



Response to Medway Council Local Plan Consultation – Development Options

For the attention of the Planning Department

This is the joint response by Medway Green Party members to the Development Options stage of the Local Plan Consultation. Our membership is drawn from all wards in the Medway Council area.

Although we have produced a separate document, for ease of reference we have broadly followed the questions outlined in the online questionnaire.

Section 1 – Draft vision for Medway in 2035

Medway Green Party agrees overall with the draft vision for 2035, with some important qualifications:

1. We feel that precise population numbers should not be included in the vision. Predictions are not fool-proof and while some drivers of population growth are constant, others can be affected by changes in the political landscape and choices made by governments national and local. For example the planned building of “commuter homes” is likely to have been itself a driver of population growth on which the figures have been based. Our concern is that this will become a self-fulfilling prophesy. If provision is made for a certain number of people to live in Medway, then they will. This area is a cheap and attractive place to live, compared to nearby London. Any development delivered now will outlive the Government of the day, but ecosystems which have often been hundreds or thousands of years in the making cannot be recreated once destroyed. Medway is already well below average in its proportion of green spaces¹ in comparison to adjacent local authorities, so we cannot afford to lose more. It seems impractical to impose a figure on an individual administrative area which is likely to be unsustainable.
2. We are cautious about statements which speak of promoting economic growth for its own sake as this is so often used to trample all other considerations, including preservation of important natural environments. Our focus should be on better rather than bigger.

¹ As stated in the Issues and Options consultation document, page 66 as follows:

16.3 A local standard of 3.25ha per 1000 population is currently used as a basis for assessing the level of provision, including that which should be made in new developments. This compares to standards of 6.14ha per 1,000 people in Tonbridge and Malling, 10.1ha in Gravesham and 7.39ha in Swale.

<http://www.medway.gov.uk/PDF/Final%20Issues%20and%20Options%20Public%20Consultation%20Copy.pdf>

3. The vision ignores the economic benefits of promoting a low carbon economy, as clearly pointed out in the response by Medway Green Party to the first consultation. The statement “Medway’s growth will promote a low carbon economy” implies that the economic growth has to come first. A better vision statement would be “promotion of a low carbon economy will be central to Medway’s success”. This would be more consistent with the NPPF statements such as that local planning authorities should “*have a positive strategy to promote energy from renewable and low carbon sources*” and “*design their policies to maximise renewable and low carbon energy development...*”².
4. We hope that the use in the consultation document of the terms “university city” and “riverside city” do not suggest that the Council will seek to impose city status or a name change for the area on the people of the Medway Towns without their agreement.
5. While we particularly welcome that the vision includes a commitment to “ensure that important wildlife and heritage assets are protected”, it can be argued that this commitment has already been contradicted by the Council’s express inclusion of Lodge Hill for development in at least three of the development options.

Section 2 – Strategic objectives

With our reservations outlined in Section 1 taken into account, we broadly agree with the strategic objectives, particularly the promise 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”.

However the objectives would be improved by a commitment to seek business and employment opportunities in climate change reduction, such as encouraging local production of renewable energy technologies, the insulation of existing housing stock and off-site manufacture of energy efficient homes.

It should be noted that while the strategies outlined to reduce inequalities in health are very welcome, there are other factors, such as low incomes and poor housing that also contribute to poor health outcomes.

Section 3 – Development options

Of the options presented, Option 1 would be the only one for which we could offer any support. This is for two main reasons:

1. All other options explicitly include development at Lodge Hill, which we do not support under any circumstances; and
2. It appears to represent the most sustainable option of those on offer.

² National Planning Policy Framework (NPPF) (p22)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

We also note that the Sustainability Appraisal accompanying the consultation clearly shows Option 1 as being the one that is most likely to have positive or significant positive effects when assessed against each of the Strategic Environmental Assessment objectives. This is graphically demonstrated in the Appendix 2 Sustainability Appraisal tables by a preponderance of green in the matrix for Option 1³. The other three Options show much more neutral or negative effects.

Reasons for supporting Option 1:

We broadly support the approach described in Option 1 of making the best use of brownfield land with the building of good quality homes at higher densities near town centres close to travel hubs. This would be likely to cut down on car use and the need for provision of additional road networks and road widening, reducing the impact on green spaces as well as ensuring that communities have services and facilities close-by to suit their needs.

The development of Medway City Estate appears an attractive option and would be likely to be an improvement. However we do have concerns in relation to additional traffic pressures on already congested access roads.

This could be offset by a new river crossing for pedestrians and cyclists from Chatham Town Centre to Medway City Estate which would also connect the two areas. We hope that the new link across the river, mentioned in Option 1, would represent that described in Section 11 on Sustainable Transport: *“The introduction of a new river crossing could facilitate sustainable transport and address the restrictions that apply to pedestrians and cyclists who are unable to use the Medway Tunnel”*.

In fact one of our candidates in the 2015 General Election mooted the possibility of just such a bridge for pedestrians and cyclists from Chatham Town Centre to Medway City Estate. As part of his research he contacted Amanda Levet Architects (who designed a few of the landmark footbridges in Canary Wharf), who were open to an initial consultation to explore the feasibility of this idea.

A ferry crossing from Chatham to a new development at Medway City Estate would also be a good option and be likely to cut down on road congestion.

A downside of this Option (noted in the consultation) is that a large proportion of apartments may not meet the needs of all the sectors of population in the Medway Towns looking for homes. However considering the predicted shift in need towards one and two bedroom properties for individuals living alone, couples downsizing, and small families, together with the existing housing stock and potential for additional incremental suburban development, it is unclear why this should be an issue. There is also potential for building large apartments within high density development.

Additionally, high density homes should be built to meet or exceed Medway Council’s space specifications, particularly in main living areas. This should be adhered to whether the housing is at full market price or in the “affordable” category. It should be made clear that building at higher densities refers to building taller buildings, not skimping on space within individual apartments or on providing inadequate green “infrastructure”.

3

http://www.medway.gov.uk/pdf/APP2_SA%20Tables%20for%20Development%20Options%20and%20Policy%20Approachesfinal.pdf

Buildings should also be built to be accessible to those with disabilities, including adequate doorway width in all apartments and public areas for wheelchair access and lifts. This allows the buildings to be adaptable for many different uses.

We believe that, in addition to higher density urban projects, each existing residential location throughout the Medway Council area could take a proportionate amount of additional development but this should be on a relatively small scale.

Aspects of option 1 we do not support:

We are concerned by the comment that “suburban and rural growth, including options for locations on the Hoo peninsula” would make up the identified shortfall of 7000 homes and hope that this does not represent the inclusion of substantial development at Lodge Hill.

We are concerned that Medway City Estate lies within either flood zones 2 or 3 [7.20] and attention must also be paid to flood risk in other riverside locations.

We would be cautious about development at Mill Hill. Though it appears a good idea to move Gillingham Football Club to a larger site, the Mill Hill site, as with many others suggested within the four Options, has not been deemed “suitable” in the SLAA. There has also been a lot of local objection to development at this site.

Reasons for not supporting Option 2:

In addition to objection to the development of Lodge Hill we would also be concerned about any review of the Green Belt, and that farmers may be encouraged to sell valuable agricultural land. Much of the land referred to appears to be Grade 1 or 2 agricultural land which is of the highest quality. It is likely that for this reason much of the proposed land around Capstone Valley, Rainham and Strood has been deemed “unsuitable” in relation to sustainability standards on the SLAA. Development of this valuable green space would be of great loss to the neighbouring areas as well as reducing the potential for self-sufficiency, protecting future generations and supporting the rural economy. In this respect the recent decision of the Government planning inspector to permit 450 houses to be built at Gibraltar Farm is very unfortunate and sets a bad precedent for other areas. We feel that the Local Plan should focus on brownfield land which has met the suitability criteria.

Reasons for not supporting Option 3:

We are concerned about the extent of development proposed on the Hoo Peninsula generally including Lodge Hill. Much of the proposed land for development appears to be Grade 1 agricultural land, the best and most versatile form of agricultural land, and should not be developed for the reasons stated above in relation to Option 2.

