

Medway Green Party

Response to Medway Council Local Plan Consultation

Dear Planning Department,

Medway Green Party welcome Medway Council's attempt to engage the local community in discussions of the future of the Medway area (though many of the questions posed required specialist knowledge).

Medway Green Party members have opted to jointly respond to sections of the Medway Council Local Plan Issues and Options document. These represent our initial comments, in what we hope will be an ongoing contribution to the consultation process. Due to time constraints, we were unable to comment on all the sections and issues raised, but hope this will represent a good start to our contribution.

Introduction

We believe that the primary objective of the Local Plan should be to meet the needs of the local population, while at the same time protecting our rich local natural environment. Alongside this, we must take active steps (action that must happen in every Local Authority) to combat climate change. A joined up solution which places environmental protection at its core would improve the local economy by providing training and jobs in:

- Renewable technologies
- Providing efficient new housing
- Transforming the existing housing stock
- Growth in local independent businesses, and other community based organisations, e.g. co-operatives/social enterprises

It would improve the health and wellbeing of the population by:

- Enhancing provision of cycling and pedestrian routes
- Providing better access to green spaces
- Ensuring that amenities are available within walking distance or that public transport links are available and affordable
- This would in turn help to cut down on car travel and the resulting congestion and air pollution

Finally the plan should seek to empower the local population, by encouraging and supporting community co-production and ownership in co-operative housing projects and renewable energy production.

All too often, growth in the economy is implicitly the primary focus, with other needs being compromised to this end. However without a planet which is fit to live on there can be no

The Town and Country Planning Act focuses on determining the appropriate use of land, protection of the environment and conservation of scarce resources.

'Planning' is the 'application of common sense for the common good'. As such it calls on an understanding of a vast array of scientific, technological and other disciplines to guide decision making within the broad philosophical framework of Plato's 'Republic'.

The Green Party's interpretation of the 'common good' includes the well being of generations yet unborn and opposes decisions made for short term economic or political gain.

economy. This focus needs to be turned on its head; the challenge of meeting the needs of a growing population need to be worked out within the context of responding to the environmental crises or serious steps are unlikely to be taken. The need to protect and enhance the natural environment (to truly be sustainable) must not be left as a small part of a bigger framework, as is the case in the section (in the consultation document) on sustainable development – where it, in effect, represents a sixth of the sustainable development framework. A framework which instead makes environmental protection the central focus means that all options will need to be considered within this primary objective. This means that different options will need to be looked at, including innovative solutions that may seem unusual at first look in some cases. However, the consultation document does essentially contain many of the elements that could make this vision possible. At the same time it misses elements; both in identifying economic opportunities in our need to protect our environment and failing to note that decisions taken locally can be themselves a driver of population growth in the area.

Background

The Medway Council area consists of a combination of diverse topographical and geological elements within North Kent.

Approximately 20% of the Medway Council area is occupied by the water of the River Medway and the margins of the River Thames.

The remaining land areas are divided fairly evenly between the fertile flat land of the Hoo Peninsula, to the north, with its underlying clay geology and the hilly chalk pasture land of the North Kent Downs to the south.

Much of the hilly, lower value farmland of the Downs has been built over and the remaining undeveloped areas are used for recreation.

The Hoo Peninsula, despite its rich arable land, has suffered from ill considered planning decisions in the past and now has large areas of polluted land and development inappropriate to the 21st Century.

A large portion of the current housing stock in Medway dates back to Victorian times; built after the 'great fire of Chatham' and consists of workers' houses associated with the Dockyard and facilities related to the military presence in the area.

Much of the existing housing stock is of poor quality, cramped and expensive to heat and light.

Population Increase

In the Executive Summary the forecast for Housing Need in Medway mysteriously translates the projected growth in population into a requirement for 29,463 dwellings.

The consultation document informs us, in the Context Section, that the population estimate for Medway in mid 2014 was 274,015 people.

In the Executive Summary we are informed that by 2035 the population of Medway is estimated to be 322,700 people.

This is an increase of 48,685 people or 17.76% over the 2014 estimate.

During the local plan's lifetime this probably amounts to a year on year growth of approximately 0.75% in numbers of people in Medway.

