

From: [REDACTED]
To: [policy, planning](#)
Subject: Medway Local Plan 2041
Date: 06 July 2025 15:32:45
Attachments: [image001.png](#)
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[image005.png](#)

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To whom it may concern.

I am alarmed by the Council's visions regarding the future of the Medway area. Despite strong and justifiable opposition to proposed high scale development plans, the Council appears to continue to ignore the importance of Chatham port and the companies that provide vital employment and service to industries both imported and exported. As a major supplier of construction timber to the UK our Company benefits from large scale house building provided it meets the local need and has minimal impact on the natural and commercial landscape. For 25 years the port of Chatham has handled a significant volume of timber that has been used to manufacture houses all over the UK. The port continues to flourish despite ongoing concerns about it's future. While the Government has set optimistic targets to address the UK housing crisis, I believe that there are many other more appropriate areas in the UK that meet this requirement and the Medway has to remain a crucial and valuable avenue to provide future employment and to service the import of material needed for this kind of large scale construction.

Yours faithfully,

Ian Drane



Ian Drane | Managing Director



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Model Representation Form for Local Plans

 Medway COUNCIL <i>Serving You</i>	Local Plan Publication Stage Representation Form	Ref: (For official use only)
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Name of the Local Plan to which this representation relates:

Medway Local Plan

Please return to Medway Council Planning Service by 11th August 2025

Email: planning.policy@medway.gov.uk or post to:

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

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

Title	<input type="text"/>	<input type="text" value="Ms"/>
First Name	<input type="text"/>	<input type="text" value="Lucy"/>
Last Name	<input type="text"/>	<input type="text" value="McDonnell"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Senior Associate"/>
Organisation (where relevant)	<input type="text" value="ArcelorMittal Kent Wire Limited"/>	<input type="text" value="Dentons UK and Middle East LLP"/>
Address Line 1	<input type="text" value="Forest House Northside Three"/>	<input type="text" value="One Fleet Place"/>
Line 2	<input type="text" value="Chatham Docks"/>	<input type="text" value="London"/>
Line 3	<input type="text" value="Chatham"/>	<input type="text"/>
Line 4	<input type="text" value="Kent"/>	<input type="text"/>
Post Code	<input type="text" value="ME4 4SR"/>	<input type="text" value="EC4M 7WS"/>
Telephone Number	<input type="text" value="(see agent)"/>	<input type="text" value=""/>

E-mail Address
(where relevant)

(see agent)

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph

All

Policy

All

Policies Map

All

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

No

X

4.(2) Sound

Yes

No

X

4 (3) Complies with the
Duty to co-operate

Yes

No

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see continuation sheet.

Please note that we have not considered and reserve our position in relation to the duty to cooperate.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

We consider that the scale of issues is such that the draft Local Plan could not be amended at this stage to address legal compliance or soundness.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

No, I do not wish to participate in hearing session(s)

☒

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

ArcelorMittal Kent Wire wish to participate in the hearing sessions, to fully explain the shortcomings of the draft Local Plan.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

For details of our data privacy policy please see:

<https://www.medway.gov.uk/info/200133/planning/714/planning-service-privacy-statement>

CHATHAM DOCKS – ARCELORMITTAL KENT WIRE LIMITED

REPRESENTATIONS ON MEDWAY LOCAL PLAN REGULATION 19 CONSULTATION AUGUST 2025

Submitted via email to planning.policy@medway.gov.uk

We act for ArcelorMittal Kent Wire, the occupier of a large proportion of the Chatham Docks site, which is currently allocated for commercial port uses in recognition of the economic importance of its port and industrial functions. We explain below why the proposed de-allocation for commercial use and re-allocation to largely residential use under draft policy SA4, site allocation SM16 (**Draft Allocation**) cannot properly be found sound.

1 Summary

- 1.1 The Draft Allocation has been generated without any proper understanding of the role of the docks in relation to NPPF planning policy objectives for sustainable growth or local and larger than local needs they serve. The Draft Allocation cannot properly be found to be Positively Prepared, Justified or Effective.
- 1.2 The Chatham Docks site has particular characteristics that have not been factored into the evidence base, including the role of its non-tidal dock providing a location for multi-modal interchange / transshipment, manufacturing and clustering that drive employment and carbon saving benefits. This includes the role of river transport, efficient and lower carbon shipment to London and the South East for construction projects, and the skilled workers who contribute to the local economy.
- 1.3 ArcelorMittal Kent Wire has supplied Crossrail, HS1, HS2, the Lower Thames Crossing, the Thames Tideway Tunnel, Heathrow Terminal 5, the O2 Arena, Wembley Stadium, the Emirates Stadium, the London Stadium, the A13 road upgrade, the M4 smart motorway, the Shard, the Silvertown Tunnel, and the United States' new London embassy, illustrating its importance to the strategic infrastructure projects.
- 1.4 These characteristics, their contribution to the sustainable growth of the economy at a local and larger than local level and the alternatives have not been assessed. That includes that the associated impacts on the wider regional supply chain of specialist steel products has not been analysed at all in the evidence base. The Draft Allocation is therefore not a reasonable alternative (no proper alternatives relevant to the Soundness tests and stated objectives of the Emerging Plan having been tested). Nor is it Consistent with NPPF policies relevant to the site, the impacts of the Draft Allocation or the stated aims of the regulation 19 draft Local Plan (the **Emerging Plan**).

2 Medway Council's duties

- 2.1 Medway Council must identify the strategic priorities for the development and use of land in the authority's area. Policies to address those priorities must be set out in the development plan documents.¹ In preparing the draft Local Plan, Medway Council must have regard to, among other things, national policies and guidance issued by the Secretary of State.² Medway Council must carry

¹ Section 19 (1B) and (1C) Planning and Compulsory Purchase Act 2004

² Section 2 Planning and Compulsory Purchase Act 2004

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out a lawful Sustainability Appraisal and report its findings.³ A local plan must also contain a reasoned justification of the policies contained in it.

2.2 Medway Council must prepare a plan which is sound: positively prepared, justified, effective and consistent with national policy.⁴

2.3 The Emerging Plan cannot properly be found to satisfy these requirements.

3 Strategic Objectives

3.1 The Emerging Plan sets out Medway Council's strategic objectives, including but not limited to:

- (a) Prepared for a sustainable and green future, including addressing the climate emergency, and "supporting major shifts in modes of transport used to reduce carbon impacts".
- (b) Securing jobs and developing skills for a competitive economy, including "supporting local businesses to grow and innovate", "provision of a portfolio of good quality employment land", "Build on existing strengths and expertise".
- (c) Boost pride in Medway through quality and resilient development, including "to secure the ongoing benefits of Medway's regeneration, making the best use of brownfield land, including bringing forward the transformation of the waterfront and town centre sites for high-quality mixed-use development, and a focus for cultural activities".

3.2 ArcelorMittal Kent Wire submit that Medway Council have failed to consider the contribution of Chatham Docks to their strategic objectives.

3.3 Chatham Docks offer considerable carbon benefits due to their non-tidal docks and transhipment/ water borne freight role. No attempt has been made to understand or retain this benefit or understand the alternatives available to meet it elsewhere within the Council's area.

3.4 The proposed redevelopment of the site of an existing business employing a large number of skilled workers is not consistent with securing jobs and developing skills, particularly where no evidence is available that tenants have been secured for the speculative planning permission scheme on the southern part of the Docks.

3.5 The impact of the redevelopment of Chatham Docks has not been fully considered in looking at the reuse of brownfield sites (where there is a current operator with substantial resources at the site) and the impact of the loss of port and specialist manufacturing capability has not been fully assessed. There is no reasoned justification for this choice, as required by the Planning and Compulsory Purchase Act 2004, as set out above. This reflects wider failings in the assessment of alternatives against the NPPF objectives relevant to the site and the stated aims of the Emerging Plan.

4 Evidence base

4.1 The evidence base is wholly inadequate in relation to the contribution of the docks, the role of retained port and specialist manufacturing and clustering benefits.

³ Section 5 Planning and Compulsory Purchase Act 2004

⁴ National Planning Policy Framework paragraph 36

4.2 It is also inconsistent with the Draft Allocation: for example, the Medway Employment Land Needs Assessment (Rapleys, February 2025) is clear that

- (a) "[w]here offices may come forward is at Innovation Park and Basin 3, Chatham Docks, [...] development on both these locations *will require some form of cross-subsidy due the unviable nature of this type of development or if an occupier led requirement is found*";
- (b) Existing employment areas in the southeast of Medway need to be protected for employment uses; "*overall, **all of the existing employment areas need to be protected** and alternative uses resisted to ensure the integrity is maintained for employment uses in the short to medium term.*" The proposals in the Draft Allocation for wholesale clearance and largely residential redevelopment of the existing employment area is in clear conflict with this.

4.3 The Draft Allocation is therefore proposing uses that

- (a) harm the existing valuable advanced manufacturing and port functions
- (b) would result in the loss of an established scarce resource (the non-tidal dock and transshipment facilities, which the current allocation protects)
- (c) are intended to cause these harms without
 - (i) any proper assessment in the evidence base of whether the needs that the existing dock and port facilities have disappeared or could be met elsewhere.
 - (ii) Any support for the viability of some of the uses in the evidence base (and in fact contrary evidence that such uses are acknowledged to be unviable).

4.4 The draft Local Plan does not explain why the strategic objective, to redevelop waterfront sites, is not consistent with the evidence base to maintain existing employment sites. That in turn reflects that the purported objective is in fact an outcome rather than a proper planning objective in its own right. That fundamental failing is driven by the failure to carry out a proper assessment of alternatives against a proper planning objective that is consistent with evidenced needs and relevant NPPF policies.

5 Reasonable alternatives

5.1 Despite the submissions of ArcelorMittal Kent Wire at Regulation 18 stage, the Sustainability Appraisal still fails to properly consider the alternatives to the redevelopment of Chatham Docks for residential led development. The Sustainability Appraisal restates the previous assessments, the shortcomings of which we included in our regulation 18 consultation response, and points to a further "traffic light" analysis of all sites, without any detailed engagement with the issues.

5.2 Medway Council is required to understand the importance of the existing use of the site and its contribution to the wider area. However, there is no evidence in the Sustainability Appraisal of any more than superficial consideration, with no real assessment of the impact of the proposed reallocation of Chatham Docks. There are no reasoned conclusions for the redevelopment of Chatham Docks away from strategically significant steel manufacturing. The identification of Chatham Docks as an indicative residential-led development site is not explained.

5.3 There is no indication that the Council have considered the spatial and location uniqueness of the docks, nor the consequences of redeveloping them as homes in the Emerging Plan or supporting

documents. This is an inadequate approach to the loss of the last non tidal dock in the South East, with a failure to properly grapple with, or consider at all the particular features of the site in determining its future use. The draft Local Plan does not consider the impact on the UK construction industry, the carbon impacts of losing a facility for water based transport and replacing it with road based transport, the loss of skilled jobs. There is no analysis which allows a comparison of all of the relevant sustainability effects to assess the replacement of a key industrial facility, that of ArcelorMittal Kent Wire, with a housing led development. Further, there is no assessment of the "net" position where ArcelorMittal Kent Wire's operation is lost from Chatham Docks and replaced by a housing led, light industrial scheme.

