

Planning Policy
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please reply to:

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2024-09-08

Dear Medway Council,

Pre-draft Medway Local Plan 2041 (Regulation 18)

Railfuture is Britain's leading and longest-established national independent voluntary organisation campaigning exclusively for a better railway across a bigger network for passenger and freight users, to support economic (housing and productivity) growth, environmental improvement and better-connected communities. We seek to influence decision makers at local, regional and national levels to implement pro-rail policies in integrated development and transport planning. Our responses are *italicised*.

2. Vision and Strategic Objectives

2.1 Vision

"Vision for Medway in 2041"

We endorse.

2.2 Strategic objectives

"Prepared for a sustainable and green future"

We particularly endorse "supporting major shifts in modes of transport used to reduce carbon impacts." and "strengthen and develop transport networks providing safe and effective choices for sustainable travel, including improved opportunities for walking and cycling and enhanced public transport services, and management of the highways network, with associated improvements in air quality."

"Supporting people to lead healthy lives and strengthening our communities"

We endorse.

"Securing jobs and developing skills for a competitive economy"

We endorse, particularly "deliver the infrastructure needed for business growth, to provide accessible employment locations"

"Boost pride in Medway through quality and resilient development"

We endorse, particularly "ensure that development is supported by the timely provision of good quality effective infrastructure, so that the needs of Medway's growing and changing communities are well served."

2.3 Spatial development strategy

"Spatial Development Strategy"

We endorse, most especially "The strategy provides for the coordination of infrastructure delivery to support wider growth. Land is safeguarded for the delivery of a passenger rail service connecting the Hoo Peninsula to the North Kent services"

www.railfuture.org.uk www.railfuturescotland.org.uk www.railfuturewales.org.uk
www.railwatch.org.uk

3. Spatial Growth Options

“3.2 Preferred spatial growth option”

We endorse.

4. Natural Environment

“Policy S1: Planning for Climate Change”

We endorse.

“Policy S2: Conservation and Enhancement of the Natural Environment”

“Policy S3: North Kent Estuary and Marshes designated sites”

“Policy S4: Landscape protection and enhancement”

“Policy S5: Securing Strong Green and Blue Infrastructure”

“Policy S6: Kent Downs Area of Outstanding Natural Beauty National Landscape”

No specific comments.

“Policy DM1: Flood and Water Management”

“Policy DM2: Contaminated Land”

“Policy DM3: Air Quality”

“Policy DM4: Noise and Light Pollution”

No specific comments.

“Policy S7: Green Belt”

No specific comment.

Questions: Natural Environment

Q1 - The Council could consider setting local standards for development that go beyond national policy/regulations in addressing climate change. What evidence would justify this approach, and what standards would be appropriate?

Q2 - Do you consider that the Council should seek to go beyond the statutory minimum of a 10% increase in BNG? What evidence can you provide to support your view?

Q3 - Do you agree that the tariff based strategic approach applied to development within 6 km of the designated areas, supporting the delivery of the Bird Wise SAMMS programme represents an effective means of addressing the potential impact of recreational disturbance on the designated SPA and Ramsar habitats of the Thames, Medway and Swale Estuaries and Marshes.

Q4 - Do you consider that Medway Council should identify landscapes of local value as an additional designation in the new Local Plan?

What should be the criteria for designation? Are there areas that you would identify as justifying a local valued landscape designation – where and why?

Q5 - Do you agree that the Council should promote Natural England’s Green Infrastructure Framework standards in the Medway Local Plan policy?

Q6 - Has the draft Medway Green and Blue Infrastructure Framework identified the correct key issues and assets, and provide effective guidance for strengthening Medway’s green infrastructure?

Q7 - Do you consider the Green Belt boundary should be revised in line with the recommendations in the 2018 Green Belt Assessment?

Q8 - Do you consider that exceptional circumstances exist to justify review of the Green Belt boundary?

No specific comments.

5. Built Environment

“Policy T1: Promoting High Quality Design”

“Policy DM5: Housing Design”

“Policy DM6: Sustainable Design and Construction”

“Policy DM7: Shopfront Design and Security”

“Policy DM8: Advertisements”

“Policy S8: Historic Environment”

“Policy DM9: Heritage Assets”

“Policy S9: Star Hill to Sun Pier”

“Policy DM10: Conservation Areas”

“Policy DM11: Scheduled Monuments and Archaeological Sites”

No specific comments.

Questions: Built Environment

Q9 - Should this policy be broadened out to areas adjacent or near to Conservation Areas rather than only within?

No specific comment.

6. Housing

“Policy T2: Housing Mix”

“Policy T3: Affordable Housing”

“Policy T4: Supported Housing, Nursing Homes and Older Persons Accommodation”

“Policy T5: Student Accommodation”

“Policy T6: Mobile Home Parks”

“Policy T7: Houseboats”

“Policy T8: Houses of Multiple Occupation”

“Policy T9: Self-build and Custom Housebuilding”

No specific comments.

