



**Kent
Police**

Protecting and serving the people of Kent

Direct Line: [REDACTED]

E-mail: [REDACTED]

Date: 7th July 2025

Dear whom it may concern,

Thank you for opportunity to comment on the Medway's Local Plan for the period of 2025 to 2041.

These comments relate to Designing Out Crime via Crime Prevention Through Environmental Design (CPTED), the National Planning Policy Framework (NPPF) and Section 17 of the Crime and Disorder Act 1998.

CPTED:

Access and Movement: Places with well-defined routes, spaces and entrances that provide for convenient movement without compromising security;

Structure: Places that are structured so that different uses do not cause conflict;

Surveillance: Places where all publicly accessible spaces are overlooked;

Ownership: Places that promote a sense of ownership, respect, territorial responsibility and community;

Physical Security: Places that include necessary, well-designed security features;

Activity: Places where the level of human activity is appropriate to the location and creates a sense of security at all times;

Management and Maintenance: Places that are designed with management and maintenance in mind, to discourage crime in the present and future.

NPPF:

Dated December 2024

https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf

We draw your attention to the following paragraphs:

117 c); 96 b); 20 b); 102 a) and 102 b)

Section 17 of the Crime and Disorder Act 1998:

Without prejudice to any other obligation imposed on it, it shall be the duty of each authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, (a)crime and disorder in its area (including anti-social and other behaviour adversely affecting the local environment); and (b)the misuse of drugs, alcohol and other substances in its area and (c)re-offending in its area.

We also strongly recommend that the latest advice from the Secured by Design (SBD) Design Guides are included: www.securedbydesign.com is incorporated when considering development applications. SBD is the UK Police flagship initiative addressing designing out crime and security. In addition to design and layout advice, they list independently certificated companies and products that meet recognised security standards and have been responsible for consistently high reductions in crime as verified by numerous independent academic research studies of 87% reduction in burglaries in new homes. There is a carbon cost for crime and incorporating SBD provides opportunity for it to be addressed.

Recommendations from points in the draft report include:

New development plans should provide an explanation of how they can help address and encompass NPPF, Section 17, CPTED, and Secured by Design to avoid creating an opportunity for Crime, Fear of Crime, ASB, Nuisance and Conflict:

- Designs should protect the Local Green, amenity, leisure and recreation spaces.
- Designs should protect local footpaths, any bridleways, cycleways or formal desire lines.
- Sport and leisure access routes to be safe, with management and maintenance to help avoid them becoming "narrow, unsafe, urbanised routes".
- New housing should incorporate advice from SBD Homes 2019.
- New commercial developments should incorporate advice from SBD Commercial.
- Development layouts should maximise opportunity for natural surveillance e.g. windows in side elevations.
- Perimeter treatments can include densely planted hedging, walls and fencing.
- Corner Properties and any ground floor bedroom windows will require defensive treatments.
- Parking spaces require "active" windows so that the owners can see them unless in a secured area.
- Lighting to be designed by a qualified professional lighting engineer to provide security without creating conflict or light pollution.
- Physical security to meet SBD certified standards.

Yours's sincerely,

DOCO.

Designing Out Crime Officer

Strategic Prevention Command

SUBMISSIONS TO THE MEDWAY LOCAL PLAN REGULATION 19 2025

INTRODUCTION

These submissions to the Regulation 19 version of the new Medway Local Plan are made on behalf of Endeavour Gillingham Limited, the new owners of the Hempstead Valley Shopping Centre, Hempstead Valley Drive, Hempstead, ME7 3PD (the Centre). While representations were made to the regulation 18 version of the draft Plan, these focused solely on its retail policies. While a number of changes have been made and are broadly welcomed, these comments will continue to comment on the retail policies but will also now consider other policies of the plan. These are contained in this document.

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

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

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

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

RECENT PLANNING HISTORY

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

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

In 2015 permission was granted for a development of new retail and leisure space within the yellow car park comprising up to 7,522 sq m of retail space although 1,904 sq m of this could alternatively be used for leisure purposes. The car parking lost on the yellow car park is

principally to be replaced by way of a single decked car park on the blue and purple car parks together with some minor reconfiguration of the green car park. Although not completed, this permission remains extant.

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

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

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

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

This history demonstrates the Centre's ability to evolve and adapt to changes in retailing and related structural societal trends, especially post covid and flexibility for continued evolution is sought throughout the new plan period.

