

Hearing Statement

Matter 4 – Built Environment

Issue

Whether the Plan and its policies on the built environment are clear, positively prepared, justified, effective and consistent with national policy.

Questions

Policy T1: High Quality Design and Amenity

- 4.1 What evidence demonstrates that the Plan's design policies will secure development of a higher quality than would otherwise be achieved through the application of national policy and existing development management processes?
 - 4.1.1 Policy T1 brings reference to local design guidance and alignment with corporate strategies. These provide the basis for more specific consideration of local characteristics and issues than the requirements in national policy and these support the existing development management processes. Adopted design guidance, including the Chatham Design Code (ref: B14) and the Star Hill to Sun Pier Development Framework, along with the Landscape Character Assessment (ref: B7) and Heritage Asset Review (ref: B9) evidence base - provide detailed, local, place-specific design parameters that go beyond the generic requirements of national policy and can help achieve more consistent and context-sensitive development outcomes.
 - 4.1.2 The Chatham Design Code (ref: B14) has enabled higher quality design in recent developments through its application and the requirement for non-compliant schemes to have a minimum of two independent Design Review Panels to go through an exemplary design process. This was the case for recent approvals/resolutions to approve at Clover Street (MC/25/0846) - improved design through compliance and Go Outdoors, The Brook (MC/24/2495) and the use of Design Review Panels for 'code breaking'.
 - 4.1.3 In addition, the Design, character and site context referenced in the sixth bullet point in Policy T1 -on the transition from urban edge to rural will (and have already begun to) inform the masterplans for West of Strood, Capstone Valley and Rainham Parkside, strategic site allocations in the Plan.
 - 4.1.4 In conjunction with Policy T27, this Policy T1 provides opportunities to secure greater contributions to the health and wellbeing of Medway's communities,

which is a corporate priority. This recognises significant health inequalities in Medway and below average health outcomes. These ambitions are reflected in the vision and strategic objectives of the Plan.

- 4.2 How have the Council's character assessments, urban design evidence and place-making studies informed the requirements of the policy, and how do those requirements respond to the distinct character of different parts of Medway?
- 4.2.1 The evidence provided in character assessments, urban design evidence and place-making studies has identified issues of particular significance to Medway. These are reflected in the criteria in Policy T1. The Adopted design guidance, including the Chatham Design Code (ref: B14) and the Star Hill to Sun Pier Development Framework, along with the Landscape Character Assessment (ref: B7) and Heritage Asset Review (ref: B9) evidence base provide the local context for the different parts of Medway, and Policy T1 acts as the delivery mechanism requiring development proposals to respond to that context as required by bullet point 2 of Design, character and site context.
- 4.2.2 The design guidance documents identify and provide the principal evidence base for understanding local character, the distinctive qualities of Medway's towns, waterfronts, historic centres, suburban areas and landscapes that should be conserved, reinforced and reflected in new development. The supporting text emphasises the need for development to respect local distinctiveness, heritage assets and the varied character found across Medway.
- 4.2.3 Policy T1 reflects this evidence by moving beyond a generic design approach and requiring development to be context-led. Rather than applying a single design solution across the borough, the policy seeks development that responds to the specific characteristics, scale, form and appearance of its surroundings. The adoption of the Chatham Design Code (ref: B14) demonstrates how urban design evidence has been translated into detailed local requirements. The Design Code establishes place-specific expectations for built form, streets, public realm, movement and townscape quality, reflecting the particular character and regeneration ambitions of Chatham rather than relying solely on national design principles.
- 4.2.4 Similarly, the Star Hill to Sun Pier Development Framework provides a place-making framework tailored to a distinctive historic and waterfront area. The Local Plan identifies adherence to this guidance as important in delivering coherent, high-quality environments and avoiding piecemeal development that could undermine local character. As an example, the [Star Hill to Sun Pier Conservation Area Appraisal, 2024](#) assessed the components which define the distinctive character of this area. The associated Star Hill to Sun Pier Conservation Area

Management Plan provided guidance on materials and approach. The content and criteria in Policy T1 align with the scope of matters in the evidence base.

- 4.2.5 The policy responds to differences across Medway by recognising that design considerations will vary between locations. For example, development within historic urban areas will need to respond to heritage significance and established townscape patterns, while development in waterfront, regeneration or edge-of-settlement locations may need to respond to different landscape, visual and placemaking considerations. The Landscape Character Assessment (ref: B7) provides guidance reflected in the Policy that will help manage development in rural and suburban areas.

4.3 Are the design requirements sufficiently clear and precise to provide certainty for applicants, decision-makers and local communities, whilst remaining flexible enough to accommodate differing site circumstances?

- 4.3.1 Yes, Policy T1 provides a clear overarching framework for high-quality, context-led design, supported by adopted guidance which add place-specific guidance and greater certainty for applicants and decision-makers.

- 4.3.2 The policy is generally flexible, requiring development to respond to local character and site context rather than prescribing uniform design solutions across Medway. The policy has been begun to be used to inform and evolve schemes through the pre-application procedure and has been successful in its intentions.

- 4.3.3 Design guidance is being continually reviewed and future new/enhanced/replacement guidance to reinforce the regeneration/design requirements is being developed.

4.4 How will the policy ensure that strategic allocations and major regeneration sites deliver coherent, attractive and well-designed places rather than individual development parcels considered in isolation?

- 4.4.1 Policy T1 requires a comprehensive, place-making approach by requiring development to respond to its wider context within Medway, the local character and surrounding environment, rather than considering individual sites in isolation.

- 4.4.2 For major regeneration areas, site-specific policies directly relate to the vision-led policy wording which supports coordinated development across multiple parcels. This coordinated approach is taking place along the River Waterfront sites (SA4) where a comprehensive approach to the development has begun.

- 4.4.3 Existing development briefs and masterplans for the strategic sites, will ensure an appropriate design solution depending on local character. Work has begun on

the masterplans for the strategic sites (including cross boundary sites) to ensure it is a coordinated approach. This work is reflected in the Statements of Common Ground with developers and promoters of strategic site allocations.

4.4 What evidence demonstrates that the design and amenity standards are deliverable and viable when considered alongside affordable housing, infrastructure, climate change and biodiversity requirements?

4.4.1 The Policy T1: High Quality Design and Amenity policy requirements were tested in the Local Plan Viability Assessment (Ref: B5) in Chapter 8 (paragraphs 8.36 to 8.39) and findings and recommendations set out in Chapter 12. The Viability Assessment (ref: B5) at paragraph 8.36 stated that Policy T1 *‘does not add to the cost of development, over and above those set out elsewhere in this report’*. Information on developer consultation and engagement in the preparation of the Viability Assessment (Ref: B5) is set out in Appendices 2 and 3.

4.4.2 Confidence in deliverability relies largely on the overall plan-wide viability evidence which tests the cumulative impact of Local Plan requirements, showing that development can accommodate design, affordable housing, infrastructure, climate and biodiversity requirements without undermining implementation of the Local Plan. These conclusions are set out in Chapter 12 of the Viability Assessment (ref: B5), from paragraph 12.69, page 198. This includes an element of flexibility for professional judgement on some individual sites given the changing markets, climate change response and changes to biodiversity requirements. However, these would be the exception and would form an essential part of the discussion at pre-application stage.

4.5 How does the policy ensure that all future occupiers will benefit from a high standard of amenity, including adequate daylight, sunlight, privacy, outlook, internal space, outdoor space and protection from noise and disturbance?

4.5.1 The policy ensures, in the Amenity and inclusivity section, that new residential development would achieve the internal space required by the National Space Standards, supported by Policy DM5.