For the first year we would therefore need to accommodate an extra 2,055 people. This means that 2,055 people would need a home.

However, people are most commonly born into a shared home environment and at various stages in life choose to live alone or share with others.

Future homes provided in Medway need to be of better quality, generous in size and efficient at conserving energy.

Housing: Identifying need

Without much more detail than is offered in the consultation document, it isn't clear what the range of types of home will be needed. However, it is our opinion that many recent developments in Medway do not respond to local need; for instance the Redrow development in Halling¹ where houses currently for sale are at prices of over £400,000. It is also notable that, according to the North Kent Strategic Housing and Economic Needs Assessment² (used as a basis for predicted housing needs in the consultation document) there has been a stark rise in inward domestic migration from neighbouring towns and South East London, in the last four to five years, whereas, before this, the net direction had been outward. Could it be that this is a direct response to the building of new developments that are too costly for the local population?

Being as land is in such short supply, and we expect a rise in natural population growth, it would seem prudent to aim the housing provision (with some exceptions e.g. health or social care reasons, refugee status etc) at those who already live in the Medway Towns or work here. We will never meet the housing needs of the local population if we allow our valuable land to go to building executive homes that the majority of the local population cannot afford.

Thus it must be taken into account that using absolute figures is a limited way of representing the requirement for homes. Shortages are not simply a result of population figures outweighing numbers of homes available, but other factors, such as income inequality, play a part and must be taken into full consideration when planning future allocations. This is also reflected in the existence of under occupancy alongside over crowdedness³.

Furthermore, in the last Housing Summary Measures Analysis report by The Office for National Statistics (August 2015), Medway featured as having the biggest shortfall in social housing in the country⁴. A clear objective therefore must be to focus on putting this right; to address this shortfall (and predicted need over the plan period).

At a national level it would make sense if opportunities and growth were spread more evenly around the country, so as not to put too much strain on the South East. This is something our

Inequality in size of home

“Between 1991 and 2011, four million extra homes were built in the UK. Unfortunately, 36% of new rooms went to the 10% of the population who were already the most generously housed (i.e. those who already had the most rooms). On the other end of the spectrum, the least generously housed 10% of the population (those with the least rooms per person) gained no extra rooms at all.

It's worth pausing on this fact: **An extra four million homes did nothing to increase space for those most in need**". [3]

¹ <https://www.redrow.co.uk/developments/st-andrews-park-halling>

² <http://www.medway.gov.uk/pdf/North%20Kent%20SHENA%20Baseline%20report.pdf>

³ <http://www.neweconomics.org/blog/entry/inequality-is-at-the-heart-of-our-housing-crisis>

⁴

<http://www.ons.gov.uk/peoplepopulationandcommunity/housing/articles/housingsummarymeasuresanalysis/2015-08-05#social-housing-shortfall>

national government should be working on. Medway Local Authority may be able to work at this at a regional level, not to build new tunnels, airports and massive infrastructure projects, but to explore ways in which the challenges of a rising population, growing inequality and environmental crises can be met, without destroying what is good about each area.

An additional issue is that more than half of the predicted growth is a result of people living longer and thus the population aging. It would therefore seem sensible that a large part of any future housing development should be designed to meet the potential needs of older people in our population. The precise details of these requirements should be decided in consultation with older people's groups, and by reference to demographic information. It has been noted that Montgomery Court in Wainscott⁵ is seen as very attractive to older people in the community, and similar models may be worth considering when planning future need.

It may also be possible to explore ways of enabling older people to divide their properties into smaller units. This may be beneficial to people who find themselves in the position that, while they do not want to move into a different area, they nevertheless find themselves burdened by properties which are too large for their needs or their ability to maintain. This would also have the benefit of reducing under occupancy and providing an increased stock of housing without the need for additional land.

Medway Local Authority could also address under-occupation through encouraging 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.

The use of existing housing, as an alternative to purpose built "retirement homes", would need to be considered in the context of providing adequate funds for predicted social care needs.

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, e.g. 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.

The social model of disability⁶ should be taken into account in relation to new homes for both older people and younger people with mobility issues. This requires that all homes and other environments are accessible to those with physical disabilities. This means that all homes should be designed to make them suitable for wheelchair users for instance.