Lodge Hill:

Inclusion of the Lodge Hill site for potential development is in direct contradiction to the draft Vision statement which states that the Council would “*ensure that important wildlife and heritage assets are protected*” and also the statement [Policy Approach: Securing Strong Green Infrastructure, p65] that “a high level of protection from damaging impacts of development will be given to Sites of Special Scientific Interest”.

Further inconsistency appears to be demonstrated in the Strategic Land Availability Assessment (SLAA), January 2017, cited as part of Medway Council’s evidence base. In keeping with the methodology outlined in the document the proposed site at Lodge Hill should have been screened out at Stage 3 of the screening process due to its SSSI

designation. However it has not been included in the list of sites screened out for this reason and no explanation is provided for this. NPPF guidelines state that:

“...proposed development on land within or outside a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted. Where an adverse effect on the site’s notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Interest.”⁴

According to the RSPB, “40% of the SSSI [at Lodge Hill] (including 80% of all the nightingale territories) would be destroyed if the development goes ahead. The remainder would be fragmented and compromised by all the development around it”. Alongside this, development within or around the SSSI at Lodge Hill would set a dangerous precedent for other SSSIs across the country.

Since the impacts of development are likely to destroy the features that warrant its SSSI designation, as well as affecting the preservation of other SSSIs, it is difficult to see what the benefits of going ahead with development at Lodge Hill might be. Housing can and should be provided in other locations, whether in the Medway Towns or elsewhere. Additionally, as the Lodge Hill site is an out of town location, development there would require additional road infrastructure. It is very difficult to imagine where that could go without causing further environmental damage and loss.

Despite this, we understand that Medway Council continue to support the development of 3000 homes and associated infrastructure there during the Local Plan period and a further 2000 homes following this period.

Medway Green Party remains against development of this area.

Reasons for supporting Option 4:

As there are no easy, quick fix options, in principle we support the idea of offering a combination of solutions.

Reasons for not supporting Option 4:

Despite the suggestion that this is a mixture of options, the Hoo peninsula is still expected to take the majority of housing pressure with 6500 homes at Hoo and 3000 at Lodge Hill. We believe that development should be proportionate to existing development throughout the Medway Council area. The developments proposed at Hoo and Lodge Hill are not proportionate. It would be good to see a Local Plan that included a real alternative to major development at Lodge Hill and greater balance in development.

In comparison to Option 1, Option 4 reduces the potential for high density development from 10,500 to 6,500. Medway Green Party believe that good quality high density housing around travel hubs is the most sustainable option and, given the extent of homes needed, the Local Plan should encourage this area to be developed to its full potential. We also support development of Medway City Estate with gradual movement of employment areas away from the area. Option 4 appears to be limiting this opportunity.

⁴ National Planning Policy Framework (NPPF) (p27/28)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

An alternative sustainable development option from Medway Green Party:

Rather than taking a numbers first approach, the Council would begin by putting a hard line around public green areas, SSSIs and other protected sites, farmland, woodland, open spaces and areas of special biodiversity and not permit development in these under any circumstances.

The Council would then work within these environmental limitations to provide the best possible solution in the circumstances, bearing in mind that the population will probably expand. This is likely to lead to the Council needing to look outside the “business as usual approach” and to explore options such as making empty homes and offices available for housing and building in the space above car parks and existing buildings, all of which are recommended in the new Government Housing White Paper⁵. In addition to this the council should be mindful that large houses that are currently under-occupied may come up for sale during the plan period. These properties could be converted into several smaller accommodations. The existing development options do not appear to take into account potential better use of the existing housing stock in Medway. It is also important to factor into plans things which may not currently be taken into account in determining housing needs, such as infill developments and loft conversions or extensions to existing homes.

Finer details of this approach are as follows:

- If not already done by the Council, as early as possible during the plan period:
 - Every brownfield site would be recorded and assessed for its bio-diversity and environmental value and publicized.
 - Every piece of under-used land will be recorded and assessed for its development potential and publicized.
 - Every vacant or under-utilized building will be recorded and assessed for their development potential and publicized.
- The Council would appoint a senior planning officer to offer pre-application advice on the local plan criteria to potential developers with a short time limit for a site visit and a further short time limit for the written assessment. Failure to meet the time constraint would result in a refund of the fee.
- The first component of this alternative option for development would then be to focus on the regeneration of Chatham as a dense urban centre and the redevelopment of the Medway City Estate area as a mixed development, while using the urban section of the river to its maximum potential. This would represent the regeneration area under our Plan.
- The emphasis would be on a mixed development of residential, business and retail in Chatham with light industrial added to the same mix in the Medway City Estate area.

⁵ Taken from Government White Paper (2017) “Fixing our broken housing market” (P32) as follows: “address the particular scope for higher-density housing in urban locations that are well served by public transport (such as around many railway stations); that provide scope to replace or build over low-density uses (such as retail warehouses, lock-ups and car parks); or where buildings can be extended upwards by using the ‘airspace’ above them;”

- The River Medway, from the Rochester/Strood railway bridge to the Council Offices in Chatham would be used to accommodate people living on the river in houseboats with proper services installed.
- In the first phase Medway City Estate and Chatham will be connected by a ferry service from Sun Pier.
- In later phases pedestrian and cycle bridges will be built at key locations, for example from the Council Offices to the Medway City Estate.
- The riverside site in Chatham will be divided into at least three sites to create a sustainable high density development.
- Redevelopment of the Pentagon would be considered as a priority.
- All existing and new car parks will be built above and used primarily for housing.
- All major developments would be initiated via a design competition with the emphasis on sustainability and the environmental credentials of the proposals.

Within the plan period there is a need for 1281 homes per annum. Of these, according to the consultation documents, 58% of the total (744 each year) should be affordable and the Plan would be based around this requirement. A small proportion of the homes required each year could be built outside the regeneration area outlined above, in other parts of Medway, but this would be on a percentage basis of the existing housing stock. For example, if 250 of the homes required each year were built outside the regeneration area, this would represent approximately 2 for every 1000 existing homes, creating a development percentage of 0.20%.

Homes built outside the regeneration area would be built on small sites, with priority given to self-build, cooperative ownership and small local contractors. Large developers and volume house builders would be excluded from the areas outside of the regeneration area to limit inward migration from London and maximise the benefits to the local economy.

Predictions of growth in the Medway Towns are from a high baseline with the population figures in Medway already high in comparison to neighbouring areas⁶. It is therefore unsurprising that predicted figures will be high. Ultimately it is unrealistic to expect individual administrative areas to expand in line with predicted populations when those populations are likely to be better served by adjacent areas, or other areas in the country, that are less populated and congested and have a higher ratio per person of green spaces.

We would urge the Council, in addition to considering the above alternative option, to make a case against over-expansion in the Medway Towns, rather than simply falling in line with unrealistic and damaging expectations. While the consultation document notes the “duty to cooperate” in relation to cross boundary projects, there is also a clear avenue for seeking cooperation with adjacent local authorities in relation to lack of land availability for predicted need, which is set out in the new Government Housing White Paper. We would urge Medway Council to explore this option in light of the low proportion of green spaces per 1000 people in Medway, rather than allowing greenfield land to be built on.

⁶ Taken from Strategic Market Housing Assessment (2015) as follows: “Based on the 2011 population level, Medway makes up the largest proportion of the population in the wider HMA, at 34%” – Housing Market Area (HMA) has been identified as consisting of Medway, Gravesham, Swale, Maidstone and Tonbridge and Malling) <http://www.medway.gov.uk/pdf/Medway%20SHMA%20Final%20Report.pdf> (p42)

Section 4 – Housing

Policy approach for housing delivery:

While we broadly agree with the need to plan ahead and create sustainable communities with adequate infrastructure and service provision, we disagree with a policy approach that focuses on numbers. Truly sustainable communities also need green spaces and clean air as this is so important to health and well-being.

We do, however, agree that a Local Plan should be produced which focuses on making Medway the best that it can be. We note that in section 7.2 the statement is made that “The new Local Plan will seek to strengthen the condition of the local environment, and respect the need to live within the earth’s environmental limits” – an important statement which we hope the Council genuinely believes in.

Policy approach for housing mix:

We broadly agree with the policy approach.