FUTURE ASPIRATIONS

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

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

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

The concept of a traditional town centre as a location primarily driven by retailing no longer exists; rather the entire environment around shopping and leisure has changed and will

continue to evolve and so the notion of a traditional centre being a fixed thing is open to challenge. Greater flexibility is required as evidenced by the changes to the Use Classes Order. For example centres become not just places to go and buy goods from – they are now nodes from where goods and services are distributed, recognising changing formats such as last mile delivery by the likes of Deliveroo linked to dark kitchens etc. To then try and restrict that evolution is counter productive.

Flexibility is also sought in order to accommodate changes in demographic profile, especially an aging population which it is evident that the Centre serves and is popular with.

RETAIL AND TOWN CENTRES

Section 8 of the Plan address retail and town centres; it includes inter alia a strategic policy S15 in relation to town centres generally, policy S16 in relation to a town centre hierarchy, policies on sequential and retail impact policies, and separate policies for each of the 6 main town centres, most relevant to these objections being policy S23 for Hempstead Valley District Centre. The plan is supported by the Medway Retail and Town Centres Study 2025.

Policies S15 and S16 are supported. Policy T16 as now amended from the Regulation 18 version is supported. It is noted however that the Proposals Map, nor Appendix A, contain a town centre boundary for Hempstead Valley (notwithstanding para 8.2.10 states “Refer to Appendix A for maps of each town and district centre, their proposed Primary Shopping Areas to which this policy relates.”). This is inconsistent with the other main centres which each have a town centre boundary; it is also a change compared to the adopted Local Plan. The lack of a boundary is contrary to NPPF para 90 (b) which requires policies to “define the extent of town centres...”

Accordingly an objection is made to the plan and an amendment sought to include a town centre boundary for Hempstead Valley Shopping Centre. The extent of the defined centre should include the main centre, The Venue, Sainsburys petrol station, the surrounding car parks and the Hungry Fox public house (as per the 2003 adopted plan).

Policy T17 sets out the requirements for an impact assessment for retail and leisure proposals “in edge or out of centre locations including retail parks, leisure designations and Hempstead Valley Shopping Centre”. Separate thresholds are set for convenience and comparison retailing, and leisure uses.

Hempstead Valley is singled out from the other main centres by having a requirement to undertake an impact assessment. There is an ambiguity in the wording which could either mean the impact assessment is required in edge or out of centre locations including Hempstead Valley i.e. not within Hempstead Valley but on it’s edge; or in all cases in relation to retail parks, leisure parks and Hempstead Valley whether edge of centre or not. It is assumed the latter (see policy S23) and that an impact assessment would be needed for any retail or leisure proposals, over the threshold sizes, either in Hempstead Valley District Centre or on the edge of it.

This would be contrary to NPPF para 94 which refers only to impact assessments outside town centres and which are not in accordance with an up to date development plan. The supporting text to policy T17 provides no justification for the different treatment of Hempstead Valley compared to the other main centres. For this reference has to be made to Policy S23 and para 8.13. This argues that since Hempstead Valley is different to a traditional town centre and has no high street, and it could have the potential to impact on Chatham town centre there is

justification for a policy which seeks to “protect other town centres and retain and manage the hierarchy of centres”. A criteria based policy is said to be a sound way to achieve this.

We object to this requirement; it is contrary to NPPF and is not justified by the reasons given in the plan or evidence base. We have previously supported the town centre hierarchy policy which includes sub para 1 (b) which states that “The Council will seek to maintain a balanced provision of uses appropriate and reflective of the character, scale and role of these centres (individually and in relation the Chatham to maintain the hierarchy): Strood, Gillingham, Rainham, Rochester, and Hempstead Valley.” This approach is more common in requiring new development to respect the town centre hierarchy without the need for an impact assessment for in centre development which would then be in accord with the NPPF. Accordingly an amendment to delete Hempstead Valley from policy T17 and S23 is sought.

HOUSING POLICY

The owners of the Hempstead Valley Shopping Centre are considering the potential for the inclusion of an element of housing with the centre, potentially open market or specialist housing such as sheltered housing or care home. This is generally encouraged by the draft Plan’s town centre policies such as policy S15. However some aspects of the Plan’s housing policies would discourage or limit the extent to which Hempstead Valley could deliver new housing. In this regard reference is made to policy T2: Housing Mix.

We object to the reference in Policy T2 paragraphs 2 and 3. Paragraph 2 suggests that residential development will only be permitted if it includes a mix of residential types. There may well be sites and opportunities that are suitable for certain types of residential use, and which as part of a wider neighbourhood, would be sustainable in the sense of providing a mix of dwelling types. However the use of the word “only” in the policy suggests that every residential development on its own must provide such a mix. The deletion of “only” is sought.

