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BY EMAIL ONLY

Dear Catherine,

Re: Medway Council Local Plan 2012-2035 Development Options Regulation 18

Thank you for consulting Kent County Council (KCC) on the emerging Medway Council Local Plan. KCC previously submitted a technical response to the 'Issues and Options' consultation on 29 February 2016 and welcomes the opportunity to comment on this latest draft.

KCC supports the commitment from Medway Council to work with the neighbouring planning authorities in cross-boundary matters. The need to accommodate identified growth for Medway will have impacts on key services provided in Kent – not only for development growth close to neighbouring boundaries, but also in terms of cumulative impacts and pressures. As the options for growth are developed, a clear strategy for delivering such infrastructure should underpin the Plan to ensure that growth is sustainable. Work is progressing in updating the Kent and Medway Growth and Infrastructure Framework (GIF), which highlights the challenges of population growth to 2031, and will also develop a 2050 vision that will also look to longer term ambitions for growth, and KCC recognises the synergies between this work and the emerging Medway Local Plan and the opportunities for collaborative working. KCC also recognises that there may be opportunities arising from the work of the Thames Estuary Commission, which could impact on the draft local plan.

The County Council will continue to work positively with Medway Council to assess and mitigate impacts and infrastructure requirements.

The County Council has reviewed the consultation document and for ease of reference, sets out its comments structured under the chapter headings used in the Local Plan.

Vision and Strategic Objectives for Medway in 2035

The consultation document sets out the vision for Medway:

“By 2035, Medway will be a leading waterfront University city of 330,200 people, noted for its revitalised urban centres, and its stunning natural and historic assets, and countryside”.

KCC supports the recognition of the significant cross-boundary strategic considerations as a core element in defining strategic objectives and a vision for Medway. Medway will experience increasing demands for growth and travel, especially as the planning and delivery of strategic development and infrastructure progresses, including the Lower Thames Crossing, Ebbsfleet Garden City and potential for a Crossrail extension to Ebbsfleet, raising a variety of cross-boundary impacts. KCC is supportive of a vision for Medway that has regeneration at the core of its growth plans and vision – this also aligns with the Thames Gateway vision for North Kent to prosper; through enabling existing businesses to grow, delivering new homes and re-shaping town centres.

There is a real opportunity to utilise Medway's position in the Thames Gateway as an attractive, accessible, well-connected alternative to London for employers. The County Council supports the potential for mixed-use growth in the waterfront areas and therefore welcomes the vision to transform the urban waterfront and neighbouring centres into attractive locations for homes, jobs, leisure and cultural activities.

The current draft of the Local Plan does not consider any of Medway's transport priorities in detail (such as improvements to the A229 corridor between Maidstone and Medway); however, these priorities are explained in more detail in the adopted Medway Local Transport Plan (2011-2026). The pressures that the Lower Thames Crossing Option C proposal will place on the road network through Medway and the corridors beyond into Kent, and the changes to traffic patterns, should not be underestimated. This will include the impacts on the already congested A2, A289 and A226 corridors. The County Council looks forward to continued liaison with Medway Council as it progresses a Strategic Transport Model to ensure that the model covers the key corridors and junctions identified and is compatible with outputs from other transport models which have been developed or are under construction by KCC – in particular that for Maidstone and the Malling/Aylesford Model. The model outputs will be fundamental in informing the County Council's position on the transport impacts of growth.

KCC also welcomes the prominent inclusion of Medway's heritage features in developing a vision for 2035. As part of the key strategic issues, there is a need to regenerate and develop Medway in a way that is sensitive to its past. The Local Plan should seek to ensure that all heritage assets across Medway are used to their maximum advantage so that regeneration is successful and sustainable. KCC supports the inclusion of the two strategic objectives that seek to conserve heritage assets and also contribute to the health and wellbeing agenda. Development is the greatest threat to the historic environment of Medway, but it can also draw on heritage assets and the historic landscape to be more effective at delivering the Local Plan's regeneration objectives.

Sustainable Development - Options

Four strategic development options are put forward; however, the consultation document is at a high-level options stage which, on the whole, does not enable full consideration of impacts around transport, education and cross-boundary issues from development sites. Below, KCC provides some general comments on the development options.

The general approach of accommodating housing provision through larger planned new settlements is supported, as these are more likely to be capable of either providing the necessary infrastructure or sustaining enhancements to existing infrastructure. For settlements proposed to be located close to the border of Kent, consideration will need to be given to this cross-border impact on infrastructure, services and facilities.

Medway Council acknowledges risks with scenario 1, which includes high density development in the waterfront and town centre sites, redevelopment of commercial land at Medway City Estate and smaller allocations in suburban and rural locations. It states that risks have been identified around the ability to deliver within the plan period, potential loss of overall employment land supply, securing infrastructure and services to support growth at this scale, viability of building at high heights and difficulties in providing the full range of housing that the market requires. KCC would not be supportive of an option that fails to secure infrastructure and services that support the planned growth.

KCC has concerns with the suburban expansions east of Rainham and between Gillingham and Rainham (proposed under scenario 2), which, without the right level of supporting community facilities, could result in migration into the neighbouring Swale Borough and subsequent pressure on KCC service provision. The scenario includes incremental growth in a number of villages and rural areas in the Hoo Peninsula and KCC would want to understand fully the consequent implications on the neighbouring districts of Gravesham, Tonbridge and Malling, Maidstone and Swale, particularly with regard to KCC service provision and impact on the road network.

As part of scenario 3, there is a proposal to expand Hoo St Werburgh into a small town, with integrated infrastructure provision and services. KCC considers that this would have merit, by creating a critical mass of development to provide and support the level of services and community facilities required. The main risk identified in the Local Plan under this scenario is the capacity of the road network. The County Council would need to consider the work currently being undertaken around strategic transport networks and potential for upgrades.

Appendix A below sets out the heritage impact of each major development area, together with a table that summarises the impact of each scenario.

Housing

The County Council supports the emphasis on ensuring that infrastructure and service provision is coordinated alongside housing delivery and that housing options will seek to meet a wide range of needs.