- 5.4 Alternatives for Chatham Docks have been put forward, in particular the SPPARC Masterplan, first launched in 2022, provided at Regulation 18 stage, and also submitted alongside this representation. This considers further investment in continuing the industrial operation, with benefits for UK steel and the wider economy, retaining the unique non-tidal dock and its associated carbon benefits. The proposal puts forward measures to retain the important existing operations whilst meeting modern occupier demand. This alternative approach to Chatham Docks, including further ways to achieve various of the Council's strategic objectives, is not considered as part of the draft Local Plan.

6 Conclusion

The shortcomings we identified at regulation 18 stage have not been adequately addressed.

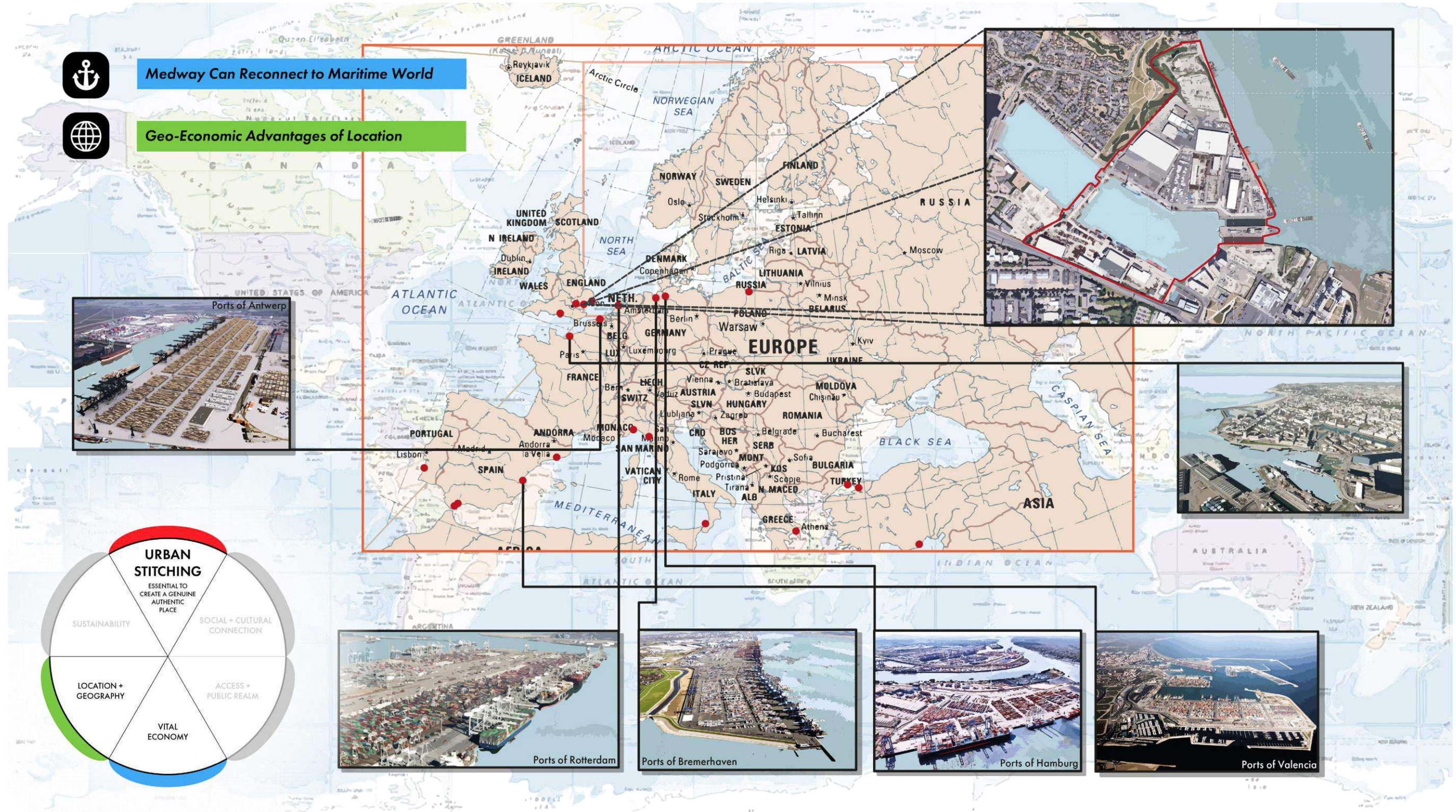
The Emerging Plan cannot, in light of the failings noted above, properly be said to meet the statutory or NPPF soundness requirements local plan examination.

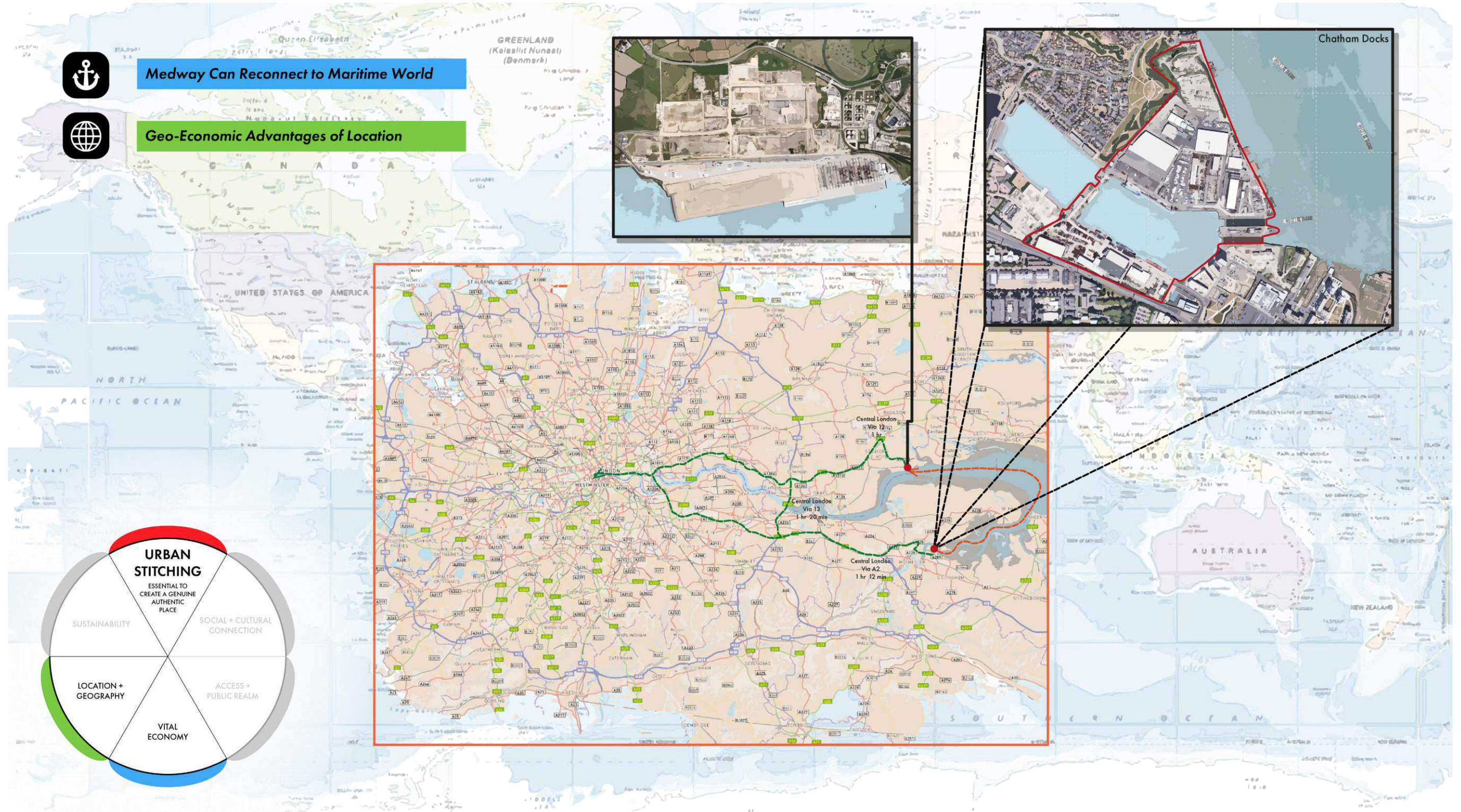
In this light, ArcelorMittal Kent Wire wish to participate in the Examination in Public, including relevant Hearing sessions.

