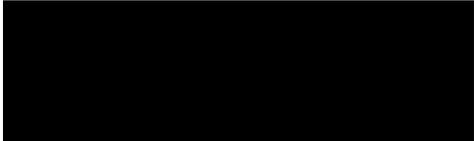




Ms Catherine Smith  
Planning Policy Regeneration  
Medway Council  
Gun Wharf  
Dock Road  
Chatham  
Kent ME4 4TR

**Environment Planning and  
Enforcement**  
Invicta House  
County Hall  
Maidstone  
ME14 1XX



29<sup>th</sup> February 2016

Dear Ms Smith,

**Re: Medway Local Plan Issues and Options Consultation**

The County Council welcomes the opportunity to comment on the Issues and Options consultation and to highlight some of the cross boundary issues that we believe should be considered in preparation of the Medway Local Plan, particularly in relation to transport and community infrastructure deliverability. KCC has provided a response to the consultation questions in Appendix A.

A summary of the key points are as follows:

- KCC have concerns over the impact that the additional houses might have on Kent services and infrastructure. Medway need to ensure that future development sites are viable and that the level of infrastructure required to support the level of growth anticipated can be funded and delivered to help create sustainable communities particularly in relation to transport and education.
- Medway should take advantage of its position in the Thames Gateway. Provision of good quality, easily accessible employment floorspace could help to capitalise on growth in the wider area. Medway needs to be promoted as an attractive cheaper alternative to London for employers, with its good transport links and more reasonable business rates.
- Greater consideration will need to be given to the proposed Lower Thames Crossing Option C proposal. The impact of the proposed route of the new Crossing on Medway roads should not be underestimated.

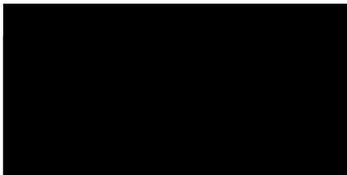


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- KCC are in general agreement with the proposed development strategy. KCC support development within the current urban areas rather than substantial development on the edge of the towns on greenfield sites and in the greenbelt.
- KCC support the proposal to explore the potential for residential development in Chatham town centre and the waterfront area. Concentrating mixed use high density development in these areas is a sustainable option and would take the pressure off greenfield sites in the countryside.
- KCC would welcome continued dialogue with Medway Council to consider the cumulative impact, of development sites in Medway and those within Kent to fully understand the impact on key services.

If you have any queries regarding our comments, please contact me.

Yours sincerely



Katie Stewart  
Director Environment, Planning and  
Enforcement Kent County Council

## **Appendix A: The County Councils response to the Medway Issues and Options Consultation Questions**

### **1) What do you think should be the key components of and ambitions for the Local Plan's vision for Medway in 2035?**

*KCC are broadly supportive of the ambition set out in the Issues and Options consultation document. One of the key issues will be to ensure that future development sites are viable and that the level of infrastructure required for 29,264 new homes can be provided particularly for transport and education.*

*Medway should also take advantage of its position in the Thames Gateway. Provision of good quality, easily accessible employment floorspace could help to capitalise on growth in the wider area. Medway needs to be promoted as an attractive cheaper alternative to London for employers, with its good transport links and more reasonable business rates.*

*The impact of the proposed Lower Thames Crossing Option C proposal will need to be considered and the impact of the proposed route of the new Crossing on Medway roads should not be underestimated.*

*KCC are in general agreement with the proposed development strategy. KCC support development within the current urban areas rather than substantial development on the edge of the towns on greenfield sites and in the greenbelt.*

*The Local Plan will need to recognise the role that Medway's historic environment has played in forming the character of the area as well as its potential as a contributor to the success of the area in the future..*

### **2) What do you think are the strategic issues that the Local Plan needs to address?**

*The Issues and Options document covers the main strategic issues in Kent that also affect Medway, it refers to the Lower Thames Crossing (LTC), Medway's place in the Thames Gateway, the development of Ebbsfleet Garden City, and the work of the South East Local Enterprise Partnership.*

*KCC welcomes the commitment to work with neighbouring planning authorities and statutory bodies in cross boundary matters to address these strategic issues.*

*Among the key strategic issues is the need to regenerate and develop Medway in a way that is sympathetic to its past. 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.*

### **3) How should the council respond to these issues?**

*The Issues and Options document needs to give greater consideration to the proposed Lower Thames Crossing Option C proposal.*

*It should not be underestimated the pressure a new LTC east of Gravesend will place on some particularly congested corridors such as the A2, A289 and the A226 (Gravesend Road). It is expected that Medway will be properly engaged in the LTC*

*process, particularly as Option C is likely to see a change in existing traffic patterns across the wider Medway area, notably east-west movements.*

*Medway are committed to working with neighbouring planning authorities and statutory bodies in cross boundary matters, KCC welcome this as a means to addressing the strategic issues. KCC's forthcoming fourth Local Transport Plan (LTP4) will also determine to work with partner organisation on such matters and so both authorities align with one another.*

*The Plan needs to emphasise the importance of conserving and, where possible, enhancing the historic environment such that it can contribute to the future growth, economy and social wellbeing of Medway. The Plan should recognise the full range of heritage assets in the area: listed and historic buildings, archaeological sites and monuments, and historic landscapes.*

