



The Independent Group (on Medway Council)
C/O 17 Grandsire Gardens
Hoo
Hoo Peninsula
Rochester
Kent
ME3 9LH

Sunday 8th September 2024.

Local Planning Authority (LPA)

Medway Council
Gun Wharf Dock Road
Chatham
Kent
ME4 4TR

planning.representations@medway.gov.uk

CC: Dave Harris (Chief Planning Officer) and Catherine Smith (Planning Policy Manager).

Re: Medway Council Local Plan Regulation 18 Consultation - September 2024.

Dear Local Planning Authority,

This representation concerns Medway Council’s Local Plan Regulation 18 Consultation (2024) - between July and September 2024 - and specifically the questions asked in the consultation document. The Independent Group represents the communities of Cliffe, Cliffe Woods, Cooling, Frindsbury, Wainscott, Upnor, Chattenden, Hoo and High Halstow on the Hoo Peninsula. The table below details the responses to the consultation questions from The Independent Group and, where possible, we have provided evidence to support our position.

Regulation 18 Consultation (2024) Question:	TIG Response:
Natural Environment	
<i>“Question 1: The Council could consider setting local standards for development that go beyond national policy/regulations in addressing climate change. What evidence would justify this approach, and what standards would be appropriate?”</i>	<p>Yes, the LPA should set standards that go beyond national policy/regulations in addressing climate change.</p> <p>The consultation document rightly recognises the vulnerability of the Hoo Peninsula to climate change. The peninsula is surrounded by low-lying marshland and is prone to sea-level rises and regular flooding. This critically important habitat is recognised and internationally/nationally protected because of the wide range of wildlife it supports - for example, hundreds of thousands of migratory birds rely on this habitat every year.</p> <p>The agricultural land on the peninsula is recognised as being best and most versatile (top grade), and was historically mostly used for top-fruit crops. The soil type is predominantly London Clay, which is notoriously wet in the winter and incredibly dry and hard in the summer. This means impacts from drought and warmer weather significantly affects crops growing on the peninsula.</p> <p>The Hoo Peninsula is a Serious Water Stress Area according to the Environment Agency. The area is projected to face a significant daily water deficit if no action is taken to address the issue.</p> <p>The LPA should set local standards for development that go beyond national policy/regulations in</p>

	<p>addressing climate change. There should be a separate set of local standards for rural development and urban development. Urban development is within the Medway Towns themselves (Strood, Rochester, Chatham, Rainham and Gillingham) and rural development is within the villages of the Hoo Peninsula, as well as Cuxton and Halling.</p> <p>Any rural development that comes forward should provide, or contribute towards, creating additional new habitat on the Hoo Peninsula in order to accommodate local wildlife and species that may become displaced from rising sea levels. There will also need to be new areas where more water storage measures and agricultural infrastructure can be installed, so crops can continue to be irrigated and grow on the Hoo Peninsula.</p> <p>An environmental assessment needs to be carried out by the LPA detailing what measures and green infrastructure needs to be introduced on the Hoo Peninsula, to ensure the rural community and local wildlife is resilient to climate change, including sea-level rises and warmer weather.</p> <p>Urban development will have separate priorities from rural development, such as a need for a significantly increased tree canopy within the urban towns - to cool down urban areas and increase biodiversity.</p> <p>Good practice guidance on planning policies for climate change have been published by the Town and Country Planning Association and Royal Town Planning Institute. This guidance highlights how essential nature-based solutions and natural capital approaches are to climate change adaptation and promoting sustainable travel, urban cooling, and natural flood defence.</p> <p>We urge the LPA to adopt this guidance in full and make it official planning policy.</p> <p>Evidence documents: (1) https://www.tcpa.org.uk/wp-content/uploads/2021/11/TCPA-RTPI-Climate-Guide-4th-edition-1.pdf</p>
<p><i>“Question 2: Do you consider that the Council should seek to go beyond the statutory minimum of a 10% increase in BNG? What evidence can you provide to support your view?”</i></p>	<p>Yes, the LPA should set a minimum requirement of 20% Biodiversity Net Gain (BNG), in line with neighbouring authorities and the rest of Kent. This is especially important for environmentally sensitive locations such as the rural Hoo Peninsula. The policy could allow for a minimum 10% BNG in urban locations, due to viability issues. But, for rural locations the minimum should be 20% BNG.</p> <p>The State of Nature report for 2023 shows that the abundance of species within England has declined on average by 32% since 19704. The report also found that 16% of the 10,000 plus species surveyed risked being lost from Great Britain. The statutory minimum</p>

of 10% Biodiversity Net Gain (BNG) is not sufficient to meet the UK's commitments to nature's recovery and to aid in halting the biodiversity crisis. It is therefore imperative that the LPA goes beyond this figure - especially in terms of avoiding, mitigating and compensating harm.