However all housing requirements should be considered in association with our need to reduce energy demand.

⁵ <http://www.housingcare.org/housing-care/facility-info-160328-montgomery-court-strood-england.aspx>

⁶ <http://www.scope.org.uk/about-us/our-brand/social-model-of-disability>

Housing: Reducing environmental impact

Empty homes:

The shortage of housing is made worse by homes being left empty for long periods. In 2014 when figures were last provided 1004 homes in Medway had been empty for more than six months⁷ and this may not be an accurate figure as it will only reflect the housing that Medway Local Authority has been informed of. Before building any more homes, particularly before considering building on green spaces and environmentally sensitive land, the first focus should be on measures that might bring unused, or underused existing stock back into use. It is of note that the body within the council responsible for bringing empty homes into use was cut in 2014 which may have had an impact on future success. We would ask that Medway Council ensure that strategies for bringing empty homes into use are fully operational.

The Council should draw up a register of empty property. They should also make much more proactive use of Empty Dwelling Management Orders and work with self-help co-operatives to bring homes into use.

Empty homes awaiting refurbishment can provide short term, flexible, accommodation at a lower than market price, cutting down on the period that they are left empty. Schemes exist that arrange property guardians such as Dot Dot Dot.⁸

Empty offices:

Researchers in Bristol recently uncovered evidence that over 15 million square feet of office space in the city lies empty. This is equivalent to 40,000 houses worth of space, a figure that exceeds, by a considerable margin, the homeless and waiting list problem in that city. It is likely that all major conurbations in the UK have a similar problem and that Medway is no exception. Additionally the proportions could be similar. This may have the potential to solve the entire housing shortage.

Much of this office space is reportedly left empty in order to balance the books of large investment portfolio companies who can inflate their balance sheets by keeping properties empty. This is because the market value (rentable value) will remain fixed, allowing them to 'fix' the value of property on their books. This may be beneficial for the company concerned but this space could and should be used for housing and also for small businesses and start-ups that have very little affordable business property to choose from in Medway. A thorough audit of all empty office space should be conducted annually and the council should create incentive schemes to reduce this problem and/or introduce penalties for companies and landlords who deliberately allow buildings to remain unoccupied.

Where to build

Of the 29,463 projected dwellings envisaged, the Council is still hoping to build 5,000 of them (17%) at Lodge Hill, despite the environmental issues and damage to wildlife. The Council is also suggesting building other large housing developments on the Grain Peninsula on green field sites using valuable agricultural land.

⁷ http://www.kent.gov.uk/__data/assets/pdf_file/0015/7350/Vacant-and-empty-housing-property.pdf

⁸ <http://dotdotdotproperty.com/about/>

The Council appears to be seeking approval to adopt the easy options to providing homes in the Medway area avoiding the more difficult tasks associated with finding a multitude of solutions to a myriad of issues.

If the easy options in planning are adopted, in the future, there will be no agricultural land or other countryside left for the increased population to enjoy.

Medway Green Party will continue to object to development at the Lodge Hill site or any other environmentally important areas. The Lodge Hill site has been designated a Site of Special Scientific Interest (SSSI) as it supports the UK's largest nightingale population which could be destroyed if the development goes ahead, along with many other rare species and habitats. This is in the context of quantitative assessments conducted by the RSPB⁹ which showed a 60% decline in 3,148 wildlife species in the last 50 years, with a strong decline in 31% of these. Much of this decline is the result of human encroachment on wildlife habitats, including development of land and modern farming practices. Not only is this site of vital importance locally but using it for development would set a dangerous precedent for other SSSIs across the country.

The development strategy for the Local Plan includes the following:

1. high density town centre and riverside development
2. incremental suburban development
3. planned growth of existing settlements
4. freestanding settlements
5. urban extensions
6. role of custom and self build housing
7. approaches to the town centres

A mixture of different options may need to be considered including both high density housing which must be close to transport hubs and incremental suburban development. We would favour smaller developments of not more than 25 homes at a time, rather than large urban extensions. We would not be in favour of freestanding settlements due to the additional infrastructure requirements which are likely to damage even more of our countryside. Any planned growth of existing settlements should be no more than 5% in the 20 year period. We would, however, welcome the option of custom and self-build developments within the context of cooperatives formed of local people. These should be sympathetic to the natural environment and provide a real opportunity to empower local citizens and further social equality.