4.5.2 The provision for future residents of high standard of amenity including adequate daylight, sunlight, privacy, outlook, outdoor amenity space and noise mitigation is to be secured through the first part (which should be a bullet point) of the Amenity and inclusivity section of the Policy T1:

‘Provides a suitable level of amenity for future occupiers including compliance with the National Space Standards and respects the amenity of neighbouring occupiers, and uses, and does not result in significant harm in relation to light levels, overshadowing, overlooking, loss of privacy, visual intrusion, vibration, noise and fumes, and appropriately designed car parking.

- 4.6 How have potential conflicts between achieving higher densities and maintaining acceptable living conditions been addressed within the policy framework?
- 4.6.1 Policy T1 addresses potential conflicts at both a more strategic level in directing the most appropriate to development density, and at a specific household level, where application of Policy T1 can secure acceptable living conditions, such as in HMOs. The Amenity and inclusivity section of the Policy specifically refers to establishing healthy communities, the use of shared spaces, and provision for play. This can be applied in circumstances such as development for housing in urban centres, where high density would be supported, but with the expectation that development provides for residents', including families, needs. It supports higher-density development through a design-led approach, requiring schemes to respond positively to local character and context while delivering high-quality environments. The 'Chatham Design Code (ref: B14) 'code breaking' element has already been used successfully to achieve highly dense but lower massing of development than was otherwise being brought forward, whilst ensuring compliance with the National Space Standards.
- 4.6.2 The policy framework does not treat density as an objective in isolation; development must also achieve good design, amenity and place-making outcomes. High density does not have to come at the expense of levels of amenity. Adherence to the National Space Standards will ensure adequate internal space for future residents of higher density development and the design requirements of DM5 for higher density development include shared outdoor amenity space (bullet point 2).
- 4.7 What safeguards exist to ensure that proposals do not result in unacceptable impacts upon the amenity of existing residents through overlooking, overshadowing, overbearing effects, noise or other forms of disturbance?
- 4.7.1 Safeguards against overlooking, overshadowing, overbearing impacts, noise and disturbance are strengthened through site-specific assessments, supporting evidence and planning conditions where necessary. T1 requires this consideration in the Amenity and inclusivity section of the Policy "...respects the amenity of neighbouring occupiers, and uses, and does not result in significant harm in relation to light levels, overshadowing, overlooking, loss of privacy, visual intrusion, vibration, noise and fumes..."
- 4.8 How will the Council assess whether development proposals have successfully responded to local character whilst also encouraging innovation and high-quality contemporary design?
- 4.8.1 Policy T1 will be implemented through the assessment of how proposals respond to their site context, local distinctiveness, townscape, landscape and

heritage characteristics identified in the Council's evidence base as demonstrated within proposal applications, and in conjunction with Policy DM5.

- 4.8.2 The Council will draw on studies such as the Chatham Design Code (ref: B14) and Star Hill to Sun Pier Development Framework to evaluate whether schemes reflect locally specific design expectations and place-making objectives.
- 4.8.3 The policy and supporting documents remain sufficiently flexible to support innovation by focusing on design outcomes rather than prescribing architectural styles.
- 4.8.4 High-quality contemporary design may therefore be supported where it demonstrably enhances local character and contributes positively to its surroundings.
- 4.9 What mechanisms, including masterplans, design codes, design review processes or monitoring arrangements, will be used to secure and maintain high quality design throughout the Plan period?
- 4.9.1 The Chatham Design Code (ref: B14) and Star Hill to Sun Pier Development Framework, provide detailed, place-specific design guidance and expectations.
- 4.9.2 The policy allows for further production of codes and development frameworks where appropriate. Strategic allocations and regeneration areas are to be guided by masterplans and development frameworks to ensure comprehensive, coordinated development rather than piecemeal proposals.
- 4.9.3 Medway uses Planning Performance Agreements, which include Design Review Panel Assessments and also Members presentations to raise the quality of design.
- 4.9.4 Monitoring arrangements through annual design reviews with officers and members and Medway design awards every 5 years.
- 4.9.10 We will be monitoring the number and percentage of applications refused on design grounds as shown in the submitted monitoring framework.

Policy DM5: Housing Design

- 4.10 What evidence is there to show that Policy DM5 will secure higher quality residential development than would otherwise be achieved through national policy and existing development management processes?
- 4.10.1 Locally adopted design guidance, such as Chatham Design Code 2024 (ref: B14), Star Hill to Sun Pier Development Framework 2024 and conservation area appraisals and management plans are prepared with an analysis of local characteristics and provide guidance that specifically respond to these

assessments. Such documents provide a basis for requiring housing that responds to Medway's distinctive character and place-making objectives.

4.10.2 The policy includes reference to the local Medway Housing Design Standards. These include areas not covered in the National Standard, such as shared outdoor amenity space.

4.11 How have local character assessments, design evidence and place-making studies informed the housing design requirements, and how do those requirements respond to the differing character of Medway's urban, suburban and rural areas?

4.11.1 Policy DM5 is informed by Medway's wider evidence base, including the Landscape Character Assessment (ref: B7), Heritage Asset Review (ref: B9) and locally prepared design guidance, which identify the distinctive qualities of different settlements and neighbourhoods across the authority. Neighbourhood Plans in Medway have also considered local characteristics in different urban and rural areas.

4.11.2 The policy requires housing design to be context-led, reflecting the scale, form, density and character of its surroundings rather than applying a uniform design approach across Medway, thus responding to this evidence.

4.11.3 This enables differing responses in urban regeneration areas, suburban neighbourhoods and rural settlements, ensuring new housing reinforces local identity while supporting high-quality place-making.

4.11.4 Supporting design codes and frameworks such as Chatham Design Code 2024 (ref: B14) and Star Hill to Sun Pier Development Framework 2024 provide additional area-specific guidance where appropriate.

4.12 Are the housing design requirements sufficiently clear, precise and flexible to ensure consistent decision-making whilst accommodating different site circumstances and forms of development?

4.12.1 Clarity is provided by referencing standards such as National Space Standards (Amenity and inclusivity 1st para), Medway Housing Design Standards (Policy DM5 bullet point 2) and the relevant local area design guides and codes (Design, character and site context bullet point 2).

4.12.2 Flexibility is maintained by requiring development to respond to site context, character and local circumstances rather than imposing a single housing design solution across Medway. The policy sets specific standards, however, for outdoor space in accordance with the Medway Housing Design Standards, which itself builds in flexibility for constrained sites.

- 4.12.3 Existing guidance relating to areas of historic value is referenced, which give broad guidance for local distinctiveness without being prescriptive.
- 4.13 How will Policy DM5 ensure that new homes provide a high standard of living accommodation and residential amenity, including matters such as internal space, outlook, privacy, daylight, amenity space and accessibility?
- 4.13.1 Applications will be assessed against DM5 alongside Policy T1, national policy and supporting design guidance to ensure housing quality is not compromised by density or site constraints.
- 4.13.2 The requirement for adherence to the National Space Standards brings it into a Policy requirement. Inspectors (and some developers) consider the National Space Standards as guidance at the present time as it is not enshrined in Policy.
- 4.13.3 Accessibility requirements will help ensure homes remain inclusive and adaptable to changing needs over time.
- 4.14 What evidence demonstrates that the housing design requirements are deliverable and viable when considered alongside affordable housing, infrastructure, biodiversity, climate change and other policy obligations?
- 4.14.1 The Policy DM5: Housing Design policy requirements were tested in the Local Plan Viability Assessment (Ref: B5) in Chapter 8 (paragraphs 8.40 to 8.42) and findings and recommendations set out in Chapter 12. Information on developer consultation and engagement in the preparation of the Viability Assessment (Ref: B5) is set out in Appendices 2 and 3.
- 4.14.2 Schemes are being delivered currently that adhere to the requirements.
- 4.15 Why is the proposed Housing Design policy the most appropriate approach to securing high quality homes across Medway, and what evidence demonstrates that it can be consistently delivered throughout the Plan period?
- 4.15.1 The policy is informed by Medway's character, heritage and urban design evidence base, helping to ensure that new homes respond to local circumstances rather than relying solely on generic national policy.
- 4.15.2 Deliverability is supported by the Council's Viability Assessment and the use of established national and local standards, development management processes, design guidance and design codes to secure implementation throughout the Plan period.
- 4.15.3 Consistent delivery will depend on clear, measurable policy requirements and ongoing monitoring through planning decisions.

