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Planning Policy, Regeneration, Community,
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Medway Council
Gun Wharf
Dock Road
Chatham ME4 4TR

01 March 2017

OUR REF: JE/BH/14/105/FD

Sent via post and email: futuremedway@medway.gov.uk

Dear Sir,

**DEVELOPMENT OPTIONS CONSULTATION JANUARY 2017 – MEDWAY
LOCAL PLAN 2035**

We act on behalf of Brookworth Homes Limited who have an interest on land to the north of 178 Brompton Farm Road, Strood, ME2 3RE. We wish to make comment in respect of the Development Options document which has been published for consultation as part of the preparation of the emerging Medway Local Plan.

Having reviewed the development scenarios, my clients view remains as expressed in our response at the Issues and Options stage that the most appropriate mechanism for delivering the new homes that Medway requires, both in the short term and in the long term, is a combination of regeneration and suburban expansion.

Regeneration is plainly desirable and is the most sustainable of the development options in that it would involve reuse of brownfield land which is sustainably located and which would bring about a range of benefits for the town centres, for transport infrastructure, for urban design and for creating new places/communities. However, as the consultation document acknowledges, such regeneration, which may involve highly constrained sites, will not deliver the new housing that is needed in the shorter term. By contrast, suburban expansion around established urban areas would provide a range of sites that are deliverable within five years and which would, of themselves, contribute to more sustainable patterns of development than the other alternatives that are proposed.

My clients are firmly of the view that outward expansion into the rural areas through either significant development on the Hoo peninsula through settlement enlargement or the creation of a new rural town would be both longer term in respect of delivery and less sustainable in terms of transport and infrastructure. In my clients' view, it makes no sense for substantial new development within the rural areas, which have limited access to the existing public transport networks and which are unlikely to justify the provision of significant transport infrastructure, to be contemplated when there are areas available for development which already enjoy locational and transport benefits by comparison.

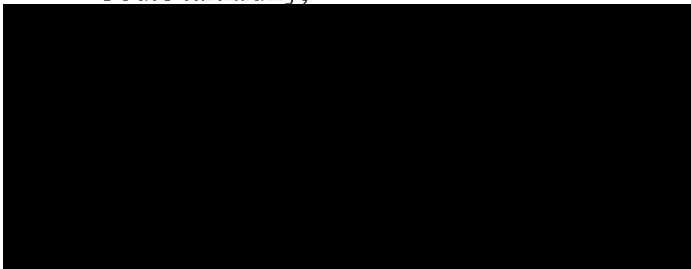


My clients, therefore, would fully support a Green Belt review being undertaken as part of the Local Plan relating to the land currently to the north of Brompton Farm Road and between existing residential development and the A289 bypass. In scenario two, this land is shown to be potentially developable as an employment led mixed use development. Given the competing priorities in Medway, my clients believe that a residential led mixed use development would be more appropriate.

As you will be aware, the Council has recently refused planning permission for a residential development on land to the rear of 178 Brompton Farm Road. However, the Council's decision was based solely on Green Belt policy and the loss of agricultural land. There were no other constraints to development that were identified through the development management process. A suitable and convenient means of access can be provided. The site is deliverable now and, as the suburban expansion scenario contemplates, sites such as this can make an immediate contribution to addressing Medway's housing needs.

In all the circumstances, my clients believe that the land to the north of Brompton Farm Road should be the subject of Green Belt review and, whilst not wishing to pre-judge the outcome of the review, it is submitted that the land should be allocated for a residential led mixed use development.

Yours faithfully,



From: [REDACTED]
Sent: 05 April 2017 14:59
To: futuremedway
Subject: Medway Development Scheme Local Plan 2035

Follow Up Flag: Follow up
Flag Status: Completed

With respect to planning application MC/14/2395 regarding the development of 450 houses on land at Gibraltar Farm surely this Local Plan negates the main argument for building these houses I.e., that the Medway Councils housing plans only extend to 3 years and not 5 years. The Local Plan refers to the development of the area AS A WHOLE and not just ad hoc development on the whims of private developers. Capstone Valley is a well needed green resource.