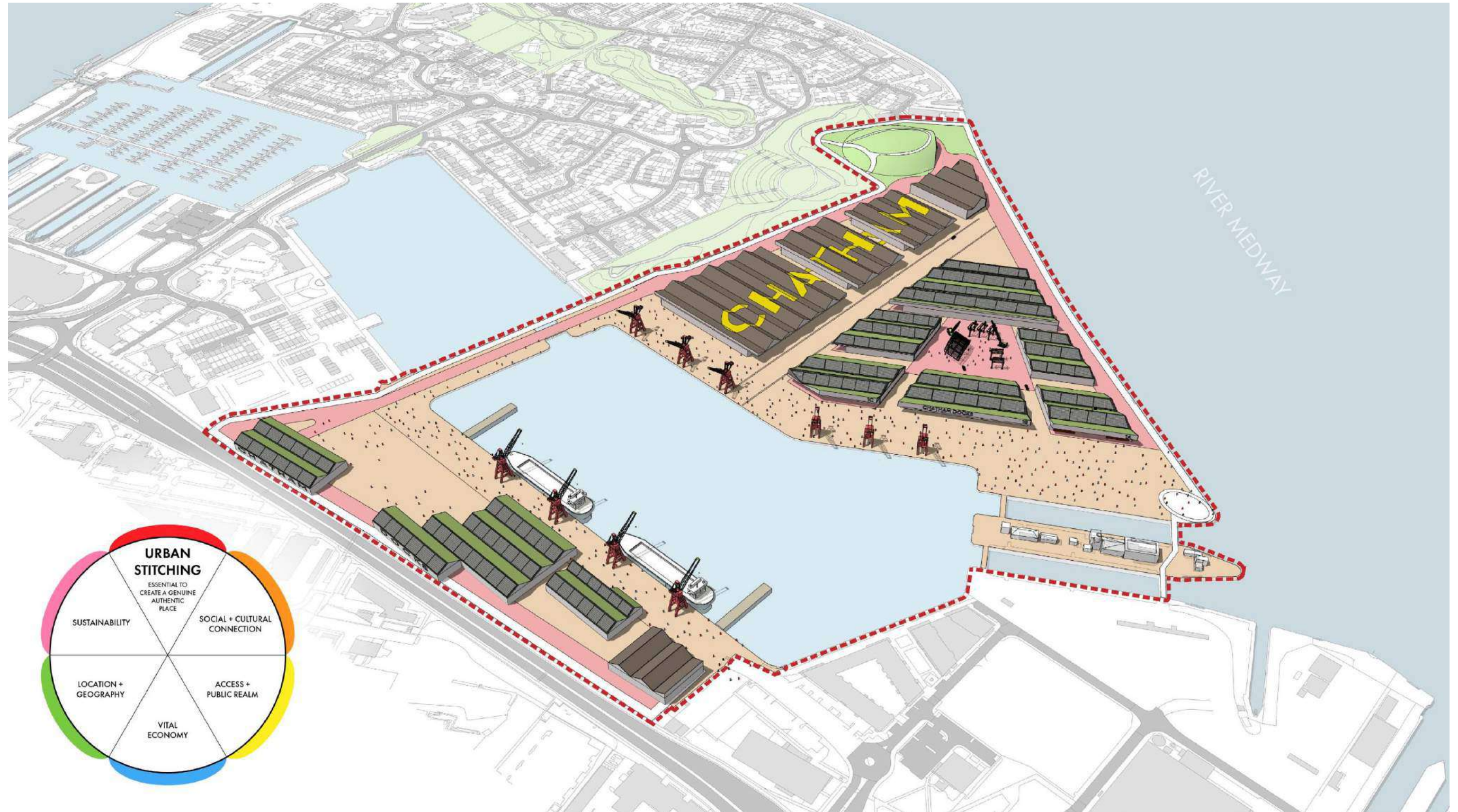
CHATHAM DOCKS

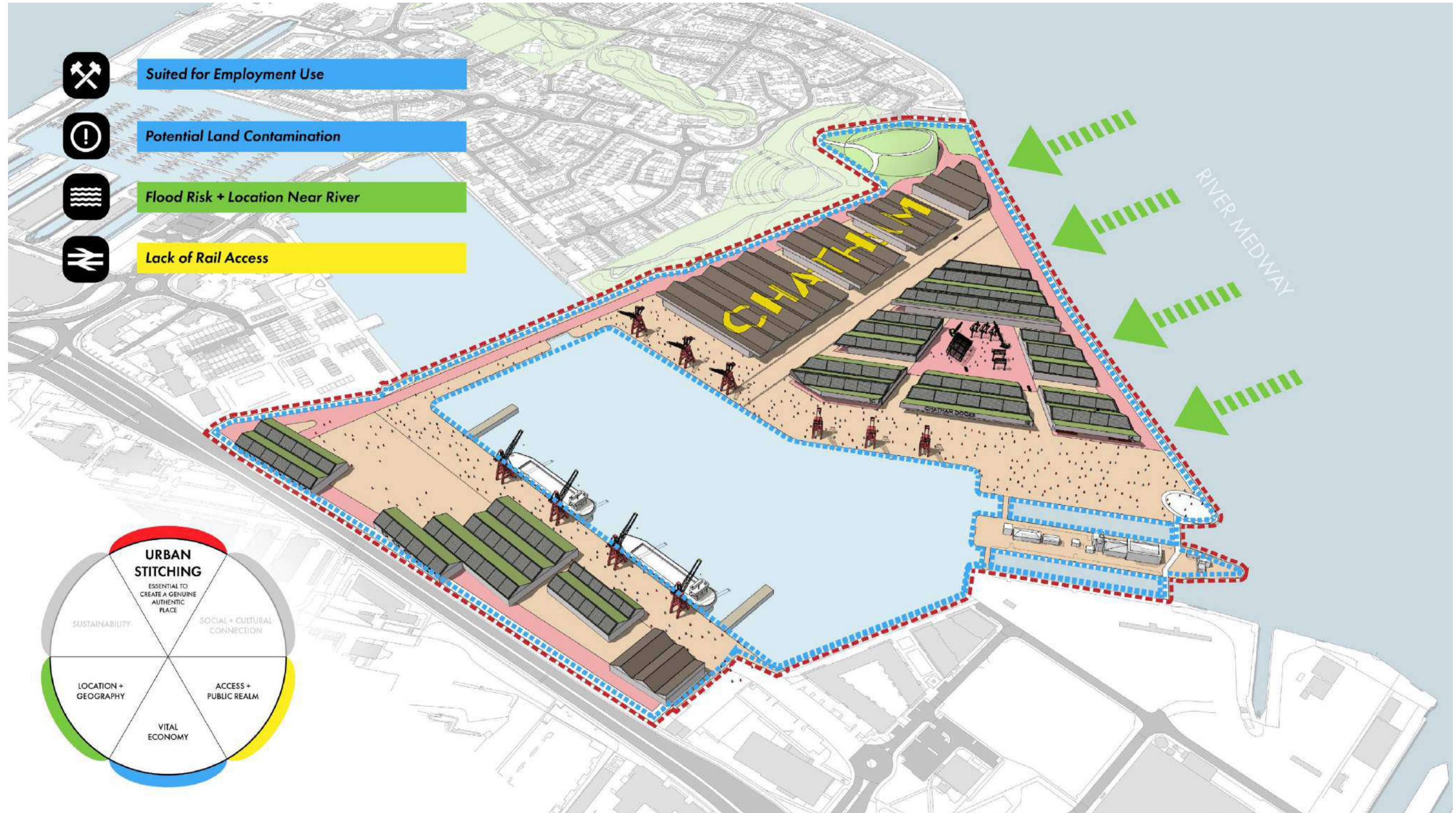
The Masterplan Vision





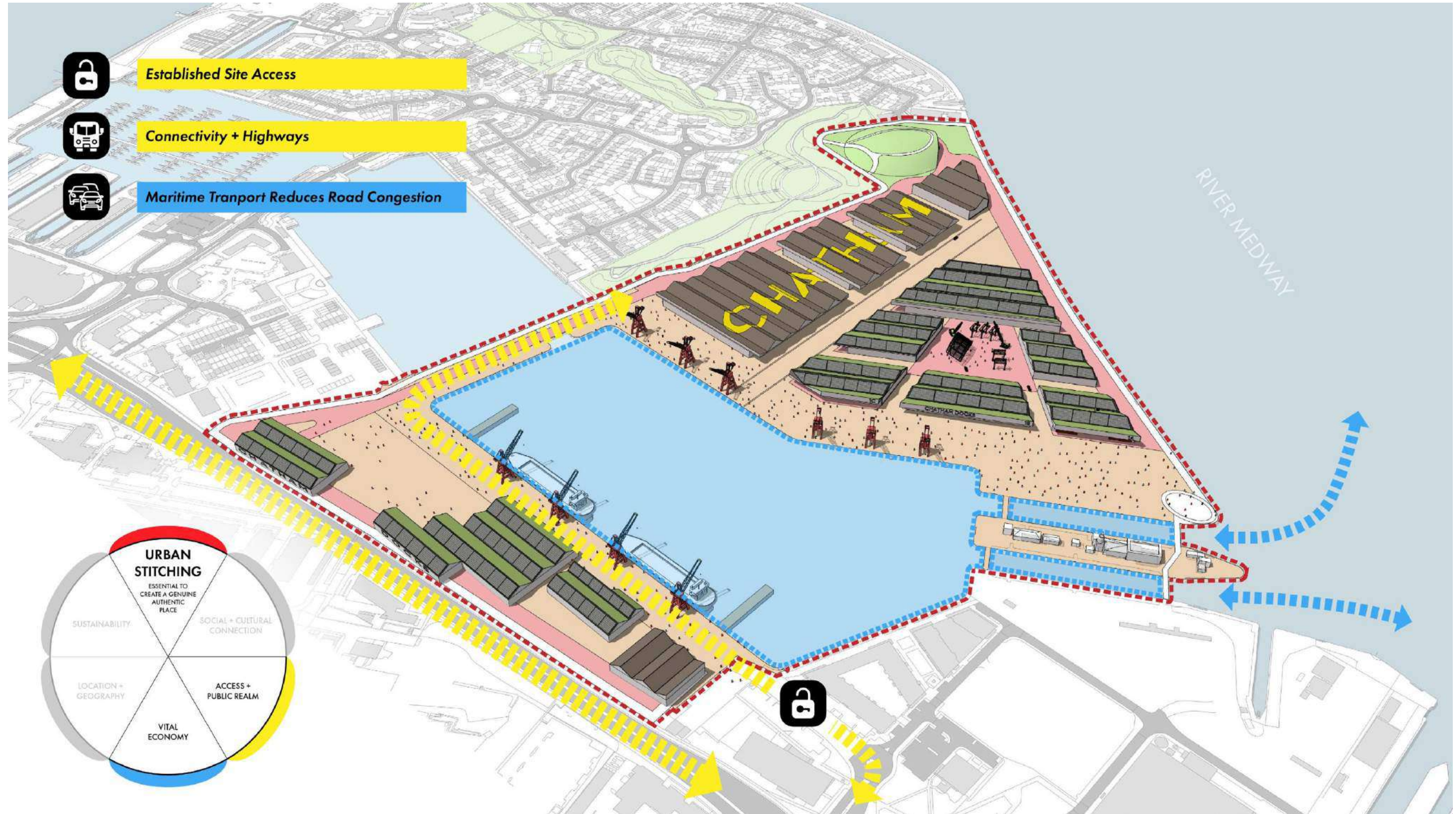


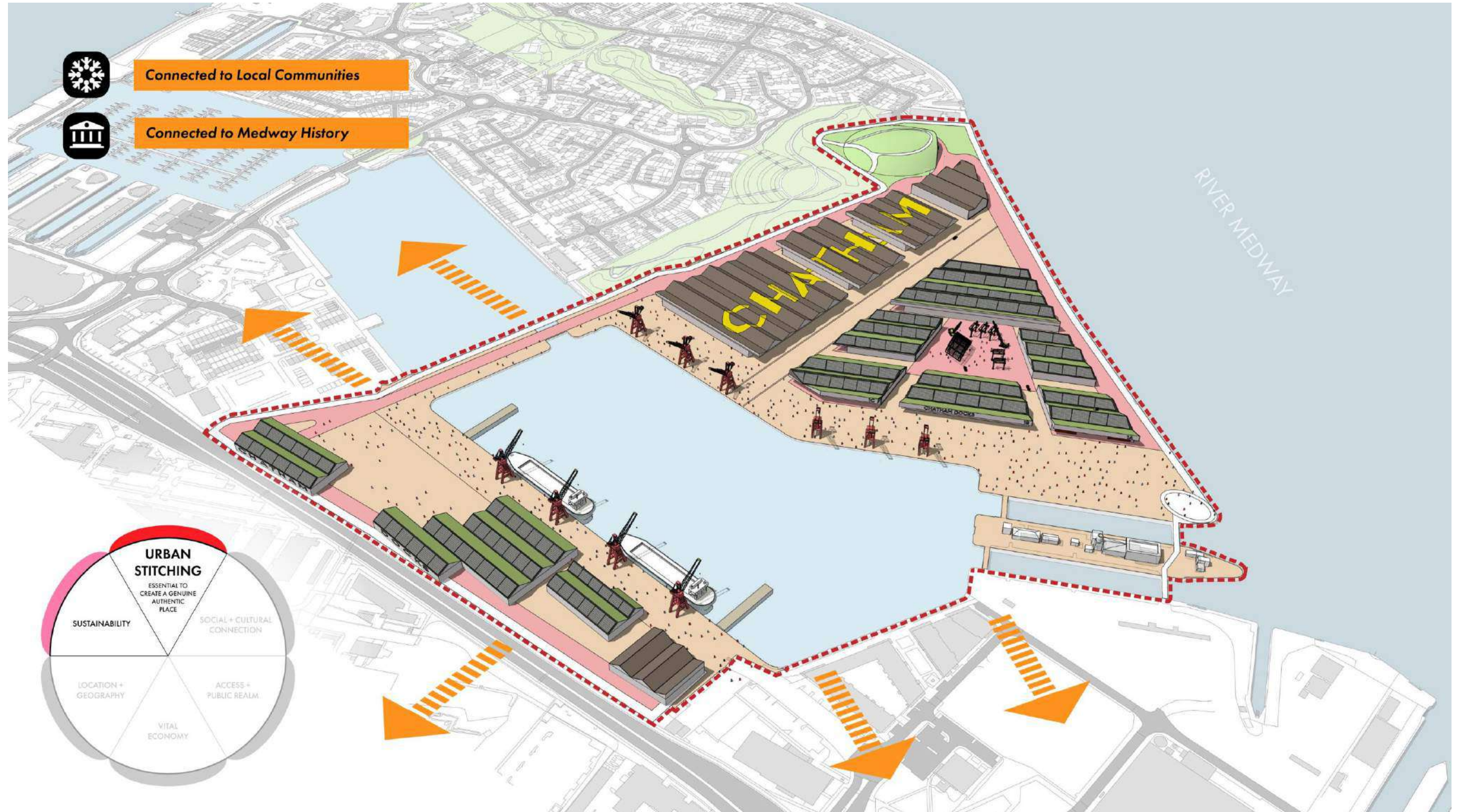