**4) Do you agree with the approach and conclusions of the assessment of housing needs calculated for Medway over the plan period?**

*KCC attended a session on the North Kent Strategic Housing and Economic Needs Assessment and consider the methodology to be appropriate and the conclusions reasonable.*

**5) What do you consider to be the appropriate housing market area for Medway?**

*The housing market area needs to extend past the Medway boundary and include neighbouring authorities particularly with the improved HS1 services which attracts commuters to the Medway Towns.*

**6) Do you agree that 25% is an appropriate level for the requirement of affordable housing, and what threshold should be set for the scale of development that needs to provide affordable housing?**

*Viability is a key concern for KCC and the appropriateness of the figure would depend on whether the initial analysis indicates that this percentage would be deliverable on developments of over 15 units. KCC would encourage further work to consider whether smaller developments would be able to support the delivery of affordable housing.*

**7) What form of housing best meets the needs of Medway's growing population of older people?**

*A combination of nursing homes, warden controlled homes and houses that can be adapted to incorporate specific requirements i.e. wheel chair access etc. are needed.*

**8) What housing is needed for other specific groups in Medway?**

*The Medway Towns has a large student population; their accommodation needs should be considered.*

*KCC would encourage a review of the gypsy and traveller accommodation needs following the changes in government policy.*

**9) How can development make a positive contribution to the health and wellbeing of Medway's communities?**

*Good design can help to make a positive contribution to the health and wellbeing of communities. Well-built, attractive homes with plenty of public open space and good access to key services can improve the wellbeing of Medway's communities.*

**10) Do you have suggestions for potential sites for starter home developments?**

**11) How do you consider the infrastructure needs of starter home and self and custom build developments should be addressed?**

**12) How should the council provide for the demand for land for self and custom build housing? For example, integrated with larger developments, on standalone sites, or linked to placemaking ambitions to deliver highly sustainable and innovative design quality.**

*Starter homes could be incorporated into a number of the key strategic sites particularly those close to public transport as those residents on lower incomes are likely to rely on public transport.*

*Housing developments are often stalled due to viability. An increase in starter homes will have an impact on the viability as they are exempt from S106/ CIL and this could have a major impact on the ability to fund critical infrastructure to support communities.*

**13) What is the demand for student housing and where would this be best located? For example, would dedicated student housing be appropriate in Medway's town centres?**

*Student housing should be located close to the universities and colleges or close to public transport to provide good access to the facilities.*

**14) What is the level and type of need for gypsy, traveller and travelling showpeople's accommodation in Medway, and what criteria should be used to identify appropriate sites?**

*This will need to be determined through the proposed review of Gypsy and Traveller accommodation needs. KCC would be happy to be involved in this review.*

**15) Where should such sites be located, considering opportunities in existing employment areas, and potential new sites such as Lodge Hill or other developments?**

*A range of employment areas and suitable business accommodation should be provided this will help to improve the local economy and reduce travel and out-commuting. These should be located where there is good transport infrastructure particularly in and close to the town centres and at existing employment areas.*

**16) What are the opportunities for further business growth in and close to town centres in Medway?**

*KCC consider that the opportunity areas have been identified on Page 30 of the consultation document.*

**17) Do you agree with scale of jobs and employment land needs identified for Medway over the plan period?**

*KCC attended a session on the North Kent Strategic Housing and Economic Needs Assessment and consider the methodology to be appropriate and the conclusions reasonable in relation to jobs and employment.*

**18) How can Medway realise opportunities to capitalise on growth in the wider area, including London?**

*Medway should capitalise on its position in the Thames Gateway. Provision of good quality, easily accessible employment floorspace could help to capitalise on growth in the wider area. Medway needs to be promoted as an attractive cheaper alternative to London for employers, with its good transport links to the wider area and its more reasonable business rates.*

**19) How should the plan respond to opportunities arising from the expansion of higher and further education in Medway?**

*The Plan should encourage greater links between the universities, colleges and local businesses to share experience and knowledge. This can increase productivity of existing business and potentially attract inward investors.*

**20) Is it feasible to reduce the amount of out-commuting from Medway, and what would be required to achieve this?**

*A shortage of good quality office space has been identified as a potential problem in the consultation document and addressing this is necessary in reversing the trend of out commuting, as well as through encouraging new tech and creative activities in to the area.*

**21) How should the plan address the specific locational requirements of some businesses, for example access to wharves?**

*Many of the wharves and docks along the Thames and Medway although are of historic importance are, however, often neglected and difficult to access. An assessment of business need is required to understand the locational requirements.*

**22) What scale and form of additional visitor accommodation is needed to support and develop a successful tourism sector in Medway?**

*Opportunities for further visitor accommodation should be sought particularly in Rochester.*

*KCC welcome the recognition in the Plan that the Paramount proposal could offer new opportunities for tourism.*

**23) What are the opportunities for extending tourism in Medway beyond day trips to the main attractions and events?**

*Groups of attractions/activities should be promoted to encourage extended visits; this could be combined with neighbouring areas. Overnight accommodation could be improved and encourage use of historic or unusual buildings.*