Kent's natural environment faces exceptional pressures, and it is considered that a 20% BNG target is a proportionate response to address this pressure. The Kent Nature Partnership has produced a report which sets out the justification for setting a target of 20% in Kent. This report has been used by local authorities in other authorities who have successfully included a 20% BNG policy in their Local Plan.

Recent examples in Kent of LPA's applying a minimum 20% BNG in their Local Plans:

Maidstone Borough Council. The Maidstone Local Plan Review mandates a minimum 20% BNG for new residential developments, with calculations based on the latest Natural England/DEFRA biodiversity metric.

Canterbury City Council. The draft Local Plan (Policy DS21) requires developments to incorporate measures delivering a minimum 20% BNG, considering Biodiversity Opportunity Areas and Nature Recovery Networks.

Sevenoaks District Council. The draft Local Plan (Policy BW2) mandates a 20% BNG for all qualifying development proposals.

Swale Borough Council. Swale's draft Local Plan review aims to be a vanguard for BNG policy, requiring a minimum 20% net gain in biodiversity against a pre-development baseline.

The Kent Nature Partnership (KNP), in collaboration with Kent County Council and Natural England, has conducted a strategic viability assessment supporting the feasibility of a 20% BNG target across the county. The assessment concluded that increasing BNG from 10% to 20% is generally viable and does not significantly impact development viability.

Kent Wildlife Trust is also advocating for the 20% BNG standard and is working with LPAs to integrate this target into their Local Plans. They report that many councils are considering or drafting policies to adopt this higher threshold.

The LPA should align minimum BNG requirements with the rest of Kent, particularly in order to implement the local nature recovery strategy (Kent and Medway Local Nature Recovery).

Evidence documents:

	<p>(1) https://kentnature.org.uk/wp-content/uploads/2022/07/Justification-for-biodiversity-net-gain-in-Kent-Sept-2020.pdf</p> <p>(2) https://kentnature.org.uk/wp-content/uploads/2022/07/Justification-for-biodiversity-net-gain-in-Kent-Sept-2020.pdf</p> <p>(3) https://kentnature.org.uk/wp-content/uploads/2022/07/Viability-Assessment-of-Biodiversity-Net-Gain-in-Kent-June-2022.pdf</p>
<p><i>“Question 3: Do you agree that the tariff based strategic approach applied to development within 6 km of the designated areas, supporting the delivery of the Bird Wise SAMMS programme represents an effective means of addressing the potential impact of recreational disturbance on the designated SPA and Ramsar habitats of the Thames, Medway and Swale Estuaries and Marshes.”</i></p>	<p>No, we do not believe the Bird Wise SAMMS programme represents an effective means of addressing the potential impacts of development on habitat sites. We believe the current arrangement on its own does not go far enough and is therefore ineffective. The one-size-fits-all approach is inappropriate to try and avoid, mitigate and compensate harm to habitat sites.</p> <p>For example, a development in the Capstone Valley would not impact habitat sites on the Hoo Peninsula, in the same way as a development in Hoo itself. Therefore, a specific strategy needs to be in place, in addition to Birdwise SAMMS, for allocations in sensitive rural areas, such as the Hoo Peninsula.</p> <p>We believe the LPA should introduce a <u>minimum</u> 400m no net new residential development exclusion zone or buffer around the boundary of habitat sites, including RAMSAR, Special Protection Area (SPA) and Sites of Special Scientific Interest (SSSI). This is to mitigate the urban effects of development - including increased recreational pressure, pet predation, fly-tipping and fire risk - that can adversely affect nearby protected habitats. This approach is not unusual, as explained below.</p> <p>Examples of where development exclusion/buffer zones have been applied around habitat sites:</p> <p>Thames Basin Heaths SPA. These LPAs enforce a strict 400m exclusion zone where no net new residential development is permitted: Surrey Heath Borough Council, Wokingham Borough Council, Bracknell Forest Council, Elmbridge Borough Council (via its draft Local Plan mitigation strategy). Additionally, East Hampshire District Council applies a similar 400m buffer around Thames Basin Heaths SPA from the Bentley Neighbourhood Plan.</p> <p>Epping Forest SAC / SPA / Ramsar (London Boroughs). Several London boroughs follow a 400m “urban effects” buffer around Epping Forest: Waltham Forest Borough Council requires project-level HRA for any development within 400m of Epping Forest SAC. London Borough of Redbridge adopts the same approach in its Local Plan HRA. Epping Forest District Council's Local Plan includes 400m mitigation measures. Enfield Council recognized the impossibility of new development within 400m due to proximity.</p>

