

SECTION 3

DEVELOPMENT STRATEGY

- 3.1 This section considers the scale of development needed to support Medway's growth, and strategies to deliver our ambitions for a leading University waterfront city, noted for its revitalised urban centres and its stunning natural and built environment. It presents alternative approaches to how Medway may achieve the vision and strategic objectives set for sustainable development promoted in the plan.
- 3.2 Four development scenarios are presented for consultation. These largely focus on the distribution of housing land. However there are common approaches to employment and retail land in the development strategy, and there will be requirements for infrastructure delivery in line with housing allocations. The council will consider the comments made during consultation, together with further technical assessment work to prepare a preferred development strategy that will be presented in the draft Local Plan. This will be published for consultation later this year.

Defining Development Needs

- 3.3 When the council started work in preparing a new Local Plan for Medway, it commissioned, jointly with Gravesham Borough Council, a Strategic Housing and Economic Needs Assessment. This work is an intrinsic part of the Local Plan evidence base, and identifies the scale and mix of development needed to support Medway's growth over the plan period.
- 3.4 A Strategic Housing Market Assessment²² was published in 2015 to support consultation on the Issues and Options stage of the new Medway Local Plan. The assessment took account of official data on household projections, together with a broad range of criteria that provide market signals, and employment projections, to determine the scale and mix of housing needed by 2035 by Medway's communities. It also considered the relationship with surrounding areas, with rates of migration and commuting and defined Medway's housing market area. There was explicit consideration of the relationship with London and migration rates. This assessment was based on the 2012 based Household Projections published in 2014. This identified a need for 1281 homes per annum, or 29, 463 over the plan period.
- 3.5 Since the preparation of the Strategic Housing Market Assessment, further 2014 based household projections have been published, as well as annual data on population estimates and migration. Through the annual Authority Monitoring Report, the council collates and analyses a range of demographic, housing and development data.
- 3.6 This information shows some notable variations in population and migration in recent years. The rate of annual growth in Medway's population has slowed in recent years,

²² GVA, 'North Kent Strategic Housing & Economic Needs Assessment: Employment Land Needs Assessment Medway', December 2015, Available at: <http://www.medway.gov.uk/pdf/Medway%20Employment%20Land%20Assessment%20Final%20Report%20161602.pdf>

from the peaks seen between 2012 and 2014. Rates of growth in 2016 were under 60% of the level seen in 2012. Migration trends have also been very volatile in recent years. There is also some uncertainty on assumptions informing national projections of migration, particularly after the UK exits the European Union. The SHMA methodology used a 10 year average to smooth out short term variations. Further consideration of the demographic information and trends informing Medway's household projections are set out in a Housing Delivery background paper, produced to support the Development Strategy consultation. The council recognises the variations in projections of population and household growth, and will update its evidence base for development needs to take account of the 2016 based household projections due to be published in summer 2018.

- 3.7 In September 2017, the Government published a consultation document 'Planning for the Right Homes in the Right Places'²³, that included a proposed standard method for calculating Local Housing Need. The supporting information identified an annual housing need up to 2026 for each Local Authority in England. In Medway, the rate was for 1665 homes a year, or 37,143 over the plan period. The large increase in defined housing need, above the 2015 SHMA figure of 1281 homes per year, resulted from use of a methodology that reflected an adjustment factor in areas of poor housing affordability. In common with many areas across Kent and the wider South East, this proposed method resulted in a significantly higher housing needs figure for Medway. The council has identified concerns with the methodology and its application, given that Medway is comparatively one of the most affordable areas in the South East.
- 3.8 At the time of preparing the content for this Regulation 18 document, the Government has not yet published its response to the consultation on the Standard Method. However advice²⁴ from Government has confirmed its expectations that local planning authorities use the Standard Method where emerging Local Plans have not yet been submitted for independent Examination before Spring 2018. This is the case for Medway.
- 3.9 The consultation document states that the defined Local Housing Need is a first step for the housing target for a Local Plan. It is recognised that areas may have important constraints, such as environmental designations, Green Belt, or physical constraints that restrict the ability to meet the needs in full. If this is robustly and soundly assessed, the plan may promote a housing target lower than the Local Housing Need figure. However the council will be required to explore other options for meeting its area's housing needs, such as providing more land in a neighbouring borough.
- 3.10 Therefore in preparing for this stage of consultation on Medway's new Local Plan, the council has explicitly considered how it could meet the higher level of housing needs

²³ Department for Communities and Local Government, 'Planning for the right homes in the right places: consultation proposals', 2017, Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/652888/Planning_for_Home_s_Consultation_Document.pdf

²⁴ Ministry of Housing, Communities & Local Government, 'NPPF timetable update', Jan 2018, Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/678443/NPPF_Timetable_Update-January_2018.pdf

over the plan period, consistent with the strategic objectives of the plan, and requirements of sustainable development.