There are also additional options which may be considered:

1. redundant offices
2. space above shops
3. space above supermarket and other car parks
4. Ex-industrial
5. On the river

Housing zones:

We are concerned that the use of housing zones to stimulate house building projects is more geared towards the needs of investors than those of the local population. This could produce a blanket type approach which is insensitive both to the local population and the natural

⁹ http://www.rspb.org.uk/Images/stateofnature_tcm9-345839.pdf

environment. We need to start providing homes instead of using the housing market as a way to prop up economic growth.

What to build

Outdated norms:

Our normal perception of life is that things don't change from one day to the next, but when we look back over ten or twenty years we see that immense changes have taken place.

This is why the Local Plan strategy needs to be elastic and able to accommodate changes in living patterns, life style and economic circumstances.

It is imperative that the Local Plan does not constrain people to a limited choice of life style based on outdated norms.

Bricks are used here as an example of an outdated norm; there are many other materials in common use that are just as inefficient and costly as the brick example.

Vernacular construction techniques were inherently economic and benefitted from hundreds of years of ingenuity being applied to their development.

Current so-called traditional building methods are not inherently economic, they use up scarce resources and produce carbon emissions in the production of building materials and create enormous waste in their assembly.

Our 'traditional' construction industry is part of a 'linear economy', that uses resources without considering their true worth or the impact our actions will have on future generations. The Planning System could be a leading exponent and facilitator of a 'circular economy' in which we design-in adaptability, re-use, recycling, re-engineering and retro-fitting as the norm, in place of short lifetime, redundancy and a 'throwaway' policy.

There are now no brickyards, quarries or other sources of traditional building materials in Medway. No reason therefore not to promote a factory made approach to construction whether for dwellings, apartments, student hostels or even houseboats.

Brixit

Back in Victorian times it probably made sense to build solid brick walls; labour was cheap, fuel was cheap and air quality wasn't discussed.

We currently hear construction industry commentators bemoaning the fact that in light of the massive house building programme, soon to get underway, bricks are in short supply and holding up construction work and even, if we had them, there aren't enough skilled people to build with them.

Bricks seem to be beloved by planners, yet actually do not earn their place in the fabric of a building. With careful design, bricks will keep out the rain despite some commonly used face bricks being able to absorb 25% of their mass in water.

Bricks commonly have a heat conductivity coefficient of 0.84 W/m degC. This means that a 100mm wide brick is eight times more efficient at conducting the heat out of your house than an insulation block, or conversely eight times less efficient at conserving the heat in your home. Bricks are also forty times less efficient at conserving heat than the same thickness of polyisocyanurate insulation (e.g. celotex)

Timber has about the same heat conductivity coefficient as an insulation block and 100mm of timber would be six times more efficient at conserving heat than the equivalent thickness of brick.

When all the environmental and other costs are considered, bricks can be seen as an extremely expensive building material.

The delivery of housing could be assisted and accelerated by the growth in the use of off-site construction. Prefabricated homes have come a long way since the poorly constructed post-war models.

Three storey houses:

In Georgian and more commonly in Victorian times the space formed by the roof structure of a house was used to accommodate servants.

This was possible because the slates and tiles used needed a fairly steep pitch in order to function effectively. Consequently roof pitches in excess of 35 degrees were the norm.

Roofs continued to be made with steep pitches until the double lap large format roof tile was introduced about fifty years ago and this allowed shallower pitches and the use of low grade timber trusses to be used to support the roof structure.

A large number of two storey houses from the first half of the twentieth century had up to 20% of their volume enclosed in an unused loft space.

The recent plethora of 'loft conversions' is witness to the lack of foresight, not only of the original developers who built these redundant spaces but also the more recent fashion for lower pitched roofs that in the cause of cheapness reduced the usefulness of the expensive roof space.

Encouraging developers to build three storey houses with purpose designed rooms in the roof will allow the actual footprint of the house to be reduced and save money on land cost, infrastructure and servicing.