The only main access to and from this site being North Dane Way is laughable. Surely getting to this road from the site will mean cutting through Ancient Woodland I.e., a remnant of the old Cowbeck Woods whose mighty oaks helped build HMS Victory.

The road leads down into Luton where there is a roundabout at its northern end which is invariably blocked during the rush hour with traffic trying to get from Gillingham and Lordswood through to Chatham and that will be further encumbered by traffic from the new estate which is being built on the old waterworks land next to the roundabout. This does not take into account the rat run traffic caused by accidents on the M2, nor the fact that learner HGV traffic uses this road. This planning application will lead to traffic chaos at the peak hours.

The lack of services to the area appear to have been dismissed by the application as not being of their concern. That really sums up the developers attitude and their lack of concern.

The 'escape route' through Ham Lane is an interesting concept possibly indicating the shortcomings of the North Dane Way route.

Yours sincerely Roger Bell

Sent from [Mail](#) for Windows 10

[REDACTED]

From: Ron Pellatt [REDACTED]
Sent: 11 April 2017 10:32
To: futuremedway
Subject: Development of Cliffe and Cliffe woods

Follow Up Flag: Follow up
Flag Status: Completed

Dear Sir / Madam,

I am writing in response to the Draft Vision and Strategic Objectives outlined in the Medway Council Local Plan 2012 – 2035 and I would like to raise the following concerns regarding the considered development at Cliffe, in particular the land between Chancery Road and Cooling Road and also the land adjacent to the Telephone Exchange and North to Buttway Lane.

Many of the concerns would also apply to Cliffe Woods as the main access to local towns from Cliffe is via Cliffe Woods and other aspects of the local infrastructure are also shared between the two villages.

Having had a look at a map of the local area, if the two main proposed sites at Cliffe were put forward for development, it would appear to me that this could potentially double the size of Cliffe which has far reaching implications for the village and any significant development would, I believe, have a negative impact on this treasured rural setting and substantially change its character.

There would be an impact on the local environment as currently the land is used for growing crops, land that is very high grade and valuable for growing food efficiently and building on land used for this purpose would also have an impact on Carbon absorption and drainage.

Cliffe has long been a farming community and the landscape and features relating to this should be respected as this is the reason many people live in the countryside for this type of scenery and rural setting. This rural setting is a direct contrast to living in towns or cities.

Regarding Agriculture in general, at a time when the Common Agricultural Policy and membership of the European Union is, to say the least, 'under review', the majority of the UK's food is imported, there are millions of people in the UK in what could be considered Food Poverty, our import costs have the potential to rise considerably due to the exchange rate and potential import duty, the decision to destroy valuable food producing land at a time when the population is increasing significantly has serious implications as far as I am concerned.

I cannot understand why an exponentially growing population would choose to reduce its ability to grow food.

I believe there is a government directive to encourage the population to consume more fresh fruit and vegetables and to reduce Food Miles and its wider implication for the environment and so I believe Food Security is not something that should be taken lightly in an ever changing world and add to this the way the way climate appears to be changing, there must be less valuable land that could be considered for redevelopment.

Taking all of the above into consideration, valuable farming land and the skills of the farming community should not be taken for granted and the long term future way past 2035 should also be considered as once very fertile and productive soil is destroyed by development it is very difficult to regain.

Back on to a more local and personal level, if the fields between Chancery Road and Cooling Road were developed, the view from house of the countryside, farming land, the hills and woods in the distance would be completely obscured by any development in this area, a view that many others living adjacent to this land

would also share. In my mind there is no better rural view than a field of ripened wheat and it is something I have looked forward to for as long as I can remember over the 45 years I have lived in the village and I greatly enjoy the fact that I can see my parents' house, my childhood home on the opposite side of the proposed development.

From a more practical point of view, the local infrastructure is already, in my opinion, at capacity.

The local school is full, the waiting time to see a GP has increased considerably recently, the single main road leading to Cliffe is narrow, the sewage system at the other side of Cliffe woods struggles to cope with the current population, the broadband and phone system in areas of Cliffe, in particular where I live, is unreliable due to out of date cable technology, mobile phone coverage is limited, there is no visual Police representation, facilities for young people are minimal to name a few examples.

The transport structure to the village is limited with an expensive taxi journey many times the only transport option, the roads or lanes are restricted, the shops are small, there are no big business' fancy coffee shops, cinemas or gyms and that is exactly how it should be.