- 3.11 Gravesham Borough Council shares a housing market area with Medway. In its representations to consultation on the emerging Medway Local Plan, it has sought flexibility within the Medway plan to meet the wider housing market area's needs, should excess residential land be identified during the plan preparation process. Gravesham Borough Council will be publishing details of its Site Allocations and Development Management Policies document for consultation later in 2018. Medway Council will engage with Gravesham Borough Council on the respective plans through the Duty to Cooperate, and prepare a Statement of Common Ground, to address cross boundary development issues, including the supply of housing land. This will include engagement with other neighbouring local planning authorities within Medway's housing market area.
- 3.12 The council will refresh its evidence base on development needs prior to the publication of the draft Local Plan for consultation. This work will take account of the updated household projections based on 2016 data, and the publication of the government's response to the outcomes of the consultation on the Standard Method. This refreshed evidence will support the draft plan.

Identifying alternative development approaches

- 3.13 The council is seeking to positively prepare a plan to manage Medway's growth, addressing the challenges of meeting housing needs, boosting the economy, protecting the environment and raising standards of health and well-being. Such complex and diverse challenges require a considered and sound strategy to ensure that development benefits, rather than damages our area and communities. Consultation on the 'Development Options' stage of the emerging plan, showed general support for the proposed vision and strategic objectives for the Local Plan. These inform the alternative approaches to development that have emerged from further work on site assessment and sustainability appraisal.
- 3.14 The council has carried out a wide review of potential land for development across Medway, to determine which sites and locations represent the most sustainable and successful choices for the plan's growth strategy. It has followed an iterative process of assessing land availability and suitability within the borough. The council has prepared Strategic Land Availability Assessments²⁵ (SLAAs) to support the production of the Local Plan. These assessments have involved a wide ranging review of land across Medway and engagement with the development sector through the 'Call for Sites' process to identify potential land for development.
- 3.15 The SLAA process has considered a comprehensive range of criteria to determine the suitability of land for sustainable development. The criteria have included environmental issues, transport and accessibility, heritage, physical and infrastructure constraints. The council has used the site assessment information,

²⁵ Medway Council, 'Medway Strategic Land Availability Assessment', Available at: <http://www.medway.gov.uk/planningandbuilding/planningpolicy/strategiclandavailability.aspx>

together with consideration of wider strategic development opportunities to identify locations that would best meet the objectives of the Local Plan and deliver sustainable development. These have been further tested through the Sustainability Appraisal process informing the preparation of the Local Plan. The council mapped walking zones to train stations to define areas of high accessibility. This was used to inform calculations of density approaches on a site by site basis.

Land Supply Pipeline

- 3.16 The council monitors the delivery and planning of development through its annual Authority Monitoring Report²⁶. It has used data collected for the period up to 31 March 2017 to identify a pipeline of land supply for housing over the plan period (2012-2035). This provides:

Development status	Number of dwellings
Homes completed 1 April 2012- 31 March 2017	2822
Residential planning permissions	7299
Total housing identified 'pipeline'	10,121

- 3.17 This 'pipeline' of housing sites forms part of the supply of the housing needed over the plan period.