Passivhaus standard homes and retrofitting:

Passivhaus buildings provide a high level of occupant comfort while using very little energy for heating and cooling. They are built with meticulous attention to detail and rigorous design and construction according to principles developed by the Passivhaus Institute in Germany, and can be certified through an exacting quality assurance process.¹⁰

Not only does building homes to this standard contribute to combating climate change but has the positive effect of large savings in energy bills. In a development of 51 houses in Rainham, Essex (built by Circle Homes, a Social Housing Provider, in partnership with Climate Energy Homes)¹¹ a three bedroom detached house was monitored for heating

Affordable passive homes

Built on a brown field site which was formerly a Carpet Right warehouse, a new development in Rainham, Essex provides 51 rentable homes, designed to passive house energy standards. These have been built by a partnership between Circle Homes (a social housing provider) and Climate Energy Homes (a business who supply factory built homes using the ecoTECH build system). The homes can be erected to be weather tight within one day and fully completed ready for trade and services within one week per house, at an equal cost to that of building a traditional house. [11]

¹⁰ http://www.passivhaustrust.org.uk/what_is_passivhaus.php

¹¹

http://www.circlegroup.org.uk/news/News_archive/2014/04/25/12/29/Cabinet_minister_praises_UKs_first_100_percent_affordable_passive_homes_scheme

and hot water bills. The bills were £260 per year in comparison with the UK average of £1200.

Medway Council should explore such options which could help in addressing fuel poverty in the Medway Towns. It is of note that in the Fuel Poverty and Conservation Strategy¹² (undated) more than a quarter of Medway households were defined as in fuel poverty:

- 23.2% of Medway households are spending more than 10% of their income on fuel costs – fuel poverty
- 3.40% of Medway households are spending more than 20% of their income on fuel costs – severe fuel poverty
- 0.60% of Medway households are 30% or more on their income on fuel costs – extreme fuel poverty.

Much of this is due to a combination of deprivation and older properties and the options relation to retrofitting the existing stock should also be explored and implemented.

Sustainability/Climate change

The consultation document suggests ways that planning can mitigate climate change as follows:

1. Increased renewable and low carbon energy generation.
2. Reduced energy demand and improved energy efficiency, both in new buildings and retro-fitting to existing buildings.
3. Distributing new development in a pattern that reduces the need for travel and maximises the potential of more sustainable methods of travel to reduce emissions from private transport use.
4. Where new technologies can reduce the emissions from a business of home, supporting planning applications to enable this.

We are in full support of all of these measures. We are also in support of improvements in education skills and training and have in the “Economy” section stressed how this would provide local economic benefits if Medway were to become a base for the development and manufacture of renewable technologies and factory built energy efficient housing.

We are, however, concerned, that the consultation appears to suggest that there is uncertainty about climate change when in fact the opposite is true. Combating climate change must be a core objective not tagged onto an associated social good. The prevention of climate change is in itself a social good. The cheap and easy options suggested of planting more urban trees, providing more space for food growing and orientating buildings to take advantage of natural cooling, while welcome, are much too limited. We only have a short window of opportunity to make a difference – falling within this plan period. Bad decisions taken now will be very difficult to unravel.

¹² <http://medway.gov.uk/pdf/fuel%20poverty%20and%20home%20energy%20conservation%20strategy2008-11.pdf>

Water shortage:

We are of the opinion that local evidence justifies improved water efficiency in new dwellings and this should be followed as a matter of course in all buildings.

Economy and our towns

The challenges presented by the need to combat climate change also present economic opportunities which this consultation has failed to take account of. There is potential for employment in all areas of energy conservation and production including the following areas:

1. Research and development of renewable technologies
2. Manufacture of renewable technologies
3. Manufacture of factory built (passive) or energy conserving homes
4. Retrofitting existing homes

There is also potential for economic revival alongside reduction in CO2 emissions by focussing support on developing clusters of local businesses instead of outside investment. This both cuts down on travel distances and improves employment opportunities for the local population.

A study commissioned by the JPMorgan Chase Foundation suggests that inner cities which suffer from high deprivation levels in the United States have benefitted from this approach¹³.

A report commissioned by the same organisation makes a case for 20 minute neighbourhoods.¹⁴ This is the concept of reducing distances between amenities to a 20 minute walking distance, which cuts down on unnecessary car use. We are encouraged that this consultation document includes reference to the need to shorten distances but would suggest that there is a need for this focus to replace that on large infrastructure projects such as road expansions and other large development projects.