Policy DM6: Sustainable Design and Construction

4.16 What evidence is there to show that the Plan's Sustainable Design and Construction policy is necessary to address Medway's climate change objectives and will achieve outcomes beyond those secured through Building Regulations and national policy?

4.16.1 The vision and strategic objectives for the plan respond to specific issues and opportunities in Medway. The Council clearly states in its vision for the Plan (notably in paragraphs 2 and 3) and the overarching strategic objective – Prepared for a sustainable and green future the importance of securing greater sustainability in growth over the Plan period. These identify the importance of reducing emissions and improving environmental performance across all development. Policy DM6 clearly contributes to delivering on the vision and strategic objective. The Policy can require development to address locally important matters such as climate resilience, overheating, green infrastructure, sustainable drainage, water efficiency and site-wide carbon reduction measures.

4.16.2 Evidence of need is provided by the Council's Climate Action Plan and wider evidence base for the Plan climate change objectives and supporting evidence base. The supporting text also refers to Historic England Advice Notes, such as Climate Change and Historic Building Adaptation, which support the re-use of buildings. This is reflected in the sixth bullet point of the Policy.

4.16.2 Medway is a recognised seriously stressed water area, as reflected in the Southern Water's Water Resource Management Plan. There is a strong case in Kent and Medway for promoting greater water efficiency standards. The Policy responds to the option available to Local Planning Authorities to reduce usage levels below the national Building Regulations standard.

4.16.3 The Policy references use of good practice and well-established tools and standards, such as Building for a Healthy Life and Building with Nature standards to clarify expectations and requirements. Use of these tools, where relevant, or technically and financially viable, will achieve outcomes beyond Building Regulations in higher standards for energy efficiency, carbon reduction, water conservation, sustainable construction or climate resilience than national minimum requirements.

4.17 How have the Council's climate change evidence, carbon reduction studies and sustainability assessments informed the policy requirements, and why are the chosen standards considered the most appropriate?

4.17.1 Policy DM6 is informed by the [Council's Climate Change Action Plan](#)(CCAP), the Council's climate emergency declaration, Sustainability Appraisal (SA)(ref: A3.2 – see chapter 9) and wider Local Plan evidence, such as the Landscape

Character Assessment (ref: B7) which highlight the issues affecting Medway in relation to climate change and identify climate mitigation, adaptation and progress towards net zero as strategic priorities for Medway. As an example, the CCAP at page 24 identifies that domestic energy use accounts for 35% of Medway's greenhouse gas emissions. This highlights the importance for influencing future design of homes through the Plan to increase energy efficiency. The SA at Table 9.2 presented a summary of the identified effects of the Plan on climatic factors. The factors included flood risk, increased greenhouse gas emissions, and loss of multi-functional green infrastructure. Policy DM6 is identified in the SA at Table 9.2 as one of the mitigating Policies in the plan.

- 4.17.2 In representations on the preparation of the Plan, the Environment Agency has supported the Council following the option to plan for 110 litres/person/day. This reflects the pressures on water supply in Kent and Medway, as a seriously water stressed area. This level is consistent with the Southern Water's Water Resource Management Plan, 2024. In its representations on the Published Plan, the Environment Agency (E.68) welcomed the policy for greater water efficiency and support for tighter standards that would help the water company to achieve their target and also reduce the impact that future demand will have on limited water resources in North Kent. The Agency suggested a wording change to the supporting text at paragraph 5.4.3 for clarification purposes on this point.
- 4.17.3 The chosen standards are considered appropriate because they seek to address Medway-specific climate challenges while supporting the Local Plan objective of delivering sustainable development and progressing towards net zero carbon emissions. The water standard is consistent with the Water Resource Management Plan, and a tighter standard than provided by current Building Regulations is supported by the statutory consultee and reflects the seriously water stressed context in Medway.
- 4.18 What evidence demonstrates that the Sustainable Design and Construction requirements are deliverable and viable across all forms of development, including strategic allocations, regeneration sites and brownfield developments?
- 4.18.1 The Policy DM6: Sustainable Design and Construction policy requirements were tested in the Local Plan Viability Assessment (Ref: B5) in Chapter 8 (paragraphs 8.43 to 8.69) and findings and recommendations set out in Chapter 12, including paragraph 12.42 and 12.67 – 12.69. Information on developer consultation and engagement in the preparation of the Viability Assessment (Ref: B5) is set out in Appendices 2 and 3.

4.18.2 Policy DM6 is also informed by the Climate Change Action Plan, Sustainability Appraisal and wider Local Plan evidence, which support the need for enhanced sustainability standards in new development.

4.18.3 Deliverability across strategic allocations, regeneration sites and brownfield developments depends on demonstrating that sustainability requirements can be accommodated alongside affordable housing, infrastructure and other policy obligations without threatening implementation, which will be judged through the development management process.

4.19 How does Policy DM6 ensure that new development incorporates measures to minimise carbon emissions, improve energy efficiency, increase resilience to climate change and promote sustainable resource use throughout the lifetime of the development?

4.19.1 Policy DM6 seeks to minimise carbon emissions by requiring development to incorporate sustainable design principles, energy-efficient construction and measures that support the Local Plan's net-zero objectives.

4.19.2 The policy promotes climate resilience through requirements that address overheating, flood risk, sustainable drainage and green infrastructure, reflecting Medway's identified climate risks. Sustainable resource use is supported through measures relating to energy, water and construction efficiency, helping to reduce environmental impacts over the lifetime of development.

4.19.3 Building for a Healthy Life and Building for Nature Standards are specifically referenced in the policy as suitable assessment frameworks for applicants to use. The Policy also references the very good BREEAM standard for water and energy for non-residential developments, where appropriate and technically and financially viable.

4.19.4 Compliance is secured through the development management process, contributing to the Council's ambition for a low-carbon and climate-resilient Medway.

4.20 Are the policy requirements sufficiently clear, flexible and capable of consistent implementation throughout the Plan period, particularly in light of potential changes to national policy, Building Regulations and emerging technologies?

4.20.1 Policy DM6 is capable of providing a clear framework where requirements are expressed through measurable standards for energy efficiency, carbon reduction, climate resilience and resource use in other Council documents such as the Climate Action Plan and national standards such as Building for a Healthy Life.

4.20.2 The policy should retain flexibility by focusing on performance outcomes and allowing different technological solutions to achieve them, reflecting varying site circumstances and development types.

4.20.3 Consistent implementation will be through the supporting guidance and proportionate evidence requirements at application stage.

4.20.4 The Policy should also be sufficiently adaptable to accommodate future changes to standards in Building Regulations, national policy, Medway specific guidance in the Climate Action Plan and emerging low-carbon technologies throughout the Plan period.

4.21 Why is the proposed policy the most appropriate approach to achieving the Plan's climate change and sustainability objectives, and what evidence demonstrates that it can be delivered consistently and viably across Medway throughout the Plan period?

4.21.1 Policy DM6 is capable of providing a clear framework where requirements are expressed through measurable standards for energy efficiency, carbon reduction, climate resilience and resource use.