Making the most effective use of land

- 3.18 Planning policy²⁷ and wider government guidance promotes the effective re-use of previously developed land (provided that it is not of high environmental value). Regeneration of brownfield sites is at the core of Medway's development plan.
- 3.19 Regeneration in Medway over recent decades has brought marked changes and benefits to the area. This has included the establishment of a learning quarter around Chatham Maritime, with the shared Universities at Medway campus, Mid Kent College and the University Technology College. This major investment is critical to addressing the skills gaps still seen in some areas in Medway, and provides the basis for lifting economic productivity.
- 3.20 In transforming from the area's industrial past, Medway has brought forward land for development, promoting opportunities to make best use of derelict or underused previously developed land. In line with national policy, the council supports a development strategy that continues to deliver benefits from regeneration. This forms the core of the Local Plan vision and strategy for growth and directly addresses the strategic objectives of the plan.
- 3.21 Development on urban brownfield sites forms a significant component of the development strategy. The regeneration strategy is set out in 'Medway 2035', which

²⁶ Medway Council, 'Authority Monitoring Report 2016-2017', available at: <http://www.medway.gov.uk/planningandbuilding/planningpolicy/authoritymonitoringreport.aspx>

²⁷ Department for Communities and Local Government, 'National Planning Policy Framework', Paragraph 17, pg.5, 2015 Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

complements the emerging Local Plan. The development of key waterfront sites forms an important element of plans, with many benefitting from planning permission or development briefs.

- 3.22 The council has identified further opportunities in urban centres for sustainable development. As retail has undergone structural changes in recent decades, the function of town centres in Medway, as elsewhere, has weakened. A key objective of the plan is to strengthen the role of town centres, and opportunities have been identified to diversify the range of uses within central areas. This includes residential, wider commercial and community activities.
- 3.23 Government promotes the efficient use of land in meeting the significant housing challenges that the country faces. Development in areas that benefit from high levels of accessibility to sustainable transport is encouraged. Analysis of access to a range of transport modes in Medway has clearly shown highest levels of accessibility in central urban areas, with relationships to mainline train stations and public transport hubs. Such areas may support higher density approaches to housing, where appropriate to the character and amenity of the surrounding area. An increased resident population in central areas can increase the vitality, economic and social wellbeing of town centres. There are opportunities for further student accommodation in centres, particularly in Chatham and Gillingham, which are located within walking distance to the Universities and colleges. The council seeks to widen the community role of town centres, such as through an enhanced leisure and cultural offer in Chatham. The centres also offer attractive locations for a wide range of businesses, which could benefit from good levels of connectivity. The accessibility analysis²⁸ carried out by the council has confirmed the potential of the central urban areas to accommodate higher density development, where this does not conflict with heritage and amenity.
- 3.24 The council has identified a number of potential sites, and wider opportunity areas, that could form the basis for revitalising town centres, bringing land forward for new homes and jobs, and supporting a strengthened retail core. There are specific opportunities in Strood, Chatham and Gillingham.
- 3.25 The sites making up these opportunity areas have been assessed to determine the potential capacity and mix for new development uses. The council recognises that not all sites are currently available, and has taken a cautious approach in specifying the amount of development to be realised in the opportunity areas during the plan period.

Hoo Peninsula Rural Town

- 3.26 In reviewing the options available to positively preparing a plan for Medway's sustainable growth, the development of a rural town on the Hoo Peninsula was assessed to potentially provide a core component of the strategy. This would complement the urban regeneration dimension, providing for a wider range of development. The rural town could also provide a basis for enhancing the

²⁸ Further information in Housing Delivery background paper at www.medway.gov.uk/futuremedway

sustainability of the peninsula, through a strengthened economic and social offer, and investments in the wider environment.

3.27 This growth option would involve a number of strategic landholdings in and around Hoo St Werburgh, Chattenden and Deangate. A masterplan led approach would be required to deliver:

- a sustainable rural town defined by quality and distinctive development that respects its countryside setting;
- a wide range of homes reflecting the needs of households in Medway, including affordable housing, supported and adapted housing to meet the needs of people with disabilities, and a mix of household sizes and types;
- new employment land diversifying the current offer;
- upgrades to transport to the Hoo Peninsula, and serving and connecting the town;
- new and improved services, including shops, education, schools, parks, allotments, leisure and sports facilities, utilities and water and flood management, to meet a range of community needs, including children and young people, and older people;
- resilient and attractive green infrastructure that respects and defines the rural setting, separation of settlements and relationship to the wider peninsula; and
- mitigations to address air quality through provision of measures to promote modal shift and provide for greater range of services being accessed locally.