	<p>Dorset Heathlands SPA / SSSI (BCP & Dorset Councils). Bournemouth, Christchurch & Poole (BCP) Council and Dorset Council jointly apply SPD-backed mitigation including a 400m buffer for Dorset's lowland heaths (SPA/SSSI/Ramsar sites).</p> <p>New Forest and Wealden Heaths SPAs (400 m buffers). New Forest National Park Authority applies a 400m constraint for the Wealden Heaths Phase II SPA, though with limited windfall development tolerance.</p> <p>Within assessments for impacts on the Thames Basin Heaths SPA, where ground nesting birds were present, studies showed that there was a need for a 400m buffer between the SPA and development to ensure no impact on the birds due to cat predation and recreational disturbance. The Lodge Hill National Nightingale Bird Sanctuary (SSSI) contains ground nesting birds vulnerable to similar pressures and therefore it is our view that a minimum 400m no net new residential development buffer is specifically required for this habitat site.</p> <p>The Interim Habitats Regulations Assessment (HRA), supporting this Regulation 18 consultation (2024), acknowledges where minimum 400m buffers have been applied elsewhere in the country. However, the HRA suggests such a buffer is not appropriate for the Medway Towns and Hoo Peninsula. This is based on the following report: Liley, D. & Underhill-Day, J. (2013). Thames, Medway and Swale Estuaries - Strategic Access Management and Monitoring Strategy. Unpublished report by Footprint Ecology.</p> <p>The HRA states: <i>"This concluded that a 'sterile' zone of no development around the North Kent SPAs would encompass ports, town centres, very built-up residential areas and contaminated brownfield sites and therefore development would potentially be halted or pushed to greenfield sites and prevent the regeneration of urban centres."</i></p> <p>However, this document is twelve years old and therefore clearly out-of-date. The report was also created at the time the LPA was supporting controversial development proposals to build a new 5,000 home town at Lodge Hill. In 2021, the LPA was developing proposals for a 150m buffer around the Lodge Hill National Nightingale Bird Sanctuary (SSSI). In 2013, the LPA had proposed buffers up to 200m in their Core Strategy. Therefore, the LPA will need to include a no net new residential development buffer around protected habitat sites.</p>
<p><i>"Question 4: Do you consider that Medway Council should identify landscapes of local value as an additional designation in the new Local Plan. What should be the criteria for designation? Are there</i></p>	<p>Yes, we believe the LPA should identify and include landscapes of local value as an additional designation in the new Local Plan.</p>