The acceptance of the concept of 20 minute neighbours would mean that plans should aim for a future where housing, employment opportunities, and services would exist in close proximity to each other and transport links.

High Streets:

We agree with the suggestion that our high streets would benefit from a different focus, rather than attempting to compete with Bluewater. Again, efforts should be concentrated on encouraging and supporting local independent retailers, which might be assisted by lowering the business rates for Chatham High Street. It is of note that we recently witnessed the departure of Rooks on account of excessive business rates charged in the area. We also agree with the introduction of a street market at Chatham but do not see the need for another supermarket in Gillingham High Street. Instead the focus should be on retaining and attracting new independent suppliers of locally sourced food. We feel that all high streets would benefit from investment and that Chatham should not be the sole beneficiary.

¹³ http://www.icic.org/ee_uploads/publications/Local_Cluster_Paper.pdf

¹⁴ <http://www.icic.org/connection/blog-entry/blog-the-rise-of-the-20-minute-neighborhood>

Environment/open spaces

Medway Green Party members welcome the suggestion of greater access to the river, and are interested in the proposal for a joined up river walk through the historic towns, riverside regeneration and countryside. We are also interested in the proposed cycle route between Medway and Maidstone. It has been noted that restricted access to pedestrian and cycling only is unlikely to impact on the needs of wildlife. Floating walkways may be a possibility. We would also like to see a cycle hire scheme introduced in Medway which is similar to that brought in by Boris Johnson in London, whereby cycles can be hired from cycle racks and dropped off at a different point of the journey.

The Medway City Estate:

Despite the Medway Road Tunnel the Medway City Estate needs to be better connected to the southern side of Medway.

Ideas to achieve this include the following:

1. A footbridge from near the new Rochester Railway Station across the river
2. A ferry from Sun Pier near Chatham Bus Station across the river.
3. A lock opposite the Gun Wharf building with connecting bridges.

The lock would make it easier for ships to access the docks, make the river above the lock more accessible, reduce the damage to boats currently being floated twice a day and provide a hydro-electricity producing weir, as well as a site for tourists and entertainment.

Open spaces:

Seeking to preserve the integrity of open space is an entirely appropriate ambition and we should not be seeking to rationalise it. We should instead be looking at alternative options to meet housing needs, such as those suggested in our “where to build” section.

Flood risk

Flooding in urban and rural settlements is a fact of life, and is set to get worse as our climate changes. Flood risk will change over time and should be regularly reviewed. Local plans should aim to reduce flood risks arising from all sources (rivers, tidal surges, sewers, groundwater, surface water and infrastructure failure). 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 account in planning decisions. Water sinks into soil under trees at 67 times the rate at which it sinks into soil under grass.¹⁵

¹⁵ <http://www.theguardian.com/commentisfree/2014/jan/13/flooding-public-spending-britain-europe-policies-homes>

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.

In urban areas, Urban Forestry has been introduced, 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 also helps to improve the air quality.

Air Quality

Please see below our previous response to Medway Council's Draft Air Quality Action Plan 2015. The measures we have suggested are consistent with our overall approach to the Local Plan consultation, and point further to the need for a holistic approach to many of the challenges we are faced with:

Medway Council have highlighted that air pollution is a major issue within the UK, which reduces life expectancy by an average of 7-8 months with estimated equivalent health costs of up to £20 billion each year.

The Green Party welcomes the Council's Action plan. However, while it does touch on the main issues, Medway Greens believe far more could be done to address air pollution. These include the following measures:-

1) Promote a switch from car use to Public Transport

(i) We would encourage the Council to divert funding from roads to public transport and cycle routes. The Council's action plan includes road improvements on the assumption that that this will speed the flow of traffic and so reduce pollution. As Greens our concern is that this investment may simply increase the overall volume of road traffic. A more effective approach may be to use these funds to enhance public transport and cycle routes.

(ii) While we welcome the Council's commitment to promote public transport, this does appear at odds with the recent cuts in bus services. The Green Party would encourage the Council to liaise with the bus company to seek to reverse these cuts. Ideally the Council and the bus companies should consult with passengers on routes and their frequency. A further issue is the high cost of fares for non subsidised passengers.