The commitment to facilitate the provision of suitable specialist and supported housing for elderly, disabled and vulnerable people is welcomed. KCC considers that the policy approach sufficiently addresses Medway's aims for developing specialist accommodation through extra care housing and care homes for older people. KCC does place people in Medway care homes and has a good relationship with the commissioners at Medway.

KCC welcomes the positive planning approach for student accommodation which will continue to grow as continued emphasis is placed on further and higher education sectors.

Employment

KCC supports Medway's vision for inward investment and focusing opportunities for business growth in and close to town centres that can capitalise on its position in the Thames Gateway. The policy approach for economic development emphasises the importance of raising higher value employment through supporting development of the Universities at Medway and linking to growth in the wider economy. Links between universities, colleges and local businesses will help to increase productivity and attract inward investment.

The policy approach for economic development focuses predominantly on supporting higher value employment. The encouragement of higher value employment would be supported by assets like the Learning Quarter in Chatham Maritime and the Rochester Airport Enterprise Zone. However, KCC would stress that the Council should not overlook some of Medway's existing strengths, such as the growth in manufacturing within a strong production sector and the opportunities for port and wharf related activities. In addition, the Development Options place significant employment development at Kingsnorth and Grain on the Hoo Peninsula. It would be helpful to understand more fully how these designations would meet identified existing/future business needs.

Medway's policy approach to protect valuable agricultural and rural services, whilst supporting diversification of the land-based sector (where this can demonstrate positive benefits) is supported.

Retail and Town Centres

The Local Plan defines Chatham as the main location for additional comparison retail growth and sets out recommendations for its improvement. The County Council would support a policy emphasis on providing high density mixed use development in Chatham and other Medway Town Centres, providing residents with a range of services close to where they live and planning for a stronger evening economy through enhancement of commercial leisure provision.

Natural Environment and Green Belt

KCC is satisfied that the importance of the European/internationally designated sites has been recognised as part of the Strategic Access Management and Monitoring policy approach. New developments will need to appropriately address any detrimental impacts such as noise, lighting and vibrations that may impact any areas of functional habitat which in turn, will impact upon the designated sites.

In addition to the two outlined policy approaches, KCC would welcome the inclusion of a policy specifically addressing how Medway Council considers the impact upon internationally, nationally and locally designated sites, as well as on protected species/habitats.

KCC would welcome continued input into the North Kent Strategic Access Management and Monitoring Scheme.

Detailed technical comments on the policies within this section are contained within Appendix 2 to the letter.

Built Environment

The policy approach for design is comprehensive, although KCC suggests that it could be broadened to include consideration of how development will fit into the wider historic landscape.

KCC also supports the commitment to include measures to mitigate and adapt to climate change, which remains a key national priority. KCC suggests also incorporating a policy that requires the production of an Energy Statement for major schemes to show how development will address energy issues for efficiency and the use of renewable energy sources.

Health and Communities

The policy approach to health includes investigating options for redevelopment of the Medway Maritime hospital site or its relocation. The hospital serves the wider community including residents in Swale and Maidstone, and development impacts from these areas could put further pressure on the hospital which will need to be considered as part of the investigation and stakeholder work on these options.

The Local Plan recognises the inequalities challenge in Medway and the need to focus more resources on preventing ill-health and supporting people to stay well and independent. Reference is made in the Local Plan to the Sustainability and Transformation Plan for Kent and Medway (STP), which brings the NHS, public health and social care planning together across Kent and Medway. KCC supports that commitment provided within the Local Plan to ensure that the outcomes of the review process of the STP inform the policy provision for healthcare facilities.

Infrastructure

The commitment to engage constructively on strategic planning matters in order to ensure that development is supported by the provision of on and off site infrastructure, services and facilities is welcomed. The timing of infrastructure provision will depend on the housing trajectory and pace of development, and KCC will welcome continued liaison on all cross-boundary infrastructure pressures relating to the County Council's own service provision across Kent.

Education - The Local Plan sets out areas being considered for development but does not identify housing allocations and the phasing development. At present, there is insufficient housing data to determine education needs as the Local Plan refers to primary and secondary schools only in passing. There is an absence of any statements regarding the current capacity situation or quantification of forecast pupil numbers and demand mitigation, and no allowance is being made for meeting pupil demand from outside the county. Therefore, KCC is not in a position to make detailed comments regarding cross-border education issues potentially affecting neighbouring districts and boroughs (Swale, Gravesham, Tonbridge and Malling and Maidstone) and Medway in terms of education matters. It is understood that Medway plans to mitigate the pupil pressure arising from Medway's development and KCC requests continued discussion as work on the Local Plan progresses.

Communications Infrastructure - KCC is encouraged to see the requirement for new developments (commercial and residential) to have access to superfast broadband prior to occupation. As policies are prepared, KCC would recommend the inclusion of a policy which promotes Fibre to the Premise (FTTP) or requires the consideration of alternative technologies (such as fixed wireless networks) to provide speeds in excess of 24mbps.

Sustainable Transport

KCC would welcome continued engagement, alongside relevant transport providers, as Medway Council plans for strategic road network and rail improvements. The key development sites that are likely to generate additional trips impacting on the routes outside of Medway are at Rochester Airport (which has recently been awarded Enterprise Zone status, as well as a £4.4 million allocation from the Local Growth Fund), Cliffe, Cuxton, Halling, Capstone and Rainham, which has been identified for a significant mixed use development.

There is likely to be an increase in traffic heading into Gravesham, including:

- Via the A226 (which will need to be considered in the light of the Lower Thames Crossing proposals);
- Into Tonbridge and Malling (impacting on Walderslade and Lordswood);
- Via the A228 corridor towards Maidstone (including via the A229);
- At M2 Junction 3;
- On routes through Bredhurst and Boxley; and
- On the A2 through Newington and into Swale, including the A249/ A2 junction.

The impact of the additional journeys on the strategic highway network will need to be carefully considered and quantified, as well as the impact of rat running traffic and localised congestion on rural communities.

The Local Plan does not contain any significant detail on the extensions and redevelopments at London Thamesport and Chatham Docks, which may influence the freight movements and modal shift through Kent and Medway.