**24) What role does the river and Medway's countryside have to play in developing tourism locally?**

*There are a range of local attractions in Medway, primarily focused on the river, that would benefit from improved conservation and presentation and that would in turn contribute significantly to the regions wellbeing, sense of place, and economic potential.*

*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 Issues and Options Report 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.*

*Medway's countryside can also play a greater role in tourism. For this to happen though it needs to be first understood and then conserved. The comments made in relation to Historic Landscape Characterisation in response to question 32 apply here.*

**25) Should we focus investment & retail capacity on Chatham to consolidate its position as Medway's highest order centre?**

*Investment and retail should be focused towards Chatham to increase the vitality of the centre which has been in decline in recent years and to try and reduce the vacancy rate.*

*Gillingham should also be a further focus of investment as the shopping environment has been in decline in recent years.*

**26) Should we seek to facilitate development in Chatham of sufficient critical mass to improve market share, or plan for investment to meet currently identified capacity only?**

*Meeting currently identified capacity should be a starting point, with the medium term plan to explore the potential for increased market share.*

*KCC supports the proposal to explore the potential for residential development on some of the vacant sites within Chatham and Strood Town Centres.*

**27) What should the mix be in Medway's town centres between retail and other supporting uses, including food and drink, commercial leisure, employment and residential?**

*There should be a good mix of uses in the town centres although it is not for the place of KCC to say what that mix should be for each particular town.*

**28) Should we consider making provision for a new or replacement supermarket in Gillingham town centre? If so, where should this go?**

*Although the provision for convenience retail in the town centre is poor, there is a new Asda close by and a large Tesco's on the A2 so it is suggested there is sufficient retail provision nearby.*

**29) What should our approach be to proposals for new or enhanced out of town retail?**

*It is suggested that provision should not be made for new out of town retail but encourage enhanced provision at existing ones.*

**30) What are the most effective means to secure and strengthen Medway's environment, in the context of the area's development needs?**

*All new development should consider the surrounding environment and consider ways to mitigate any potential harm that maybe caused and look for ways to enhance and improve access to it.*

**31) What opportunities should be pursued in the Local Plan to extend connectivity for wildlife and people throughout urban and rural parts of Medway?**

*The Green Infrastructure (GI) for any proposed development needs to consider adjacent sites/areas to ensure that all GI is connected within Medway and neighbouring Local Authorities.*

*There is a need for a strategic approach to GI to ensure it doesn't develop in a piecemeal way with individual developments. Any GI strategy produced will need to have consideration of other GI strategies produced.*

**32) What approach should be taken to determining the role of landscape in producing a spatial strategy for the new Local Plan, and development management policies?**

*The presentation of Medway's environment in the current text focuses on the biodiversity and semi-natural aspects of the landscape. It does not at present seem to recognise that the whole landscape of Medway is the result of the interaction of natural and human processes over many centuries. Even areas of landscape such as the 'undeveloped' areas identified in the text (11.4) contain many historic features such as the patterns of tracks, lanes and hedgerows that give character to the district, and the 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. Some parts of Kent have now been covered by such as assessment (including the Hoo Peninsula) and it is suggested that Medway Council works with KCC to take forward a Medway study.*

*Also the extended urban surveys only dealt with the early part of the post-med period and would benefit from a further study building on the VCH work and looking at the post-medieval and modern periods. Such a study would be of great benefit to*

addressing Q32 in particular as it could identify historic connections between places in Medway that could serve as a basis for enhancing connectivity.

The National Heritage List for England lists 634 listed buildings in Medway, not 900 as stated in Paragraph 12.4. Section 12 lists Medway's heritage assets but only includes historic Rochester and Medway's military heritage. Medway also contains a wealth of other known archaeological sites and many others as yet unknown. There are also large numbers of historic buildings that may not be listed but are still important elements of the communities in which they lie. Each of these contributes to the heritage and character of the area.

### **33) What approach should we take to managing Medway's heritage assets, particularly in the context of bringing forward regeneration?**

*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.*

*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 defending ring of forts, Gillingham which has Saxon origins and the fortifications 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 its military and industrial survivals as well as its 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.*

*In recent years, Kent County Council has developed a Heritage Strategy for Dover District Council, and is currently developing another for Shepway District Council. The goals of these strategies are:*

- *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 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*

*It is recommended that Medway Council develop a similar strategy which would also be compliant with para 126 of the NPPF which requires local authorities to have a*

*“positive strategy for the conservation and enjoyment of the historic environment.” I would be happy to discuss the matter further.*

*If the Authority decides not to pursue a Heritage Strategy then it is essential that the Local Plan underpins the conservation and enjoyment of the historic environment in all relevant sections. The sections will need to describe the contribution that the historic environment can make as well as the issues that need to be considered to ensure appropriate conservation of heritage assets.*

*These should include:*

- Building design (e.g. the need for new build to respect local character in terms of form, size, materials, massing and orientation)*
- Settlement hierarchy and design (e.g. the benefits of new development respecting the layout of boundaries, roads and lanes so that they fit into the grain of existing settlement)*
- Landscape and green infrastructure (e.g. using aspects of the historic landscape to promote connectivity and ensure that historic character is enhanced)*
- Natural environment and coasts (e.g. recognising the wealth of heritage assets along the coast of Medway and that these can take the form of settlement, maritime or military sites)*
- Tourism and economy (e.g. identifying those heritage assets that can play a greater economic role in the area by promoting them as tourist sites or re-using historic buildings for new purposes).*
- Sustainability and climate change (e.g. bringing together recent research by Historic England on the energy savings often inherent in existing buildings compared with the cost of demolition and new build but also the need for historic buildings to be treated sympathetically when energy improvements are being made)*
- Flood risk (e.g. the need for SUDS permissions to take account of the impact they can have on historic structures and archaeological sites. Guidance on this is available from KCC Heritage Conservation)*