We agree that a sufficient range of sustainable housing options should be produced, support a mixture of tenures, and note that the preferred option is for good sized two bedroom properties, which would be consistent with Option 1 of the development options. This option would also be supported by the analysis that there has been a rise in single person and small households.

We like that the Council has stipulated that consideration is needed of those on the council house waiting list and that provision of affordable housing be discussed with the Council’s Housing Strategy team, but feel that the focus is still too much geared towards market housing with little or no provision for social rentable homes. Medway has been noted to have the biggest shortfall in social rentable property in the country (Housing Measures Summary Analysis Report, Office of National Statistics, 2015⁷). This consultation document fails to address that. It is of note that there is no mention of the Council building social homes and no mention of working collaboratively with MHS homes to increase the provision of social homes. This is surprising given they are currently a major provider in the area. If the option was available, many people may prefer to rent Council Homes given the lack of security provided by private landlords.

We agree to developers giving consideration to custom and self-built plots, but we would like to see the Council offering encouragement to cooperative building projects including providing support to Community Land Trusts. Support also needs to be included for encouraging off-site built eco efficient homes which can be enshrined in the Local Plan’s economic policy.

⁷ Taken from Housing Summary Measures Analysis, Office for National Statistics, 2016 - chapter 17

"In 2015, the 3 areas with the largest shortfall in social housing were Medway, Fylde and Isle of Wight (236% of social housing stock, 145% and 125% respectively). This means that the social housing shortfall in Medway was more than double the social housing stock for Medway in 2015".

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/articles/housingsummarymeasuresanalysis/2015#social-housing-stock>

Policy approach for affordable housing and starter homes:

We disagree with the policy approach.

While we agree that the Council should make provision in the Local Plan for affordable housing in line with the evidenced need of the area, it appears that the Council are limiting their ambition to achieve this by over-reliance on private developers.

The identified need for 17,112 'affordable' homes⁸ represents nearly 59% of the 29,463 being planned for. Thus if, as stated in the consultation, no more than 25% of the eventual mix will be of an affordable type, this would fail to meet the needs of many residents and would be likely to lead to needless expansion of the built-up Medway Towns area, resulting in at least 9,000 homes being built which don't meet the needs of the local population.

There is also a need for clarity on what "affordable" actually means. For example, many of the two bedroom flats being built at Victory Pier currently are more expensive than the existing local terraced housing stock, even with a 20 per cent discount, and so continue to be out of reach for the majority of young people seeking their first home.

As mentioned above in our response on housing mix, there is no mention of providing social housing or of working with MHS homes to ensure that the provision is increased.

A change in national government policy towards, for example, allowing Local Authorities to borrow more so that they can build more Council homes, could happen within the plan period and this possibility needs to be taken into account.

The Council should also state their support for Community Land Trusts which are community led alternatives of providing affordable housing. A description is contained within the Local Plan for East Cambridgeshire (p40) as follows:

"One mechanism for delivering community-led development is a Community Land Trust (CLT). CLTs are not for profit organisations based in and run by the community, that seek to develop key community assets to help communities become stronger and more independent. The usual starting point for CLTs is the provision of affordable housing but other benefits such as community shops, pubs, allotments, gardens, play areas, orchards, workspace, and renewable energy can also be provided".⁹

Policy approach for Supported Housing, Nursing Homes and Older Persons Accommodation:

We broadly agree with the policy approach.

⁸ See section 4.11 of the consultation document.

⁹ As an example, support for this form of provision is included in Policy Growth 6 – Community Led Development of the East Cambridgeshire Local Plan, Adopted April 2015:

https://www.eastcambs.gov.uk/sites/default/files/Local%20Plan%20April%202015%20-%20front%20cover%20and%20inside%20front%20cover_0.pdf p41

Additional information is included on their website. <https://www.eastcambs.gov.uk/housing/community-land-trusts>

We appreciate that older people prefer to continue to live in their own homes with adaptations and community care if necessary – though this needs to be sufficient. At present this is not the case and improvements in social care need to be made.

The aim to “improve flexibility of accommodation” should also include schemes that allow older people to convert their existing homes into smaller units which would make better use of the existing housing stock and reduce the need for new builds.

Medway Council could address under-occupation by older people through actively encouraging the mutual exchange of homes, helping to match people who want to downsize with those who need more space, and providing more homes suitable for people to downsize into, such as smaller social rented homes for older people. The Green Party do not support punitive or coercive measures such as “the bedroom tax”. Encouragement to downsize should take place in a supportive environment that is sensitive to the needs of individuals.

A key aspect of this is that older people who do wish to downsize are likely to require support in considering their options.

There seems to be an implication that as the population of over 65s will account for just over half of the predicted population growth in Medway over the next twenty years (per 4.16 of the consultation document), we need to look at providing accommodation targeted at older people. It is true that older people are likely to need a greater degree of supported accommodation than younger people and so any future plans need to be mindful of this. However, arguably this is not really growth in the population as presumably these people already exist in Medway – they do not represent an “extra” 31,000 residents but instead the number is largely made up of existing residents who have become older. In addition the majority of older people are likely to want to remain independent and will already have accommodation.

So the main growth area in housing may therefore instead be from younger people leaving home and wanting a place of their own. Older people might even free up suitable accommodation for younger people if they downsize from bigger to smaller accommodation after their children have moved out. How much of this potential exchange of existing property has been reflected in the figures used in the consultation?

Lastly, the Green Party support all cooperative forms of home and land ownership, including mutual retirement housing and specialist retirement co-housing. Like housing associations, the potential for cooperatives to serve particular needs should also be recognised, for people with mental health or learning disabilities, with substance misuse problems, the formerly homeless, ex-offenders and women fleeing domestic violence. Cooperatives have significant potential to enable such people to keep control of their lives and creating communities with mutual aid enables people to retain their independence.

Policy approach for student accommodation:

We agree with this policy approach.

Policy approach for mobile home parks:

We broadly agree with the policy approach but any new developments should be based on a fairer form of ownership such as cooperatives.

Policy approach for houseboats:

We broadly agree with this policy approach as long as the Council ensures that houseboats are well provided with appropriate services. We feel that these provide a good alternative to traditional homes within a broad mix of housing types.

Medway is well known for its clusters of houseboat dwellers in several locations along the river and is also a centre both for the construction of new houseboats and the conversion of redundant vessels into houseboats.

Houseboat living suits all ages and appeals to those who like fresh air and the unique atmosphere of the river. The vessels themselves are inexpensive. They can be built to a high standard of amenities and thermal comfort at a reasonable cost. With renewable energy features and onshore facilities they can be easily serviced and entirely non-polluting.

Due to the shortage of houses, many young people cannot afford to purchase or rent a house yet a young couple could set up home on a new purpose designed houseboat for about a third of the cost of the smallest one bedroom house or flat.

The Council could assist with promoting this option to help reduce the housing shortage in Medway by allowing more marinas to be developed close to the urban centres and by recognizing the unique contribution a well-designed and managed water based community would add to the character of the area.

Policy approach for houses of multiple occupation:

We disagree with this policy approach

We are surprised that only 350 HMOs have been identified, as our impression is that there are far more locally. While HMOs are a useful provision they need to be much better managed and regulated. Although we are in broad agreement with the measures included in the Policy Approach it fails to consider the needs of the tenants which also should be addressed.

Policy approach for self-build and custom house building:

We broadly agree with this approach and hope that the Council gives particular support to any applications for sustainable eco housing and those made by not for profit cooperatives

Policy approach for gypsy, traveller and travelling show people accommodation:

We disagree with this policy approach.

The Green Party believes that there should be a requirement for Local Authorities to provide sufficient sites for travellers and that this requirement would apply to both residential and transit sites. The Local Plan consultation appears to be using vague Government definitions to restrict provision to transit sites in contrast with their own previous evidence base. While there may be movement between transit and settled communities, the Green Party believes that authorities should not seek to impose unwanted conformity on travelling communities. We feel that any change in provision should therefore only happen in consultation with the communities concerned. It is unclear whether any consultation has taken place with the communities concerned in or around Medway at this point.