Overnight lorry parking - Overnight lorry parking across Kent and Medway is a significant problem. Inappropriate lorry parking or 'fly parking' leads to damaged roads, kerbs and verges, environmental health issues, litter and noise pollution issues, which are all heightened when close to residential areas. It is essential that lorries are parked at managed sites with adequate driver facilities, away from residential areas and close to the strategic road network. KCC would therefore urge Medway Council to consider allocating sites in its Local Plan for dedicated lorry parking. Guidance could also be prepared supporting associated policies in the Local Plan, advising prospective developers of best practice when it comes to bringing forward lorry park sites. Any such guidance should consider:

- Proximity to the strategic road network;
- Locations away from existing residential areas;
- Substantial landscaping and screening to mitigate any visual impact;
- Adequate access with visibility splays, turning and manoeuvring;
- HGV parking spaces to be at least 15 metres by 3.5 metres (50 sq. metres); and
- Adequate perimeter security including CCTV surveillance to prevent crime.

It is also requested that Medway Council considers making provision for HGV layover parking within Use Class B8 (Warehouse and Distribution Centre) developments.

Minerals, Waste and Energy

Minerals - KCC supports the overall policy approach for minerals. Both Kent and Medway are increasingly more reliant on imported aggregates and Kent expects there to be an increase of aggregates landed in Medway being exported to Kent. The Kent Minerals and Waste Local Plan (KMWLP) 2013 – 30 and the Medway Local Plan 2012-2035 will need to align in respect of the overall vision and objectives. To this end, KCC supports the notion of sharing importation data for minerals/aggregates.

The Local Plan sets out how Medway will meet the needs for land-won aggregates (sand and gravel) and chalk as the main economic geologies in the area. However, it is silent on how Medway will meet the needs for other potentially required materials that may be part of the area's economic geology, or those that may be required by commercial activities within the area reliant on imports. KCC requests clarification on whether there is an expectation that these other economic minerals will be imported from Kent and the wider region and that the policy approach to safeguarding sand and gravel is expanded to all economic minerals where possible. It is assumed that Mineral Safeguarding Areas and Mineral Consultation Areas will be defined as part of the Local Plan.

The Infrastructure Position Statement (IPS) sets out that a more comprehensive assessment will be carried out as part of the minerals planning evidence base for the emerging Local Plan. The County Council, as adjoining Mineral Planning Authority, would welcome the opportunity to work with Medway Council from the outset of its preparation.

Waste and Recycling - KCC supports the policy approach for waste, which closely reflects the policy approach for waste with the KMWLP 2013-30. This is welcomed, given the close relationship between the Kent and Medway areas. In order to maintain net self-sufficiency, the policy approach should safeguard all existing waste management facilities from incompatible development and redevelopment to prevent the loss of waste management capacity. Whilst municipal solid waste (MSW) is handled by an external operator, this waste stream should still be considered in the Local Plan, as it has spatial land use implications.

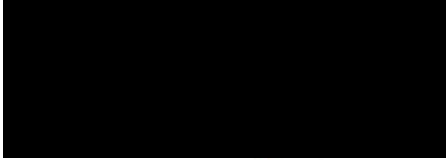
The proposed policy approach does not include reference to waste water treatment works. KCC suggests that this should be considered in the Local Plan, given the anticipated proposed growth in the Medway area. The IPS does however include reference to waste water treatment works and this is welcomed as capacity may need to be increased outside of the Medway area. It is particularly important if growth is located close to the Council boundaries. Whilst householder waste is managed by an external operator with final disposal outside the Medway area, the Local Plan should ensure that the capacity to deal with this waste will be available for the duration of the Plan.

Detailed technical comments on minerals and waste can be found at Appendix 3 to this letter.

The County Council recognises the importance of the Local Plan in establishing the framework for the sustainable development of Medway. KCC will continue to work with Medway in ensuring we have a shared script regarding priorities; the importance of the Thames Estuary; and the need for infrastructure funding to ensure that Medway's proposed housing and employment growth is supported by necessary infrastructure and service provision.

If you require any further information or clarification on any matter, please do not hesitate to contact me.

Yours sincerely,



Barbara Cooper
Corporate Director - Growth, Environment and Transport

Appendices

- Appendix 1 – Technical comments on heritage
- Appendix 2 – Technical comments on natural environment and green belt
- Appendix 3 – Technical comments on minerals and waste

Appendix 1 – technical heritage comments

Chapter 2 - strategic issues (p13)

Medway's historic environment has played a significant role in forming the character of the unitary authority today as well as having potential as a contributor to the success of the area in the future. Medway has a wide range of heritage assets, many of which are of international importance. These include 76 scheduled monuments, more than 630 Listed Buildings, and 2 Registered Parks and Gardens. There are many more heritage assets that contribute to character at a local level. These include more than 30 historic parks and gardens, historic landscape features, historic buildings and archaeological sites. Indeed, the Kent Historic Environment Record lists more than 3,300 un-designated heritage assets in Medway. These assets are to be found across the unitary authority. Highlights include Rochester with its important Roman, Saxon and Medieval remains, Chatham, with its internationally important Royal Dockyard and associated fortifications, Gillingham which has Saxon origins and the Thames Estuary fortifications located on the Hoo peninsula and Isle of Grain. Within the rural areas of Medway the historic environment is similarly important: important Palaeolithic remains are present at Cuxton and elsewhere along the former courses of the River Medway and the marshes and intertidal zone are important for later prehistoric remains. The rural areas are particularly important for military and industrial survivals as well as the pattern of historic villages and lanes. Many of these sites are of national significance but currently undesignated (e.g Cliffe explosives works). For new growth and development to be successful in the area it will have to work with the grain of this existing character and, if possible, enhance it.

Among the key strategic issues is the need to regenerate and develop Medway in a way that is sympathetic to its past. At present, Rochester is a visibly historic area with many high quality buildings and an attractive streetscape. Chatham has areas, primarily associated with the river frontage, Dockyard and historic fortifications that are similarly attractive. In Gillingham, by contrast, historic features are less common and visible yet Gillingham is a historic settlement dating to perhaps Anglo-Saxon times. The river frontage contains numerous heritage assets and has great potential for heritage-led leisure and tourism. The Local Plan should seek to ensure that the heritage assets of all of Medway are used to their maximum advantage so that regeneration can be successful and durable.