<p><i>areas that you would identify as justifying a local valued landscape designation – where and why?”</i></p>	<p>The criteria for designation should simply be that the landscape is identified as having local value in a draft or adopted Neighbourhood Plan. Local value is demonstrated by the Neighbourhood Plan itself, this plan is put together by local people and is subject to a referendum of residents.</p> <p>The Chattenden Valley, located between Chattenden and Hoo, is identified as a valued landscape in the Hoo & Chattenden Neighbourhood Plan. The Chattenden Valley should be identified and designated as a landscape of local value in the LPA's Local Plan. We believe it would be wholly unreasonable and completely unjustified for the LPA not to do this.</p>
<p><i>“Question 5: Do you agree that the Council should promote Natural England's Green Infrastructure Framework standards in the Medway Local Plan policy?”</i></p>	<p>Yes.</p>
<p><i>“Question 6: Has the draft Medway Green and Blue Infrastructure Framework identified the correct key issues and assets, and provide effective guidance for strengthening Medway's green infrastructure?”</i></p>	<p>The draft Medway Green and Blue Infrastructure Framework has identified a majority of the correct key issues and assets. However, the document has excluded the highly valued Chattenden Valley, between Hoo and Chattenden, from the framework. The Chattenden Valley should remain an attractive green corridor separating the two settlements.</p> <p>The framework also references the £170m Housing Infrastructure Fund (HIF) Project in many places. However, this funding has been withdrawn by the government.</p>
<p><i>“Question 7: Do you consider the Green Belt boundary should be revised in line with the recommendations in the 2018 Green Belt Assessment?”</i></p>	<p>Yes, the Green Belt boundary should be revised in line with the recommendations in the 2018 Green Belt Assessment. This will result in minor tweaks to the Green Belt. However, due to contractions and reductions of the Metropolitan Green Belt around London, there is a need to compensate for this by allocating new land as Green Belt.</p> <p>The Green Belt in Kent between Gravesend and Strood is noticeably not very wide, yet the Green Belt opposite in Essex is much wider and extends as far East as the Hoo Peninsula. We believe there is a case for Green Belt retraction to be redesignated on the Hoo Peninsula to compensate for the loss of Green Belt elsewhere.</p>
<p><i>“Question 8: Do you consider that exceptional circumstances exist to justify review of the Green Belt boundary?”</i></p>	<p>Yes, we believe there is exceptional circumstances to justify a review of the Metropolitan Green Belt around London and to expand the Green Belt so that it includes the Hoo Peninsula. As explained above, this would equal the width of the Green Belt in Essex opposite Kent. The Hoo Peninsula is part of the East Coast Wetlands bid to become a UNESCO Natural World Heritage Site. This is exceptional.</p>
<p>Built Environment</p>	

<p><i>“Question 9: Should this policy be broadened out to areas adjacent or near to Conservation Areas rather than only within? If so, please explain why.”</i></p>	<p>Yes, the policy should include areas adjacent or near to Conservation Areas rather than only within. A perfect example of why this policy is important is Rochester Riverside. The new development here is very close to the historic Rochester conservation area, yet several of the high-rise blocks of flats are completely out-of-keeping with historic Rochester.</p> <p>Any development that affects the setting of a conservation area should be refused by the LPA and a planning policy in the Local Plan should include words to the effect.</p>
Housing	
<p><i>“Question 10: Do you think this policy provides effective guidance on the required housing mix in Medway?”</i></p>	<p>Yes, the policy mostly provides effective guidance on the required housing mix. However, the policy excludes reference to Neighbourhood Plans that may have their own housing needs assessment. These assessments should take priority in the Neighbourhood Plan area concerned.</p>
<p><i>“Question 11: Do you agree with having a 10% requirement for affordable housing on urban brownfield sites and 30% requirement for affordable housing on greenfield sites and higher value urban locations? What do you consider would represent an effective alternative approach? Do you agree with a varied approach for affordable housing requirements based on the different value areas across Medway?”</i></p>	<p>Yes, we agree with a requirement for 10% affordable housing on urban brownfield sites and 30% affordable housing on rural greenfield sites. However, this agreement is subject to there being a clear priority policy for local residents to access the affordable housing.</p> <p>For example, new affordable housing units in Hoo should firstly be offered to those with a Hoo address. Units should then be offered to those who live in a neighbouring settlement, such as High Halstow or Chattenden. Then the units should be offered to anyone else in the LPA area (Hoo Peninsula and Medway Towns). The Post Office address system will provide the basis of this and the same system can be applied to units provided in the urban Medway Towns.</p> <p>We also agree with the varied approach for affordable housing requirements, based on the different value areas across the LPA area. However, this is again subject to the priority policy explained above.</p>
<p><i>“Question 12: What do you consider would represent an effective split of tenures between social/affordable rent and intermediate/low-cost home ownership housing in delivering affordable housing?”</i></p>	<p>We agree with the suggested split of tenures between social/affordable rent and intermediate/low-cost home ownership. We welcome the increase in percentage of shared ownership, as this is becoming an attractive route into home ownership.</p>
<p><i>“Question 13: Do you have any views on the delivery of affordable housing, and the cascade principle? What evidence can you provide to support your views?”</i></p>	<p>We strongly agree that affordable housing should be delivered on-site. Where Housing Associations are not interested in adopting groups of affordable housing units, these units should instead be offered to the Local Authority or Parish/Town Council as Council House Stock.</p>
<p><i>“Question 14: Do you have views on defining the limits to over-concentration of HMOs in a community? What criteria would be recommended?”</i></p>	<p>Yes, we believe there should be limit on the number of HMOs within a defined area or community. There are policy examples with other LPAs, including refusing a HMO application if more than 10% of households are</p>