3.28 A plan led approach to managing the growth of a rural town is essential to ensure the success of this proposed rural town. The development has the potential to make a significant contribution to housing supply, but this needs to be considered in a wider strategic context. Such a scale of growth is dependent upon significant upgrades in infrastructure, including transport, health, education and wider community facilities. In developing a town, particular aspects need to be strengthened, such as the retail, economic and community roles. The greatest care and attention needs to be given to sensitively planning growth around Hoo St Werburgh to respect the countryside setting and links to the wider estuary. The proposals would involve the creation of two new country parks, opening up access to the countryside, and mitigating the potential for negative impacts on important environmental assets. The Hoo Peninsula has a distinctly different character to urban Medway, and the development approach needs to embed the landscape and wider environmental qualities to achieve a clearly rural character. Development would be required to recognise the importance of environmental designations, given the international and national significance of the Hoo Peninsula's habitats and landscapes.

Sources of supply for windfall calculation

3.29 Many sites in Medway come forward for development as 'windfalls', that is, they have not been previously identified in the Local Plan or other policy documents. This has formed an important element of land supply over the last decade. Based on evidence, the council has identified a conservative estimate of provision from windfall supplies coming forward in the plan. It is anticipated that there will be further certainty on some sites in opportunity areas at the draft plan stage.

- 3.30 The following sources of supply are identified as some of the potential areas that could deliver the windfall allowance:
- Sites coming forward in opportunity areas for redevelopment
 - Residential units above retail and commercial properties
 - Conversion of commercial premises to residential under Prior Approval
 - Renewal and intensification of older residential estates
 - Small sites under 5 units which are not included in the SLAA
- 3.31 All represent significant opportunities and therefore provide a realistic basis from which to consider a land supply of 3332 dwellings from windfall sources over the plan period.
- 3.32 Fuller information on these potential sources of supply are set out in the Housing Delivery background paper produced for the Development Strategy consultation.

Distribution of Development

- 3.33 The sites and broad locations that have emerged from technical assessments as the most sustainable locations provide a diverse offer that can meet the wide range of housing needs. The strategic allocations, such as land around Hoo St Werburgh, provide the greatest opportunities to secure investment in critical upgrades to infrastructure. Consultation on earlier stages of plan preparation has shown that many local people and groups are concerned about the impact that growth and the associated development could have on Medway, particularly on infrastructure and services. There are a mix of brownfield and greenfield sites, and a broad variety of site sizes. The proposed allocations include a number of small and medium sites that are often quicker to deliver and attract smaller housebuilders. This accords with government policy to increase participation in the housebuilding market. Detailed assessments have been carried out to determine phasing and therefore delivery rates over the plan period.

Scenario 1: Meeting Objectively Assessed Need

- 3.34 The council is seeking to meet its housing needs within the borough boundary. The 2015 North Kent Strategic Housing and Economic Needs Assessment identified an objectively assessed need for housing of 29,463 homes over the plan period. This figure is used as the basis for this development scenario.
- 3.35 The strategy seeks to firstly direct growth to brownfield urban sites, to realise the potential of regeneration. This includes identified waterfront regeneration sites, together with 'opportunity areas' in and around town centres with the potential for redevelopment. Not all of the land in the 'opportunity areas' is currently available, and therefore these sites have not been included in the identified land supply. However there is potential for such sites to contribute to the 'windfall' land supply.
- 3.36 This approach complements urban regeneration with the proposed development of a rural town and some suburban expansion. Over half of growth is directed to urban sites, and the rural town, plus some village expansions could provide about a third of housing land. Development of the rural town in this scenario does not involve

development of land on the designated SSSI at Lodge Hill and Deangate, and includes buffers to protected land.

- 3.37 Around 10% would potentially be allocated to suburban areas. Some growth is directed to suburban areas, such as parts of Capstone Valley and north of Rainham. The release of land in the wider suburban areas is restricted due to concerns about the ability to mitigate transport and environmental impacts. It is not considered that the 'exceptional circumstances' exist to justify the review of the Green Belt boundary to accommodate development. A small 'buffer' above the defined housing need figure is shown, to allow for flexibility in the strategy

Component of Land Supply	Number of dwellings
Pipeline sites (completions and permissions)	10,121
Potential allocation capacity on identified sites	16,497
Windfall allowance (17 years)	3,332
<i>Total</i>	<i>29,950</i>
SHENA Objectively Assessed Housing Need	29,463
'Buffer'	487