There are a number of key studies and resources that should underpin any consideration and use of Medway's historic environment:

- Kent Historic Environment Record, a database of archaeological sites, historic buildings and landscape features in Kent and Medway. See <http://www.kent.gov.uk>
- The outputs of the Hoo Peninsula Historic Landscape Project – a major project carried out by Historic England from 2009 – 2012 that examined all aspects of the peninsula's heritage. See <https://historicengland.org.uk/research/current/discover-and-understand/rural-heritage/hoo-peninsula/>
- Historic town survey reports for Chatham, Rochester and Gillingham (2004). These reviewed the known archaeological and built heritage of the three towns and identified Urban Archaeological Zones of sensitivity. See http://archaeologydataservice.ac.uk/archives/view/kent_eus_2006/
- Kent Farmsteads Guidance (2012) for developers and planners considering development in the countryside. See <http://www.kentdowns.org.uk/publications/kent-downs-aonb-farmstead-guidance>
- Kent Historic Landscape Characterisation (2001). See http://archaeologydataservice.ac.uk/archives/view/kent_hlc_2014/
- Kent Gardens Trust survey reports for gardens and green spaces in Medway. See <http://www.kentgardenstrust.org.uk/research-projects/reports/?projId=8>

Developing a Vision for 2035 (p15)

Although the historic environment does not feature as a strategic issue in chapter 2 KCC heritage was pleased to see that Medway's heritage features prominently in the Vision for 2035.

2.37 KCC heritage supports the idea of a coastal path that would link key heritage sites. This should tie in with the England Coast Path being developed by Natural England across north Kent. We have already supplied appropriate Historic Environment Record information and advice to Natural England to guide the route and identify any needed mitigation or opportunities for interpretation and would be happy to do so for Medway Council.

Strategic Objectives (p17)

KCC heritage supports the strategic objective "To secure a strong green infrastructure network that protects the assets of the natural and historic environments in urban and rural Medway, and informs the design and sustainability of new development." This will help conserve the assets themselves but also ensure that their potential is exploited and that they are enjoyed by local people and visitors. This will also help to contribute to the health and wellbeing agenda.

KCC heritage supports the strategic objective "To deliver sustainable development, meeting the needs of Medway's communities, respecting the natural and historic environment, and directing growth to the most suitable locations that can enhance Medway's economic, social and environmental characteristics;" Development is the greatest threat to the historic environment of Medway but can also draw on heritage assets and the historic landscape to be more effective at delivering the Local Plan's regeneration objectives.

3 Delivering sustainable development – options

The four scenarios presented involve essentially the same range of development areas but the level of development at each is weighted differently within each scenario. We have summarised the heritage impact of each major development area below and provided a table that summarises the impact of each scenario on each development area. KCC heritage has not provided summaries of the heritage assets of the incremental expansion sites of Grain, Allhallows, Lower Stoke, High Halstow, Cliffe Wood, Cliffe, Cuxton and Halling, as this is assumed for all four scenarios.

For these sites there is therefore no difference between the different scenarios. All contain heritage assets, however, and full assessment of proposed development sites will be required before development.

Development areas included in the Scenarios

Medway City Estate & Strood sites

Medway City Estate lies immediately adjacent to the cutting for the Medway Tunnel during which sediments containing horizons of prehistoric and Roman occupation were recorded. In addition the alluvial deposits in this area contain important evidence of the sedimentological and environmental history of the Medway. Strood lies either side of the probable alignment of Roman Watling Street at the west end of the site of the Roman bridge and Roman burials and buildings have been discovered in the area. Saxon and medieval remains have also been found here. A post medieval tide mill and associated channel lies close to the bridge and by the 19th century the surrounding landscape had been reclaimed for a number of industrial

developments including an oil mill. Remains of the industrial development of the area are also of archaeological interest. Development could also impact on the Frindsbury and Manor Farm Conservation Area and the long view setting of high grade Listed Buildings.

Historic Dockyard, Chatham

The historic dockyard is of international importance and contains many designated remains in the form of both Listed Buildings and Scheduled Monuments. There is also potential for the discovery of further remains related to the historic river-front. Developments in this area have the potential to impact on both standing and buried archaeological remains, to affect the settings of the monuments or to impact on key historic views and the 'riverscape'

Chatham Docks

Previous archaeological excavation at both ends of the Medway tunnel has demonstrated that this area has good potential for the discovery of prehistoric remains from the Palaeolithic period onwards. Neolithic, Bronze Age and Iron Age remains were discovered at the east end of the tunnel. It is also possible the the remains of medieval and post-medieval river frontages could lie in this area. Towards the south of the development area are the Lower Lines, which form part of the landward defences of Chatham Dockyard. The Lower Lines were constructed from 1803 to address a weakness in the Chatham Lines fortifications and their remains could lie in the development area. Development in this area would need to take account of the setting of high-grade heritage assets as well as the historic lang views along and across the Medway – part of the general 'riverscape'.

Grange

The development area lies in a region of considerable archaeological potential, primarily from the Roman period onwards. At Grange Manor prehistoric features and over 20 Roman structures were excavated including a temple or mausoleum, workshops and roads. Early medieval evidence was also found and Grange/Grench Manor includes the remains of a 13th century medieval manor house complex. Close to (or possibly within) the development area also survive the remains of two 19th century infantry redoubts. These experimental sites marked important stages in the development of defensive sites. Development could also have an impact on the setting of existing designated heritage assets (such as Listed Buildings) and the character of the Conservation Areas.

Lower Rainham

The development area has archaeological potential associated with its position close to the River Medway, where a number of past archaeological discoveries have been recorded. These include Romano-British pottery vessels found close to Lower Rainham Road, and probably originally deposited in association with a burial. Other finds from the area include a 5th century AD gold Merovingian coin and large numbers of flint tools including Palaeolithic hand-axes.

Rainham

The Rainham development area has been relatively little studied and few heritage assets are known from within the area itself. Nevertheless, the general potential of this part of Medway is significant and includes important Roman remains to the north and at Hartlip. Roman Watling Street also passes through the development area. There are also a number of historic farmsteads and Listed Buildings.