(iii) Another area for potential improvement is to ensure integration between bus timetables and train services.

2) Reduce the Amount of Freight on the Roads

Medway Green party would seek to reduce the amount of freight carried by road. Where practical, the Council should encourage a transfer of freight from roads onto the rail network. In addition, the Council should promote local sourcing of goods and services. This would not only be more environmentally friendly but would also benefit the local economy.

3) Cycle Network

Medway Greens welcome the Council's commitment to improve the cycle network. Cycling could replace a number of short car journeys and also has positive benefits for health and fitness. Our concern is that the existing network is rather fragmented. We would support a comprehensive and dedicated cycle route throughout the Medway towns, which provides cyclists with their own

space separated from other road traffic and pedestrians.

4) Walking

The Green Party would encourage the Council to review the main pedestrian routes in Medway. Pedestrians often have to share pavements with parked cars and cycles, which may cause problems for the non able bodied or parents with push chairs or prams. It is also important to confirm that there are sufficient crossing points. Many of the immediate pedestrian routes around rail stations are particularly poor. Improvements to these routes and possible extension of pedestrian areas in town centres may encourage more people to leave their cars at home.

Energy

Opportunities for using the waste heat of power stations and for using carbon capture may be worth exploring but ultimately the focus (and any investment available) must be on increasing the use and access to renewable technologies. Medway Green Party agrees in principle with exploring the potential for wind energy on the Hoo Peninsula in consultation with wildlife groups e.g. RSPB in relation to where wind turbines are sited. It has been noted that the impact is likely to be in the planning stages, and that, once built, there is little impact on bird populations if sited appropriately.

We would also suggest that the Isle of Grain may provide a site for solar energy in replacement of obsolete oil tanks.

Rooftop solar energy should be a condition of all new developments and introduced to existing housing and other buildings which are under Council control.

We would encourage measures towards an environment that supports community initiatives and involvement in local energy production. 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 their own communities. The benefits of this approach (including monetary savings) should be promoted at all levels.¹⁶

It would also be worth exploring the benefits of the use of wind turbines small enough for installation on any roof or wall such as the Liam F1 mini model manufactured by The Archemedes.¹⁷

Apart from hydro-electricity associated with a lock [see section on Medway City Estate] the river can be used in conjunction with water source heat pumps that could provide a district heating system for the

¹⁶ More detailed report on community wind turbine project available <http://www.transitionbrogwaun.org.uk/>

¹⁷ <http://dearchimedes.com/liam-f1-mini/>

Community led energy initiative

“In the summer of 2011, Transition Bro Gwaun’s Renewables Group, with support from the Welsh Government’s community renewables programme, Ynni’r Fro, started to look for sites for a local community wind turbine. Four years later we have a turbine up and running!

Having gained planning permission, the next task was to raise the £285,000 needed for TBG’s 50% share which proved easier than expected, the whole amount being lent by 29 individuals and 3 local community groups within 6 months.

The turbine will have an output of approximately 530,000 KWh per year, the equivalent of powering approx 130 homes, and annual carbon savings will be circa 290 tonnes of CO². In addition to the obvious benefit of generating renewable energy, all interest on borrowings will go to local lenders and TBG’s share of the profit will be used to help to fund other low carbon community projects.

Local investment and support from Ynni’r Fro have been key factors in making this project happen”. [16]

new riverside developments, as well as providing an inexhaustible renewable energy source for the many Council buildings sited close to the river.

The river also has potential to use tidal energy in various forms.

It should also be noted that at present we import the technologies used in producing renewable energy. We should be investing in training in local universities and colleges, backed up with vocational training, in both the research and development of renewable technologies and in the production of these technologies. To make Medway the centre of innovation in renewable technologies would bring enormous benefits, not only in taking a step forward in combating climate change but also in reviving the local economy.

Transport:

Our approach to transport is outlined in our response to the Medway Council's Draft Air Quality Action Plan 2015. We welcome the noted need, in the consultation, for improved infrastructure for cycling and walking and for an effective, accessible and affordable public transport system. We also welcome the indication that sustainable travel would be central to the design of any new developments. Achieving sustainable travel means that travel options will need to be considered in the context of reducing CO2 emissions as well as preventing the loss of vital ecosystems.