Paragraph 3 of the policy includes that developments must be “appropriate to the size, location and characteristics of the site as well as to the established character and density of the neighbourhood”. It is considered that the reference to established character and density of the neighbourhood is unduly restrictive and in some instances inappropriate. In the case of Hempstead Valley it is in part bounded by low density suburban housing but as a town centre it would be inappropriate to restrict development to a similar character and density. The second half of the statement should be deleted from “as well as...”.

Policy T3 concerns affordable housing. All developments of over 10 units are required to deliver affordable housing with the rate of such provision set out in the policy, ranging from 30% to 10% depending on circumstances. The policy is unclear whether the 10% provision on previously developed land applies to brown field sites in lower value areas only, or on all previously developed land.


The Viability Assessment notes that affordable housing is unlikely to be viable for specialist housing (sheltered or extra care) – see para 12.84. This should be added to policy T3.

We object to the omission of a zero rate of affordable housing for sheltered and extra care housing in policy T3.

Policy T27 is concerned with Health Inequalities. The policy includes restrictions of certain types of “unhealthy” uses which includes off-licences and hot food takeaways. Specific aspects of this policy are inappropriate, in particular reference to “places where young people congregate”. This would be a highly subjective assessment and would include for example town centres where otherwise such uses are supported. It is more normal for policy to refer to specific locations, such as schools.

We object to the inclusion of “are within walking distance of locations where children and young people congregate or” and rewording of the remainder.

Model Representation Form for Local Plans

	Local Plan Publication Stage Representation Form	Ref: (For official use only)
---	---	---

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*

2. Agent's Details (if applicable)

**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.*

Title	<input type="text"/>	<input type="text" value="Mr"/>
First Name	<input type="text"/>	<input type="text" value="Eric"/>
Last Name	<input type="text"/>	<input type="text" value="Hall"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Director"/>
Organisation (where relevant)	<input type="text" value="Endeavour Gillingham Limited"/>	<input type="text" value="TDH Estates"/>
Address Line 1	<input type="text"/>	<input type="text" value="11 Old Road North"/>
Line 2	<input type="text"/>	<input type="text" value="Kempsey"/>
Line 3	<input type="text"/>	<input type="text" value="Worcester"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="WR5 3JZ"/>
Telephone Number	<input type="text"/>	<input type="text" value=""/>
E-mail Address	<input type="text"/>	<input type="text" value=""/>

(where relevant)

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 Policy Policies Map ☒

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

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.

Absence of a town centre boundary is inconsistent and makes it difficult to apply other policies of the Plan

(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.

Inclusion of a town centre boundary.

(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:


Hempstead Valley Shopping Centre is an important part of the area, policies which affect it need to be explored carefully and in the round.

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>

Model Representation Form for Local Plans

 Medway COUNCIL <i>Serving You</i>	Local Plan Publication Stage Representation Form	Ref: (For official use only)
---	---	---

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*

2. Agent's Details (if applicable)

**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.*

Title	<input type="text"/>	<input type="text" value="Mr"/>
First Name	<input type="text"/>	<input type="text" value="Eric"/>
Last Name	<input type="text"/>	<input type="text" value="Hall"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Director"/>
Organisation (where relevant)	<input type="text" value="Endeavour Gillingham Limited"/>	<input type="text" value="TDH Estates"/>
Address Line 1	<input type="text"/>	<input type="text" value="11 Old Road North"/>
Line 2	<input type="text"/>	<input type="text" value="Kempsey"/>
Line 3	<input type="text"/>	<input type="text" value="Worcester"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="WR5 3JZ"/>
Telephone Number	<input type="text"/>	<input type="text" value=""/>
E-mail Address	<input type="text"/>	<input type="text" value=""/>

(where relevant)

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 Policy Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="X"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

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.

Refer to accompanying objections; the inclusion of "only" in para 2 is misleading and inappropriate. In addition reference to the established character and density of an area.

(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.

Deletion of "only"
Deletion of the words in paragraph 3 of the policy from "as well as" onwards

(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:


Hempstead Valley Shopping Centre is an important part of the area, policies which affect it need to be explored carefully and in the round.