4.21.2 The policy should retain flexibility by focusing on performance outcomes and allowing different technological solutions to achieve them, reflecting varying site circumstances and development types.

4.21.3 The Policy is evidenced by the Council's Climate Change Action Plan 2025-2028, which sets out practical actions to achieve net zero by 2050 and to increase climate resilience. The Council has a corporate commitment to net zero: The Climate Change Action Plan and One Medway Council Plan establish a long-term policy framework for delivery and monitoring of climate objectives throughout the plan period.

4.21.4 The requirement for a Climate change and energy efficiency is a current requirement on the Validation Checklist for all new building properties, commercial and residential. It requires a statement setting out measures to tackle climate change, including the following:

- Sustainable design principles
- Energy and carbon reduction methods
- Biodiversity net gain
- Water efficiency and recycling
- Waste reduction
- Sustainable transport methods
- Air quality Improvement measures
- Education or new resident/occupier information pack

- 4.21.2 This is an established practice used by Medway Council that has helped to deliver many climate change benefits and needs to be carried forward through the new Local Plan.

Policy DM7: Shopfront Design and Security

- 4.22 What evidence demonstrates that the proposed shopfront design and security requirements in Policy DM7 are necessary to protect and enhance the character, appearance and vitality of Medway's centres?

- 4.22.1 The shopfront security design guidance which assists with this policy says well-designed shopfronts support character, attractiveness, investment, spending and business vitality.
- 4.22.2 Many of the conservation area appraisal and management plans relating to retail centres note that poor quality replacement shopfront design and standard security shutters can have a significant negative impact on the special character of the area.
- 4.22.3 There has been success at appeal defending inappropriate shopfronts as a result of the guidance (ENF/18/0456 - 171 High Street, Rochester).
- 4.23 How have townscape assessments, conservation area appraisals, heritage evidence and local character studies informed the specific design requirements for shopfronts?
- 4.23.1 Conservation Area Appraisals, including Rochester, New Road Chatham, Maidstone Road Chatham, Upper Upnor and Star Hill to Sun Pier, identify the architectural and townscape qualities that make conservation areas special. These provide local context for DM7's requirement to respect historic character and appearance (bullet point 3) as well as the identification of shop fronts of traditional design or materials, which positively contribute to the character and appearance of an area and should therefore not be lost (first part of the policy). These documents also identify the character, scale, and appearance of the building (bullet point 1).
- 4.23.2 Star Hill to Sun Pier Conservation Area Appraisal and Management Plan 2024 covers the historic High Street environment between Rochester and Chatham and defines the historic, architectural and townscape qualities.
- 4.23.3 Chatham Design Code 2024 (ref: B14) is also relevant for Chatham centre. It was prepared to guide regeneration, public realm and development so that proposals respect Chatham's heritage, landscapes and character.
- 4.23.4 Medway Heritage Asset Review (ref: B9) provides strategic heritage evidence for the Local Plan, identifying local distinctiveness, settlement character, historic landscapes and heritage assets.

4.24 How does Policy DM7 balance the need for attractive and active shopfronts with the legitimate security requirements of businesses, particularly in relation to shutters, grilles, lighting and surveillance measures?

4.24.1 DM7 supports active, attractive frontages by requiring shopfronts to respect building scale, proportions, architectural details and surrounding character.

4.24.2 It recognises legitimate security needs and bullet point 4 sets out that, when proven to be necessary, they should be integrated into the frontage and to maintain visible shop window displays.

4.24.3 Paragraph 5.5.11 and bullet point 5 of the policy discourages external roller shutters because they can harm the street scene, reduce natural surveillance and create unsafe perceptions.

4.24.4 The last paragraph of the policy itself states: Lighting and surveillance should be restrained, unobtrusive and context-sensitive, avoiding visual clutter or harm to heritage character.

4.25 Are the policy requirements sufficiently clear and precise to enable applicants and decision-makers to determine what forms of shopfront alterations and security measures will be acceptable, particularly within conservation areas and other heritage settings?

4.25.1 Yes. The Policy identifies unacceptable loss of traditional shopfronts and sets criteria on scale, fascias, architectural details, character, safety and window displays.

4.25.2 It gives a clear steer that external roller shutters will rarely be acceptable, especially where they harm street scene or perceptions of safety.

4.25.3 Clarity is strengthened by cross-reference to adopted shopfront/security guidance and design codes (listed at paragraph 5.5.10) and Policy DM7 is to be read in conjunction with Policy S8 and DM9 (paragraph 5.5.8).

4.25.4 However, the Council acknowledges that terms such as “rarely”, “necessary” and “integral feature” may require judgement, particularly in conservation areas and heritage settings.

4.26 What evidence is there that Policy DM7 will be effective and support the vitality and attractiveness of Medway's centres whilst ensuring that security measures do not result in harmful impacts on the public realm, visual amenity or perceptions of safety?

4.26.1 The [Shopfront Security Design guidance](#) explains that solid shutters can create hostile streets, reduce natural surveillance and worsen perceptions of safety, thereby reducing vitality and attractiveness.

4.26.2 DM7 responds by requiring security measures to be justified, integrated, and to retain window displays, providing clear advice on options for acceptable security measures.

4.26.3 The Policy approach is supported by Town Centre Managers and local town centre Task Forces (made up of officers, residents, businesses and politicians). The Council has worked in partnership with Historic England in the Chatham Intra High Heritage Action Zone. The programme has invested in shopfronts in recognition of their importance. Historic England has published a research report – [The Value of High Street Heritage Action Zones](#) – that has independently evaluated the impacts of the programme. The report supports the contribution of traditionally designed shopfronts to the vitality and attractiveness of centres.

4.27 Why is the proposed Shopfront Design and Security policy the most appropriate approach to securing attractive, active and safe shopping frontages across Medway, and how will it be applied consistently and effectively throughout the Plan period?

4.27.1 DM7 is appropriate because it protects traditional shopfronts while requiring new frontages to respect building scale, materials, proportions and street character. It supports active, attractive centres by requiring security measures to be justified, integrated and to retain shop window displays.

4.27.2 It addresses safety by discouraging external roller shutters, which harm street scene, natural surveillance and perceptions of safety.

4.27.3 Consistency will rely on adopted shopfront/security guidance, design codes, conservation area appraisals and management plans and heritage policies being applied through development management.

Policy DM8: Advertisements

4.28 What evidence demonstrates that Policy DM8 concerning advertisements is required to protect the character, appearance and visual quality of Medway's urban areas, town centres, conservation areas and other sensitive locations?

4.28.1 Medway's advertising planning guidance states that signage quality affects both individual businesses and the wider environment, especially listed buildings and conservation areas. The guidance is complementary to the Shop Front guidance.

4.28.2 The [Shopfront advertising design guide for historic buildings 2015](#) - also links good signage design to economic vitality, visitor experience, civic pride and the distinctiveness of historic high streets.

4.28.3 Conservation area appraisals and management plans identify sensitive townscape and architectural qualities requiring protection from visual clutter, inappropriate materials, illumination and scale.

4.29 How has the requirement for this policy been supported by evidence and how has that evidence informed the policy requirements relating to the design, scale, illumination and siting of advertisements?

4.29.1 It is supported by paragraph 5.6.1 and 5.6.2 noting that poorly designed advertisements can appear dominant, incongruous and harmful to street scene, amenity and public safety.

4.29.2 The guidance on signage with heritage considerations is based on good practice as set out by Historic England guidance.

4.29.3 Medway's shopfront advertising guide explains that signage affects business quality, the wider environment and historic high street distinctiveness.

4.29.4 This evidence from Historic England and Medway guidance informs DM8 by requiring advertisements to respect scale, size, design, materials, illumination and siting, and to avoid visual clutter. In heritage settings, DM8 requires signs to avoid harm to significance, character and setting.