*Another important management tool for the historic environment would be 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.*

### **34) What characteristics do you think makes a good place to live?**

*Places that are desirable to live are those that are well designed, with good quality infrastructure, including access to quality education, transport links, community facilities.*

*The historic environment can be used proactively to help guide successful development. If the new developments have no sense of place, no sense that they belong to the towns and villages to which they will mostly be appended, then they are*

more likely to experience social and economic problems. To achieve this sense of place it would help if the new communities worked with the 'grain' of existing patterns of settlement and landscape in Medway, complementing what has gone before.

**35) What areas or characteristics of Medway are most distinctive? How should these be protected, enhanced or reflected in new development?**

*The river frontage of Medway, both in the urban areas and in the countryside, is in many places very attractive. It contains numerous historic features relating to the commercial, industrial and military history of Medway that have the potential to be developed as tourist attractions (e.g. the fortifications at Grain) or to be included in trails or apps. Development in such areas should be preceded by careful assessment to ensure that the historic character is retained and if possible enhanced.*

*Medway's countryside is also distinctive but perhaps undervalued relative to other parts of the county. 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 would be happy to discuss this further.*

**36) What areas of Medway have weaker character and what are the opportunities for improvements?**

*Many of the wharves and docks along the Thames and Medway are of historic importance and relate to earlier periods in Medway's commercial, industrial, military and maritime history. These areas are, however, often somewhat neglected and difficult to access. KCC would support the enhanced care and protection of such heritage assets based on an appropriate assessment.*

**37) What requirements should be sought of new developments in Medway to give them a distinct character and ensure they function well, in both central areas (including brownfield sites) and suburban areas?**

*Medway Council should encourage well designed, sustainable development, which is sympathetic to the surrounding environment. New developments have the potential to enhance or diminish the character of Medway. This will depend on whether or not the development follows the existing 'grain' of the area. New development should be laid out in a manner sympathetic to the existing network of boundaries, roads, and lanes. The Historic Characterisation mentioned above in response to Q32 is the most effective method to achieve this. Within developments, the design of buildings should also reflect local character in terms of their design and layout, massing and materials.*

*Where new development impacts on archaeological sites they should seek to minimise direct impact by engineering solutions or revised layouts. Preservation in-situ should be sought where possible. Developers should be required to develop meaningful heritage statements that identify the heritage potential of the site and assess the likely impact of proposals. Where archaeological remains are affected, pre-determination assessment of fieldwork may be necessary. In any such circumstances the KCC Heritage Conservation team should be contacted at the earliest opportunity.*

**38) How should the role of Hoo St Werburgh as a service centre be developed?**

*Further growth in Hoo is also considered in the consultation document, enabling the provision of facilities that are of benefit to the whole of the Isle of Grain. KCC would support further development at Hoo, providing the necessary infrastructure is provided in a timely way.*

**39) What provision needs to be made for employment in rural Medway?**

*The Plan needs to be flexible to allow changes to the rural business sector.*

**40) How should the Local Plan address the need to maintain and improve access to services in rural areas?**

**41) What consideration should be given to strategic infrastructure and development in rural Medway?**

*Rural areas in Kent face similar challenges. Consideration needs to be given to rural proofing to ensure the Local Plan objectives can be achieved equitably across Medway. Medway Council should actively engage with KCC and its neighbouring borough and district councils as the most appropriate service centres may be outside the Medway boundary, in which case LTP4 and other Kent strategies, policies and plans will affect accessibility. LTP4 will commit to working collaboratively with other Authorities.*

**42) How can the Local Plan ensure that strategic and local needs are satisfactorily addressed in areas working towards production of a Neighbourhood Plan?**

*Medway Council need to work closely with the Parish Councils and other parties who are producing the Neighbourhood Plans to ensure that local needs are addressed.*

**43) What changes to the built environment could facilitate healthier communities?**

*KCC is developing an Active Travel Strategy (ATS). Medway's Plans should align with this and look for areas of synergy where the walking and cycling network can be joined up. There may also be opportunities for joint promotion of active travel, along with other Local Authorities. Partnership working can help to maximise the returns from investment. KCC's ATS is produced jointly between Highways & Transportation and Public Health.*

*The Local Plan can encourage walking and cycling through the provision of safe and accessible routes. Green spaces/networks should be incorporated into new developments.*

**44) How can the Local Plan encourage access to healthy food options and growing opportunities?**

*The Local Plan could encourage allotments to be included in development sites to give residents the opportunity to grow their own produce.*

**45) How can the Local Plan most effectively promote greater physical activity in Medway?**

*The Local Plan can encourage walking and cycling through the provision of safe and accessible routes. Community sports facilities should be encouraged as a priority infrastructure. Green spaces/networks should be incorporated into new developments.*