Our local shopkeepers and landlords should all be treasured along with all the other features that make the villages what they are and which would be lost for ever if these areas were developed considerably.

All this considered, I accept that there are disadvantages to living in a relatively isolated community because the benefits of the local surroundings far outweigh factors that some people may consider to be unfavourable.

In summary, I believe, any significant development of Cliffe, Cliffe Woods and most likely the other rural villages on the peninsular would have a detrimental impact on their character, the local environment, the infrastructure, the countryside views and wildlife.

There are local implications regarding traffic generation, car parking, and general amenities with far wider implications for food security and the economy if such valuable land is destroyed to house a rapidly and uncontrollably growing population that relies on it for its own long term survival.

It is for the reasons above I would oppose any significant development at Cliffe, and Cliffe Woods for that matter as development spreads and if Cliffe woods is developed then Cliffe Will be next in line and it would only be a matter of time before all the countryside local to the two villages is consumed by development and roads.

Yours sincerely

Ron Pellatt 11/04/2017

[REDACTED]

From: Rosemary Tomlin [REDACTED]
Sent: 27 February 2017 15:24
To: futuremedway
Subject: Medway Local Plan - (replacement e-mail!)

Follow Up Flag: Follow up
Flag Status: Completed

My previous e-mail was a draft which shouldn't have been sent!

Whilst your vision for Medway in 2035 sounds very positive, we would point out that there is no guarantee that Medway will be granted city status!

Our main concerns are:-

The growth in population is far too high for the area to cope with.

The roads currently struggle to cope and holdups are far too common. Any increase in traffic will also increase pollution.

Medway Maritime Hospital is struggling to cope - how is it going to deal with an increased population of more than 50,000 together with the ever increasing population in Swale who also use this hospital?

With a number of GP's in Medway due to retire in the near future, how will these vacancies be filled and how will many more GP's be attracted to the area in order to open the extra Practices that will be needed?

The increase in population will impact heavily on all aspects of social care, particularly with an aging population - have you planned for this and where will the increased funding needed come from? Hopefully, the plans include building for the elderly and disabled.

You may plan to build a number of new schools, but it will be difficult to attract good teachers to staff them at a time when nationally there is a shortage of teachers.

Looking at your four options:- Option 1 would appear to be the best as it would prevent heavy suburban expansion, have the least impact on the green space around the towns, would make more intensive use of land in the town centers and would, hopefully, regenerate Chatham and Gillingham town centres which really need improving. Option 2 which includes building out to Rainham's eastern boundary and building along the Lower Rainham Road would be the worst option - the Lower Rainham Road is already heavily used and is likely to suffer a large increase in traffic with the building already planned for Otterham Quay Lane. Rainham High Street would also be badly affected by any increase in traffic.

Rosemary & Malcolm Tomlin



Planning Manager - Policy
Physical and Cultural Regeneration Medway Council

Dear Mrs Catherine Smith

18 2 17

Preparation of a new Medway Local Plan

Thank you for your letter of 16 January 2017 inviting my views on this important subject. I speak as one who has lived here for more than forty years, and now aged just over eighty, is disabled with arthritis.

I feel very strongly about several concerns.

In view of the national need for more homes, especially of the affordable kind, I firmly believe that empty properties and brownfield sites should be utilised before good agricultural land or greenfield sites that builders surely prefer, such as the field recently approved on land to the east of Mierscourt Road / South of Oastview (Planning Application MC / 15 / 4539).

I realise that there are insufficient brownfield sites for current needs, but surely this is no reason for not utilising those that do exist. I speak from experience because the property adjacent to my home, 65 William Street in Rainham, has been unoccupied for almost 11 years, during which time its bungalow has become almost derelict and the garden mostly an untidy thicket of ivy and brambles, of trees and bushes old and new, is colonised by foxes.

Question 1. Could not a progressive increase in council tax over the years be used to persuade absentee owners to manage their property effectively and provide housing for local people?