Questions: Housing

Q10 - Do you think this policy provides effective guidance on the required housing mix in Medway?

Q11 - Do you agree with having a 10% requirement for affordable housing on urban brownfield sites and 30% requirement for affordable housing on greenfield sites and higher value urban locations?

What do you consider would represent an effective alternative approach? Do you agree with a varied approach for affordable housing requirements based on the different value areas across Medway?

Q12 - What do you consider would represent an effective split of tenures between social/affordable rent and intermediate/low-cost home ownership housing in delivering affordable housing?

Q13 - What do you consider would represent an effective split of tenures between social/affordable rent and intermediate/low-cost home ownership housing in delivering affordable housing?

Q14 - Do you have views on defining the limits to over-concentration of HMOs in a community? What criteria would be recommended?

Q15 - Do you have any sites you wish to promote for self-build allocation?

No specific comments.

“Policy T10: Gypsy, Travellers & Travelling Show-people”

“Policy T11: Small Sites and SME Housebuilders”

No specific comments.

7. Economic Development

“Policy S10: Economic Strategy”

We endorse, in particular “Larger scale Net Zero Carbon Energy generating uses and port using facilities to be directed to the Hoo Peninsula to sites at Kingsnorth and Grain.”

“Policy S11: Existing Employment Provision”

“Policy S12: New Employment Sites”

“Policy S13: Innovation Park Medway”

“Policy T12: Learning and Skills Development”

“Policy T13: Tourism, Culture and Visitor Accommodation”

“Policy S14: Supporting Medway’s culture and creative industries”

“Policy T14: Rural Economy”

No specific comments.

8. Retail and Town Centres

“Policy S15: Town Centres Strategy”

“Policy S16: Hierarchy of Centres”

“Policy T15: Sequential Assessment”

“Policy T16: Ancillary Development”

“Policy T17: Impact Assessment”

“Policy S17: Chatham Town Centre”

“Policy S18: Rochester District Centre”

“Policy S19: Gillingham District Centre”

“Policy S20: Strood District Centre”

“Policy S21: Rainham District Centre”

“Policy S22: Hoo Peninsula”

“Policy S23: Hempstead Valley District Centre”

“Policy DM12: Local and Rural Centres”

“Policy T18: Shopping Parades and Neighbourhood centres”

“Policy T19: Meanwhile Uses”

“Policy DM13: Medway Valley Leisure Park”

“Policy DM14: Dockside”

No specific comments.

Questions: Retail and Town Centres

Q16 - Do you support the approach to manage ancillary development outside of centres in this way?

Q17 - Do you support the approach to protect Medway’s centres by requiring impact assessments in circumstances set out in Policy T17?

Q18 - Do you agree with the proposed Chatham town centre boundary?

Q19 - Do you agree with the identification of the Primary Shopping Area boundary proposed within Chatham town centre?

Q20 - Do you agree with the Rochester district centre boundary proposed?

Q21 - Do you agree with the Primary Shopping Area boundary proposed within Rochester district centre?

Q22 - Which option or combination of options would you choose for the Gillingham district centre boundary?

Q23 - Do you agree with the Primary Shopping Area boundary proposed within Gillingham district centre?

Q24 - Which option or combination of options would you choose for the Strood district centre boundary?

Q25 - Do you agree with the Primary Shopping Area boundary proposed within Strood district centre?

Q26 - Which option or combination of options would you choose for the Rainham district centre boundary?

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Q27 - Do you agree with the Primary Shopping Area boundary proposed within Rainham district centre?

Q28 - Would provision of a supermarket in Hoo be beneficial to residents to encourage sustainable travel patterns, convenience and sustainable lifestyles?

Q29 - Do you agree with the boundaries and retention of these listed local and rural centres?

Q30 - Are there any other local and rural centres you may want to suggest for inclusion?

Q31 - Do you agree with the boundaries and retention of the listed shopping parades and neighbourhood centres?

Q32 - Are there any further neighbourhood centres or shopping parades you may want to suggest for inclusion?

Q33 - Do you agree with the proposed boundary for Dockside as a leisure destination?

Please refer to the proposal map for the boundary suggestion.

Q34 - Do you support the percentage mix of uses proposed?

No specific comments.

9. Transport

“9.1 Vision for access and movement in Medway”

We endorse, especially “The Hoo Peninsula has reduced car dependency and achieved a higher level of self-containment to facilitate local living in an age of increased remote working, while local employment opportunities are available at Kingsnorth and the Isle of Grain. Travel choice to/from the rural area has been improved through planning and investment in public transport.”

“Policy DM15: Monitoring and Managing Development”

We endorse.