Alternative sustainable development options for housing that have not been considered

There is little offered in the proposed policy approaches on housing regarding opportunities for utilising offsite constructed houses which have much higher energy efficiency standards than traditional building. Promotion of this form of housing is central to Medway Green Party's vision for housing development in the Medway Towns, as described in our response to the previous Issues and Options consultation paper. We understand that Local Authorities up and down the country work with a few different architectural/housing designs that have materialised over the years. We would suggest that this practice is revolutionised to take in sustainable eco housing, which will ensure that Medway Council will be seen as a flagship authority in this regard. It is noted that the current UK Government is fully supportive of this type of housing, as demonstrated in the recent Housing White Paper 2017 which states:

“Industry reports suggest homes constructed offsite can be built up to 30% more quickly than traditional methods and with a potential 25% reduction in costs. They are high quality, reliable, more productive and can be highly energy efficient.”

The Government has also stated in the Housing White Paper their willingness to work with Local Authorities who are “supportive of this type of manufacturing to deliver growth, provide jobs and build local housing more quickly”. We would urge Medway Local Authority to take up this offer.

Perhaps offsite construction has been associated in people's minds with previous wartime emergency and other ad hoc attempts to provide quick and cheap solutions to a housing shortage. However things are different now and in these days of universal awareness of climate change and the need to reduce carbon emissions, we have already adopted improved thermal standards, but we still need to take urgent measures to reduce the embodied energy in the materials we use for construction. Off-site construction, compared to so-called traditional methods of construction, is cheaper, more efficient, less wasteful and more sympathetic to the circular economy and lends itself to the use of sustainable and renewable materials with a corresponding much reduced environmental impact.

Currently one in eight skilled construction workers, in the traditional sector, come from European Union countries. An unforeseen consequence of Britain leaving the EU is going to be an incentive for construction to use off-site manufacturing methods. Such methods when designed into the construction process are as equally suitable for large scale and high rise developments as they are for small scale residential and self-build houses.

Medway Council could promote a cheaper, more eco-friendly method of construction through the planning system and by incentives for local off-site manufacturers to flourish. Locally members of the Royal Institute of British Architects are working on proposals to develop off-site construction as one of their initiatives to find solutions to the housing crisis.

We do note that Medway Council have been reported as supporting the idea of off-site construction and recently gave planning permission for the siting of some off-site built homes at Peacock Rise in Chatham. We understand that the provider of these homes, Ene Group, have also shown interest in locating a factory in Kent. This is to be welcomed in principle as long distance transportation from Scotland of such buildings will have both cost and environmental impacts. It is however unclear whether the homes at Peacock Rise meet the highest of energy saving standards. Additionally, they remain an expensive option which may not encourage local interest. We would urge Medway Council to further explore how the off-site build option can be done more affordably, more locally and with a focus on high energy efficiency.

We would also encourage Medway Authority to illustrate support in the Local Plan for cooperative forms of housing provision, including Community Land Trusts, as indicated in our earlier responses.

Section 5 – Employment

Policy approach for economic development:

While there are a few good aspects (such as working to enhance local skills and encouraging businesses that will provide high quality local jobs) we cannot agree to the policy approach in its current format. Firstly we are unable to determine the accuracy of land needs stipulated. Secondly this approach appears to indicate that GVA would be virtually the sole determining factor in assessing planning applications. An overly restricted focus on economic growth has the risk of being costly in other areas that affect wellbeing and sustainability.

Despite the opening statement of this section that the Government is committed to “meeting the twin challenges of global competition and a low carbon future” the policy approach provides no evidence that the Council would seek a joined up strategy which combines pursuing employment opportunities with taking essential measures to address climate change as well as protecting our environment. In fact, “a business as usual” approach is taken in the consultation document that embraces employment from environmentally destructive developments such as the Lower Thames Crossing, which is likely to increase pollution and will destroy even more of our local green space.

In our response to the previous Issues and Options stage of the consultation, we identified the economic opportunities presented by encouraging off-site construction of energy efficient houses. As noted in our response above to Section 4, Housing, the UK Government is also promoting this approach and are willing to work with Local Authorities who are supportive of this type of manufacturing. We therefore urge Medway Council to explore measures to actively support this form of industry within Medway, including encouraging local education establishments to include training in architecture, engineering and technology in this area. There are also opportunities in connection with the renewable energy industry which should be exploited. It is time we stopped importing these technologies and focussed on developing the manufacturing expertise ourselves.

Additionally there are ‘Green’ jobs in retrofitting existing housing stock. This idea could be particularly taken up in relation to social housing or housing association properties, which should all be fitted with adequate insulation and solar panels. The initial investment can be recovered and additional financial resources for the Council could be achieved by the sale of any surplus energy generated to the National Grid. Additionally it should be written into planning criteria that any warehouses built in industrial areas should be fitted with roof solar panels.

We urge the Council to explore potential opportunities in this area and propose that they should include a separate section of the Local Plan that specifically addresses issues such as proactively lowering our carbon footprint.

In identifying employment land, the Council must consider that patterns are likely to change over the plan period, for instance by more people working from home. There should be

regular reviews and land not being used for employment should be allocated to other uses, including housing.

Policy approach for the rural economy:

We agree with this policy approach though feel that it should contain more detailed explanation in relation to the statement that the Council will seek to “*direct development to land of lesser agricultural land [sic] where feasible*”. It is of particular concern that perceived housing pressures will give the Council room to deem the protection of Grade 1, 2 and 3a land unfeasible, particularly as Grade 1 and 2 land has already been suggested as sites for development in three of the four development options.

Policy approach for tourism:

We broadly agree with the policy approach but have a few reservations.

While tourism has significant benefits to Medway’s economy (and the potential to provide much more), it must be recognised that it has social and environmental impacts as well as economic. Any expansion of tourism must be sustainable, keeping damage to the local environment to a minimum, benefitting the local economy and being on a scale that fits with the local community. Certain leisure pursuits are resource intensive and have greater impact on the environment so may need to be discouraged in specific locations, such as motor boating and small aircraft pleasure flights.

‘Eco’ or ‘green’ tourism has been mentioned in 5.36 as an opportunity and we would like to see this carried through more positively into the Policy Approach, provided such tourism can be done in a sustainable way. Development at Lodge Hill, which includes a SSSI plus other vital habitats for wildlife, would undermine the Council’s credibility in this area.

In thinking of tourist facilities, we would particularly like to see support given to smaller independent local providers and priority given to employment of local people. The vitality and vibrancy of Medway would be enhanced if greater encouragement was given to the local arts and music scene.

Policy approach for visitor accommodation:

We agree with the policy approach, but any proposed development must be sustainable and deliver real benefit to the local economy. We think the construction of new visitor accommodation should present a real opportunity for innovative zero-carbon design to be employed.

Alternative sustainable development options for employment that have not been considered:

A joined up solution which places environmental protection at its core would improve the local economy by providing training and jobs in:

- Renewable technologies.
- Provision of efficient, sufficient new housing – the Council should explore the possibility of encouraging businesses into Medway which produce factory built energy efficient homes. These can be produced at a cost equivalent to or less than traditional homes.
- Transforming the existing housing stock by retrofitting with energy producing and saving measures.

We also support growth in independent businesses and other community based organisations, such as co-operatives and social enterprises, which would also provide employment opportunities for local people.

Section 6 - Retail and Town Centres

We broadly agree with the policy approach, with some reservations.

We believe the days of Chatham as a significant retail destination have passed due to changes in both people's shopping habits and the strategies of retailers. Therefore we do not necessarily agree that Chatham should continue to be placed at the top of the hierarchy as the main location for retail growth. We would like to see a more even investment across all town centres, with the area allocated to retail in Chatham reduced, freeing up buildings or land for alternative uses, including residential. When the town centre has more people living there, the retail aspect may become more attractive to bigger or better shops which in turn will make Chatham a more attractive place to visit to shop.

We believe that people in the villages and other local centres within the Medway area have as much right as those in the towns to adequate public services and local shops. We would like to see the Local Plan incorporate a commitment to encouraging innovative solutions to maintaining vital local shops and services.

The policy approach states that the Council will set out policy on uses considered to be 'appropriate' in local centres. We are concerned that it is not clear who will be determining what is 'appropriate'. Any policy from the Council must not be too prescriptive. We believe that decisions on what is suitable should be taken as locally as possible.