Scenario 2: Investment in Infrastructure to unlock growth

- 3.38 Work in assessing development potential across Medway has identified that land on the Hoo Peninsula could form an important part of the area's growth strategy. A rural town centred on Hoo St Werburgh is included in all of the development scenarios set out in this consultation document. As outlined in Scenario 1, this proposed rural town could deliver new and improved services and infrastructure, providing for its residents and the wider Hoo peninsula.
- 3.39 The scale and scope of potential growth requires significant investments in infrastructure to increase the capacity of transport networks, utilities and wider services to meet the needs of the area's growing population. The timely and effective delivery of infrastructure is critical to achieving the sustainable development of the rural town. Developers will be required to contribute to the funding of key infrastructure. The planning and phasing of delivery of the proposed strategic development allocation is informed by critical stages of infrastructure upgrades.
- 3.40 Delays in securing the funding needed for strategic infrastructure will impact on the timing and scale of development that can be delivered. The council is bidding for additional funding to invest in the improvements needed to strategic infrastructure to support growth over the plan period. Transport forms the core of the strategic infrastructure investment proposals. The council is engaging positively with transport service providers and planning bodies on these proposals.
- 3.41 The limited access to the Hoo Peninsula, and particularly the junction of the A228 and A289 at Four Elms Roundabout, presents a constraint to growth. The network currently experiences congestion in this location, which has contributed to the designation of an Air Quality Management Area. Transport assessments carried out in preparation of the Local Plan have confirmed severe impacts on the highways network arising from potential growth, if mitigations are not in place.

- 3.42 Transport solutions for sustainable growth require broadening the choices of how people travel. Public transport on the rural Hoo Peninsula is limited and there are higher rates of car usage than seen in the urban parts of Medway. The strategy looks to upgrade the capacity of the highways network, through new connections and design at Four Elms and road widening of the A228. It also seeks to bring about a step change in the public transport offer serving the Hoo Peninsula. This includes the potential use of the Grain freight line for passenger traffic, that could connect to the north Kent High Speed service via Gravesend. Investment would also upgrade the bus network, using dedicated bus lanes to provide fast, frequent and reliable links to key destinations. The policy approach to the proposed rural town promotes healthy travel, with walking and cycling routes central to the design.
- 3.43 The introduction of a passenger rail service to the Hoo Peninsula presents a unique opportunity for the area. It is a major component of a sustainable growth plan, and can raise values, that secure the viability and delivery of development. It is an economic driver, and can boost the attractiveness of the area as a desired business location. It also supports a different approach to design, with opportunities to develop at higher densities in specific locations that are well connected to a transport hub, such as a new station.
- 3.44 This scenario follows the development strategy set out at Scenario 1, but explicitly considers the implications and approach to masterplanning and design that could arise from the introduction of a new passenger rail service and stations. This results in bringing forward development at a faster rate on the Hoo Peninsula, and achieving greater capacity on some sites that are appropriate for higher densities in accessible locations. However, the rural character of the Hoo Peninsula would not support the densities found in more urban areas.
- 3.45 The higher and faster rates of delivery that could be supported in this scenario would reduce the need to release some sites in suburban areas, where there are more limited opportunities to mitigate transport impacts. This could remove land in the Capstone Valley and to the north of Rainham from proposed development allocations.

Component of Land Supply	Number of dwellings
Pipeline sites (completions and permissions)	10,121
Potential allocation capacity on identified sites	17,580
Windfall allowance (17 years)	3332
<i>Total</i>	<i>31,033</i>
SHENA Objectively Assessed Housing Need	29,463
'Buffer'	1,570

Scenario 3: Meeting Government's proposed calculation of Local Housing Need

- 3.46 This scenario responds to the definition of local housing need by the government's proposed standard method, as outlined at paragraph 3.7 above. The annual housing need of 1665 homes has been projected from 2016 to the end of the plan period in 2035, which calculates a need for 37,143 homes.