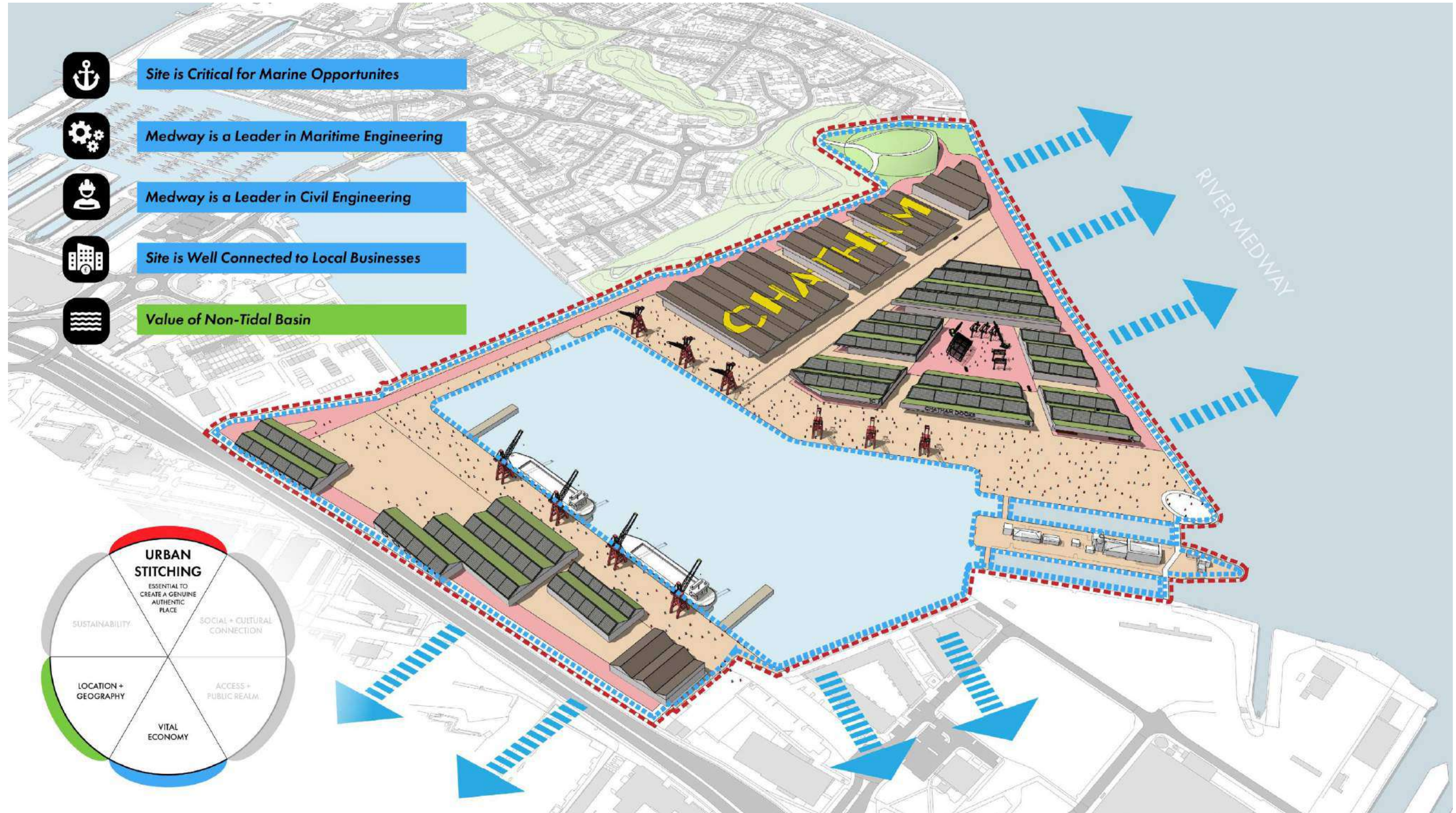


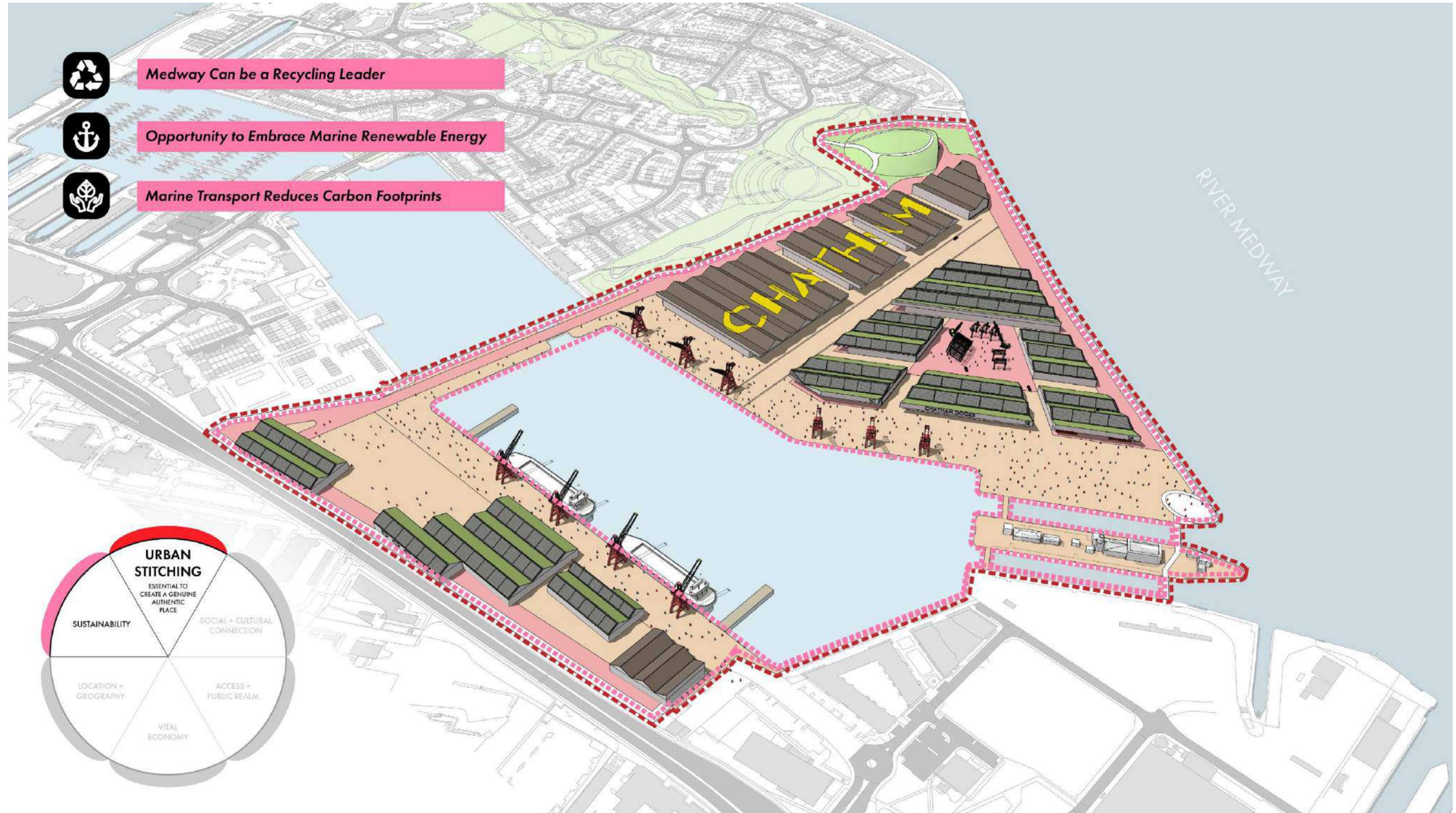
The Masterplan Vision

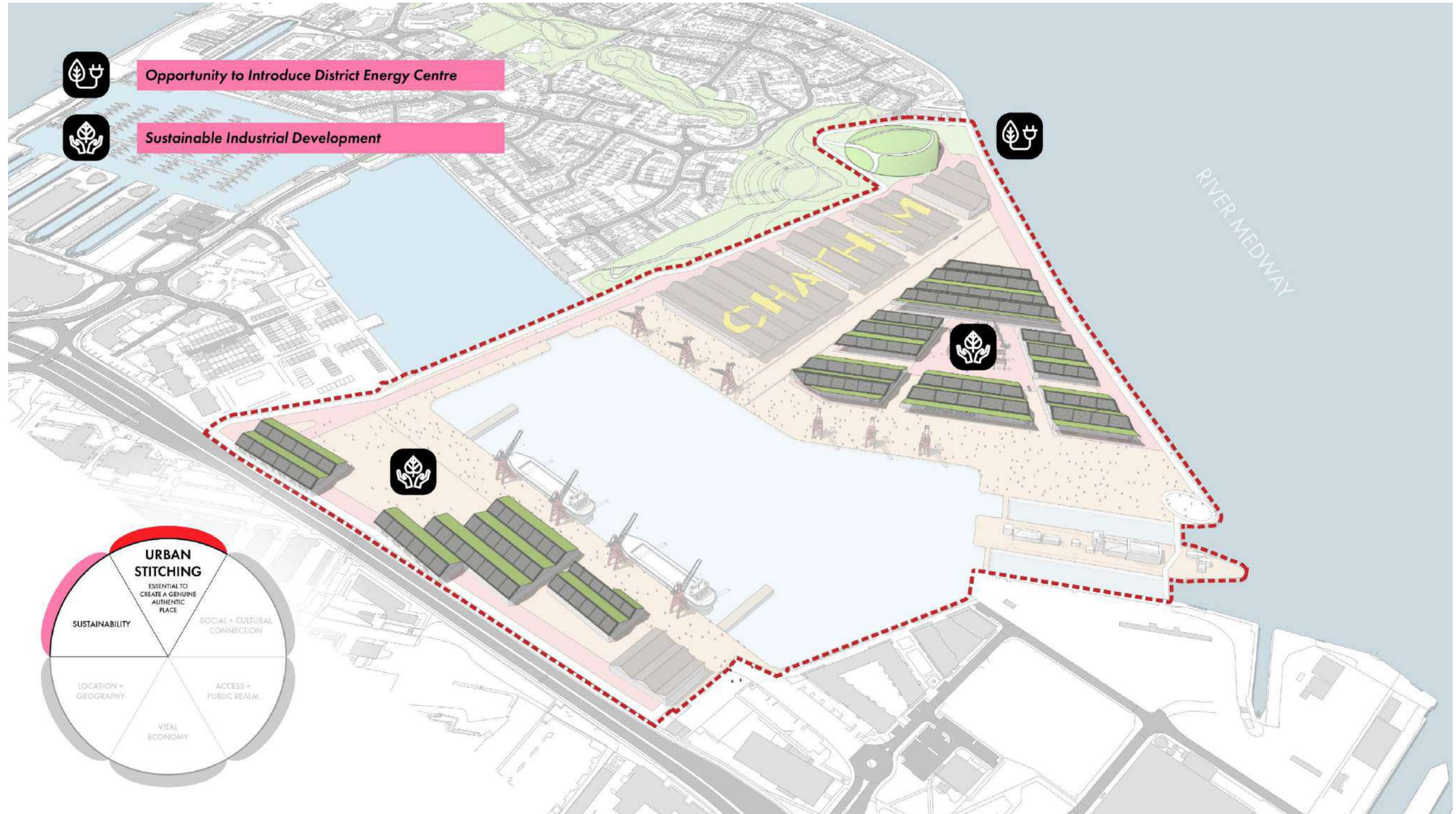
A Sustainable Approach – Use of the River for Primary Access