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>

Model Representation Form for Local Plans

 Medway COUNCIL <i>Serving You</i>	Local Plan Publication Stage Representation Form	Ref: (For official use only)
---	---	---

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*

2. Agent's Details (if applicable)

**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.*

Title	<input type="text"/>	<input type="text" value="Mr"/>
First Name	<input type="text"/>	<input type="text" value="Eric"/>
Last Name	<input type="text"/>	<input type="text" value="Hall"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Director"/>
Organisation (where relevant)	<input type="text" value="Endeavour Gillingham Limited"/>	<input type="text" value="TDH Estates"/>
Address Line 1	<input type="text"/>	<input type="text" value="11 Old Road North"/>
Line 2	<input type="text"/>	<input type="text" value="Kempsey"/>
Line 3	<input type="text"/>	<input type="text" value="Worcester"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="WR5 3JZ"/>
Telephone Number	<input type="text"/>	<input type="text" value=""/>
E-mail Address	<input type="text"/>	<input type="text" value=""/>

(where relevant)

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 Policy Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="X"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

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.

The absence of a zero rate band in the policy is contrary to the evidence base.

(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.

Inclusion of a zero rate band.

(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:


Hempstead Valley Shopping Centre is an important part of the area, policies which affect it need to be explored carefully and in the round.

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>

Model Representation Form for Local Plans

 Medway COUNCIL <i>Serving You</i>	Local Plan Publication Stage Representation Form	Ref: (For official use only)
---	---	---

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*

2. Agent's Details (if applicable)

**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.*

Title	<input type="text"/>	<input type="text" value="Mr"/>
First Name	<input type="text"/>	<input type="text" value="Eric"/>
Last Name	<input type="text"/>	<input type="text" value="Hall"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Director"/>
Organisation (where relevant)	<input type="text" value="Endeavour Gillingham Limited"/>	<input type="text" value="TDH Estates"/>
Address Line 1	<input type="text"/>	<input type="text" value="11 Old Road North"/>
Line 2	<input type="text"/>	<input type="text" value="Kempsey"/>
Line 3	<input type="text"/>	<input type="text" value="Worcester"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="WR5 3JZ"/>
Telephone Number	<input type="text"/>	<input type="text" value=""/>
E-mail Address	<input type="text"/>	<input type="text" value=""/>

(where relevant)

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 Policy Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="X"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

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.

The inclusion of areas where youths and children congregate may exclude locations where hot food takeaways are most appropriate based on other policies of the Plan and is therefore unduly restrictive.

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.

Deletion of references to "other areas where youths and children congregate"

(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:


Hempstead Valley Shopping Centre is an important part of the area, policies which affect it need to be explored carefully and in the round.

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>

Model Representation Form for Local Plans

 Medway COUNCIL <i>Serving You</i>	Local Plan Publication Stage Representation Form	Ref: (For official use only)
---	---	---

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*

2. Agent's Details (if applicable)

**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.*

Title	<input type="text"/>	<input type="text" value="Mr"/>
First Name	<input type="text"/>	<input type="text" value="Eric"/>
Last Name	<input type="text"/>	<input type="text" value="Hall"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Director"/>
Organisation (where relevant)	<input type="text" value="Endeavour Gillingham Limited"/>	<input type="text" value="TDH Estates"/>
Address Line 1	<input type="text"/>	<input type="text" value="11 Old Road North"/>
Line 2	<input type="text"/>	<input type="text" value="Kempsey"/>
Line 3	<input type="text"/>	<input type="text" value="Worcester"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="WR5 3JZ"/>
Telephone Number	<input type="text"/>	<input type="text" value=""/>
E-mail Address	<input type="text"/>	<input type="text" value=""/>

(where relevant)

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 Policy Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="X"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

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.

Refer to accompanying objections; the requirement for an impact test is contrary to NPPF.

(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.

Deletion of relevant parts of these policies.

(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:

Hempstead Valley Shopping Centre is an important part of the area, policies which affect it need to be explored carefully and in the round.

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>

5 August 2025



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

Ben Tattersall

33 Margaret Street W1G 0JD

savills.com

Dear Sir/Madam,

REPRESENTATION ON BEHALF OF UNIVERSITY OF KENT IN RELATION TO MEDWAY COUNCIL'S REGULATION 19 (LOCAL PLAN) CONSULTATION

We are instructed by University of Kent ('the University') to submit representations to the Regulation 19 'Medway Local Plan 2041', which is subject to consultation until Monday 11 August 2025. At this stage the Regulation 19 consultation provides the final opportunity to make comments on the draft Local Plan, which includes details on proposed policies and site allocations for development, prior to submission of the Plan to the Secretary of State. This representation builds on previous representations submitted on behalf of the University to the previous Regulation 18 consultation held in Summer 2024.