“Policy T20: Riverside Path”

“Policy DM16: Chatham Waters Line”

No specific comments.

“Policy DM17: Grain Branch”

We endorse, and most especially paragraphs 9.4.1 to 9.4.6.

“Policy T21: Riverside Infrastructure”

“Policy T22: Marinas and Moorings”

“Policy T23: Aviation”

“Policy T24: Urban Logistics”

“Policy T25: User Hierarchy and Street Design”

“Policy T26: Accessibility Standards”

No specific comments.

“Policy DM18: Transport Assessments, Transport Statements and Travel Plans”

We endorse, in particular “Development proposals on the Hoo Peninsula will adhere to an Area-wide Travel Plan.”

“Policy DM19: Vehicle Parking”

We endorse. See comment below in response to “Strategic Transport Assessment – Forecasting Report” concerning the potential application of different standards for residential car parking for new developments around the new Hoo St. Werburgh station resulting from improved transport accessibility.”

Questions: Transport

Q35 - Adequate overnight lorry parking would reduce the risk of lorries parking in locations that lack proper facilities and/or cause a nuisance. Are there local shortages for overnight lorry parking in Medway?

No specific comments.

“Policy DM20: Cycle Parking and Storage”

No specific comments.

10. Health, Communities and Infrastructure

“Policy T27: Reducing Health Inequalities and Supporting Health and Wellbeing”

“Policy T28: Existing Open Space and Playing Pitches”

“Policy DM21: New open space and playing pitches”

“Policy T29: Community and Cultural Facilities”

“Policy S24: Infrastructure Delivery”

No specific comments.

Questions: Health, Communities and Infrastructure

Q36 - Are there any core health and wellbeing issues or opportunities missing from the policy?

Q37 - What are examples of healthy development in Medway you would like to see more or less of?

Q38 - Of those health areas listed, what are the most important for the local plan to address?

Q39 - How can the local plan ensure that development is inclusive and accessible for all members of our community, including people with disabilities?

Q40 - Please use the online map to identify a green area for consideration as designated Local Green Space.

Q41 - Medway Council is inviting local clubs, national governing bodies of sport and other users and providers to review the latest PPS. More specifically, are there any matters in the latest PPS that should be updated?

Q42 - Do you agree identifying the required infrastructure to support the scale and locations of growth within Medway is the correct approach?

Would a ‘mini IDP’ approach’ focusing on broad locations and strategic sites be preferred?

Or do you have an alternative suggested approach?

Q43 - Align infrastructure provision in line with this growth – how can we balance growth and new infrastructure requirements with funding gap?

No specific comments.

“Policy DM22: Digital Communications”

No specific comment.

11. Minerals Supply

“Policy T30: Safeguarding Mineral Resources”

“Policy T31: Safeguarding of Existing Mineral Supply Infrastructure”

“Policy T32: Supply of Recycled and Secondary Aggregates”

“Policy T33: Extraction of Land Won Minerals”

No specific comments.

12. Waste Management

“Policy DM23: Waste Prevention”

“Policy T34: Safeguarding of Existing Waste Management Facilities”

“Policy T35: Provision of Additional Waste Management Capacity”

“Policy T36: Location of Waste Management Facilities”

“Policy T37: Other Recovery”

“Policy T38: Non-inert Landfill”

No specific comments.

Questions: Waste Management

Q44 - In light of the geological/spatial constraints in Medway and predicted limited ongoing need, do you agree that it is appropriate for the Council to plan for the management of non-inert waste that may require landfill on the basis that it will be managed at landfill sites located outside Medway?

No specific comment.

“Policy T39: Beneficial Use of Inert Waste by Permanent Deposit”

“Policy T40: Wastewater Treatment”

No specific comments.

13. Energy

“Policy S25: Energy Supply”

“Policy T41: Heat Networks”

No specific comments.

Supporting Documents

Policies Map – (North West)

We wholeheartedly endorse the indications of “Grain Branch (Permanent works)” and “Grain Branch (Temporary works)”

Transport

“Strategic Transport Assessment – Forecasting Report”

Of all the road junctions forecast to suffer increased congestion the one which seems consistently to stand out as the worst-affected is Four Elms Roundabout, together with Dunnock Drive / Peninsula Way Roundabout. They (and others along the A228) are probably the key points in the whole of Medway’s highway network which stand to benefit most from the added transport capacity of a Hoo Peninsula Railway upgraded for passenger use, including a new Hoo-Higham Chord. The resulting improved transport accessibility for new developments around the new Hoo St. Werburgh station may then enable different standards for residential car parking.

Yours faithfully,

Roger Blake BA, MRTPI (Rtd), MTPS

Railfuture

Vice-Chair London & South East regional branch

Director for Infrastructure & Networks, national Board