Section 7 – Natural Environment and Green Belt

Policy approach for Strategic Access Management and Monitoring:

We broadly agree with this policy approach, but urge the Council to be proactive in protecting the habitats of the Medway, Swale and Thames estuaries. It should actively seek to prevent harmful development rather than be reconciled to accepting payments as compensation for lost or damaged habitats.

Policy approach for securing strong Green infrastructure:

We agree with this policy approach.

It recognises the need to protect important green spaces, including providing “*a high level of protection for Sites of Special Scientific Interest and Ancient Woodlands*” (although this is at odds with aspects of the development options currently proposed by the Council) and speaks of supporting access and connectivity to green spaces for any new developments and improving connectivity generally via the public rights of way network, cycle paths etc., all of which we support.

We are in favour of greening the built environment so welcome the commitment to securing strong 'green' infrastructure. We hope that the Council will apply this concept not just to new

developments but also to existing areas of Medway, opening up estates and roads that currently lack any real connection with the natural world.

Policy approach for landscape:

We agree with this policy approach.

Policy approach for flood risk:

We support the use of sustainable drainage systems. However the Council should consider other policies to reduce flood risk such as those detailed in our response to the Issues and Options stage of the consultation - we hope these will be included in the next version of the Local Plan.

Individual developments should minimise the loss of permeable surface area and increase it where possible. Where development entails a reduction of permeable surface area, it must mitigate the resulting increase in surface water runoff using Sustainable Urban Drainage Systems (SUDs). Loss of permeable surfaces in existing developments such as front and back gardens should be avoided.

The role of trees and vegetation in preventing surface water flooding must also be taken into account in planning decisions. Water sinks into soil under trees at 67 times the rate at which it sinks into soil under grass.

In rural areas, smaller areas of agriculture broken up by trees and vegetation rather than large monocultures are not only better for wildlife but also have benefits in helping to absorb surface water and prevent flooding.

Urban Forestry has been introduced into some urban areas, for example in Portland Oregon, to reduce flooding and improve the quality of surface water run-off from residential streets. The planting of trees in residential streets can also help to improve air quality.

Policy approach for air quality:

We agree that any new developments should be assessed for their potential to make air quality worse than it is already and mitigation measures should be introduced for such developments. It is noted that the Council recognises that large out of town developments which generate significant vehicle movements are amongst a list of those which are likely to contradict Air Quality Action plans. This should be taken into account when making developmental decisions. We do of course agree with measures outlined in 7.27 to reduce air pollution and CO₂ emissions. Suggested additional measures to those proposed in the Medway Council's Draft Air Quality Action Plan 2015 were both forwarded by us to the consultation regarding that Plan and included in our response to the Issues and Options consultation. We hope that "integrated transport strategies" will include these measures.

Section 8 – Built Environment

Policy approach to design:

We broadly agree with the policy approach.

We do feel that Medway Towns are already at capacity for the existing infrastructure, so wherever possible the Council should resist pressure to over-populate and over-develop the area.

For areas within the unitary authority that can and should be developed, there is an opportunity to look to the future in respect of design.

Maintaining a sense of community is essential, with sufficient open spaces provided to give breathing space and areas for recreation. The maintenance or provision of local services, with space allowed for small business to thrive also helps to give a sense of community. New developments often promise such things, but somehow developers constantly seem to fall short of providing what has been promised initially.

Vehicles and parking are a constant problem in developments and even without any increases in population innovation in parking needs to be considered. The most logical solution is to ensure that car parking in new developments is put under the buildings and that, where possible, all public car parks offer opportunity to build above them creating opportunity for further development on brownfield sites. In these situations double story car parks could also be considered.

It is also important that the impact on the local natural environment should be considered and we are surprised to see nothing specific in this policy approach about that. We would also appreciate clarification over the item concerning landscaping (third bullet point from the end), which refers to “features considered relevant/important by the Council”. We hope that such considerations will be transparent, for example by having published guidelines. As a Party we consider that decision making should take place as locally as possible and certainly local people should always have a say in any developments that will alter the landscape of their local area.

Policy approach to housing design:

We broadly agree with this policy approach.

We would like to see movement in Medway towards zero-carbon housing, although realize this will take time to achieve. However we feel that the Council should already be aiming for low-carbon, sustainable, energy efficient housing design.

Medway Green Party would hope that all new developments take Medway into the future:

1. Ensuring that the maximum roof areas are able to take advantage of solar energy by having a strong south facing aspect. Further roofs should avoid shading those of other properties to ensure that the maximum number of properties can access solar energy.
2. Ideally all new properties should have solar panels fitted as standard, but even if this is not considered economical by the developers, the roofs should be designed in such a way that future owners can easily retrofit this technology.
3. Consideration should also be given to other renewable energy technologies such as providing locations for wind turbines. As with solar, if not actually built-in then properties should be built in such a way that retrofitting could be easily considered in future.
4. High standards of thermal and sound insulation should be insisted on in all new developments. For a property to be truly affordable it needs to be affordable to run.

Homes are still being built with poor thermal insulation even though the technology available is proven to reduce heating bills, in some cases almost to zero. Sound insulation is also given scant regard by developers and yet is one of the biggest causes of friction between neighbours and within communities. Semi-detached housing and apartment developments should have much higher standards of sound insulation and, as with thermal insulation, the technology exists to make this a reality. Unfortunately it seems as if developers will not embrace these technologies unless planning regulations compel them to. Places of entertainment within communities could be much more successful if they were built with excellent sound insulation from the outset.

5. Medway Green Party would also urge that new building materials are considered in housing design that ensure a low carbon footprint for building and sustainability. A good example is the use of hempcrete for the main wall construction of buildings. Its thermal properties are excellent, it is a truly breathable material and the raw materials (hemp and lime) can be brought to site for manufacturing into a building material, reducing transport costs and possibly also the need for some large plant and machinery. It might also be possible to grow hemp locally, meaning that locally grown hemp and timber could form the backbone of all future development in Medway, not just benefiting the global environment but also creating huge benefit to the local economy. It is also worth remembering that a building constructed of hempcrete can be returned to the earth at the end of its life - it can be crushed up and spread on the fields as fertilizer. Hempcrete is also a great material for renovation and regeneration and is easier and less expensive to repair and maintain than brick and concrete. It also offers great scope for innovative visual design and buildings of character.

Policy approach to housing density:

We broadly agree with the policy approach. As we have stated in Section 3 of this response, we generally support the idea of building good quality homes at higher densities near town centres and close to travel hubs.

Policy approach to heritage:

We broadly agree with the policy approach. We agree that Rochester and Chatham's historical legacy is of particular historical significance, but urge the Council not to overlook the importance of heritage properties in other areas of the Medway Towns.

We broadly support the Council's view management policy and believe that it should be key in determining the character of new developments and regeneration. The historical legacy should be enhanced by developments. However, perhaps one example of where this has not really happened is the new Rochester train station. Here a very modern looking building has been created and while it does work as a facility close to the centre of Rochester, there seems to have been little consideration of its setting in a city with buildings of a historic or more traditional design. We hope that in future a whole view of developments is considered which takes into proper account their setting.

While the historic legacy of Rochester and Chatham especially needs to be protected, it does seem that other areas are neglected. Strood is a good example, where much of the centre has been developed with no reference to its own historic legacy or the character on the Rochester side of the river. Regeneration here needs to reflect Rochester in character (but not copy). Perhaps the character of buildings in a re-developed Strood centre could embrace our proposals for new building materials and renewable energy access, making it

an example of modern urban development with sweeping south facing roofs featuring solar panels and properties that cost little to run and maintain.

Section 9 – Health and Community

Policy approach - reduce health inequalities:

We broadly agree with the overall aims of the policy approach to reduce health inequalities and prevent the development of health problems. However we feel that the specific measures suggested are rather limited in scope and hope that the Council truly recognises and is ambitious in addressing the multifaceted challenges to good health.

We support the Council's plan to consider the needs of those with dementia and other different groups in the community, such as those with physical and learning difficulties. The recognition that community/adult social care includes groups other than the over 65s needs more emphasis generally and within the Local Plan. It is anticipated that the Council will continue to develop appropriate plans in consultation with Service Users and Service Providers.