Capstone

There has been little formal investigation of the development area. A number of Palaeolithic implements have been discovered in the Darland area. A Bronze Age barrow may have existed at Sharstead Farm. Romano-British burials have been reported from Hale Farm and Gransden's Brickfield although there is little further information about these. Their locations suggest that a Roman routeway may have existed in this area. A possible pre-18th century chapel has been identified near Capstone. Fort Darland, built as part of the Chatham ring-fortress in 1899, is located to the north of the area. Although now demolished earthworks associated with the fort remain and these and their setting could be affected by development in the area.

Wigmore

This small development area lies in an area of more limited archaeological potential. The remains of a medieval chapel are located immediately south of Hempstead Valley Shopping Centre. A Second World War decoy site for the Shorts aircraft factory was located west of Capstone Road and a heavy anti-aircraft battery was installed at Gibraltar Farm. Some camp structures survive.

Halling

It is not possible from the consultation document to tell exactly where this site is but it seems to be in or close by the Rochester Cement Works. It is possible that the development area thus lies in a site already subject to quarrying in which case the below-ground archaeological potential may be limited although important industrial archaeology assets may still survive. If the site has not yet been disturbed then the site has archaeological potential related to its location on the historic route up the Medway valley. A prehistoric burial, possibly of Neolithic date, has been found to the north of the site and a second, probably Romano-British, burial found in the Bores Hole quarry to the north-west.

Outer Strood/Brompton Farm

The development area lies in an area of general potential, particularly related to the prehistoric and Roman periods. Excavations for new housing on Hoo Road found Middle to Late Bronze Age features. Cropmarks of probable Bronze Age ring-ditches have been observed c. 1 km north of the development area. Excavations near Four Elms roundabout found evidence for prehistoric, Roman and medieval settlement. North-west of the area a watching brief in 1977-9 found evidence for Roman occupation and a Roman bowl and associated finds were found at Brompton Farm. Roman Watling Street also runs to the south of the development area. Large numbers of finds have also been recorded by metal-detectorists including Roman and Medieval finds but also prehistoric flintwork.

Lodge Hill

KCC heritage has already submitted much detailed comment to Medway Council on proposed Lodge Hill and Chattenden developments. The development area contains several designated assets (including both Scheduled Monuments and Listed Buildings) and Historic England should be consulted on these at an early stage of any proposed development. The site also contains numerous non-designated assets including both standing structures and archaeological sites. It would be appropriate to retain and re-use some of these both to conserve the assets themselves and also to give the new development character and a link with its military past. Others will need appropriate recording.

Although the development area's more recent military heritage is the main theme of interest at the site there is also potential for the discovery of earlier archaeological remains.

Prehistoric remains have been found at the Four Elms roundabout to the south and Hoo St Werburgh is an important medieval centre.

Hoo St Werburgh

Past archaeological investigations in the area have discovered extensive prehistoric and Romano-British remains in the vicinity of Hoo. The alignment of a Roman road linking the Hoo Peninsula to Roman Watling Street is projected to run to the south of the former Chattenden Barracks close to the development area. To the north-west of the area, within the Lodge Hill enclosure, a Romano-British cemetery has previously been identified and a further occupation site has been found south of Hoo between the village and the shoreline. The village itself contains built heritage assets such as the church and it is important to protect the long views towards them. There are also Saxon and Medieval remains although the site of the 7th century nunnery has yet to be identified. The landscape also contains numerous survivals of the Second World War associated with the GHQ Stop Line that runs from the foreshore south-east of Hoo to the north of Lodge Hill where it turns west.

New / enhanced employment land

Grain

Important Pleistocene deposits have been found in a number of locations on the Hoo Peninsula, such as at Allhallows. Prehistoric peat horizons are known in coastal exposures close to the power station and prehistoric remains are known from the nearby Kent Oil Refinery site. There are also a number of probable ring-ditch cropmarks from close to the power station. A major Iron Age occupation site is known from the higher land at Grain. Roman and medieval remains have also been located at the nearby refinery site. In addition there may be evidence of the medieval and post medieval reclamation of the marshlands. The development area is also close to nationally important defensive monuments along the Grain shore whose setting could be affected by new development.

Kingsnorth

The Kingsnorth development area has been subject to archaeological study over many years. Despite the presence of an operating power station there is significant potential for archaeological remains from several periods. Mesolithic, Neolithic and Early Bronze Age finds have been recovered and archaeological features from the Middle Bronze Age, through the Late Bronze Age and into the Early Iron Age as well as of Late Iron Age date have been discovered. These included Middle Bronze Age to Late Iron Age fields, field systems and droveways; Middle Bronze Age 'ritual' and funerary activity; Late Bronze Age to Early Iron Age saltworking; and Early Iron Age settlement. During the Roman period there is evidence of industrial activities, agriculture and burials. From the medieval period onwards land reclamation is evidenced by sea walls and drainage ditches. During the First World War Kingsnorth became an important centre of airship development and some of the buildings at the site may survive from this era.

The table below summarises the relative archaeological impacts of the 4 proposed scenarios. This is only indicative, however, and detailed assessment is required to more comprehensively identify heritage risks and opportunities.

Wickham cement works

Various archaeological remains have been recorded mostly from past quarrying operations. Four Roman urns were discovered west of the application area in 1895 during quarrying for the Wickham Cement Works. In addition an Anglo-Saxon burial was found to the south of the

motorway bridge. Although much of this area has already been quarried it is possible that archaeological remains generally and industrial archaeological remains in particular may survive at the development site.

Rochester airport

Past archaeological discoveries to the south and west of the airport have revealed evidence for archaeological activity of prehistoric and Romano-British date. These remains include a Roman inhumation to the south of the airfield. It is possible that further evidence for prehistoric and Romano-British activity may extend into the development area. Rochester Airfield was itself established in the 1930s, initially developed by Rochester Council, the airfield was quickly taken over by Shorts Brothers who began flying from the site in c. 1934-35. The site was used for test-flights, a flying school and also hosted civilian flights to Southend. In the Second World War Shorts Brothers had a factory at the airfield which was used for the production of Stirling Bombers. Whilst no operational squadrons were based there a number of planes made emergency landings at Rochester. Although not an operational military airfield, the Rochester site was an important manufacturing site and as such was bombed on a number of occasions. Anti-aircraft defences were installed at the site and there were a number of air-raid shelters to provide accommodation for factory workers. A number of buildings relating to Short's use of the site survive, including hangers, air-raid shelters and other ancillary buildings. Of particular note is Hangar 3, built in 1939, for No. 23 Elementary and Reserve Flying Training School.