**46) What changes to the current siting of healthcare facilities should be considered in the Local Plan? Are there opportunities to provide new sites, and/or to integrate health services in local communities?**

*The Kent and Medway Growth and Infrastructure Framework (GIF) highlights that existing health services in Medway are unsustainable and will require a significant redesign and modernisation to move towards an integrated care strategy. This will place additional pressures on consolidation and refreshing existing healthcare. Medway is near capacity in bed provision, and moving forward, faces capacity issues in the face of significant housing growth. Medway has average patient list sizes above the UK guidelines. The GIF identifies that there is a deficit in number of GPs required to support existing and proposed population across Medway and that there is uncertainty over future needs as well as uncertainty over the plans of Medway Maritime Hospital.*

*Medway Maritime Hospital also serves the wider community including residents in Swale and Maidstone. The cumulative impact of developments in these Boroughs could put further pressure on the hospital resource. Medway need to understand these additional pressures.*

**47) How best can the Local Plan secure the provision of new and expanded schools to meet the needs of Medway's communities and ensure that such infrastructure is delivered in a timely manner and located appropriately as a key element of sustainable development?**

*KCC anticipates that Medway will need between 14 to 17 FE of primary and broadly 16FE of secondary school places. The consultation document states that all Medway schools are full or nearly full. There is a similar situation in Kent, particularly in north Kent, where schools are at or close to capacity, and KCC could not accommodate any additional pressure from Medway if the housebuilding trajectory is faster than the pace of the school build.*

*In terms of school patterns, there are existing KCC primary schools that import much of the intake from Medway, such as Tunbury, Bredhurst, Wouldham and the Snodland schools. There are, however, a number of children that travel in the opposite direction, particularly for secondary schools, where parents want to access their nearest grammar school.*

*It is important that KCC and Medway Council work together as early as possible to consider the cumulative impact, and to understand the expected pupil product rate taking into account the Medway developments and those developments within Kent. Ensuring that future developments are viable and are able to fund the level of infrastructure required to support the level of growth anticipated.*

*The GIF anticipates that Medway will require 786 additional primary school places by 2021 at a cost of £37,960,000 and 2,065 secondary school places at a cost of £39,900,000. This is based on the expectation that 22,220 homes will be built between 2011 and 2031. It also identifies that there is a lack of sufficient reception year places in Medway. Special School expansions are also planned within the commissioning plan period at Dancourt and Abbey Court Schools in Gillingham.*

*The provision of higher education in Medway remains important to Kent's growth aspirations. Medway is one of the primary centres for higher education as the University of Kent and Canterbury Christ Church; the University of the Creative Arts and the University of Greenwich are located there.*

**48) What community facilities are needed by Medway's population over the plan period, and how should they be delivered and managed?**

*There are concerns over the impact that the additional 29,264 houses might have on Kent services and infrastructure. New development will be expected to deliver the necessary infrastructure to support the development to help develop sustainable communities. Medway Council need to understand what the cross border interactions are including travel patterns between the areas and what impact housing growth could have cumulatively. Consideration needs to be given to how KCC's Education Commissioning Plan could be affected, if the growth in Medway has an impact on KCC costs this should be accounted for in their Local Plan. The cross boundary implications in relation to service provision will require inter authority working and KCC are willing to work with Medway to address this.*

**49) Is it an appropriate ambition to preserve the integrity of the open space estate, or should we be seeking to rationalise the estate?**

*The integrity of the open space estate should be preserved to the greatest extent possible. Once any part of the estate is lost to development, it can never be brought back. The document identifies a current deficit of certain open space uses, thereby enhancing the need to keep what is currently provided. More importantly, the document predicts a significant need to increase provision.*

**50) Should we continue to set a local space standard and seek to address shortfalls by new provision, and if so is the current level of 3.25ha per 1,000 population appropriate?**

*Yes a local space standard should be set in order to ensure appropriate open space is included within local developments.*

*The old standard used by most authorities for many years, 6 acres per 1,000 population is no longer the standard. Every Borough is different and there are significant differences within each Borough. Every Borough should set its own local space standard based on its own assessment of the demographics and the current space provision and what those spaces are used for.*

**51) Should we move to a multi-functional hub model of provision, and what might this look like in practice?**

*Medway should only move to a multi-functional hub if many other factors enable this model e.g. is public transport or cycle/walk paths in place to enable the population to get to the hub.*

**52) Should new development provide on-site open space, investment into the existing estate, or a balance of the two approaches?**

*There should be a mixture of the two approaches. Small on-site open spaces are useful for the residents but off-site provision of a bigger nature for more formal sports such as football, rugby and cricket should also be provided.*

**53) What management models and priorities should we consider? Should we seek to increase community involvement in open space provision and how might this be accomplished?**

*Consideration could be given to long term leases, at reasonable rates, rather than full asset transfer. This would mean that if any issues arise the local authority still has ownership of the land and would hopefully be able to ensure it continues to be used for its intended purposes*

*Although Councils do not want to build continuous revenue responsibilities, there can often be difficulty in finding the right organisation to take on the responsibility of managing the sites. A balance between Council and Community ownership would be the best option.*

**54) What provision should be made for sport in the Local Plan, including in relation to population growth and new developments?**