The Planning Services Department was kind enough recently to send me a copy of the approved application MC/15/4539 by Redrow Homes on the greenfield site off Mierscourt Road. The detailed ecological assessment etc. was impressive but I could not see much about the effect of the development on the existing Rainham population apart from references to traffic increase. I am assuming also, that local services such as existing schools, GP surgeries and so on, can cope with increased numbers.

Question 2. Has the impact on such services been assessed for this development?

I know from experience that the provision of access to a local post office can be lamentable. Rainham PO has all of 3 parking spaces plus one for disabled drivers. People I know have various strategies for visiting this particular post office. A friend is dropped off by her husband who drives around until she reappears. A careworker I know visits the adjacent flats and in effect, has private parking. I must drive to Upchurch, but with all the new housing I doubt I could find parking there in future.

Question 3. What provision, if any, is included in the planning application MC/15/4539, a development of 314 homes, and the size of a village, for the inclusion of amenities such as a village shop cum post office, for example?

In fact, application MC/15/45339 directs its new residents to Rainham post office, and to Rainham shopping centre! In the latter we have another parking problem, more so for disabled drivers like myself, with 8 wide parking bays near the shops. As I explained to Mr Mark Johnson - Principal Engineer (Parking) - in his recent survey, competition for disabled bays is fierce to the extent that a while ago, a woman stood in an empty bay so I could not park - but a car in the queue behind took the space instead. Usually I try to visit at unpopular times.

I believe that any new housing development also needs at least some integrated services with adequate parking. Twydall is an ideal example with its post office, shops, health centre and library all with adequate parking easily accessed. Just because provision in Rainham has evolved in piecemeal fashion we could still have greater and more accessible amenities, that make life a little easier for everyone, especially for disabled people trying to maintain their independence.

I also hope very much that the present greenfield housing developments in Rainham and Swale will be the last, especially as I understand that there had been an undertaking not to develop green belt land.

Yours sincerely,

Rosemary Lee



MEDWAY LOCAL PLAN CONSULTATION RESPONSE

In principle Frindsbury Extra Parish Council is committed to the growth and regeneration of Medway which is long overdue. In discussing the four scenarios set out in the executive summary all have merits. We will comment on the individual components.

Duty to Cooperate

We note that in the options it is proposed that there could be development close to neighbouring authorities whilst in the adjoining authorities it appears that housing needs are being met thorough their own plans. We would wish to see that allocations are agreed so that there are no objections from neighbouring authorities which could then lead to a review of housing allocations and delay the preparation/approval of the plan.

Housing

We note that the projected increase in population is 53,728 (19.43%) over the plan period with a requirement to provide 29,463 homes during this period, which suggests an OAN of 1,637 dwellings per annum. Having looked at SHMA November 2015 report we are unable to reconcile the figures as this report would suggest an OAN of 1,281dpa.

It is noted that we have an ageing population and would wish to see attention in the plan to the provision of sites for retirement provision that can be developed in the urban areas with facilities close to hand such as GP surgery, local shopping and public transport, together with the potential for close care facilities for dementia and other debilitating illnesses.

The mix of housing needs to reflect the requirements of the population both now and looking forward. With the regeneration of the urban areas and the increase in employment uses proposed, we will see a different profile of housing requirements which needs to be planned for in advance. The draft plan alludes to the provision of affordable housing which needs to be stipulated in policy by a percentage and tenure.

Employment

The provision of employment land is welcomed as in order to provide a vibrant community, we wish to see significant inward investment into Medway. This will only be achieved by forward planning in attracting business of all sizes to relocate to Medway. Perhaps the forward thinking could be in looking at enterprise zones to attract investment by companies. If we can provide good employment prospects this will assist in improving the quality of the area and create a sustainable plan. Medway City Estate should remain as an employment hub. Moving its businesses onto the Hoo Peninsula will increase traffic considerably on the A228 through the parish and especially at Four Elms roundabout.

Infrastructure

It is noted in the options that additional housing and employment land could be developed, the pressure these additional land allocations will place in particular on the Hoo Peninsula will lead to traffic congestions which is acknowledged at the Four Elms Roundabout. We need to ensure that the current improvements proposed can be forward looking to minimise future disruption that will occur if the Peninsula is developed in the manner proposed in the options. This will affect many people in our parish.