4.30 Are the policy criteria sufficiently clear and precise to enable applicants and decision-makers to determine what forms of advertisement will be acceptable in different parts of Medway?

4.30.1 Yes. DM8 identifies clear refusal grounds: adverse impacts from scale, size, design, materials, illumination, visual clutter, excessive number or road safety harm. It is clear that in sensitive locations the Council will require heritage-related advertisements to avoid harm to the significance, character or setting of heritage assets.

4.30.2 The Institution of Lighting Professionals Guidance Note GN01 provides the guidance for the luminance levels based on location.

4.31 How does the policy balance the commercial need for advertising and business visibility against the need to protect visual amenity, heritage significance and the quality of the public realm?

4.31.1 DM8 recognises that advertisements are needed to attract attention and convey business information, but controls are justified where signage harms amenity, public safety or street character and are not necessary to attract business. The Policy balances visibility with visual quality by allowing signs, unless their scale, size, design, materials or illumination would be detrimental, create clutter, or cause road safety harm.

- 4.31.2 In heritage settings, the policy gives greater weight to preserving significance, character and setting, requiring signage to be minimal and context sensitive.
- 4.31.3 The approach supports commercial identity while protecting Medway's public realm and sensitive townscapes.
- 4.32 What evidence demonstrates that Policy DM8 will adequately address the impacts of illuminated and digital advertisements on visual amenity, heritage assets, residential amenity and public safety throughout the Plan period?
- 4.32.1 Paragraph 5.6.3 requires illuminated signage to be restrained, unobtrusively sited and contextual, referencing Institution of Lighting Professionals GN01 on obtrusive light.
- 4.32.2 DM8 addresses illumination by refusing advertisements where lighting harms character, appearance, amenity or road safety. This approach is used currently and has had success at appeal (MC/25/0814 - Corner Of Pier Road And Dynamo Way, Gillingham; MC/24/2603 - Land At The Junction With Chatham Hill And High Street, Chatham; MC/24/2165 - 184 High Street, Rainham; MC/24/1724 - 1A Victoria Street, Gillingham).
- 4.32.3 Heritage impacts are addressed by requiring advertisements on heritage assets to avoid harm to significance, character or setting.
- 4.32.3 However, the evidence base does not yet appear to contain specific digital-advertising modelling or monitoring evidence, so effectiveness will depend on case-by-case assessment.
- 4.33 Why is the proposed Policy DM8 the most appropriate approach to managing advertising within Medway, and what evidence is there to show that it will effectively safeguard visual amenity and public safety whilst supporting the vitality and viability of centres?
- 4.33.1 DM8 is appropriate because it permits advertising unless scale, design, materials, illumination, clutter or siting would harm character, appearance, amenity or road safety, giving clear development management tests. The specific requirements within it are the most appropriate means of ensuring advertisements are appropriate to their context.
- 4.33.2 Paragraphs 5.6.1 to 5.6.5 justify the approach: signs can be dominant/incongruous; applications must consider amenity, public safety, historic features and restrained lighting.
- 4.33.3 Medway's Shopfront Advertising Design Guide links good signage to business quality, visitor experience, civic pride and historic high street distinctiveness.

- 4.33.4 Conservation area appraisals and management plans and the Heritage Asset Review (ref: B9) support stronger controls in sensitive locations

Policy DM9: Heritage Assets

- 4.34 What evidence demonstrates that Policy DM9 concerning Heritage Assets provides an appropriate framework for conserving and enhancing the significance of Medway's designated and non-designated heritage assets?

4.34.1 The Medway Heritage Asset Review (Ref: B9) and [Medway Heritage Audit report](#) provide the strategic evidence base and local context, assessing heritage themes, significance, local character and enhancement opportunities.

4.34.2 The Council also refers to Conservation Area Appraisals and Management Plans which provide area-specific evidence for sensitive historic environments. Historic England produced a [Hoo Peninsula Historic Study](#) which is an important reference for the Council in planning considerations for this rural area. Made Neighbourhood Plans also provide context for this Heritage policy.

- 4.35 How have heritage assessments, conservation area appraisals, Historic England advice and other evidence informed the approach both in Policy DM9 and the Plan?

4.35.1 Policy DM9 is informed by the work referenced in paragraphs 5.7.1 to 5.7.4, which set a positive strategy for Medway's historic environment, supported by the emerging Heritage Strategy, Heritage Audit Report and Asset Review (ref: B9), conservation area appraisals, management plans and Neighbourhood Plans.

4.35.2 Paragraphs 5.8.1 to 5.8.13 identify designated and non-designated heritage assets and explain their role in local character and place-making.

4.35.3 DM9 requires heritage statements, significance assessment and compliance with Historic England Conservation Principles, Good Practice Advice Notes and Advice Notes.

4.35.4 Conservation Area Appraisals provide area-specific character evidence.

4.35.5 The policy also refers to the emerging revised Heritage Strategy, which builds on Historic England advice and will include methods for effective inclusion of local heritage within developments, such as community engagement.

- 4.36 How does the Plan, generally and specifically through Policy DM9, ensure that the significance and setting of heritage assets have been properly considered in accommodating the scale of growth proposed over the Plan period?

4.36.1 Heritage considerations have informed the spatial strategy, and site allocations. As an example, Policy SA8 has a specific reference to military heritage assets with the objective of meeting the requirements of Policy DM9. The Sustainability

Appraisal (ref: A3.2) at Chapter 10 considered Cultural Heritage. Potential sites were assessed against their impact on designated heritage assets, including their setting. Heritage assets were also assessed as a constraint in the Land Availability Assessment (ref: B1).

4.36.2 The Sustainability Appraisal considered the mitigations provided by policies:

- Plan-wide: paragraphs 5.7.1 to 5.7.4 set a positive strategy for conserving Medway's historic environment and link this to regeneration, local distinctiveness and sustainable growth.
- Policy DM6 cross references with Policy DM9 by strongly encouraging reuse of historic buildings.

4.36.3 Paragraph 5.1.2 recognises the need to manage heritage carefully given the scale of development proposed in the Plan's spatial strategy. This aim is further progressed through the emerging Heritage Strategy which includes a priority list for the production of conservation area appraisals and management plans for those areas which may be affected by strategic allocation sites or potential windfall development.

4.36.4 Policy DM9 requires heritage statements, significance and setting assessment, and compliance with Historic England guidance and Council resources, as well as referring to the Medway Local Heritage Asset List.

4.36.5 The Medway Heritage Asset Review 2025 (ref: B9) provides strategic evidence on heritage significance, character and constraints to inform allocations and decision-making.

4.37 Are the policy requirements within Policy DM9 sufficiently clear and effective to guide decision-makers when balancing heritage impacts against the need for new housing, employment development and regeneration?

4.37.1 Yes: DM9 provides clear tests requiring proposals to preserve and seek to enhance heritage significance and setting, supported by proportionate heritage statements and, where relevant, archaeological assessment.

4.37.2 It is effective because it applies national policy balancing principles, including substantial harm, public benefits, and exceptional justification for loss.

4.37.2 This advice is then followed by requirement for compliance with Historic England Conservation Principles, Good Practice Advice Notes and Advice Notes, plus Council appraisals, SPDs and design codes.

4.37.3 However, development/regeneration balancing will still require case-specific planning judgement.

4.38 What evidence shows that Policy DM9 will successfully secure the conservation, enhancement and, where appropriate, regeneration of heritage assets throughout the Plan period?

4.38.1 Policy DM9 provides the mechanisms through the use of heritage statements, significance/setting assessment, archaeological assessment where needed, and tests for substantial harm, loss and public benefits.