	already a HMO within a 100m radius of the application site.
<i>"Question 15: Do you have any sites you wish to promote for self-build allocation?"</i>	No.
Retail and Town Centres	
<i>"Question 16: Do you support the approach to manage ancillary development outside of centres in this way?"</i>	Yes.
<i>"Question 17: Do you support the approach to protect Medway's centres by requiring impact assessments in circumstances set out in the policy above?"</i>	Yes.
<i>"Question 18: Do you agree with the proposed Chatham town centre boundary?"</i>	No, there should be no reference to Chatham being or becoming a city or a city centre, particularly for "Medway".
<i>"Question 19: Do you agree with the identification of the Primary Shopping Area boundary proposed within Chatham town centre?"</i>	No, there should be no reference to Chatham being or becoming a city or a city centre, particularly for "Medway".
<i>"Question 20: Do you agree with the Rochester district centre boundary proposed?"</i>	No, Rochester should become the primary centre for the wider area of the Medway Towns and Hoo Peninsula.
<i>"Question 21: Do you agree with the Primary Shopping Area boundary proposed within Rochester district centre?"</i>	No, Rochester should become the primary centre for the wider area of the Medway Towns and Hoo Peninsula.
<i>"Question 22: Which option or combination of options would you choose for the Gillingham district centre boundary?"</i>	No comment.
<i>"Question 23: Do you agree with the Primary Shopping Area boundary proposed within Gillingham district centre?"</i>	Yes.
<i>"Question 24: Which option or combination of options would you choose for the Strood district centre boundary?"</i>	No comment.
<i>"Question 25: Do you agree with the Primary Shopping Area boundary proposed within Strood district centre?"</i>	Yes.
<i>"Question 26: Which option or combination of options would you choose for the Rainham district centre boundary?"</i>	No comment.
<i>"Question 27: Do you agree with the Primary Shopping Area boundary proposed within Rainham district centre?"</i>	Yes.
<i>"Question 28: Would provision of a supermarket in Hoo be beneficial to residents to encourage sustainable travel patterns, convenience and sustainable lifestyles?"</i>	<p>No, the provision of a large or very large supermarket in Hoo itself is likely to seriously harm the viability of a number of existing retail units in Hoo (such as Spar and Co-op) and therefore the viability of the village centre itself.</p> <p>The term "supermarket" is subjective as it does not stipulate a certain size or floorspace. For example, a supermarket could mean a superstore on par with the very large Tesco Extra store in Gillingham. Or, a supermarket could mean a store on par with the much smaller Aldi store in Strood.</p> <p>The Spar and Co-op stores in Hoo are, by definition, supermarkets.</p>