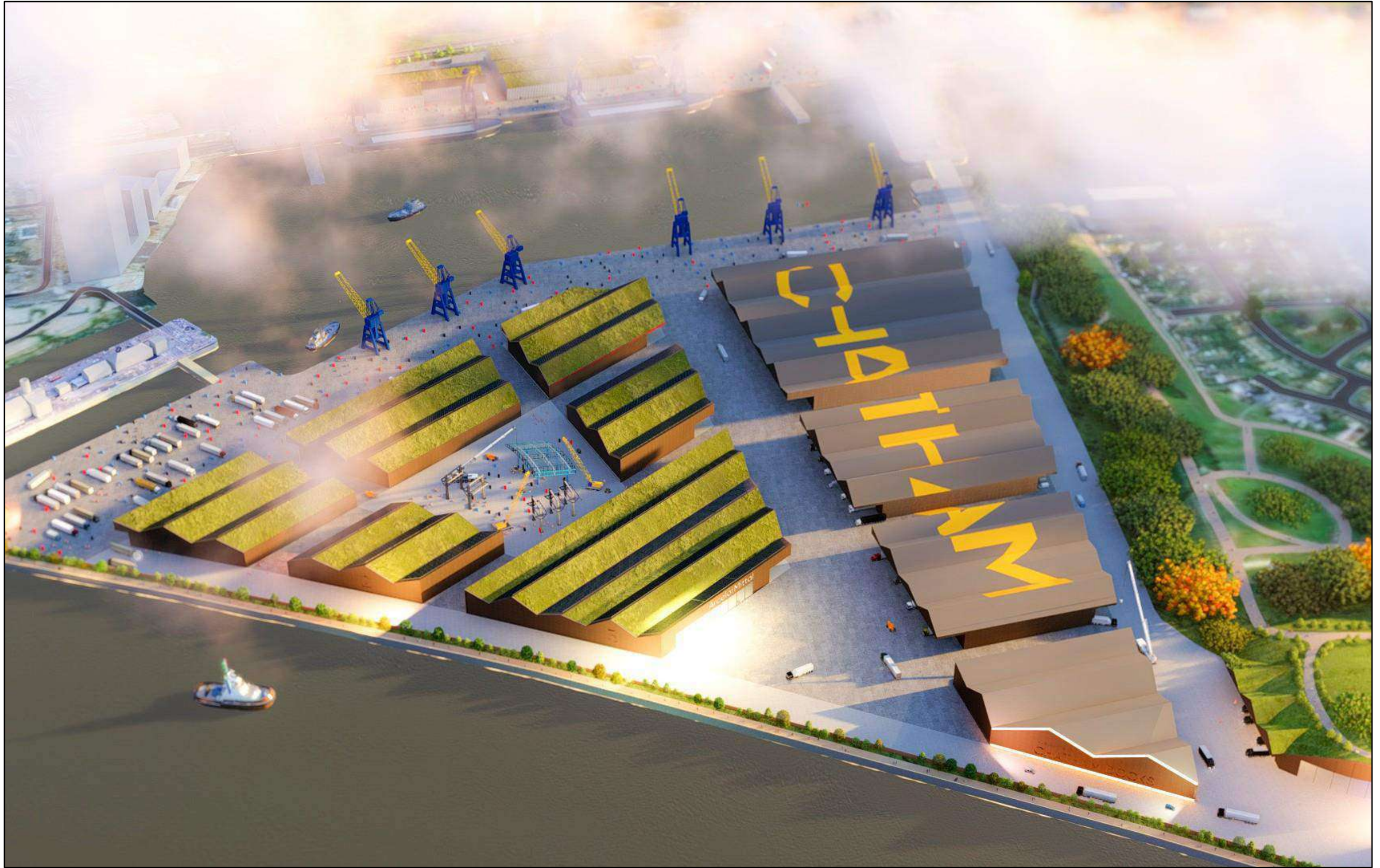


The Masterplan Vision

A Green Approach through Renewable Energy and Public Access to the River with a Green Pedestrian Route