Lordswood

There are no archaeological sites within within the immediate vicinity of the development area. The area was wooded until relatively recently although the name 'Swingate' and the nearby borough boundary do suggest Saxon activity nearby before this. The wider landscape of chalk downland, capped by clay-with-flints has produced significant prehistoric material and undated trackways in the vicinity may be of some antiquity.

North Gillingham

The development area is in an area of archaeological significance associated with early settlement along the Medway, along with latter development of Gillingham as a whole. Recent archaeological excavations at Grange Farm have revealed Romano-British and Anglo-Saxon remains of national importance, including a possible villa complex with associated mortuary areas, industrial activity possibly associated with the control of early economies and part of what may represent a complex Roman road network possibly linking the A2 (a Roman road between London and Dover) to the river. The Borough of Gillingham was extensively developed in the post-medieval period, primarily due to the expansion of military sites within the local area and further to the west at Brompton and Chatham. As a result, extensive truncation to earlier archaeological deposits is likely to have occurred. The significance of the site at Grange Farm provides evidence that villa complexes, such as those found within the Swale area, continue along the Medway towards Rochester, and possibly beyond, particularly in previously undeveloped areas.

Site	Archaeological potential of major development			
	Scenario 1	Scenario 2	Scenario 3	Scenario 4
Mixed use development areas				
Medway City Estate including Strood (scenario 1)	Higher	n/a	n/a	n/a

Medway City Estate (scenarios 2, 3, 4)	n/a	Lower	Lower	Medium
Chatham Docks (scenarios 1, 4)	High	n/a	n/a	Higher
Chatham (scenarios 1, 4)	Medium	n/a	n/a	Medium
Grange (scenarios 1,2,3,4)	Higher	Higher	Higher	Higher
Lower Rainham (scenario 2)	n/a	Medium	n/a	n/a
Rainham (scenarios 2,3,4)	n/a	Medium	Medium	Medium
Capstone (scenarios 2,3,4)	n/a	Medium	Medium	Medium
Wigmore (scenarios 2,3)	Lower	Lower	Lower	Lower
Halling (scenario 2)	n/a	Medium/Lower	n/a	n/a
Outer Strood / Brompton Farm (scenario 2)	n/a	Medium	n/a	n/a
Strood (scenario 4)	n/a	n/a	n/a	Higher
Lodge Hill (scenarios 1,2,3,4)	Higher	Higher	Higher	Higher
Hoo St Werburgh (scenarios 2,3,4)	n/a	Higher	Higher	Higher
New / enhanced employment land				
Grain(scenarios 1,2,3,4)	Higher	Higher	Higher	Higher
Kingsnorth(scenarios 1,2,3,4)	Higher	Higher	Higher	Higher
Wickham cement works (scenarios 1,2,3,4)	Medium/Lower	Medium/Lower	Medium/Lower	Medium/Lower
Chatham Historic Dockyard – interface land (scenarios 1,2,3,4)	Higher	Higher	Higher	Higher
Rochester Airport (scenarios 1,2,3,4)	Medium	Medium	Medium	Medium
Lordswood (scenarios 1,2,3,4)	Lower	Lower	Lower	Lower
Capstone (scenarios 1,2,3,4)	Lower	Lower	Lower	Lower
North Gillingham (scenarios 1,2,3,4)	Medium	Medium	Medium	Medium
Wigmore (scenarios 1,2,3,4)	Lower	Lower	Lower	Lower
Employment land to offset Medway City Estate				
North of Kingsnorth (scenarios 1)	Higher	n/a	n/a	n/a

7 Natural Environment and Green-Belt

7.14 KCC heritage would suggest that when Medway Council prepares its Green Infrastructure Framework it makes sure that the Framework takes account of the Kent Historic Landscape Characterisation (see my comments on 'Policy Approach: heritage' below). This will help the proposals of the Framework to complement the historic landscape of Medway. This will help ensure not only that historic landscape features are conserved but that route ways between green infrastructure sites work with the grain of existing tracks, lanes and paths helping connectivity and 'flow'.

Policy Approach: Landscape

All Kent's landscapes are the result of the interaction of natural and human processes over centuries or even thousands of years. When preparing policies designed to conserve the beauty, therefore, it is essential that the historic aspects of the landscape are identified, understood and appreciated. The updated Medway Landscape Character Assessment that is planned will be much more effective if it is combined with an enhanced Historic Landscape Characterisation for Medway. This has already been completed for the Hoo Peninsula which can serve as a template. KCC heritage would be pleased to discuss this further.

8 Built Environment

Policy approach: Design (p70)

The text says that consideration of development proposals should include whether the development "Responds appropriately to the character of the area, interprets respectfully the prevailing pattern of plot size, plot layout and building siting, roofscapes, mass, bulk and height, and views into and out of the site."

KCC heritage supports this, but to ensure that new development fits appropriately into the existing character also requires consideration of how the development will fit into the wider historic landscape (see section below 'Policy approach: heritage').

Heritage (p73)

General note: it is not possible to include all heritage aspects under the heading of 'Built environment'. Medway's heritage includes archaeological remains and the historic landscape, neither of which are part of the built heritage. In future Local Plan documents it would be helpful if the general title of this chapter could be changed to 'Built Environment and Heritage'.