	<p>The potential for any sized supermarket is market led. I.e. if a very large supermarket is viable, there would have already been a planning application to build one on the Hoo Peninsula. There has been no indication from several supermarket companies expressing an interest in building a very large supermarket on the Hoo Peninsula.</p> <p>Hoo itself is very close to existing large/very large supermarkets in Strood and Gillingham, therefore it is unlikely for there to be an additional supermarket. The building of new large/very large supermarkets has slowed down significantly in recent years, due to the huge increase in online shopping. Therefore, it's more likely a distribution centre is proposed on the Hoo Peninsula, rather than a large/very large supermarket.</p>
<i>"Question 29: Do you agree with the boundaries and retention of these listed local and rural centres?"</i>	Yes. However, the LPA has excluded a number of rural centres, explained below.
<i>"Question 30: Are there any other local and rural centres you may want to suggest for inclusion?"</i>	Yes. The LPA should include Grain High Street, Lower Stoke High Street, Allhallows Avery Way, Hoo Fourwents Road, Cliffe Church Street, High Halstow Christmas Lane, Lower Upnor Upnor Road, Upper Upnor High Street.
<i>"Question 31: Do you agree with the boundaries and retention of the listed shopping parades and neighbourhood centres?"</i>	Yes. However, the LPA has excluded a number of shopping parades and neighbourhood centres, explained below.
<i>"Question 32: Are there any further neighbourhood centres or shopping parades you may want to suggest for inclusion?"</i>	Yes. The LPA should include Grain High Street, Lower Stoke High Street, Allhallows Avery Way, Hoo Fourwents Road, Cliffe Church Street, High Halstow Christmas Lane, Lower Upnor Upnor Road, Upper Upnor High Street.
<i>"Question 33: Do you agree with the proposed boundary for Dockside as a leisure destination? Please refer to the proposal map for the boundary suggestion."</i>	Yes.
<i>"Question 34: Do you support the percentage mix of uses proposed? If not, can you provide evidence for an alternate mix?"</i>	No comment.
Transport	
<i>"Question 35: Adequate overnight lorry parking would reduce the risk of lorries parking in locations that lack proper facilities and/or cause a nuisance. Are there local shortages for overnight lorry parking in Medway?"</i>	Yes. Kingsnorth Industrial/Commercial Estate and Grain Industrial/Commercial Estate on the Hoo Peninsula.
Health, Communities and Infrastructure	
<i>"Question 36: Are there any core health and wellbeing issues or opportunities missing from the policy?"</i>	No, however the policy appears very high-level and different communities will have different requirements, particularly deficits in health and wellbeing infrastructure. Limiting hot-food takeaways, off-licences and betting shops within communities/certain areas is welcomed.
<i>"Question 37: What are examples of healthy development in Medway you would like to see more or less of?"</i>	Within the LPA boundary, we do not believe there is an example of ideal healthy development to provide a benchmark. There are examples of very unhealthy

	development such as East of Bells Lane in Hoo and North of Peninsula Way in Chattenden. These developments are very dense, cramped and are not very sustainable.
<i>“Question 38: Of those health areas listed, what are the most important for the local plan to address?”</i>	All of them.
<i>“Question 39: How can the local plan ensure that development is inclusive and accessible for all members of our community, including people with disabilities?”</i>	By providing specialist accommodation/development for certain groups of residents, such as the elderly and infirm. We support the provision of senior citizen development, in the right location, as this also frees up existing housing stock to benefit local families.
<i>“Question 40: The designation of land as Local Green Space allows communities to identify and protect green areas of particular importance to them. The Local Green Space designation should only be used where the green space is: a) in reasonably proximity to the community it serves; b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and c) local in character and is not an extensive tract of land. Please use the online map to identify a green area for consideration as designated Local Green Space.”</i>	<p>Please see a list of green spaces below worthy of Local Green Space designation:</p> <p>Cliffe: The Buttway Green Space, off Buttway Lane. Cliffe Recreation Ground, off Church Street. APCM Cliffe, off Church Street. New green spaces created by Trenport.</p> <p>Cliffe Woods: Cliffe Woods Recreation Ground, off Merryboys Road. Green Space Corridor between Town Road and Brookmead Road. New green spaces created by Redrow Homes and Gladman Developments.</p> <p>Upnor: Frog Island Pond, off Upnor Road. Upnor Green, off Upnor Road. Lower Upnor Riverside Promenade, off Upnor Road. Green space off Galleon Way. Green space off Schooner Walk.</p> <p>Cooling: Cooling Recreation Ground, off Main Road.</p> <p>Chattenden: Hoo Common, off Elm Avenue. Green space off Haig Villas. New green spaces created by Esquire Developments. New green spaces created by Abbey Homes. Chattenden Village Green, off Chattenden Lane. Lodge Hill Recreation Ground, off Lodge Hill Lane.</p> <p>Hoo: Deangate Ridge Country Park, off Dux Court Road. Deangate Ridge Sports Ground, off Dux Court Road. Kingshill Recreation Ground, off Fourwents Road. Robson Drive Recreation Ground, off Robson Drive. Pottery Road Recreation Ground, off Pottery Road. Hoo Sports Field, behind Hoo Village Institute. Main Road Verges, outside Hundred of Hoo Academy. Hoo Village Green, centre of Hoo. Hoo Remembrance Garden, off Vicarage Lane. New green spaces created by Bellway Homes. New green spaces created by Taylor Wimpey. New green spaces created by Esquire Developments. New green spaces created by Jones Homes.</p>