Scale

Frindsbury Extra parish has experienced much development over the last 20 years and the population grew by 21% in the 10 years between the 2001 and 2011 censuses. We wish to preserve the green spaces between the parish and the urban area of Strood North and the other villages and would oppose large developments that would compromise this, for example at Manor Farm or between the A228 and Upnor.

Development should as far as possible be in the urban areas with changes of use of redundant retail space, higher rise developments to increase the number of dwellings and on brownfield sites within the urban areas.

Roxana Brammer
Parish Clerk



Planning Policy Team
Medway Council
Gun Wharf
Chatham ME4 4TR

By email only: futuremedway@medway.gov.uk [REDACTED]

26 May 2017

Dear Ms Smith,

Re: Medway Council Local Plan 2012 -2035 Development Options Consultation

The RSPB is grateful for the opportunity to contribute to the Development Options Consultation as part of the process of preparing the Medway Council Local Plan 2012-2035 ("the Consultation").

Please note that some of our comments concern several points and therefore do not fit within the specific Consultation questions. In addition we do not have comments on all the issues in the Consultation. Therefore we are responding by letter rather than by using the online form. However we have sought to structure our response in a format that is consistent with the way the Consultation is set out in order to make it clear to which parts of the document we are responding. Please note that our consultation response should be read in conjunction with letters sent to Medway Council throughout the consultation period namely letters dated 19 December 2016, 2 February 2017, 16 March 2017 and 5 April 2017. A summary of our response is below, followed by a more detailed analysis in the Annex and an Advice Note by Freeths LLP commissioned by the RSPB.

Summary of RSPB's Response

1. The RSPB notes that each of the development options set out in the Consultation includes development at the Chattenden Woods and Lodge Hill Site of Special Scientific Interest (SSSI), which would constitute one of the largest losses of a nationally protected wildlife site in UK history.

2. The SLAA process claims to screen out all sites of National or International Environmental Designation and as such Lodge Hill as a SSSI should not be considered any further in the Local Plan Process. The Council's own screening process for sites clearly states that SSSIs are excluded from further consideration as development options at Stage 3 of the screening process, but not only allows the Lodge Hill site to proceed beyond this stage but provides no understandable justification for doing so. The allocation of Lodge Hill appears to have been tied up in a process which has been inconsistent and flawed and which has led to an unjustifiable conclusion with regards to the availability of land within Medway. The RSPB considers that as a result of this, the draft Local Plan is

fundamentally flawed because it fails to follow the “avoid-mitigate-compensate” hierarchy that national planning guidance requires for development on nationally protected sites. This is in spite of the Council’s own housing potential figures suggesting that there is already sufficient capacity elsewhere to achieve their allocation figures.

In taking this approach, it wholly disregards the specific advice on this matter given by the previous Local Plan Inspector about the Council’s approach, and replicates the flawed approach that led to her conclusions on the previous SLAA being unsound and ultimately the withdrawal of the previous draft Core Strategy. We consider there to be a serious risk, if the Council continues its current approach, that the Plan will be found unsound again. Fundamentally, the RSPB considers that the scenario of allocating Lodge Hill on the strength of benefits outweighing impacts – socio economic benefits or otherwise – should not arise in the Local Plan Process and certainly not when the Council’s own figures suggest there is sufficient capacity.

3. As Lodge Hill is notified as a SSSI, a Nationally Important Wildlife Site, it should therefore should be granted a higher level of protection. The Strategic Land Availability Process has dismissed potential sites for allocation for development with less environmental or amenity value than Lodge Hill. This has resulted in a flawed assessment which has skewed the results and need for development of the Lodge Hill site.

4. The consultation does not explain to consultees that Lodge Hill is part of a SSSI or the planning legal protection and policy implications of this designation, despite the RSPB requesting that this be addressed prior to the Consultation being launched. This we maintain should have been essential for a fair and proper consultation. We note that (including the Christmas period) 25 days elapsed between our initial request to the Council, based on the draft Plan approved by Cabinet on 20 December 2016 and the start of the Consultation period in which this clarification to the final documentation could have been made. We also note that a number of more significant changes were made (such as the removal of the housing figures from the four consultation options) and therefore time was available for such required changes to be made.