Policy approach - healthy food environment:

While this is important it is just one contributing factor and it is hoped that the Council's policy approach will truly be multifaceted and address the many challenges to quality of life. The Green Party believe that health for individuals is only possible in the context of a healthy environment and society. A healthy society is one which guarantees a safe and clean environment; material security for all its citizens; good work; adequate housing; a balanced and unpolluted diet and clean water; appropriate education; a safe transport system; accessible and sensitive public services; equality of opportunity; and a secure present and hope for the future. Medway Council needs to recognise and include measures in its Local Plan to address all of these issues.

Policy approach - Medway Maritime Hospital and Healthcare Provision:

We believe that it should always be considered whether services currently offered in or by hospitals could be transferred to the community and we would support the provision of accessible, local community health centres that provide a wide range of services, including out-of-hours care, but feel these should be to help people access healthcare quickly and easily rather than being a replacement for GPs. Community care has often been used as a cost cutting exercise which is inadequately resourced and as a result provides inadequate care and support and this must be avoided.

It is noted that Medway Council and Kent County Council ('KCC') drafted a Sustainability and Transformation Plan ('STP') in October 2016. It would have been useful to have details of these plans highlighted in this consultation. It is understood that Medway Council are currently evaluating responses to the STC draft and that there will be further consultation in the summer of 2017. It has been reported in the national press (Tuesday 14th February 2017) that Medway Council and KCC have made plans which include:

- 10 per cent reduction in hospital beds, equivalent to 300 beds by 2020-21.
- Trauma and maternity to be located at a single acute hospital with A & E and planned care at two hospitals.

- Services including vascular, renal, urology and hyper-acute stroke care to be moved to a single site.

Clarity on these plans would be appreciated. While we support integrated delivery of services and increased community provision, we do not support hospital closures to finance these changes. We do not support centralised services if it means that patients need to travel further distances to access necessary outpatient or inpatient care. A better approach is outreach services from central bases within local hospitals. Centralising services has the risk of impacting the most vulnerable members of our society, such as low income groups who cannot afford travel costs. As an example, the closure of 'A' block at Medway Maritime Hospital has been reported by a local volunteer to have had an impact on rising numbers of street homelessness in Medway, as people with mental health conditions have been unable to access support locally when they are in crisis.

We would urge that Medway Council, as part of the Kent and Medway STP team, is thorough in investigating the full potential impact of changes before making them and that they ensure that any changes will not lead to further loss of access to vital services within Medway.

It is very good news that Medway Maritime Hospital has been taken out of special measures recently and we trust that everything will be done to support the Trust in furthering improvements. It is anticipated that the Council will continue to update the public regarding future plans for Medway Maritime Hospital.

Neighbourhood plans:

We agree with this policy approach as we support the principle of subsidiarity, that is, decisions should be made as close as possible to those they affect. However the policy approach would benefit from greater clarity on the processes and criteria that will apply, particularly in regard to how much influence decisions made in Neighbourhood Plans would actually have in relation to the Local Plan and planning decisions made by Medway Council. For example it appears that Headcorn Parish Council is now struggling to have its Neighbourhood Plan recognised by Maidstone Borough Council¹⁰.

Alternative sustainable development options for health and communities:

The Green Party feel that greater investment is needed in health and social care and in our 2015 election manifesto we promised additional funding. Ultimately, the Green Party would choose to reinstate the NHS to its original model, removing the purchaser provider split and PFIs which should make it cheaper to run.

The Green Party would also provide social care that is free at the point of delivery for the over 65s and additional funding towards social care for 18-65 year olds.

We understand that local authorities are limited by national decisions but we feel that Medway Council should be more proactive and vocal in informing central government about the difficulties that are being experienced locally and in seeking additional central funding, particularly for social care. The Government should be urged to take responsibility and invest in councils, rather than pushing costs onto residents and effectively creating a postcode lottery of care.

¹⁰ http://www.downsmail.co.uk/news_sport/News/Headcorn_village_plan_rejected_by_examiner/

We believe that a substantive injection of funding is needed and support the call by Unison to use £2.4bn in unallocated business rates collected from local government to provide real additional funding for social care.

We also believe that the Barker Report (Commission on the future of Health and Social Care in England)¹¹ made a significant contribution regarding possible ways forward. No doubt Medway Council is aware of the Commission's recommendations and we hope that they will take account of these in the Local Plan. There seems to be general agreement that health and social care need to deliver more integrated services. The Commission believe that the financing of future services is affordable, and note that by 2025 public expenditure on health and social care combined might reach somewhere between 11 and 12 percent of GDP, broadly comparable with current expenditure on health alone in some other countries.

Section 10 - Infrastructure

Policy approach on infrastructure (general and strategic):

We broadly agree with the policy approach.

It is important that supporting infrastructure and services must be put in place before or at the same time as any new development, not at some unspecified time in the future. This includes services and facilities promised by developers as part of their approved planning application.

As respects strategic infrastructure, while we appreciate that current or future national or regional projects may affect the Local Plan and its delivery, we urge the Council to always act in ways that best protect the interests of Medway people and the natural environment they enjoy.

Medway Green Party is on record as having opposed the proposed Lower Thames Crossing near Shorne – see Section 11 below for our further comments on this.

Policy approach on education:

We broadly agree with the policy approach.

However we are concerned that under the recent change in the Government's funding formula most schools and academies effectively face cuts in funding over the next few years. For example it is estimated that by 2020 Sir Joseph Williamson's Mathematical School in Rochester faces a cut of 12% in its annual budget by 2020 – equivalent to 12 teacher salaries – and Warren Wood Primary Academy a cut of 19%¹². Such reduced funding is likely to result in increased class sizes, a loss of staff and cuts to extra-curricular activities. With pressures like these it is difficult to see how the existing educational facilities in Medway will be able to cope with an increased population.

It is of particular concern that funding cuts could lead to reduced support for children with special educational needs.

¹¹ https://www.kingsfund.org.uk/sites/files/kf/field/field_publication_file/Commission%20Final%20%20interactive.pdf

¹² Information from www.schoolcuts.org.uk

Policy approach on community facilities:

We broadly agree with the policy approach.

We feel it is especially important to safeguard and enhance community facilities in the rural areas of Medway, especially if any incremental development is permitted in the villages on the Hoo peninsula. In order to move towards sustainability, each village needs the basic facilities for those social and cultural activities required by the local community.

The Council should actively encourage and support innovative solutions to maintain vital local services if necessary, such as post offices being relocated into village shops or pubs, or churches doubling up as community meeting rooms.

We are concerned that paragraph 10.17 of the consultation document implies that it has already been decided that there will be large developments extending the boundaries of existing villages. Medway Green Party believes that any additional development allowed to villages in the Medway area should be incremental only, and limited to a very small percentage of the existing housing stock there. Our objections to large developments in the Medway countryside that seek to establish a new town such as Lodge Hill are noted elsewhere in our response.

Policy approach on communications infrastructure:

We agree with the policy approach, but would also like to see a firm commitment to treat the rural and urban areas of Medway equally when it comes to communications infrastructure, for example by ensuring that high-speed broadband will be available to those living in the rural parts of Medway at the same cost and speed as to those based in the town centres.

Policy approach on open space & sports facilities:

We broadly agree with the policy approach.

We believe that all existing open spaces should be protected and if possible enhanced. Wherever feasible, new developments should be required to include on-site open space provision which is carefully planned and managed to protect and encourage wildlife, forming part of an enhanced, linked green infrastructure throughout the Medway Towns.

We are not opposed to the idea of Gillingham Football Club moving its ground away from Priestfield Stadium. However as noted in Section 3 of this response we are cautious about development at the Mill Hill site. The Green Party seeks to treat all farmland and open country as environmentally sensitive, to be protected appropriately. Whatever site is eventually chosen for a new stadium complex, it must be easily accessible by train and other public transport to minimise car use.

Policy approach on utilities

We broadly agree with the policy approach.

However we notice that there is no mention in the policy approach of demand management. An alternative to expanding facilities is to reduce demand. We believe that Medway Council should take a lead in encouraging and supporting measures to reduce energy usage and water use, such as the installation of solar panels, home insulation programmes and reusing treated wastewater.