8.21 KCC heritage was pleased to see that Medway intends to set out a strategy for the Historic Environment. Medway's heritage has great potential to contribute more effectively to the quality of life in the area than it does at present. The heritage is complex, however, and needs careful consideration to ensure that the opportunities it presents are not missed and that it is not harmed by inappropriate or poorly planned development. In recent years, Kent County Council has developed a Heritage Strategy for Dover District Council, and is currently developing another for Shepway District Council. We would suggest that the goals of the Medway strategy should be:

- To identify and describe the key themes of relevance of the heritage of the district and the heritage assets that represent them
- To assess the role that these can play in regeneration and tourism

- To identify both their vulnerabilities and the opportunities they provide
- To inform site allocations within the district
- To support policy development

There are now a number of models for Heritage Strategies. The most successful not only underpin development control decision-making but support the exploitation of the historic environment to bring a range of economic, social, health and educational benefits. Others can be much more superficial, however, and often fail to deliver the objectives for which they have been established. We would ask that Medway discuss this with us at an early stage.

Policy approach: heritage (p74)

The historic environment of Medway is a rich and complex resource that if conserved appropriately and exploited effectively has the potential to bring great benefit to its people. If treated inappropriately, however, then these benefits will not accrue and Medway's environment, both built and historic, will degrade and developments fail to be successfully integrated into existing communities.

With this in mind, the text in this section is very limited. Presumably, at a later point in the Local Plan process, formal policies will be developed to underpin the management of the historic environment by Medway Council? These will need to include a number of sections that go beyond the current text:

Built environment

Conservation Areas

Conservation Areas are key to preserving the historic character of Medway's settlements and helping to tie new developments, in both urban and rural contexts, into existing settlements. Central to this process are Conservation Area Appraisals and we would recommend that Medway Council commit to continuing the CAA programme.

Listed Buildings

Medway contains more than 600 listed buildings. These are important markers from the past in the urban and rural landscape and are often central to people's appreciation and understanding of their local character. The Local Plan should contain detail of how these buildings will be conserved such that their significance is retained and where possible enhanced by development.

Locally listed heritage assets

Another important management tool for the historic environment would be a Local List of Heritage assets (not just buildings). The assets likely to be included on a local list will be those of particular importance to local communities as opposed to those on the statutory list which meet national criteria. A local list thus allows a particularly responsive and community-led approach to the conservation of the historic environment.

A recent project carried out by Medway Council, Kent County Council and the Kent Gardens Trust is a good example of this. The project involved a community group (Kent Gardens Trust) assisting professionals to review information on key local heritage assets so that they can be included in a local list. The model was extremely successful and would lend itself well to projects aimed at other types of asset.

Military and coastal heritage

The built heritage of Medway has a number of key themes that policies could develop and support.

Medway has long been an area of military significance for the UK. Much of this importance is derived from the presence of the historic dockyard and the text suggests that this is appreciated. However, the potential of the defence systems that surround the dockyard are not fully appreciated. In particular, the fortifications of Grain constitute one of the most powerful and varied sets of defence sites in the country. These could play a much greater role in Medway's tourism industry which could be particularly important given the range of challenges faced by that part of Medway. There are additional defence sites along the Medway that could be incorporated into river-based tourism, even if some, such as forts Hoo and Darnet could not be visited. Within the Hoo peninsula the remnants of the Second World War GHQ Stop Line forms one of the most complete military landscapes of the Second World War in Kent and in conjunction with the nearby military remains at Chattenden could again play an important economic and social role in this growth area. Further to the west, Cliffe Fort and Slough Fort also have an undeveloped tourism potential.

The exploitation of the Thames estuary for industrial purposes has also left a wealth of historic remains that can be seen today in the form of wharves, jetties, hard, landings and structures. These were constructed to serve a range of industries but the most important of these may have been the gunpowder and explosive industries that flourished in the area, particularly at the Curtis and Harvey Explosives Works at Cliffe. Many of these remains will be clearly visible to people using the coastal path and provide an excellent opportunity for interpretation. Across Medway there are numerous industrial structures that may not be listed buildings but which nonetheless form key components in the authority's character and which would be suitable for sympathetic re-use rather than wholesale replacement.

Townscape

Settlements have a historic character that go beyond just Conservation Areas and Listed Buildings. The urban environment as a whole contributes to historic character. Elements in this environment such as streets and street patterns, structures, furniture, surfaces, boundaries, open and green space (squares, urban parks, etc.) help to give settlements a sense of place even when they may not warrant protection as Conservation Areas.

Archaeology

At present, there is no consideration of Medway's archaeological heritage in the document. There are more than 1,500 known archaeological assets in Medway. Many of these relate to Scheduled Monuments such as the remains of Roman and Medieval Rochester. Others are undesignated but still significant to local communities such as the Roman temple/mausoleum at Grange Manor or the Saxon to Medieval remains at Hoo St Werburgh. These are inevitably less visible than Medway's built heritage but are no less important in understanding Medway's past and in giving a sense of belonging to new settlements and developments.

Landscape

Historic landscape

The landscape of Medway is the result of the interaction of natural and human processes over many centuries. Even apparently less developed areas of landscape will contain many historic features such as the patterns of tracks, lanes and hedgerows that give character to

the district. Even marshland has been created by reclamation from the medieval period onwards. The Kent Historic Landscape Characterisation (2001) has identified the broad historic character of the landscape of Kent. Where it is to be applied locally further study is needed to refine its conclusions but it remains an essential tool for understanding Medway's landscape. To be fully effective in local planning and development control, the Historic Landscape Characterisation should be backed up by more detailed case-by-case analysis, to add greater detail through secondary sources. The Hoo Peninsula has already been covered by such an assessment and we would suggest that Medway Council works with us to take forward a general Medway study.

Farmsteads

Like much of Kent, Medway has historically had a dispersed settlement pattern. Development between villages and hamlets and among farm buildings would in many places be consistent with the historic character of those areas. English Heritage has published guidance on historic farmsteads in Kent that considers how rural development proposals can be assessed for whether they are consistent with existing character of the countryside. The Kent Farmsteads Guidance has been endorsed by the County Council and it is recommended that Medway Council considers adopting the guidance as SPD, as part of the Local Plan process. KCC heritage would be happy to discuss this further.

Appendix 2 – technical biodiversity comments

Policy Approach: Strategic Access Management and Monitoring

KCC is satisfied that the importance of the European/internationally designated sites has been identified, along with the threats, in particular through increased recreational pressure.

The SAMMS report also encourages development to include greenspaces within their development proposals to provide recreational areas, particularly for dog walkers. This approach will further alleviate any potential impacts through recreational disturbance on the designated sites and needs to be encouraged where necessary.