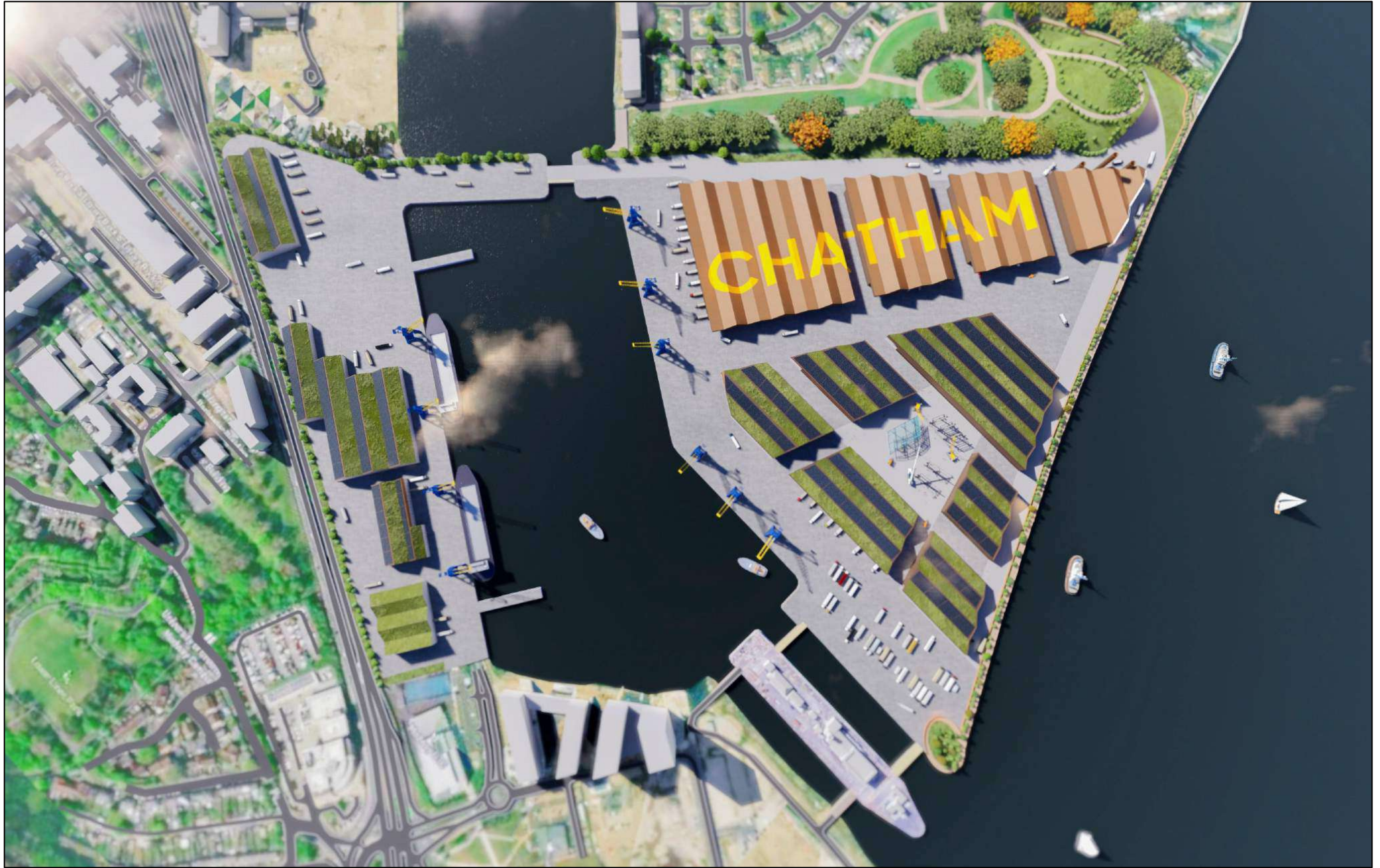








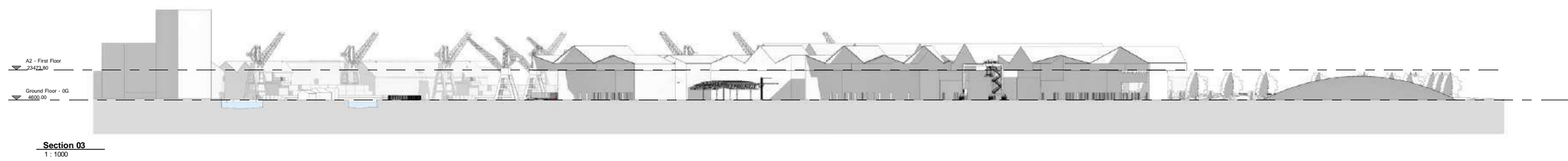
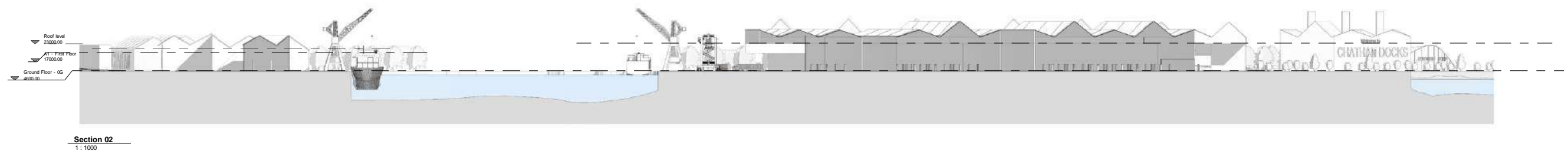
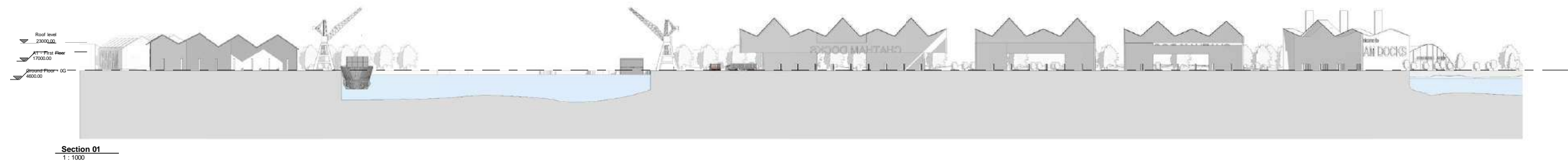