4.38.2 Paragraphs 5.8.10 to 5.8.13 confirm the use of appraisals, design codes and heritage evidence to identify non-designated assets and guide decisions. The Council is now progressing work on a [Local List](#).

4.38.2 Medway Heritage Asset Review 2025 (ref B9) supplies the strategic evidence on heritage significance, local distinctiveness, risks and enhancement opportunities. This, along with Conservation Area Appraisals, Management Plans, the emerging Heritage Strategy (to be adopted in early 2027) and design codes will be used and updated throughout the Plan period.

4.38.3 The Council will monitor the implementation of the Policy. There are monitoring indicators in the submitted Monitoring Framework:

- The Number of Listed Buildings, Scheduled Monuments and Conservation Areas on the National Heritage at Risk Register (already in the existing AMR).
- Non designated heritage assets – how many are applied for and how many approved.

4.39 Why is Policy DM9, as proposed, the most appropriate strategy for managing change within Medway's historic environment, and how is it demonstrated that it will effectively conserve heritage significance whilst accommodating the development needs of Medway?

4.39.1 DM9 is the most appropriate strategy as a blanket restriction on change would not meet Medway's housing, employment and regeneration needs, and therefore not provide for sustainable development. An overly permissive approach would risk unacceptable harm to heritage significance. DM9 on balance uses a proportionate, significance-led assessment.

4.39.2 It enables reference to published Council resources which now include the emerging Local Heritage Asset List as well as the emerging Heritage Strategy, alongside the existing and forthcoming conservation area appraisal and management plans.

4.39.3 It is preferable to relying only on national policy because it applies NPPF principles to Medway's specific heritage context, supported by paragraphs 5.7.1 to 5.7.4, paragraphs 5.8.1 to 5.8.13, the Heritage Asset Review 2025 (ref: B9), conservation area appraisals, SPDs and design codes.

4.39.4 It allows justified development while securing conservation, enhancement, reuse and public benefits.

4.39.5 The Council notes that the representations from Historic England (E.79) on the Published Plan recommended a modification to the Policy to distinguish more clearly between designated and non-designated heritage, in addition to some wording in the Policy. The Council would support a modification to the Policy to clarify between designated and non-designated heritage and provide for cases that cause less than substantial harm, in line with the advice from Historic England. Policy DM9 would be amended to read at the third and fourth paragraphs:

Development that causes the total loss or substantial harm to the significance of a designated heritage asset will only be permitted where it can be demonstrated that substantial public benefits will result that outweigh the harm or loss.

The total loss of a heritage asset will not be permitted unless it can be demonstrated that there are exceptional and overriding reasons; and that all possible methods of preserving the asset have been exhausted. In the exceptional circumstances where the total loss of a heritage asset can be fully and robustly justified, the applicant must make information about the heritage asset and its significance available to the Council and publicly, along with making it possible for any materials and feature to be secured and safely stored.

At the sixth paragraph, the first line is to be amended to read: ‘Development proposals for cases of less than substantial harm shall demonstrate...’

Policy S9: Star Hill to Sun Pier

4.40 What support is there to show that Policy S9 is necessary and that the proposed policy framework is the most appropriate strategy for securing the regeneration and enhancement of the area?

4.40.1 Historic England (E.79) in its representation on the Published Plan welcomed reference to this policy in the Local Plan as it provides the policy context for decision making that flows from the Star Hill to Sun Pier Development framework. There is a specific and distinctive regeneration need. The Plan identifies Star Hill to Sun Pier/Chatham Intra as a historic area with “vast” conservation interest but also significant potential to become a social, cultural and retail destination, supporting small businesses, social enterprises and the creative sector. It is a unique area of heritage within Medway and managing change will ensure that its potential for significant social and economic benefits can be achieved.

4.40.2 There is an adopted place-specific framework - the [Star Hill to Sun Pier Development Framework SPD](#) 2024, which provides detailed, locally tailored guidance and is confirmed as a material consideration for proposals in the area.

4.40.3 Heritage evidence is provided through [the Star Hill to Sun Pier Conservation Area Appraisal](#) and Management Plan 2024 which defines the area's historic, architectural and townscape qualities, supporting a heritage-led regeneration approach.

4.40.4 The Council considers that this provides the most appropriate strategy as a generic town centre or heritage policy would not provide sufficient area-specific direction. Policy S9 links regeneration, conservation, design and cultural objectives in one place-based framework.

4.40.5 The policy is effective as it requires proposals to comply with the adopted SPD, ensuring consistent decision-making throughout the Plan period.

4.41 [How have other documents such as heritage assessments, conservation area appraisals, townscape studies and regeneration evidence informed the policy requirements and the vision for the Star Hill to Sun Pier corridor?](#)

4.41.1 The Policy reflects recent evidence work, planning guidance and partnership activity in this distinctive area of Medway. Paragraphs 5.9.1 to 5.9.5 provide references to identify Star Hill to Sun Pier/Chatham Intra as a historic corridor, the Historic England Heritage Action Zone initiative, and the opportunity for social, cultural, retail and creative-sector regeneration, which has active community support.

4.41.2 The Star Hill to Sun Pier Development Framework SPD 2024 provides the place-specific vision and design/regeneration framework and made a material consideration by paragraph 5.9.3 and Policy S9.

4.41.3 The Star Hill to Sun Pier Conservation Area Appraisal and Management Plan 2024 define the area's historic, architectural and townscape qualities.

4.41.4 These documents justify a heritage-led, corridor-specific policy rather than relying solely on generic design or heritage policies.

4.42 [What evidence is there to demonstrate that the scale and type of development envisaged by the policy are deliverable throughout the Plan period?](#)

4.42.1 There is a strong link between this Policy and Policy SA2: Heritage-led Sites which identifies Star Hill to Sun Pier as 3.68ha, with capacity for c.474 homes, split across sites with delivery in years 1-5 and 6-10. This has been tested through the Plan preparation process, including the Land Availability Assessment (ref: B1), the Sustainability Appraisal (ref: A3) and Viability

Assessment (ref: B5). Paragraphs 14.1.3 to 14.1.4 state allocations derive from land availability/site selection, with phasing in the housing trajectory.

4.42.2 The Star Hill to Sun Pier SPD 2024 sets expected type, form, scale, density and character of development. The Council engaged with local communities, key stakeholders and developers in the preparation of the SPD. The adopted guidance provides additional certainty to developers on the specific requirements and opportunities for development in this area.

4.42.3 Deliverability is supported by stakeholder engagement and Historic England input as Medway is a 'Priority Place' for the organisation. There is strong partnership working established in this area, which has benefitted from £1.6m HSHAZ funding.

4.43 How will Policy S9 ensure that new development and regeneration proposals conserve and enhance the significance of heritage assets, whilst also supporting economic growth, active uses and investment within the area?

4.43.1 There is a well-established context for planning guidance and partnership work that has informed this Policy and will also support its successful implementation. The Star Hill to Sun Pier Conservation Area Appraisal and Management Plan 2024 define the heritage and townscape qualities to be conserved and enhanced.

4.43.2 Policy S9 requires proposals to comply with the Star Hill to Sun Pier Development Framework SPD 2024, ensuring regeneration is significance-led and sensitive to the corridor's historic character which can act as a building block for enhancement and continued investment. The SPD supports active uses, investment and contextual development through guidance on scale, form, public realm and riverfront connections.

4.43.2 Paragraphs 5.9.1 to 5.9.5 reference the Historic England Heritage Action Zone. This was supported by strong partnership of interests and has potential for further social, cultural, retail and creative-sector regeneration, building on the achievements of recent years. This area is part of the [Chatham Creative Quarters](#) programme and partnership, where the Council is working in partnership with local communities, businesses and wider interests, such as education institutions. Medway is a Priority Heritage Place for National Lottery Heritage Fund.