*Sport and Physical Activity has a key role to play in local health and wellbeing of residents and therefore provision for sport, both indoor and outdoor should be included in the local plan. This should be ideally linked to any Medway Sport and Leisure Strategies.*

*Provision in the Local Plan for Sport based on the established and well understood standards of provision should be maintained at all costs. KCC support dual use and joint provision of sports facilities on school sites; however, there is always the difficulty that if the legal status of a school changes (e.g. from LEA to Academy) there can be difficulties in ensuring the continued use by the public. Significant negotiations can be fruitful with developers in enhancing a school sports hall to 'community standard' as against providing a community sports hall as well as a school sports hall.*

**55) How should the Local Plan address the aspirations for a new stadium for Gillingham FC?**

*It may be better to investigate whether the Stadium can be updated, and seating capacity increased, rather than find another site thereby taking away another open space which could be used for another purpose.*

**56) What weight should be given to the protection of the best and most versatile agricultural land, in the context of considering sustainable locations to accommodate growth in Medway?**

*It is considered that the best and most versatile agricultural land should be safeguarded where possible, but if significant development of agricultural land is necessary, areas of poorer quality land should be used.*

**57) How should the Local Plan address the AQMAs and the potential development sites that could be affected by pollutants in these areas?**

*There are a number of AQMAs in the Medway area. These will need to be taken into consideration when planning for new development. Also, careful planning will need to ensure that further AQMAs are not created because of new development. It will be necessary to incorporate mitigation measures into new schemes to ensure the health of the residents is not affected by pollution from additional trip generation. Electric*

*charging points and incentives to encourage using public transport and walking and cycling should be explored. The Kent and Medway Air Quality Partnership have recently produced guidance on this agenda.*

**58) What approach should be taken to planning for land won minerals in Medway?**

*The Medway area has both significant reserves of primary land-won mineral resources (unpermitted but potentially very significant at 3.3 to 4.5 million tonnes) and significant reserves (1.2 million tonnes at Hoo St. Werburgh) of river terrace sands and gravels. Other mineral deposits that may be of economic importance into the future are the high purity chalk deposits at Cliffe, cement manufacturing chalk in the Medway valley around Holborough (permitted for chalk manufacture) and engineering clay (the London Clay) on the Hoo Peninsula.*

*In order to safeguard these important resources in accordance with the National Planning Policy Framework (Section 142 of the NPPF discusses the need to ensure the conservation of sustainable mineral supply) any Medway Local Plan should identify Mineral Safeguarding Areas and policies to ensure that the minerals of economic importance are conserved for future sustainable supply through the prevention of sterilisation. This is the basis for having an NPPF compliant approach to planning for land won minerals. Data on the occurrence of all important economic minerals are available from the British Geological Survey (BGS) and should inform the safeguarding mineral policy of any future plan.*

*The contributions of secondary and recycled aggregates from industrial activity and waste related processing are often significant to overall supply of aggregates. These also supplement finite primary land-won materials. In order to comply with the NPPF this should be part of the considerations as to how overall aggregate needs will be met over a given plan period. The level of supply per annum (as identified by Local Aggregate Assessment monitoring), to meet market requirements is also a fundamental part of mineral planning. The differing minerals have their specific requirements, with regard to land-won aggregates a 7 year landbank should be maintained year on year throughout a plan period (Section 145 of the NPPF).*

*Given that minerals are natural geological features and are essentially finite in their occurrence (in particular aggregates laid down as superficial deposits) it can be the case that identified society needs will outstrip the naturally occurring supply. In such circumstances the inability to maintain aggregate landbanks at the NPPF required level should be offset with imports via wharves and railheads. Medway has significant capacity in this regard and has an undeniable regional role significantly greater than required to meet identifiable local needs.*

*As such, importation infrastructure should be safeguarded with the same local plan policy rigour that applies to sustainable primary land-won minerals, as required by Section 143 of the NPPF. For example, losses in mineral wharves appears very difficult to replace given the degree of competition for available previously developed land for non-minerals related development in the wider South East. It should also be noted that in the Examination Hearings for the Kent Minerals and Waste Local Plan last year and subsequent modifications to the Plan's safeguarding strategy, the important role that Medway plays in terms of importation facilities in the region was recognised. The capacity and availability of the infrastructure within Medway appears to be key driver in the removal of a Kent 'test' for the loss of mineral*

infrastructure within the KCC area where it may be threatened by non-mineral development.

**59) What are the requirements for wharves and their supporting land-side infrastructure in Medway over the plan period?**

*Safeguarding will remain important as required by the NPPF; it includes planned and potential mineral wharf sites as well. This is due to the fact that indigenous mineral supply (aggregates) are running low and once depleted will have to be supplanted with imports.*

**60) What provision should the Local Plan make for waste management and disposal in Medway, for both household and commercial streams?**

*From the data available it is clear that the Medway area has significant arising's of waste materials from the main waste stream types. Some 140,000 plus tonnes come from the municipal (MSW) and hazardous waste streams. The commercial and industrial (C&I) and the construction, demolition and excavation (C,D & E) are likely to be significant sectors that may well mean that the Medway area produces some 300,000 tonnes per annum (as an estimate) overall. Though the amount of waste managed by the area far exceeds this, as records show it handles over 0.65 million tonnes per annum. This demonstrates how waste movements and management capacity are clearly responding to market forces that are far greater than the administrative boundaries of the area. The main conclusion that may be drawn from this disparity of arising's over capacity is that the Medway area has an important regional role in waste management in the South East, and no doubt this includes significantly the Kent county area.*