5. The Council’s assertion that the Lodge Hill site can be developed because it is Previously Developed Land (PDL) is of grave concern for two key reasons. Firstly, the site only contains a small proportion of PDL, as confirmed by the previous Local Plan Inspector; indeed, the site is not on Medway Council’s Pilot Brownfield Site Register. To continue to categorise the site as “brownfield” clearly contradicts the evidence. Secondly, even if the site were brownfield, to seek to develop it would again be in direct contravention of the National Planning Policy Framework (NPPF) which clearly outlines that brownfield sites can have high biodiversity value and this point is particularly important for a site that is a SSSI, as was clearly stated by the previous Local Plan Inspector. It appears that this advice is being totally disregarded. Crucially it fails to recognise that the SSSI designation is more important than a brownfield designation.

6. In consequence, we strongly recommend that the Council reconsiders its approach to Lodge Hill, for the sake of achieving a workable Local Plan. We urge the Council to view these comments in the constructive manner that they are intended. We want Medway to have a signed off Local Plan that is in line with national planning guidance, so that work can begin to deliver *“a leading waterfront University city of 330,200 people, noted for its revitalised urban centres, its stunning natural and historic assets and countryside”*.

7. The Local Plan is the place to set out the possibilities for the future. The Chattenden Woods and Lodge Hill SSSI is a stunning natural asset for Medway. We strongly recommend therefore that the Council consider options for its Local Plan that recognise this.

8. We hope that the views of the more than 10,000 people who submitted responses to the Consultation asking for Chattenden Woods and Lodge Hill SSSI not to be developed will be added to the many other concerns set out in this response.

9. We are also deeply concerned by the way in which the Consultation process has been conducted, with vital supporting documentation not being released until many consultees had submitted their responses. It is unacceptable that the consultation process involved piecemeal publication of documents, sometimes months apart with extensions to the consultation process announced on the final day of the original consultation period, and with several contradictory dates being announced. It was fraught with inconsistencies throughout the consultation period. These problems may unfortunately have resulted in consultees not having all the documentation available when reviewing and submitting responses.

Conclusions

In order to address the issues that the RSPB has highlighted, we consider that it is essential for the Council to remove Lodge Hill from its Plan. It should produce a Plan that does not rely on housing development partly destroying a SSSI. The RSPB welcomes the Council's suggestion made at a Consultation Workshop (25 April 2017) that a further revised consultation should take place in 2017 to refine the alternatives available and examine the issues highlighted above by the RSPB and other stakeholders. The RSPB does not want to cause any delay to the Council's plan-making process; however, we believe that many of the points we have identified are so substantial with regard to national planning guidance as to seriously jeopardise the soundness of the Plan as currently presented.

We continue to be keen to meet and work with the Council on all these issues recognising the need to secure a Plan that delivers the development Medway needs whilst securing the effective protection of its important wildlife sites. We look forward to further opportunities to participate in the subsequent stages of the preparation of the plan including the suggestions for a new revised consultation on alternatives. We request that if at all possible you contact us directly once those further stages become available.

Yours sincerely

Steve Gilbert

Conservation Programme Manager,
RSPB SE England Region, [REDACTED]

Annex

The RSPB's detailed comments on the Medway Council Local Plan 2012 -2035 Development options consultation

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1. The RSPB's interests in Medway

The RSPB is a significant landowner and land manager in Medway Council's area. We have nature reserves at Cliffe Pools, Northward Hill, Nor Marsh and Motney Hill (857 ha in total). The northern part of the Council's area is within the boundary of the RSPB's Greater Thames Futurescape, one of our four highest priority places in the UK for the promotion of conservation at a landscape-scale, adopting the principles advocated by the Lawton Report *Making Space for Nature* (2010), which recommended (in simple terms) more, bigger, better, and better joined up protected areas. The Futurescape is working towards delivering these requirements. In addition to direct management of our nature reserves we have an extensive programme of advice provision to farmers and landowners in the area and are engaged in a number of partnership initiatives.