4.44 What mechanisms will be used to secure the delivery of the policy's objectives, and how will the Council monitor whether the anticipated environmental, economic and townscape improvements are being achieved through Policy S9?

- 4.44.1 Delivery will be secured through Policy S9, requiring compliance with the Star Hill to Sun Pier Development Framework SPD 2024, alongside relevant heritage, design and conservation policies in the Framework and wider Plan.
- 4.44.2 Site delivery is supported through the development allocation Policy SA2: Heritage-led Sites, which identifies site capacity, phasing and requirements for conservation area/SPD compliance.
- 4.44.3 The Council will use mechanisms through the Development Management process such as the advice and assessment of applications, heritage/townscape assessments, design review, conditions, obligations and the use of the Conservation Area Appraisal/Management Plan.
- 4.44.4 The submitted monitoring framework (A14) contains monitoring indicators for the number of planning applications decided in the Star Hill to Sun Pier area and the number approved/refused to enhance/protect the area.
- 4.45 Why is Policy S9 considered to be the most appropriate and effective means of securing the long-term regeneration, heritage enhancement and economic vitality of this important gateway area, and what support is there to suggest that its objectives are capable of being delivered during the Plan period?
- 4.45.1 Policy S9 is most appropriate approach as it provides a place-specific, heritage-led framework, rather than relying on generic design/heritage policies, for a sensitive gateway between Rochester and Chatham, which was subject to a Chatham Intra/Heritage Action Zone (HAZ). The importance and distinctive character of this area was recognised by Heritage England in the Heritage Action Zone programme.
- 4.45.2 The Policy is supported by the Star Hill to Sun Pier Development Framework SPD 2024, which provides detailed and specific guidance on the type, form, scale, density and character of expected development. This SPD was informed by a clear evidence base in the Star Hill to Sun Pier Conservation Area Appraisal and Management Plan.
- 4.45.3 Please see our response to Question 4.42.1. Confidence in the delivering the objectives of this policy in the Plan period is supported by the development allocation Policy SA2, together with Historic England support and funding, and an active partnership promoting the ambitions of this distinctive area of Medway. There is a strong partnership promoting the objectives of the Policy through the Chatham Intra CIC and links to the Creative Medway Cultural Partnership.
- 4.45.4 Comparable schemes such as SNF35 directly opposite Rochester Castle on the Strood side of the river have been designed successfully and approved with reference to the policy.

Policy DM10: Conservation Areas

4.46 What is there to support the approach that Policy DM10 provides an effective framework for preserving or enhancing the character and appearance of Medway's conservation areas?

4.46.1 DM10 provides clear criteria requiring proposals to respond to Conservation Area Appraisals, respect setting, retain historic features, use sympathetic materials and remove harmful features where achievable. The supporting text to Policy DM10 (paragraphs 5.10.1 to 5.10.4) recognises that Medway's 24 conservation areas are sensitive to change and require preservation or enhancement of special historic and architectural character.

4.46.2 Medway's adopted Conservation Area Appraisals and Management Plans provide area-specific evidence of significance, character and appearance.

4.46.3 The Heritage Asset Review 2025 (ref: B9) supports a positive, evidence-led heritage strategy. The emerging corporate Heritage Strategy, a revision of the draft 2018 report, is supported within the policy and will secure commitment to review and production of CAAMPs according to priority as well as effective engagement with the community on local heritage sensitive development.

4.47 How have Conservation Area Appraisals, Management Plans and other heritage evidence informed the policy requirements and the identification of key issues affecting individual conservation areas?

4.47.1 Adopted Conservation Area Appraisals, including Rochester, New Road Chatham, Maidstone Road Chatham, Upper Upnor and Star Hill to Sun Pier, identify area-specific townscape and heritage issues. As an example, the [Upper Upnor Conservation Area Appraisal, 2022](#), in section VII. Condition and issues identified a number of issues with inappropriate materials, such as slate or clay roof tiles replaced with concrete. The third bullet point of the Policy directs developers to 'use materials and details that are appropriate and sympathetic to the locality and existing buildings'.

4.47.2 The Heritage Asset Review 2025 (ref: B9) provides wider strategic heritage context with heritage themes that can be applied to each individual conservation area to strengthen its special character and appearance.

4.48 How does the Plan and specifically Policy DM10, ensure that the proposed scale of development and regeneration can be accommodated without causing harm to the significance, character or appearance of conservation areas?

4.48.1 The Sustainability Appraisal (ref: A3.2) at Chapter 10 considered Cultural Heritage. Potential sites were assessed against their impact on designated heritage assets, including their setting. Heritage assets were also assessed as a

constraint in the Land Availability Assessment (ref: B1). The Sustainability Appraisal considered the mitigations provided by policies.

4.48.2 Growth is managed through applying the Plan as a whole, including reference to Policy T1: High Quality Design, Policy S8: Historic Environment, Policy DM9: Heritage Assets and Policy DM10, requiring contextual design, heritage statements, setting assessment and use of Council Conservation Area Appraisals and wider SPDs.

4.48.2 Site allocations policies in the Plan add further criteria, such as Policy SA1: Chatham Town Centre and Surrounds requires heritage, landscape/townscape and views assessments and Policy SA2: Heritage-led Sites requires compliance with the Star Hill to Sun Pier Development Framework, Conservation Area Appraisal and Management Plan.

4.49 Are the policy requirements sufficiently clear and effective to guide decision-makers when balancing heritage considerations against the need for housing, employment growth, town centre regeneration and other development objectives?

4.49.1 Yes. DM10 gives decision-makers clear criteria, including responding to Conservation Area Appraisals, to respect setting, retain historic/architectural features, use of sympathetic materials, and removal of harmful features where achievable.

4.49.2 The Policy will be applied in conjunction with wider policies such as Policy T1: High Quality Design, Policy S8: Historic Environment and Policy DM9: Heritage Assets, providing a layered framework for balancing growth and heritage impacts. Additional site-specific guidance is given in site allocation policies, such as SA1: Chatham Town Centre and Surrounds and SA2: Heritage-led Sites require heritage, townscape, visual and conservation area/SPD compliance.

4.49.3 The effectiveness of the Policy is supported by the detailed and specific information in Conservation Area Appraisals for Rochester, Brompton Lines, New Road Chatham, Maidstone Road Chatham, Upper Upnor and Star Hill to Sun Pier.

4.50 What methods and levers will be used to secure enhancement opportunities within conservation areas and to address areas identified as being at risk from neglect, inappropriate development or incremental change?

4.50.1 The Council considers that the Development Management process will provide effective levers to achieve the aims of this policy. DM10 will secure enhancements through requirements for applicants to respond positively and sensitively to guidance in Conservation Area Appraisals, to respect the setting of

the designation, retain historic features, use sympathetic materials and remove harmful features where achievable.

4.50.2 The Council will apply this policy in conjunction with policies in the Framework and wider Plan, such as, T1, S8 and DM9 requiring high-quality design, heritage statements, significance/setting assessment and the use of Council SPDs, appraisals and design codes. Policy DM9 also encourages proposals which will secure the future of heritage at risk as identified by the Derelict Buildings Officer, the local list of heritage asset at risk, and Historic England's register of heritage at risk.

4.50.3 There are site-specific levers in site allocation policies, such as SA1 and SA2 which require heritage, townscape/visual assessments and compliance with the Star Hill to Sun Pier SPD, Conservation Area Appraisal and Management Plan.

4.50.4 The Council will monitor the implementation of the Policy, and report on the Conservation Areas on the National Heritage at Risk Register and the number of new or updated Conservation Area Appraisals and Management Plans completed.

