement, inclusivity, and public health considerations were raised. Suggestions for creating dementia-friendly spaces, enhancing community connections through green spaces and allotments, and promoting local businesses' integration within communities were mentioned. The importance of reducing carbon emissions, tackling loneliness, fostering a sense of pride, and recognising the existing history across different areas for community well-being are also discussed.
- 1.10 Overall, the themes focused on balancing development needs with environmental conservation, community well-being, and inclusive planning to create sustainable and thriving spaces in Medway.



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