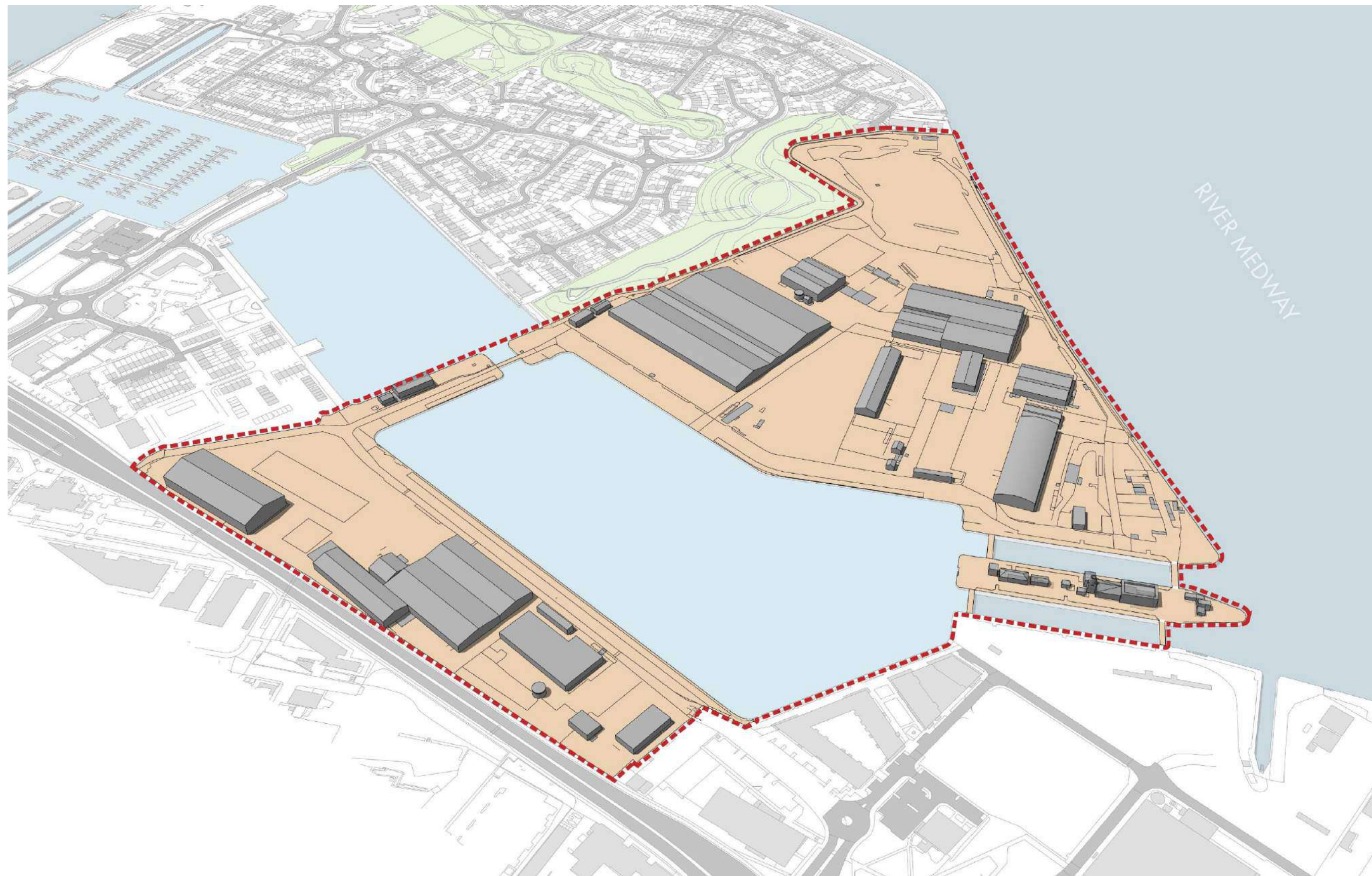


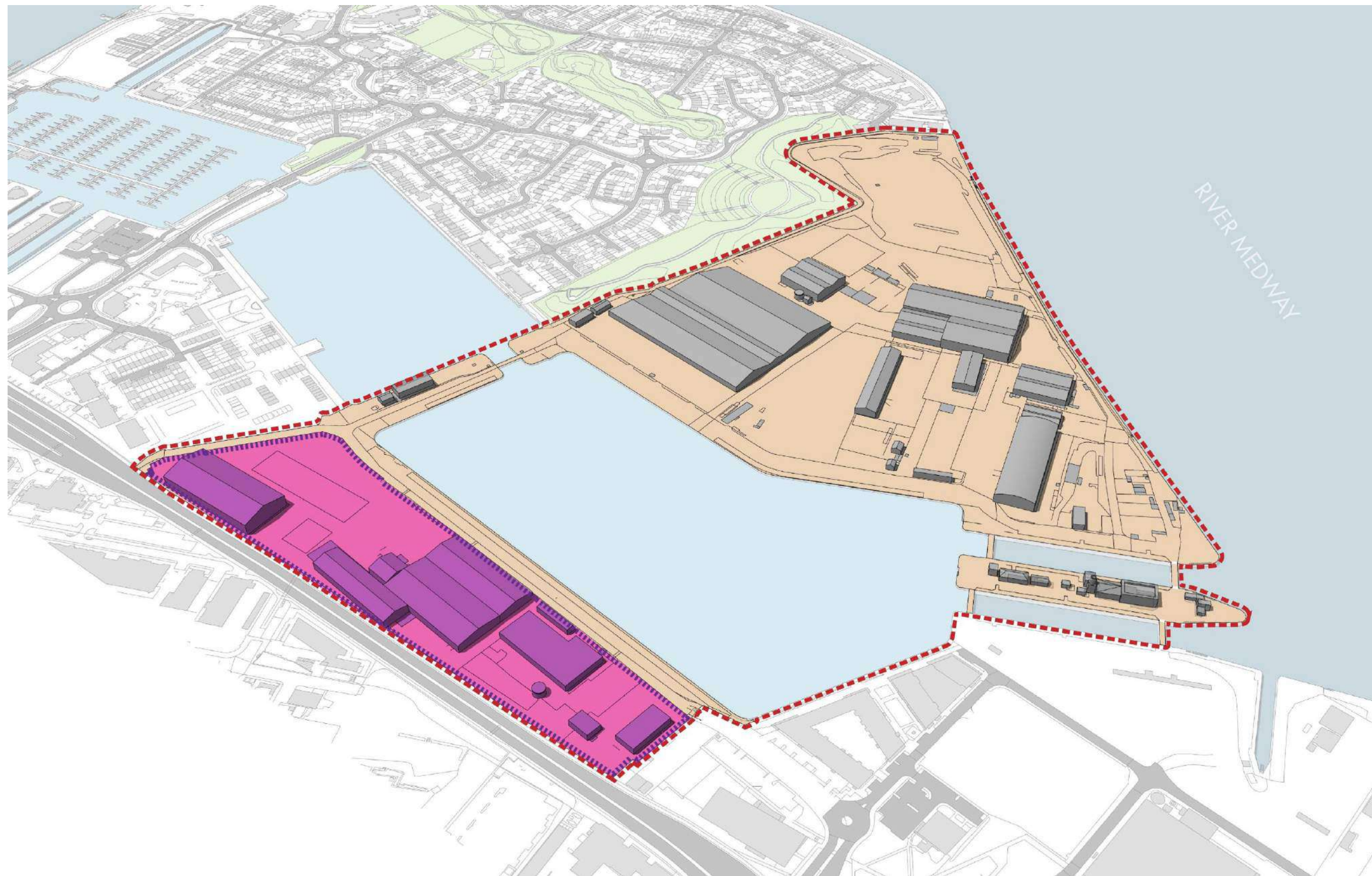


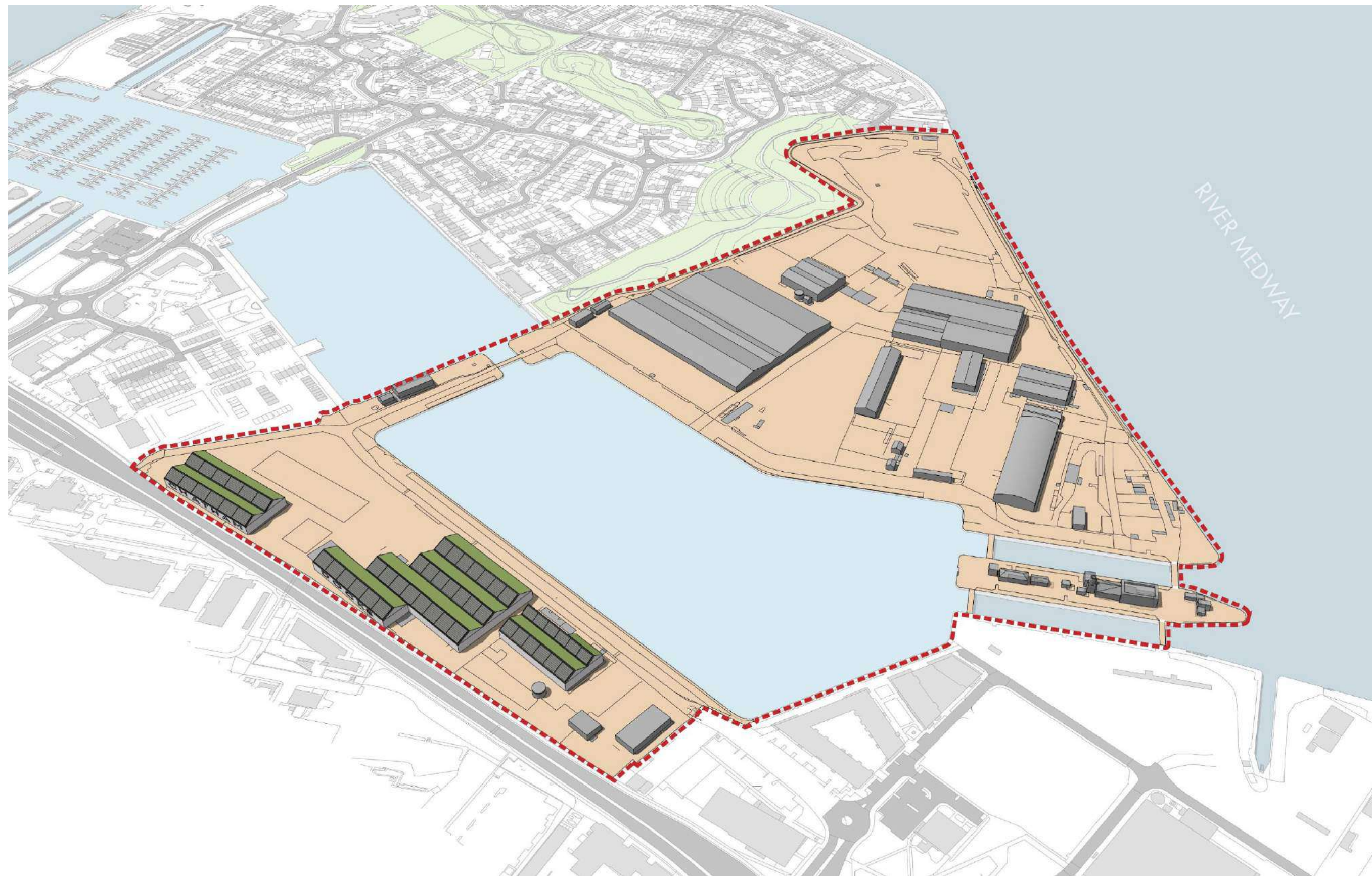


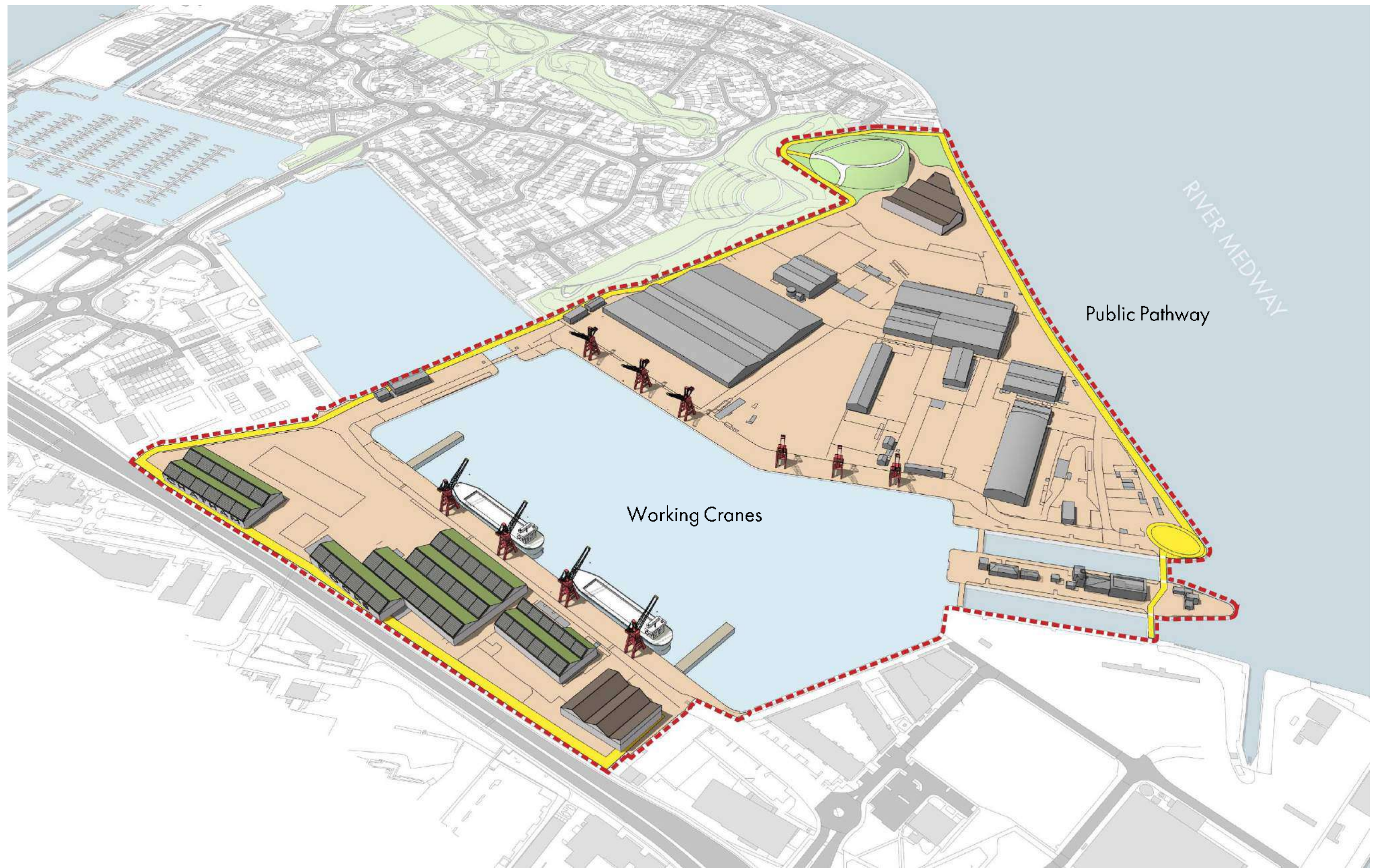
CHATHAM DOCKS

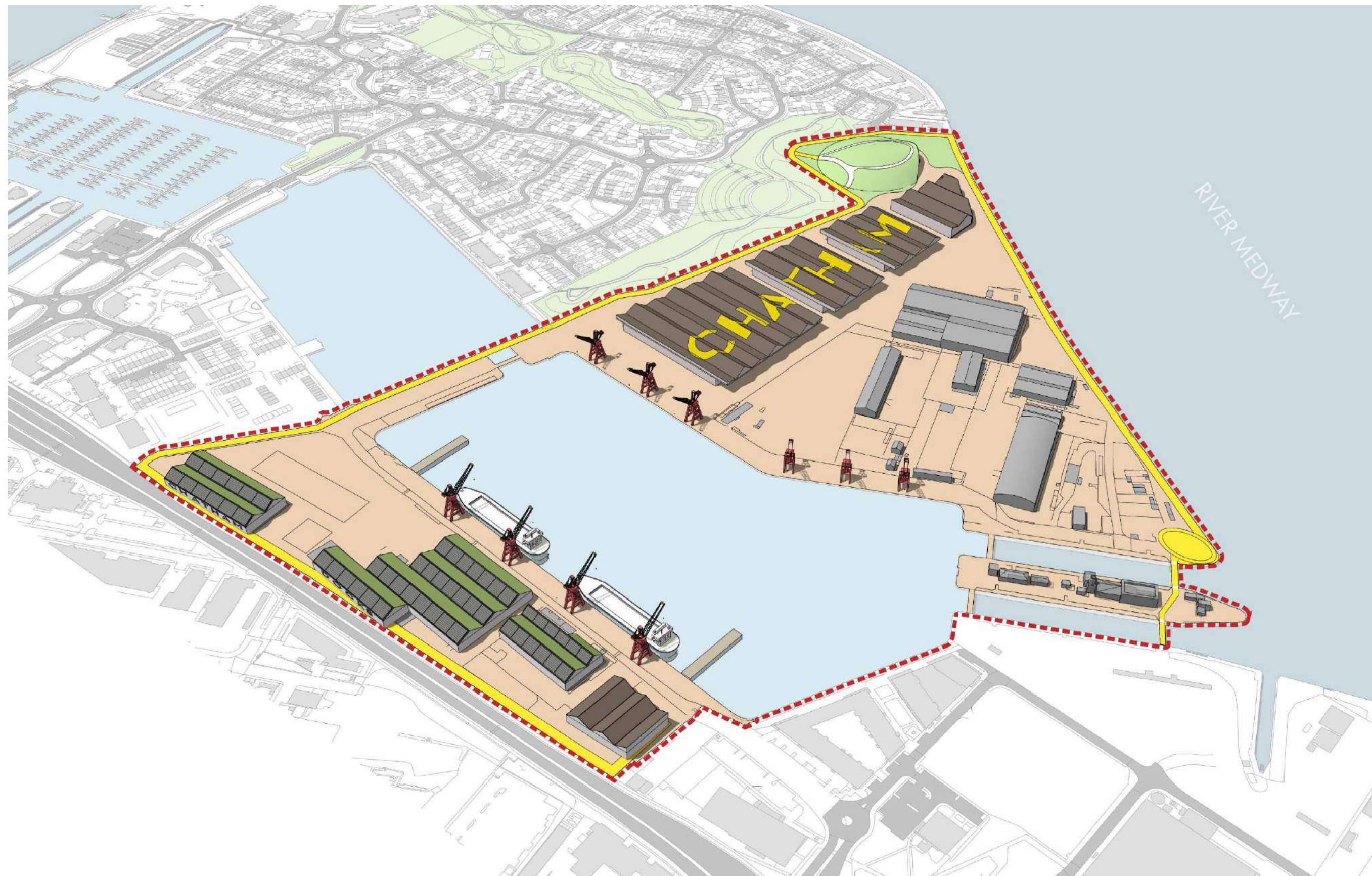
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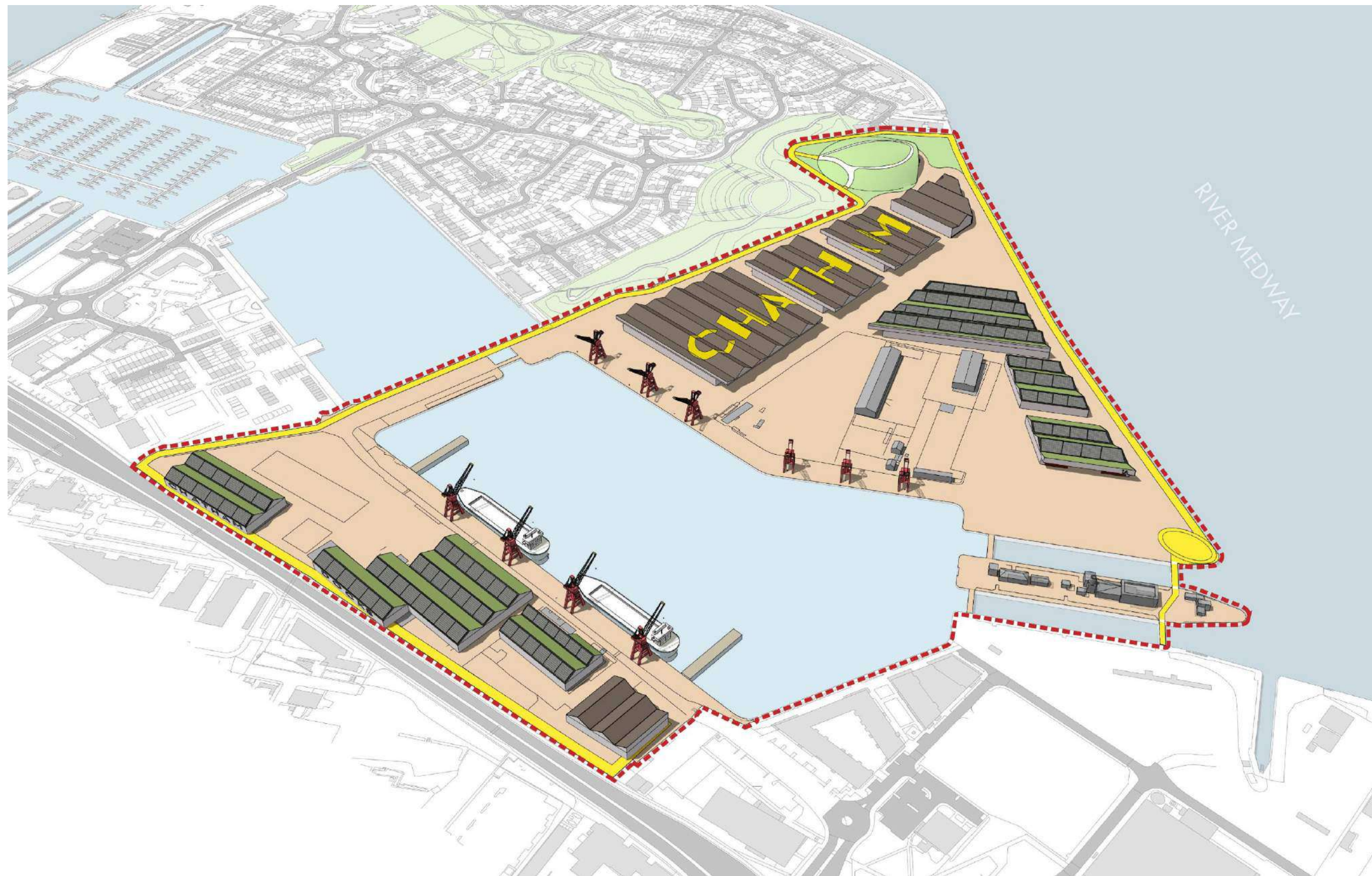


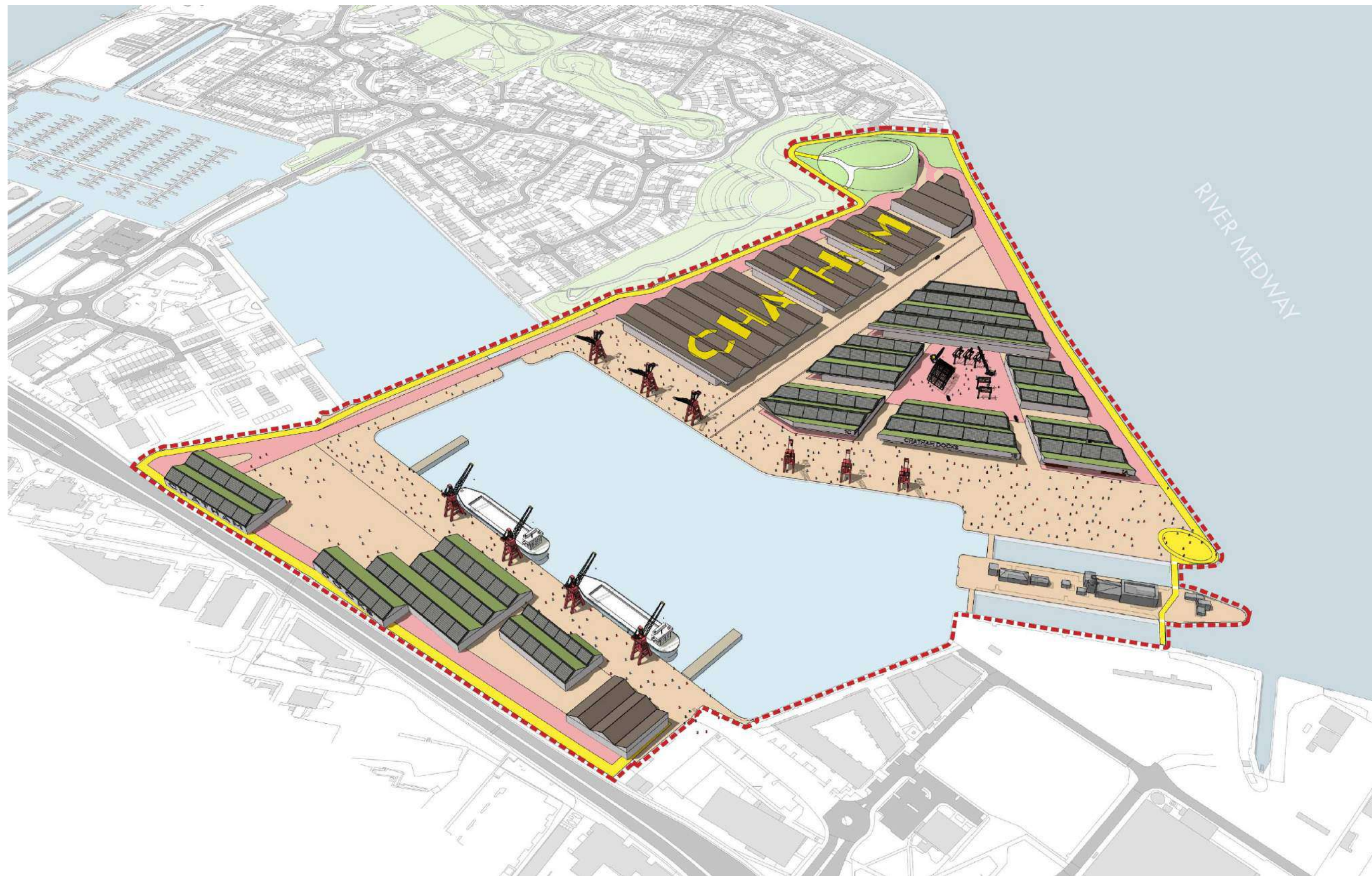












In Excess of **ONE**
million Sq/ft of
Employment Space
Created



Site Plan
Ground Floor Plan







PROPOSED AREA SCHEDULE		
BLOCK	Area	
	m ²	ft ²
Existing 1	4,637	49,913
Existing 2	9,944	107,037
D1	2,600	27,986
D2	2,823	30,387
A1	16,861	181,492
A2	9,800	105,487
A3	5,100	54,896
A4	4,419	47,566
B1	2,174	23,401
B2	3,572	38,449
B3	13,599	146,380
C1	4,609	49,611
C2	2,915	31,377
C3	3,309	35,618
E1	10,970	118,081
DEVELOPMENT TOTAL	97,332	1,047,682



Local Planning Authority
Medway Council
Gun Wharf
Dock Road
Chatham
Kent
ME4 4TR

planning.representations@medway.gov.uk

**Representation in response to
Medway Council's Regulation 19 pre-submission draft Local Plan**

Dear Local Planning Authority,

I write to you as a local resident in the village of ~~HIGH HILSTON~~ on the Hoo Peninsula. This is a representation in response to the Regulation 19 consultation on the legal compliance and soundness of the draft Local Plan. Please pass my representation on to the Independent Inspector when the plan is submitted for Examination.

The Local Plan is not legally compliant or sound for the following reasons.

- Duty to Cooperate (Section 33A, PCPA 2004). Evidence submitted by Medway Council is insufficient to demonstrate continuous, constructive, and active engagement with all prescribed bodies on strategic cross-boundary issues, contrary to NPPF paras 24–28.