4.50.5 The Council will continue to support and promote partnership working, and deliver on the Medway Heritage Place project, supported by Historic England and local stakeholders, such as the Chatham Intra CIC and Creative Medway partnership which are promoting heritage led development and securing investment that enhance opportunities within conservation areas.

4.51 Why is Policy DM10 the most appropriate approach to preserving and enhancing the special character and appearance of Medway's conservation areas, and what is there to demonstrate that the policy will remain effective whilst accommodating the growth and regeneration envisaged by the Plan?

4.51.1 Policy DM10 is the most appropriate approach because it provides a conservation area-specific framework, rather than relying only on generic design or heritage policies, requiring proposals to respond to Conservation Area Appraisals, respect setting, retain historic features, use sympathetic materials and remove harmful features where achievable.

4.51.2 It is supported by paragraphs 5.10.1 to 5.10.4, which identify Medway's 24 conservation areas as sensitive to change and confirm appraisals are material considerations. An example of the sensitivity and significance is given in the Cabinet report to extend the Star Hill to Sun Pier Conservation Area
<https://democracy.medway.gov.uk/mgconvert2pdf.aspx?id=73569>

4.51.3 The effectiveness is reinforced by application in conjunction with Policies T1, S8, DM9, SA1 and SA2, plus the guidance given Conservation Area Appraisals for

Rochester, Brompton Lines, New Road Chatham, Maidstone Road Chatham, Upper Upnor and Star Hill to Sun Pier, which guide growth in areas identified for development in the Plan's spatial strategy. The Policy provides for reference to future new or updated Conservation Area Appraisals over the Plan period.

Policy DM11: Scheduled Monuments and Archaeological Sites

4.52 What evidence is there to show that Policy DM11 provides an appropriate framework for the protection, conservation and enhancement of Scheduled Monuments and archaeological sites across Medway?

4.52.1 The Policy was prepared in consultation with Historic England and Kent County Council's Heritage Service that provides advice to the Council on archaeology. It is supported by both.

4.52.2 The Policy approach is consistent with the Framework for Proposals affecting heritage assets, particularly paragraph 207). The Policy recognises the both the currently identified scheduled monuments in Medway and the wider areas of known and potential archaeological interest, and this is referenced in the supporting text – paragraphs 5.11.1 to 5.11.8. The Policy specifies the requirements for a desk-based assessment and where appropriate, a field evaluation, preservation in situ, or recording or archiving.

4.52.3 The Medway Heritage Asset Review 2025 (ref: B9) provides the strategic evidence base, identifying archaeology, including reference to the Kent Historic Environment Records, historic landscapes, Chatham Dockyard defences, military heritage and other heritage themes.

4.52.4 The Policy is also informed by the Draft Medway Heritage Strategy, and work on the preparation of the updated Strategy (anticipated January 2027) which supports a long-term framework for the emerging Heritage Strategy and effective management of change in the historic environment.

4.52.5 The Policy will be applied in conjunction with the Framework and wider Plan policies, such site allocation Policy SA1 and SA2 to require archaeological statements/assessments for relevant allocations.

4.53 How have archaeological assessments and other heritage evidence informed the Plan's spatial strategy, site allocations and development requirements, particularly in locations where archaeological remains are known or likely to be present?

4.53.1 The Sustainability Appraisal (ref: A3) and Land Availability Assessment (ref: B1) considered Scheduled Monuments in the assessment processes that informed site allocations. The potential for adverse effects was assessed. Consideration was given to mitigation provided by policies. In Table 10.1 of the Sustainability

Appraisal (ref: A3:2) DM11 was assessed as an effective policy in mitigating potential adverse effects.

4.53.2 A site specific example is given in the strategic site allocation policy, SA8: Hoo St Werburgh and Chattenden. Paragraph 18 in the Policy refers applicants to Historic England's Hoo Peninsula Historic Landscape project, and requires specific consideration of the area's military heritage, particularly the Hoo Stop Line. Other examples in Policies SA1 and SA2 require heritage, townscape and archaeological assessments where relevant and as identified by the areas of potential and in consultation with KCC's Senior Archaeologist.

4.54 How does the Plan, and Policy DM11 in particularly, ensure that the significance and settings of Scheduled Monuments are appropriately considered where major development, regeneration or infrastructure proposals are proposed nearby?

4.54.1 The Policy approach is consistent with the Framework for Proposals affecting heritage assets. Policy DM11 prevents development that adversely affects Scheduled Monuments, their settings, or archaeological sites of comparable significance.

4.54.2 The Policy requires a desk-based assessment, field evaluation, preservation in situ or excavation/recording where impacts may arise. This will be assessed by the Council, in consultation with Historic England and Kent County Council Heritage Service when determining planning applications.

4.54.3 Wider policies in the Plan also ensure the appropriate consideration of the significance and settings of Scheduled Monuments, as referenced in our response at 4.53.2.

4.55 Are the requirements of Policy DM11 sufficiently clear and effective to ensure that archaeological investigation, recording, preservation and mitigation measures are undertaken where appropriate before development occurs?

4.55.1 Yes. DM11 clearly specifies the required sequence: desk-based assessment, field evaluation where appropriate, preference for preservation in situ, and excavation/recording where preservation is not possible or justified. Public archiving requirements ensure investigation outcomes are secured before or alongside development.

4.55.2 The Council at paragraph 14.1.7 supporting the Site Allocation policies, requires archaeological assessments for site allocations to further gauge archaeological potential and allow for an assessment of impact on any SAMs that could be affected.

4.56 What is there to indicate that the proposed policy approach will successfully conserve archaeological significance whilst allowing sustainable development to come forward throughout the Plan period?

4.56.1 The Sustainability Appraisal (ref: A3) and Land Availability Assessment (ref: B1) considered Scheduled Monuments in the assessment processes that informed site allocations. The potential for adverse effects was assessed. Consideration was given in the SA to mitigation provided by policies. In Table 10.1 of the Sustainability Appraisal (ref: A3:2) DM11 was assessed as an effective policy in mitigating potential adverse effects.

4.56.2 Policy DM11 is evidence-led and proportionate. This Policy approach protects against harm to Scheduled Monuments or comparable sites, and criteria in the third paragraph of the Policy provides for sustainable development by referencing how potential impacts will be managed, where development is permitted.

4.57 Why is the proposed policy the most appropriate approach to safeguarding Medway's Scheduled Monuments and archaeological resource, and how have archaeological interests appropriately informed both the spatial strategy and the allocation of development sites within the Plan?

4.57.1 The Sustainability Appraisal (ref: A3) and Land Availability Assessment (ref: B1) considered Scheduled Monuments in the assessment processes that informed site allocations. The potential for adverse effects was assessed. Consideration was given in the SA to mitigation provided by policies. In Table 10.1 of the Sustainability Appraisal (ref: A3:2) DM11 was assessed as an effective policy in mitigating potential adverse effects. Please also see our response to Question 4.53.2 for examples on how archaeological interests have appropriately informed both the spatial strategy and the allocation of development sites within the Plan.

4.57.2 Policy DM11 is the most appropriate approach because it gives strongest protection to Scheduled Monuments and comparable archaeological sites, while using proportionate assessment and mitigation for wider archaeological interest. Paragraphs 5.11.1 to 5.11.8 evidence the need for this Policy. Medway has 80 Scheduled Monuments, numerous archaeological sites and areas of archaeological potential affecting the spatial strategy. Therefore, growth must be planned with heritage constraints intrinsically reflected in the Plan's vision, strategic objectives, spatial strategy and site allocations. The Medway Heritage Asset Review 2025 (ref: B9) and Kent Historic Environment Record underpin the spatial understanding of archaeological significance.