As noted in our response to the Medway Council's Air Quality Action Plan 2015, expansion of the road networks is likely to have the unintended consequence of increasing car use.¹⁸ We are disappointed that the Medway Council Local Plan consultation indicates measures that will continue us along this path, with the associated detrimental effects on local communities who live near proposed road expansions and new road infrastructure. It is likely that these expansions would be associated with increased noise and pollution levels, potential loss of countryside and ecosystems, together with a further reduction in our ability to respond to the challenge of climate change. In this context we are concerned to read of the planned upgrade between the Four Elms Roundabout and the Medway Tunnel. We are also actively opposed to the proposed new Lower Thames Crossing. Measures to reduce congestion should focus on providing accessible and affordable alternative transport solutions to car travel rather than expansion of the road network.

Improving conditions for pedestrians:

Many of the residential streets in the Medway Towns were not designed to accommodate cars, and are now partially blocked with parked cars.

This creates a dangerous environment for people crossing the road, especially children. A speed limit of 20 miles per hour should be enforced on all tertiary residential estate roads and within 500 metres of all schools.

In addition a switch from dependence on car travel to alternative travel options may go some way to alleviating this problem.

Rural issues

Rural communities would benefit from greater access to services, for instance a convenience store and Post Office within walking distance, and more frequent and affordable public transport. This would also have environmental benefits in reducing car use. It may be that expansion in housing would improve access to local services but it is unclear whether there is a direct link. Chattenden, for example, has already seen new housing development but still lacks basic

¹⁸ <http://www.bettertransport.org.uk/roads-nowhere/induced-traffic>

amenities. The proposed development at Lodge Hill has been suggested as a solution to this lack of services at Chattenden, but represents a whole new town which would completely change the character of the existing settlement. The solution may be to constrain any development to small developments which are sensitive both to local communities and the natural environment and to make the provision of basic services a condition of that development.

Deliverability

Community infrastructure levy:

Medway Green Party is cautiously supportive of the adoption of a Community Infrastructure Levy (CIL) approach as a replacement for Section 106 agreements, with charges based on floor space and contributions to a general infrastructure fund. This could represent a small step towards a funding structure commonly known as Land Value Taxation¹⁹ the introduction of which is a long term goal of The Green Party.

One of the issues the consultation document raises in this section is potential reduction in funding as a result of exemptions from the CIL. We wondered whether it would be worth considering raising standard tariffs to take account of predicted concessions based on the level of "affordable housing" needed.

New methods of delivery:

We feel that it would help to have some flexibility over permitted development rights in order to cater for changes in working practices that cannot at this point be predicted. For instance, there has been a shift towards home working. This, in turn, means a smaller requirement for office space which could be converted to meet growing housing needs.

We are, however, concerned about options such as Local Development Orders and Permission in Principle or any other blanket type proposals; we are concerned that they could mean a reduction in the proper consultation process and detailed environmental surveys. We would urge that planning decisions continue to be made on a case by case basis.

However, the planning department should aim to encourage and prioritise initiatives related to renewable energy production and energy conservation, particularly small scale initiatives such as community led cooperative projects and adaptations to individual properties. In these instances there may be a need to relax planning controls.

We also feel that enterprise zones should be more focussed on provisions for start-ups and very small businesses as there is a distinct lack of this type of provision in the Medway area.

Land Value Taxation

Land Value Taxation is not really a tax but a system whereby landowners pay a yearly rent to the community (represented by the Local Authority) based on the maximum value of land owned in its current usage. It represents a payment for betterment which has resulted from wider community activity to which the landowner has made no contribution. The difference to current funding structures is that it would be payable on all land, irrespective of whether it has planning permission, and would not be influenced by improvements. Thus it is likely to encourage such improvements as it would not lead to a higher assessment. It would also be likely to reduce the hoarding of land as a speculative investment. It is regarded as a replacement for Council Tax and business taxes, and would be expected to reduce those payments for the majority of households. [19]

¹⁹ http://www.andywightman.com/docs/LVT_england_final.pdf