Background and Context

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

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

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

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

Key to the University's strategy has been the establishment of the Institute for Creative and Cultural Industries (iCCI), which builds on Kent's strengths in design, media, digital arts and human-computer interaction work with strategic bodies such as the Creative Industries Federation and Arts Council England, to equip students with the necessary skills to support the development of the creative and cultural industries in the region, be at

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

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

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

Representations

We have reviewed the latest draft of the Local Plan and the University welcomes the recognition made in the local plan to the contributions University's make in Medway. The continued support under the local plan ensures the University's operations within the Borough can be sustained and enhanced. The University is particularly pleased to see changes made to the draft Local Plan following our previous representation to the Regulation 18 consultation which took place in 2024. These changes include:

- Progression of a 'brownfield first' approach to deliver new housing and development in urban centres and waterfront locations under the Spatial Development Strategy. This will support the University through delivering high-quality placemaking on large areas of brownfield land surrounding Pembroke Campus and at the Historic Dockyard;
- Revisions to Policy S14 (Supporting Medway's culture and creative industries) to specifically recognise higher education's role in the creative industries to deliver continued growth in Medway's cultural and creative industries, notably in equipping local people with the skills and industry connections required to enter into the cultural and creative industries. Suggested wording found within our previous representation has since been integrated into the policy wording which supports the University's position in Medway, particularly with landmark investment in The Docking Station at the Chatham Historic Dockyard.
- Continued support for Chatham Town Centre under Policy S17 (Chatham Town Centre) which seeks to support Chatham's high street offer of retail, community uses and services, commercial leisure (food and beverage), creative uses, culture and tourism. The University relies in the Town Centre to satisfy local student and staff need in the absence of on Campus facilities for retail and leisure uses such as gyms and cafes. This is supported as it will ensure that the town centre remains an attractive node for students to use local facilities, study in informal workspaces and socialise with peers.

Further to the University's comments on the Regulation 18 Draft Local Plan, the sole comment the University has on the Regulation 19 local plan concerns Chapter 14 (Site Allocations), principally Site Allocation CCB25 Riverside (Interface Land).

Site Allocation CCB25 Riverside (Interface Land)

As set out previously, the iCCi is developing 'The Docking Station' at Chatham Historic Dockyard, an innovative project that will convert the former Police Section House and the land to the rear of the building into a 'creative industries' accelerator space.

The University notes there are two proposed allocations under the draft local plan surrounding The Docking Station - CCB35 Brunel (Interface Land) and CCB25 Riverside (Interface Land). Allocation CCB35 is currently proposed to be allocated for mixed-use and allocation CCB25 is proposed to be allocated for residential.

The University requests that site allocation CCB25 (River Interface Land) is allocated as mixed-use, rather than as residential. Paragraph 125 of the NPPF states that planning policies should encourage multiple benefits from both urban and rural land, including through mixed use schemes. It is considered that allocation CCB35 presents an opportunity to deliver multiple benefits through a mixed-use scheme complimentary to the University and wider Historic Dockyard,

A mixed-use allocation will provide greater flexibility on the type of uses to be brought forward on the Dockyard, which as existing comprises a rich mix of uses including residential, commercial, leisure and education uses. A mixed-use allocation would align with the existing character of the Historic Dockyard and would be beneficial to the University's existing and future operations to promote a sustainable and vibrant neighbourhood providing a range of uses, including commercial, retail and leisure uses, which will create an attractive environment for students, staff and visitors, complimentary to the University's operations from the Dockyard.

A mixed-use allocation will be compatible with the University Strategy 2025, to deliver a fresh and exciting vision for the Medway Campus which addresses current student recruitment challenges and staff and student experiences. This includes to deliver business engagement and support for the creative industries, education and skills development, and community engagement at the Docking Station. All of these benefits would assist the University to deliver on its civic mission for Medway. For these reasons, it is requested that the Council consider a mixed-use allocation for 'CCB25' Riverside (Interface Land).

Conclusion

We are delighted to participate in the public consultation on the Regulation 19 Medway Local Plan 2041 and to submit these representations on behalf of University of Kent. Our client plays a fundamental role in providing access to Higher Education in Medway, promote skills growth and contribute to key growth sectors in the local economy, notably the cultural and creative industries. The University of Kent welcomes the recognition that is given in the draft Local Plan, but request the Council to consider a mixed-use allocation for 'CCB25' Riverside (Interface Land), which would be more aligned with creating a vibrant neighbourhood at the Dockyard and support the University's long-term vision for the area and supporting its Civic mission.

Please would you acknowledge receipt of this representation. We reserve the right to supplement this representation. Please contact either myself or Jacob Ashford [REDACTED] should you have any queries.

Your faithfully,

[REDACTED]
Ben Tattersall
Associate