- 3.47 The council has considered how it could plan to deliver this scale of growth over the plan period. This level of housing need is incredibly challenging, and would require a radical change in how development is delivered. In assessing the options to deliver this level of growth, issues of infrastructure and environmental capacity were identified.
- 3.48 The vision and strategic objectives for Medway’s growth are based on ambitions for sustainable development. These inform a strategy that seeks to realise the further opportunities of regeneration, and direct development to sustainable locations in the wider borough, that respect the environment and can be supported by infrastructure.
- 3.49 A major objective of the Local Plan is to strengthen the local economy, lifting rates of productivity, providing the basis for more quality jobs. The Strategic Housing and Employment Needs Assessment considered the relationship between housing and employment, to define appropriate levels of land supply, to ensure balanced and sustainable development. The ‘Standard Method’ solely considers housing need, and guidance has not yet been provided on the relationship to employment land needs. The council recognises the risk of loss of commercial land to residential uses in seeking to significantly boost the supply of housing to levels identified by the government’s methodology. This could exacerbate rates of out commuting and unsustainable development, if jobs growth does not keep pace with the rising housing supply.
- 3.50 The key components to increasing the supply of housing in this scenario would require a reliance on the development of the urban opportunity areas and achieving high densities on appropriate sites. This could lead to difficulties in achieving the mix and range of housing types needed by Medway’s communities. Land in the Capstone Valley and to north and east of Rainham would be considered as potential allocations for development in this scenario. Some employment land is also identified for possible redevelopment to meet housing needs.
- 3.51 There is considerable uncertainty on the ability to demonstrate the deliverability of such rates of growth, together with the infrastructure requirements. The impacts on the transport network would be particularly challenging to mitigate, and exacerbate the problems of poor air quality in the designated Air Quality Management Areas.

Component of Land Supply	Number of dwellings
Pipeline sites (completions and permissions)	10,121
Potential allocation capacity on identified sites	22,508
Windfall allowance (17 years)	3,332
<i>Total</i>	<i>35,961</i>
Standard Method Local Housing Need	37,143
‘Shortfall’	-1,182

Scenario 4: Consideration of development within Lodge Hill SSSI

- 3.52 Previous stages of consultation on the emerging Medway Local Plan made reference to the possible use of land at Lodge Hill for a new settlement on the Hoo Peninsula. This involved development of former military land designated as a Site of Special Scientific Interest. The potential inclusion of the site as part of Medway's development strategy was subject to the outcome of a Public Inquiry into an outline planning application for the proposed development of a strategic mixed use site, providing for up to 5,000 homes.
- 3.53 In September 2017, the outline planning application for proposed development at Lodge Hill was withdrawn and the Public Inquiry cancelled. Land at Lodge Hill has transferred from the military ownership of the Defence Infrastructure Organisation to the national regeneration agency, Homes England. Homes England has carried out new survey and evaluation work to provide a detailed understanding of the site. It is using this information to assess the impact of potential development on the environmental interests of the site. The agency is preparing a new development proposal for land at Lodge Hill, based on this analysis of the site. The new proposal is significantly reduced in scale from the withdrawn outline planning application, reflecting a new strategy for nature conservation on the site. However the scheme does involve elements of development on land designated as a SSSI.
- 3.54 Homes England is seeking to achieve a new approach that secures the environmental interests of the site in perpetuity, addresses concerns of site safety resulting from unexploded ordnance and is underpinned by resources realised through development values in other parts of the site. In considering new proposals for the site, Homes England is working with Natural England in compiling its evidence base and assessing its emerging approach to the management and development of land at Lodge Hill.
- 3.55 Ecological survey work has informed a new proposal for the site that directs development to the western and southern areas, around Chattenden Barracks and Lodge Hill Camp. All of the ancient woodland and land to the north-east of the site would remain undeveloped to be managed for the long term environmental interests.
- 3.56 The emerging proposal seeks to deliver a residential led scheme for up to 2,000 homes, as part of a wider strategic development of the wider Hoo rural town. It would also include land for a primary school, over 29 hectares of public open space, some mixed use facilities, for community uses, small retail units and commercial land. The proposal focuses on two areas – expanding the existing Chattenden village, and a new village at Lodge Hill Camp. Development at an expanded Chattenden would seek to sensitively integrate with the current village, as well as possible development that may come forward on adjacent land as part of a strategic growth allocation. The current village of Chattenden has a limited range of services and new development would be required to address these shortcomings as part of a balanced and sustainable approach to an expanded village.