See also our comments in relation to Energy in Section 12.

Policy approach: implementation and delivery

We broadly agree with the policy approach but do have reservations:

It is important that the Council acts firmly in relation to developer contributions, which should not be used as a means for the developer to avoid providing infrastructure needed to make a development sustainable. Where contributions are agreed these should be a true reflection of the costs associated with the development – not just those associated with providing physical infrastructure but also those that reflect such things as any lost environment.

The demonstration of ‘viability’ should apply to any development, not just those regarded as ‘significant’ (who decides that, and on what basis?), and ideally should be replaced by a demonstration of ‘sustainability’.

We note that paragraph 10.35 makes no mention of the Council having regard to the views of local residents in developing the strategy and producing policies for the new Local Plan. We hope this is an oversight as planning decisions should always be made at the most local practical level. The importance of proposed developments in the opinion of developers or national or regional government should always be weighed alongside the needs and expressed opinions of the local communities in the areas in which they will be sited.

Section 11 – Sustainable Transport

Policy approach for transport:

We broadly agree with the policy approach with some reservations:

We feel that the definition chosen for ‘sustainable transport’ in 11.1 misses some key features of true sustainability. For transport to be sustainable it has to both minimise harmful effects on people and the environment (rather than just having a ‘low impact’) and minimise the depletion of natural resources (not mentioned at all in 11.1), and as a result can be sustained in the long term. A particular omission from the definition in the consultation document is any reference to minimising harm to human health, despite it being recognised that certain areas of the Medway Towns already suffer significant levels of air pollution and traffic noise. It is good to see a reference in the Policy Approach to improving air quality as a result of vehicle emissions but we would like to see a greater emphasis placed on this with a firm commitment made to an overall reduction in emissions, even taking into account the planned growth.

One alternative approach, originating from the EU, defines a sustainable transportation system as one that:

- allows the basic access and development needs of individuals, companies and society to be met safely and in a manner consistent with human and ecosystem health, and promotes equity within and between successive generations;
- is affordable, operates fairly and efficiently, offers a choice of transport mode, and supports a competitive economy, as well as balanced regional development;
- limits emissions and waste within the planet’s ability to absorb them, uses renewable resources at or below their rates of generation, and uses non-renewable resources at or below the rates of development of renewable substitutes, while minimizing the impact on the use of land and the generation of noise.

Very few of these features of 'sustainable transport' are incorporated in the simplistic definition in 11.1.

If sustainable transport truly is the aim in the Local Plan, then we feel that in planning priority should be clearly given to certain forms of transport over others. Walking and cycling should come first, followed by public transport, then taxis and light goods vehicles, cars and lastly HGVs. We would like to see both the Local Plan and the future three-year implementation plans for Medway's Local Transport Plan clearly reflect this hierarchy, for example by pedestrian and cycling routes and bus lanes being given priority. While public funds would best be spent on the forms of travel at the top of the hierarchy, we recognise that many people will prefer to use cars (or will need to as no other method of transport is available). We therefore urge the Council to be pro-active in supporting electric or hybrid vehicles as a valid alternative to petrol or diesel cars. Electric cars are likely to grow in popularity over the plan period and could potentially replace petrol or diesel cars in the near future, given adequate infrastructure. The Council should work with developers (both commercial and residential), employers and green energy providers to ensure that adequate infrastructure for recharging electric cars is provided where car parking is available, both for current and predicted future need. The Council should also be alert to the possibilities and implications of other types of vehicles that may become commercially available, such as hydrogen cell cars and autonomous vehicles.

It is also important that the peripheral and rural areas of the Medway Towns are not overlooked or neglected. While providing sustainable transport options for such areas may be more difficult than for urban or suburban areas, it should not be regarded as impossible, especially if incremental development is permitted there. Any new housing developments in the countryside should fully recognise the potential transport needs of residents, providing solutions that do not rely on private car ownership.

To improve the sustainability of transport in Medway we must begin to reduce our dependence on car use and the Local Plan provides an opportunity to start this process which should not be lost. The nearly 30,000 homes proposed in the Plan could easily mean 50,000 extra vehicles on Medway's roads and probably many more. We would like to see the Council taking measures to reduce car traffic in the urban areas of the Medway Towns, such as improving public transport options and reducing the need to travel by creating mixed-use urban developments, as discussed in Section 3 of this response.

Public transport in Medway is inadequate. While we recognise that the Council currently has limited control over the operation of privatised bus or train services, we would like to see a firm commitment in the Local Plan that the Council will do whatever they can to improve such services and make them more accessible to all users. This could, for example, include the subsidising of vital rural bus services or ensuring free bus travel for school students.

Lastly Medway Green Party was opposed to the proposed Lower Thames Crossing near Shorne ('Option C'). We were disappointed when Medway Council expressed their support for this Option and even more so when the Government announced that it had been chosen. It is likely to impact negatively on areas such as Strood, Frindsbury and Wainscott, bringing increased local traffic and air pollution, as well as causing irreparable harm to the environment. Now that the decision has been made to pursue this Option for the Crossing, we urge the Council to make a firm commitment in the Local Plan that they will work actively to minimise and mitigate the impacts of the project, both during its construction phase and when operational, particularly through the prevention of 'rat runs' on local roads and infill development between the Crossing site and the Medway Towns.

Policy approach for transport and the River Medway:

We broadly agree with the policy approach and believe that the River Medway is an asset that is currently under-utilised. In particular we would like to see:

1. A firm commitment to introducing a river taxi service to connect the whole of the Unitary Authority area, from Halling to the Riverside Country Park. Water transport can be energy efficient with a low environmental impact. It could be used to help take traffic off the roads by making transport within the Towns easier, particularly if fully integrated with accessible and affordable bus and train services.
2. More and better facilities and infrastructure for permanently moored houseboats. When considering how to accommodate new homes in the Medway Towns the river should not be overlooked as a possible development area.

We welcome the commitment to addressing the loss of intertidal habitats and to supporting measures to protect and enhance the river as a resource for wildlife and biodiversity.

Policy approach for waterfronts and river access:

We broadly agree with the policy approach.

We like the idea of a new river crossing, but hope this will be for the use of pedestrians and cyclists only. It should form part of improved car free accessibility for all people to the whole of the riverfront. While appropriate development along the river should be encouraged this should not be at the expense of public access – for example there should be no gated communities that deny the people of Medway access to their River.

Policy approach for marinas and moorings:

We broadly agree with the policy approach.

Section 11.19 concerns us slightly. We believe there should be scope on the River for both marina berthing and residential houseboat moorings. The section on houseboats under “Housing” (4.41 and 4.42) suggests that the Council will look more favourably on new marinas than proposed sites for residential houseboats.

Policy approach for aviation:

We disagree with the policy approach.

Medway Green Party questions the continuing need for an airport in the Medway Towns. We do however recognise that the Council approved the Rochester Airport Masterplan in 2014 and so, as things currently stand, that document will be used to provide guidance on the future development of the site.

We do welcome the statement in section 11.22 that there are no plans to transform Rochester Airport into a commercial airport. We would also be happy for the establishment at the site of an enhanced base for the Air Ambulance service, as has recently been proposed.

However it does concern us that the consultation document suggests that there will be some expansion of operations at the site. The aim stated in the ‘Policy Approach’ of providing an ‘enhanced aviation facility’ certainly needs further clarification as to what this means in practice in terms of any increase in aircraft movements. While section 2.23 of the

Masterplan suggests that a restriction on the number of movements is likely to be imposed, which is positive, the initial limit suggested is 38,000 per annum, which is about 20% more than the average number of movements over the previous ten years. We consider that this would represent a significant increase in flights to and from the Airport.

With the exception of increased use by the Air Ambulance, we oppose the expansion of aircraft operations at Rochester Airport. While the aircraft that will be using the facility are relatively small, they will still be sources of pollutants, including carbon dioxide, carbon monoxide, carcinogenic particles and noise. Such emissions can cause damage to the natural environment and have serious effects on human health.

Policy approach for vehicle parking:

We broadly agree with the policy approach.