On top of the SAMM payments, greater emphasis should be placed on the impacts upon any functional habitat associated with the designated sites. In particular, habitats of principal importance such as mudflats and saltmarshes that are a key component to the SPA, despite not being within the designation. Furthermore, new developments will need to appropriately address any detrimental impacts through noise, lighting and vibrations that may impact any areas of functional habitat that in turn, will impact upon the designated sites.

Policy Approach: securing strong green infrastructure

KCC biodiversity welcomes the inclusion of both statutory and non-statutory designated sites. We would be pleased if the policy included the protection of habitats of principal importance. The UK Post-2010 Biodiversity Framework, published in July 2012, succeeded the UK Biodiversity Action Plan (BAP) and 'Conserving Biodiversity – the UK Approach'. The Biodiversity Framework is now focussed at country-level rather than a UK-level to demonstrate how the work of the four countries and the UK contributes to achieving those targets (JNCC, 2015). Priority species and habitats that were identified under the UK BAP remain important and are now referred to as habitats and species of principal importance. The Kent Habitat Survey (2012) has provided a quantitative assessment of habitats of principal importance and reference should be made to this project.

The policy approach does not include reference to protected species as outlined through the Wildlife and Countryside Act 1981 (as amended), Conservation of Habitats and Species Regulations 2010 (as amended) as well as those listed on section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. Any implementation of green infrastructure will need to take into consideration the relevant mitigation measures for protected species.

Additional Policies

In addition to the two outlined policy approaches, KCC biodiversity would welcome the inclusion of a policy specifically addressing how Medway Council considers the impact upon internationally, nationally and locally designated sites, as well as on protected species/habitats.

KCC biodiversity expect that new developments will adhere to the 'mitigation hierarchy', ensuring that where the potential for ecological impacts to occur is identified, the approach to development will first try to avoid the impacts, then minimise impacts and, as a last resort, to compensate for any remaining ecological impacts, ensuring that Medway Council has a full understanding of the potential ecological impacts as material considerations in the planning determination.

Appendix 3 – technical minerals and waste comments

Minerals

Overall, the policy approach for minerals is supported by Kent County Council. Both Kent and Medway are increasingly more reliant on imported aggregates and Kent expects there to be an increase of aggregates landed in Medway being exported to Kent. It was made clear by the Planning Inspector during the examination of the Kent Mineral and Waste Local Plan 2013 - 30 (KMWLP 2013 – 30) that this source of aggregates is vital to Kent maintaining a steady and adequate supply and therefore the safeguarding policy (point 6) is welcomed. Given the importance of importing minerals via wharves, there is an opportunity for sharing data, where appropriate, for the tonnages of mineral/aggregates imported via wharves to assist with the plan making process.

Following the most recent SEAWP (late 2016) meeting, it was considered appropriate for Kent and Medway to factor in both areas as whole unit for the analysis of aggregate data for the benefit of plan making and strategic planning. This is supported by point 3 of the Policy Approach: Minerals. Therefore, it is necessary for both the KMWLP 2013 – 30 and the Medway Local Plan 2012-2035 to align in regards to the overall vision and objectives and supports the notion of sharing importation data for minerals/aggregates.

Whilst the Development Options document discusses how Medway will meet the needs for land-won aggregates (sand and gravel) and chalk, as the main economic geologies in the area, it is otherwise silent on how it will meet the needs for other potentially required materials that may be part of the area's economic geology or be required by commercial activities within the area that will rely on imports. To clarify what is able to be supplied from the area, an economic geological map is required which will predicate the Mineral Consultation Area and Mineral Safeguarding Areas. The map should also show the safeguarded importation points that may be required for minerals that are unrepresented in the area's geology, such as imported crushed rock and silica sand and to supplement land-won supplies of minerals.

The document states in paragraph 12.3 that Medway imports aggregates but it does not state the type of mineral or aggregate imported and how this will contribute to the needs of a steady and adequate supply of industrial minerals and/or aggregates in the area and its contribution to mineral supply more widely. Paragraph 12.4 suggests that whilst some of the need may be met through secondary and recycled material it is unlikely to account for the whole need. Consequently, the policy approach seems to be weighted towards sand and gravel with less emphasis on meeting the needs of the other economic minerals. Is there an expectation of these other economic minerals being imported from Kent and the wider regional area?

The policy approach to safeguarding sand and gravel should be expanded to all economic minerals where possible and it is also assumed that this policy will be accompanied by Mineral Safeguarding Areas and Mineral Consultation Areas.

Whilst one policy is safeguarding existing mineral infrastructure, another policy approach is seeking to relocate parts of the secondary and recycled aggregate sector that will be displaced through the planned redevelopment scheme. As these policies contain a contradiction it is assumed (though not stated) the safeguarding policy will include exception criteria in which the presumption to safeguard such facilities is exempt if an alternative suitable site is available that is equivalent to, or better than the existing site. It is considered that this position will need expansion and clarification.

Finally, it should be considered that the policy approach should encourage the prior extraction of economic minerals where practical and economically viable in order to meet the mineral needs and prevent needless sterilisation of economic minerals.

Waste

Overall, the policy approach for waste is supported by Kent County Council. The synergies of the policy approach for waste with the KMWLP 13-30 is welcomed, given the close relationship between the Kent and Medway areas. In order to maintain net self-sufficiency the policy approach should safeguard all existing waste management facilities from incompatible development and redevelopment to prevent the loss of waste management capacity. Whilst MSW is handled by an external operator, this waste stream should still be considered in the Local Plan as it has spatial land use implications.

The policy approach does not include any reference to waste water treatment works. This should be considered in the Local Plan given the proposed growth in the Medway area.

Minerals & Waste

The Development Options document provides a substantial basis upon which the Medway Local Plan 2012-2035 can plan for minerals and waste. Given the recommendations from the previous SEAWP meeting and the importance of mineral/aggregate imports for both Kent and Medway, this process will provide a good opportunity for sharing import data. Alternatively, representatives from the Minerals and Waste Policy Team would be happy to meet with Medway Council's officers to discuss mineral and waste matters now and as the Plan progresses.