*The central principle of the Waste Framework Directive is to manage waste arisings proximately and to achieve net self-sufficiency. The Medway area is demonstrating that it is more than meeting this objective. However, through time with changes in economic cycles and local economic structures and population growth will bring changes to the resultant waste streams that will require changes to the area's waste management infrastructure. To not respond to these changes over the period of the Plan on the basis that net self-sufficiency has essentially been attained could well result in deterioration of the strategic role the Medway area has, and which Kent and the wider locality are significant stakeholders.*

*This approach is in accordance with the requirements of the Waste Management Plan for England (2013), which states local authorities should:*

- i. work jointly and collaboratively with other planning authorities to collect and share data and information on waste arisings, and take account of:*
- ii. waste arisings across neighbouring waste planning authority areas;*
- iii. any waste management requirement identified nationally, including the Government's latest advice on forecasts of waste arisings and the proportion of waste that can be recycled; and*
- iv. ensure that the need for waste management facilities is considered alongside other spatial planning concerns, recognising the positive contribution that waste management can bring to the development of sustainable communities.*

Therefore Kent County Council wishes to be engaged with Medway Council to ensure the wider waste management role of the area is fully taken into account by the Medway's emerging Local Plan.

**61) What should sustainable development look like for Medway? What plans and policies should we put into place to achieve this?**

*Sustainable development should include well designed, well connected communities with a mix of housing types, good access to key services, employment, in a clean and safe environment.*

**62) How can Medway ensure that all communities share in the benefits of growth, in order to reduce the significant inequalities across the area?**

*Ensure new developments provide facilities and opportunities for new and existing residents.*

**63) What measures should new development take to mitigate and adapt to the risks posed by climate change?**

*New development should avoid areas of high flood risk. They also need to be designed to provide for resilience to climate change, including use of Sustainable Urban Drainage Systems (SUDS), etc.*

**64) How can existing development and communities mitigate and adapt to the risks posed by climate change?**

*Existing developments and communities need to take measures to reduce energy and water use and reduce emissions. Retrofitting existing homes with LED lights, cavity wall etc. can assist. The Kent and Medway Warm Homes initiative could also be used.*

*District heating plants could connect new as well as existing homes.*

**65) Should Medway adopt the optional national standards for water efficiency? What local evidence would we need to underpin this?**

*The whole of south east England is classified as an area of 'serious water stress'. This is reflected in water company plans and it is vital that this is also reflected within Local Plans.*

*Water supply within the Medway Unitary area is the responsibility of Southern Water (SW) but this is an issue that is not just restricted to SW's 'Kent Medway' supply zone: Some of that water comes from the upper reaches of the Medway river catchment through resources such as Bewl Water reservoir that are shared with other water companies and serve a wider strategic role across the entire region via an increasing inter-connected network of strategic pipelines that allow bulk transfers of water between resource zones and between company supply areas to help address localised shortages.*

*All the local water companies are pursuing demand management options as an increasingly important part of their Water Resources Management Plans (WRMPs) and this includes the retrofitting of water efficient fittings within existing homes and commercial properties. Such options have been selected by the water companies because they are a cheaper alternative to additional major water supply infrastructure and therefore help to minimise customer bills.*

*The optional national standards for water efficiency involve the use of simple, proven water efficient fittings within new properties at almost no cost above that of providing high water use fittings and their inclusion can help to minimise customer bills and future potential water shortages.*

*The main sources of evidence are:*

- *The Thames River Basin Management Plan*
- *The Medway Catchment Abstraction Management Strategy and Abstraction Licensing Strategy*
- *The WRMPs for Southern Water, South East Water and Affinity Water*

*The Local Plan should also be consistent with the Kent Environment Strategy.*

**66) How should flood risk and SuDs be taken into account in planning for growth in Medway?**

**67) What safeguards should be put in place to ensure future requirements for improved flood defences are not compromised?**

*A flood risk assessment should be undertaken for the Medway area to understand where the key problem areas are.*

*SuDs should be designed into development sites particularly those in the flood risk areas.*

**68) Should we allocate sites or zones for wind energy development?**

**69) What policies should we set for other forms of energy development?**

**70) How should we take advantage of opportunities for use of waste heat from the large-scale energy generation on the Peninsula?**

*Opportunity areas should be considered, the potential in the area particularly on the Isle of Grain should be explored.*

**71) What infrastructure is required to support Medway's growth over the plan period?**

*The Kent and Medway Growth and Infrastructure Framework makes an assessment of infrastructure, including transport infrastructure, required to support growth over the plan period to 2031. It identifies that significant improvements to the highway network will be required to support growth.*