As stated in the consultation document, the imposition of parking standards should be used to manage the local road network and promote sustainable transport. Planning rules should be used to reduce the requirements for car parking. All developers must be required to show how their development can be fully accessed by more sustainable modes of transport than cars. Any development that potentially encourages a large number of journeys must only be permitted in a location accessible to a wide range of public transport.

The Council should also be prepared to seek to support or create totally car-free developments wherever feasible.

According to the last paragraph of the policy approach, the Council may be seeking to increase the quantity of parking in town centres. This should not detract from the establishment and maintenance of 'Park and Ride' facilities to take traffic away from the town centres. Additionally any large scale surface car parking should only be permitted with the building of homes above to maximise the use of the space.

Policy approach for cycle parking:

We agree with the policy approach.

Policy approach for connectivity:

We broadly agree with the policy approach.

New building developments and road systems should be designed in accordance with the hierarchy we set out near the start of our response on this Section, i.e. with priority given to pedestrians and cyclists, followed by public transport and so on. Such new developments/systems should provide:

1. convenient, safe and pleasant access for pedestrians and cyclists;
2. convenient and safe access to affordable public transport;
3. measures to control dangerous and unsociable driving, especially speeding.

We would also like to see existing road systems adapted in a similar way wherever possible.

Alternative sustainable development options for sustainable transport that have not been considered:

We have already mentioned some ideas in relation to the previous headings, however we also suggest:

- restricting urban growth to 'corridors of growth' along key transport routes;
- provision of so-called 'Boris Bikes';
- other active encouragement of the use of cycles, for example by having bike festivals, investing in cycle lanes and supporting other projects which promote cycling;
- greater use of 20 mph zones;
- conversion of all Council-owned vehicles to hybrid or electric-power;
- promoting and supporting car sharing schemes for areas poorly served by public transport;
- ensuring no-one in Medway lives more than ten minutes' walk from a bus stop.

Section 12 – Minerals and Energy

Policy approach for minerals planning:

We broadly agree with the policy approach.

It is important to note that sand and gravel are not renewable resources, so it is questionable how their production and distribution could ever be described as 'sustainable'. The Green Party would generally like to see more movement towards the use of alternative materials in construction, with the aim of reducing the amount of non-renewable natural resources that need to be removed from the Earth. We must learn to do more with less and make better use of re-use and recycling when planning the built environment.

However we do recognise the current importance of the minerals industry to the local economy. We welcome the intention to promote the transportation of minerals by rail or water instead of road and hope that the Council will be very active in this promotion. We also support the greater use of facilities supplying secondary and recycled aggregates as an alternative to the extraction of new.

Policy approach on waste planning:

We broadly agree with the policy approach.

We note that municipal waste is handled under a contract that does not expire until 2035, so is outside the scope of this Local Plan.

We agree with the aim for zero waste and hope that the Waste Framework Directive will not be thrown out when we leave the EU. While zero waste has to be the ultimate aim for the sake of Medway and the planet, the immediate priorities for waste management should be to avoid or reduce unnecessary waste in the first place and to maximise the efficient reuse, recycling and composting or digestion of any waste produced. Improving waste management may avoid the need for additional landfill sites totally, even with possible population growth.

We recognise that the proportion of household waste in Medway sent for reuse, recycling or composting (2015/16 financial year) increased to 42.7%¹³, but the figure two years before was 41.2% - an increase of just 1.5% in two years is nowhere near enough.

We would like to see the Local Plan set out a clear hierarchy of waste treatment, with reuse first, followed by recycling/composting, then treating any residual waste in non-polluting ways that produce useful products like biogas. There should be very little left destined for landfill.

It is especially important that all new developments have adequate provision for the storage and collection of waste. One of the biggest obstacles to reducing waste is changing the behaviour of householders and businesses. We believe that it is the Council's responsibility both to educate people on how to reduce waste and to reuse, recycle or compost, and to make things as easy as possible for them to do this.

We would like to see the current recycling rates in Medway raised to at least 65%, which is in keeping with current UK flagship local authorities. Medway Council has the power to keep perishable waste from landfills. The current system, which generally works well, utilising brown bins for recycling perishable goods and white and blue boxes or bags to separate paper and plastics, should be able to negate the need to use black bags.

Other initiatives may help too. For example black bags are used to send waste such as nappies and cat waste to landfill. The Council could highlight the deceptive advertising by multi-national companies that disposable nappies are good for the environment. In practice, they take years to disintegrate on landfill sites. The Council could also more actively promote their own advice which is to use disposable nappy liners, which can then be flushed down the toilet. Similarly, they could advise people to bury cat waste in their gardens (provided that the garden is child free and pregnant women are made aware of the toxic hazards associated with cat waste).

Policy Approach on Energy:

The policy approach on energy has been split under two headings - "Conventional Energy" and "Renewable & Low Carbon Technology".

(1) Policy Approach - [Conventional] Energy:

The Green Party believes that action on climate change must be prioritised by Government at all levels, including through a rapid transition to a zero-carbon sustainable economy. This will include phasing out fossil-fuel based energy generation. Because of this we do not agree with the Policy Approach for Conventional Energy, where we take the statement of support for additional new power generation to refer to additional new conventional, fossil-fuel based energy. This is inconsistent with a shift to zero carbon provision and meeting agreed climate change targets and we therefore cannot support it.

(2) Policy Approach - Renewable and Low Carbon Technologies:

While the consultation document states a commitment to reducing the carbon footprint of the Medway Towns and describes possible development opportunities associated with taking such action, this is not reflected in the policy section which concentrates too much on perceived negative features of this form of energy provision. There is no indication that the Council will positively promote this form of energy such as through R&D activities, unlike with

¹³ <http://www.kentonline.co.uk/kent/news/kent-council-in-top-three-122274>

conventional energy. This is inconsistent with the guidance of the NPPF which states that local planning authorities should:

“have a positive strategy to promote energy from renewable and low carbon sources” and “design their policies to maximise renewable and low carbon energy development...”¹⁴.

Our previous response to the Issues and Options consultation set out how the challenges presented by the need to combat climate change also presented economic opportunities. Medway Council should be seeking to exploit such opportunities by exploring potential for both the manufacture of renewable technologies within the towns and of attracting industries that promote demand reduction such as through retrofitting and building of energy efficient homes.

Alternative sustainable development options for minerals, waste and energy that have not been considered:

1. There should be a commitment to supporting community led forms of renewable energy provision. Communities not only respond better to being included very early in the decision making processes but to being co-producers in schemes that provide energy for those communities. The benefits of this approach (including monetary savings) should be promoted at all levels.
2. The River Medway is the defining feature of our area and the consultation document indicates that the Council intends to acknowledge this in the Local Plan and to use its potential to the full. One way of using the many advantages the river offers would be to use it for district heating systems. The water in the river is a constantly renewable source of heat which can be exploited to provide a super-efficient heating system for both new and old developments close to it.

When coupled with solar power a water source heat pump can provide zero carbon emission heating at virtually zero running cost. Local expertise in this technology is available and the Council could take a lead by installing the technology into its own headquarters in Dock Road.

General comments

To finish we would like to comment on the process of the Local Plan consultation. Like many others, Medway Green Party responded to the Issues and Options stage of the consultation. We understand that the Council produced a report on all of the responses. However, although the actual individual responses were uploaded to the Council's website along with other documentation related to the consultation process, the report which analysed the public responses was not. It is therefore difficult to know how much impact the public consultation has had on the Council's subsequent decisions, particularly as responses receive only an occasional passing mention at best within this Development Options stage of the consultation.

Additionally, while it is appreciated that an evidence base is necessary this is likely to contain a set of assumptions. The large volume of reading both within the consultation

¹⁴ National Planning Policy Framework (NPPF) (p22)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

document and the evidence base makes it difficult to thoroughly explore the basis for each policy approach. This means that the process is not particularly accessible. We would hope that accessibility has been improved by the consultation events that were held as part of the process. However one of our members reported being misinformed by a Council official hosting one of these events that there are no SSSIs in Medway. This is particularly worrying given the important status that Lodge Hill has within the process.

We hope that this is not a frequent occurrence as it would put the validity of the public consultation which has been carried out in some doubt.

While we continue to value the process of consultation, we would be grateful if the Council could clearly demonstrate that the consultation has been carried out thoroughly and show a willingness to take on board the results.