	<p>High Halstow: High Halstow Cricket Club, off Christmas Lane. High Halstow Sports Field, off The Street. High Halstow Green Triangle, opposite St. Margaret's Church. The Street Green Verges, along The Street. Forge Common, off Marsh Crescent. Topley Drive Recreation Ground, off Topley Drive. New green spaces created by Redrow Homes.</p> <p>This list does not include potential Local Green Space designations in All Saints Ward, including the villages of St. Mary Hoo, Allhallows, Stoke and Grain.</p>
<p><i>"Question 41: Sport England require an up-to-date PPS to justify the protection, enhancement and provision of playing pitches. Based on an audit and assessment of the supply and demand for existing and future playing pitches, the PPS provides recommendations and an action plan for addressing issues regarding the quantity, quality and accessibility of playing pitches and ancillary facilities. Medway Council's latest PPS was completed in October 2019 for the period 2018-35. Medway Council is inviting local clubs, national governing bodies of sport and other users and providers to review the latest PPS. More specifically, are there any matters in the latest PPS that should be updated?"</i></p>	<p>No, however it should be noted that the Hoo Peninsula has lost a number of playing pitches despite growing in population. The loss of the former Hoo Peninsula Social Club off Bells Lane, Hoo and the former Sturdee Club off Stoke Road, Hoo was significant. Also, playing pitches have been lost in Chattenden off Elm Avenue. This provision will need to be replaced to serve the existing population, yet alone any increase in population. A playing pitch deficit currently exists on the Hoo Peninsula, particularly in Hoo and Chattenden.</p>
<p><i>"Question 42: Do you agree identifying the required infrastructure to support the scale and locations of growth within Medway is the correct approach? Would a 'mini IDP approach' focusing on broad locations and strategic sites be preferred? Or do you have an alternative suggested approach?"</i></p>	<p>Yes. However, a one-size-fits-all approach is not suitable as the LPA area is made up of two distinctly different communities with different needs - the urban Medway Towns community and the rural Hoo Peninsula community. A 'mini IDP approach' focussing on broad locations and strategic sites would be preferred as the infrastructure required will need tailoring to the specific broad location in question.</p> <p>For example, further development on the rural Hoo Peninsula is not sustainable without significant upgrades in strategic transport infrastructure and significant environmental mitigation and compensation. This is before considering the substantial health, education and other community infrastructure needs.</p>
<p><i>"Question 43: Align infrastructure provision in line with this growth - how can we balance growth and new infrastructure requirements with funding gap?"</i></p>	<p>Without capital investment from central government, the infrastructure needed to support and make growth sustainable cannot be financed through Section 106 developer contributions alone. Therefore, significant growth is not sustainable, viable or deliverable - because the level of contributions required from developers makes the schemes unviable.</p> <p>Permitting development without the necessary infrastructure investment is harmful to the existing community, and this harm outweighs the benefit of delivering housing. Exposing new residents to an unsustainable community is not good for these residents either. For example, new residents will struggle to obtain a GP appointment or find local</p>

	primary school places - this harms their quality of life etc.
Waste Management	
<i>"Question 44: In light of the geological/spatial constraints in Medway and predicted limited ongoing need, do you agree that it is appropriate for the Council to plan for the management of non-inert waste that may require landfill on the basis that it will be managed at landfill sites located outside Medway?"</i>	Yes. Due to the environmental constraints of the rural Hoo Peninsula, including habitat sites, no landfill sites should be allocated.

Thank you for allowing us to take part in this consultation. If you have any questions about this representation, please feel free to get in touch.

Best wishes and Kind Regards,

The Independent Group (TIG).

George Crozer

Councillor George Crozer (Ind)
Leader
Hoo & High Halstow Ward

Michael Pearce

Councillor Michael Pearce (Ind)
Deputy Leader
Hoo & High Halstow Ward

Ron Sands

Councillor Ron Sands (Ind)
Group Whip
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Elizabeth Turpin

Councillor Elizabeth Turpin (Ind)
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John Williams

Councillor John Williams (Ind)
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