Homes England – Lodge Hill scheme proposed development mix
Overall land ownership – 365 ha
Net development area – 47.8 ha
Number of Homes – up to 2,000 dwellings
1 primary school (2 form entry)
Local centre, including business and retail
Public open space – 29.6 ha
Non developable area (including nature conservation areas) – 228.22 ha

- 3.57 Homes England has outlined an initial nature conservation strategy based on the ecology surveys and assessments carried out in and around Lodge Hill. The strategy consists of both on-site and off-site measures, with land management for conservation interests, sensitive clearance of unexploded ordnance to secure site safety, and establishment of compensatory habitat for nightingale habitat to address negative impacts addressing from potential development. The nature conservation strategy informs both the location of potential development land and its phasing.
- 3.58 National policy provides the highest level of protection from development that would result in significant harm to land designated as a SSSI. The NPPF directs local planning authorities to seek to avoid development likely to have an adverse effect on a SSSI, with the only exception being that the benefits of the development clearly outweigh the impacts on the features of the site, and any broader impacts on the network of SSSIs. Only where development can not be avoided, should mitigation and compensation measures be considered.
- 3.59 The council has included this potential scenario that involves development on land designated as a SSSI so that a transparent and objective assessment of the impacts arising from potential development can be made as part of the consultation process that informs the new Medway Local Plan.
- 3.60 If the proposed scheme for development at Chattenden village and Lodge Hill Camp, as outlined in plan 5 (attached) is determined to be sustainable development, this would contribute to the supply of development land in the plan period. In meeting the 'Objectively Assessed Need' for housing, development at Lodge Hill could replace the need to release land at Lower Stoke and south of Shawstead Road in the Capstone Valley.
- 3.61 With the exception of the sites mentioned above, and the extended potential development area at Lodge Hill, all other components of land supply in this scenario are the same as outlined in Scenario 1.

Component of Land Supply	Number of dwellings
Pipeline sites (completions and permissions)	10,121
Potential allocation capacity on identified sites	17,116
Windfall allowance (17 years)	3,332
<i>Total</i>	<i>30,569</i>
SHENA Objectively Assessed Housing Need	29,463
'Buffer'	1,106

Policy DS1: Sustainable Development

The purpose of planning is to achieve sustainable development. When considering development proposals the council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.

Planning applications that are in conformity with the Medway Local Plan (and where applicable, with policies in Neighbourhood Plans) will be approved, unless material considerations indicate otherwise.

Where there are no policies relevant to the application, or relevant policies are out of date, the council will grant permission, unless material considerations indicate otherwise, and considering whether:

- Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
- Specific policies in the NPPF indicate that development should be restricted.

Policy DS2: Spatial Development Strategy

The council will seek to meet the development needs for homes, employment and retail land, infrastructure and services, as determined by the evidence base set out in the Medway Local Plan, whilst respecting the need to conserve and enhance the natural and built environment.

The development strategy for Medway prioritises regeneration, making the best use of underused and previously developed land and directing investment to urban waterfront and centre opportunity areas. The council will encourage sustainable development in appropriate urban regeneration sites to deliver housing, employment, retail and community uses, establishing a quality and accessible public realm, including the extension of a riverside walk. Chatham will provide the focus for new retail and community facilities. Appropriate opportunities to capitalise upon the learning quarter at Chatham Maritime will be positively considered.

Outside of the regeneration areas, the council will support the development of a small rural town based around Hoo St Werburgh that is designed to the highest standards and sensitivity to respect its countryside setting and supported by significant infrastructure investments. The development will be in accordance with a masterplan, to secure the balance of land uses, attractive and effective green infrastructure, phasing to reflect the delivery of improvements required to a range of services and infrastructure.

The council will consider a lesser scale of development in defined sites in suburban locations around Rainham and Capstone and the villages of High Halstow, Lower Stoke, Allhallows, Grain and Halling, where the principles of sustainable development can be met, and where unacceptable impacts on infrastructure and the environment can be avoided.

Strategic green infrastructure zones throughout urban and rural Medway will promote a natural capital approach, and secure benefits for nature and people and provide separation of settlements.

Question DS1:

Does the proposed spatial development strategy represent the most sustainable approach to managing Medway's growth?

What do you consider would represent a sound alternative growth strategy for the Medway Local Plan?