*Some of the priority infrastructure schemes identified in the GIF include;*

- *Improvements to the A2/M2 corridors to address local capacity issues, congestion and facilitate growth.*
- *A transport strategy for Strood and the Medway City Estate to deliver improvements to traffic flows and upgrade the public realm.*
- *new station at Strood and upgrades at Rainham and Chatham to improve train capacity and the passenger experience.*
- *A289 Four Elms to Medway Tunnel improvements*
- *Improvements to the A229 corridor between Maidstone and Medway Towns*
- *Strood and Chatham Town Centre Improvements*
- *Public Transport Improvements throughout the Medway towns*

*Within the Issues and Options document, Medway need to acknowledge the proposed Lower Thames Crossing (LTC) Option C.*

*The pressure a new LTC east of Gravesend should not be underestimated. Additional pressure will put on some particularly congested corridors such as the A2, A289 and the A226 (Gravesend Road). It is expected that Medway will be properly engaged in the LTC process, particularly as Option C is likely to see a change in existing traffic patterns across the wider Medway area, notably east-west movements.*

**72) What measures should be considered to increase public transport usage and rates of walking and cycling in Medway?**

*Some of the possible measures that are relevant to increasing public transport usage, walking and cycling rates are:*

- *Use of 20mph limits where appropriate*
- *Improved safety on public transport networks*
- *Maintenance of footways and cycleways*
- *Utilisation of the public rights of way network*
- *Promotion of active travel as a healthier mode of transport*
- *Accessibility improvements*
- *Integration of the public transport network, for example quality interchanges*
- *Creation of connected door-to-door journeys*
- *Affordable public transport*
- *Multi-agency working to engage the public and increase uptake of active travel.*

**73) What provision should be made for car parking?**

*Medway will need to set local parking standards taking into account the type, mix, use and accessibility of new developments.*

*Provision for electric vehicle parking spaces should be included.*

**74) What are the requirements for waterside infrastructure, such as docks, wharves, marinas, piers and berths, and their supporting landside facilities, to support commercial and leisure activities?**

**75) How should the aviation facilities at Rochester Airport and Stoke be considered in the Local Plan?**

*This will need to be considered as part of the master planning process.*

**76) How can the Council ensure that the Local Plan and its policies remain deliverable while seeking to ensure that development in the area is high quality and sustainable?**

*The Council will need to ensure that there is sufficient viability to enable contributions towards infrastructure without stalling development. Delivering infrastructure at the appropriate time and locations and meeting the needs arising from new development will be important.*

**77) Should we consider setting different rates of affordable housing and CIL contributions to take account of differing viability between areas of Medway?**

*KCC would support this approach as the land values in Medway vary greatly and we need to ensure that viable sites are brought forward.*

**78) How can we ensure timely and appropriate delivery of infrastructure to meet the needs of new and existing communities? What infrastructure types or projects should be prioritised where funding is limited?**

*Working with partners and organisations will be important. Prioritisation of infrastructure is key and KCC would be willing to assist with helping to prioritise schemes. The GIF can play a role here in helping the authority to identify what these priority schemes are, and where there are funding gaps, where KCC and Medway can work more closely together to attract investment to Kent and Medway*

**79) What use should be made of new methods of delivery to help speed up the planning process, and how can we ensure that quality is not compromised in favour of speed?**

*KCC have concerns with the 'Permission in Principle' policy. Although a site may be suitable for redevelopment, it should not automatically mean that any housing proposal that is put forward would be acceptable and should be granted permission in principle. This could lead to poorly designed inappropriate development. There is also a danger that the proposed changes will result in development which is unsustainable and therefore not in line with the overarching aim of the NPPF.*

**80) Are the development principles right? Should other guiding principles be introduced?**

*All new development should consider the surrounding environment and consider ways to mitigate any potential harm that maybe caused and look for ways to enhance and improve access to it.*

**81) Do you agree with the assessment of advantages and disadvantages of the various development type options set out above? Are there other advantages and disadvantages that should be considered?**

*KCC are in general agreement with the assessment of the advantages and disadvantages of the various development type options.*

*KCC support development within the current urban areas rather than substantial development on the edge of the towns on greenfield sites and in the greenbelt.*

**82) Which development type (or combination of types) do you think best meets the identified growth requirements for Medway?**

*A combination of development types, depending on location, will be needed to meet the growth requirements.*

**83) Should we consider more radical approaches to meeting development needs, such as significant increases in density, or large-scale redevelopment of existing employment areas for residential or mixed use?**

*High density development should be considered in the town centres. If additional sites are required, consideration may need to be given to the existing employment areas for mixed use development. These could provide the opportunity for residents*

*living close to where they work; however, this would require careful consideration and the potential health and environmental impacts would need to be assessed.*

**84) Should the green belt boundary be reviewed?**

*It may be necessary to consider a review of the green belt boundary if sufficient sites cannot be found to accommodate the expected housing required. KCC would support further exploration of the brownfield sites in the existing urban areas prior to a review.*

**85) What provision should be made for mixed use in residential developments, both high density and lower density?**

*KCC supports mixed use high density development in the town centres.*

**86) What approach should be taken to future development opportunities and mix of uses in Chatham town centre and Waterfront?**

*KCC supports the proposal to explore the potential for residential development in Chatham town centre and the waterfront area. There are good transport links with the recent redevelopment of the bus station and improvements planned at the railway station. Concentrating mixed use high density development in these areas is a sustainable option and would take the pressure off greenfield sites in the countryside.*