- Failure to Comply with Regulation 18 and 19 Requirements. The consultation process is procedurally defective. There is inadequate evidence of meaningful engagement at Regulation 18, and insufficient regard has been paid to community representations in the Regulation 19 draft.
- Non-Conformity with the NPPF (December 2024). Numerous policies do not align with the legal obligations of the NPPF including sustainable development (para 11), plan-making (paras 15–36), and the treatment of Neighbourhood Plans (para 30–31).
- Non-Conformity with the Hoo St Werburgh & Chattenden Neighbourhood Plan (September 2024). The draft Local Plan conflicts with the Neighbourhood Plan's legally adopted policies, particularly in relation to infrastructure, landscape, community facilities, and housing.
- Insufficient Integration of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA). The Sustainability Appraisal fails to legally satisfy the SEA Directive, and the HRA is flawed in its methodology and fails to correctly apply the precautionary principle.
- Lack of Evidence for Infrastructure Delivery and Monitoring. The Infrastructure Delivery Plan and monitoring framework are vague and legally inadequate, contrary to Regulation 19 and NPPF para 35.

The Local Plan does not minimise development allocations on the Hoo Peninsula (an unsustainable and sensitive location) and maximise development allocations in the urban area (a more sustainable location, closer to existing infrastructure and transport links). This is crucial to reduce impacts on the Hoo Peninsula's habitats and wildlife - following the avoid, mitigate and compensate hierarchy.

Please turn over for further comments on the reverse.

Kind regards,

Name: Village Store.

Address: [REDACTED]

ME3 [REDACTED]

Date: 8th AUGUST 2025