A substantial part of the Council's area is subject to statutory nature conservation designations: the Thames Estuary and Marshes Special Protection Area (SPA) and Ramsar site and the Medway Estuary and Marshes SPA and Ramsar site, the North Downs Woodland Special Area of Conservation, the Medway Estuary Marine Conservation Zone and a number of Sites of Special Scientific Interest, including the large (351 ha) Chattenden Woods and Lodge Hill SSSI, which is notified for supporting a nationally important population of the red-listed nightingale, along with rare grasslands (discussed in more detail below). The RSPB regards our work on securing protection for and enhancement of the Thames Estuary and Marshes SPA and Medway Estuary and Marshes SPA and their underpinning SSSIs, along with the protection of the Chattenden Woods and Lodge Hill SSSI, as being among the highest priorities for our work nationally.

2. Vision and Strategic Objectives

The RSPB welcomes and supports the Vision set out on page 15 of the Consultation: *By 2035 Medway will be a leading waterfront University city of 330,200 people, noted for its revitalised urban centres, its stunning natural and historic assets and countryside.* We are delighted to see the Council's recognition of its stunning natural assets; we believe that Medway is enhanced by them, and that there is much to be gained for the people of Medway and beyond by further celebrating and enhancing them.

We support this commitment to integrate the future development of Medway with respect for its character, functions and quality of the natural and historic environments (Box, page 15). However, we consider the Council's clear determination in the Consultation to support development on the Chattenden Woods and Lodge Hill SSSI fundamentally undermines and is wholly incompatible with this Vision. If Lodge Hill was developed it would be one of the largest single losses of a SSSI in UK history.

We broadly support the Strategic Objectives set out in para. 2.39 (page 17).

3. Delivering Sustainable Development Options

This section references research into the need over the Plan period for the provision of homes, office space, industrial and warehousing space and retail space. There is a lack of clarity and there are inconsistencies in the Development Options Document and the SLAA which have resulted in a presentation of Development Options which all include Lodge Hill. It goes on to review the Residential Development Pipeline and to present four possible scenarios for future development. The RSPB has major concerns about the way in which this has been approached, which we believe is wholly incompatible with the NPPF, with the guidance from the previous Local Plan Inspector, and with the principle of sustainable development with regard to development on nationally protected SSSIs.

These concerns fall into several related categories:

3.1 Flawed approach to assessment of land which has resulted in Lodge Hill being included within the Development Options

3.2 The Residential Development Pipeline's Lack of clarity about housing numbers

3.3 Lack of transparency about sites being considered

3.4 Failure to consider alternatives

3.5 Failure to justify departure from the National Planning Policy Framework (NPPF) with regard to avoiding damage to a SSSI and with regard to Previously Developed Land (PDL)

3.6 And added to the point above, an opaque presentation in the Consultation of the legal and planning status of the proposed development site at Lodge Hill

We will deal with each of these concerns sequentially.

3.1. Flawed approach to assessment of land which has resulted in Lodge Hill being included within the Development Options

3.1.1 The methodology for assessment of potential sites for housing and other developments is set out on page 9 of the SLAA. The Council has used a sequential approach, screening potential sites against a series of criteria to eliminate those which are inappropriate for development. At Stage 3 of the screening sites are removed for the following reasons (emphasis added):

"Environmental Designations (**SSSI**, SACs, SPAs, Ramsars, AONB & Ancient Woodland), Flood Risk Unresolvable sites, Heritage designations".

This is consistent with NPPF.

3.1.2 Appendix 4, page 45 of the SLAA lists those sites with environmental designations screened out at Stage 3. However, despite forming part of the Chattenden Woods and Lodge Hill SSSI, the Lodge Hill site was not screened out at this stage but was allowed to proceed to Stage 4. No explanation is given for this failure to adhere to the stated screening process, or the clear divergence

from NPPF policy. The RSPB considers that this is a wholly inconsistent and inappropriate application of the screening criteria.

Under the NPPF, Medway is obliged to consider alternative land allocation strategies, and there is a hierarchy of categories of land, as Medway is aware, that should be considered before nationally protected sites. This has not happened. It may also require considering the cumulative approach of allocating several sites to overcome issues of poor access to services, facilities and transport. However these alternatives would enable the protection of a nationally important habitat site.

The RSPB has instructed Freeths LLP, an independent planning consultant, to undertake work to review potential alternative sites, and the detail of that advice is appended to this letter (Appendix 5).

We believe that these sites identify potentially alternative land allocation strategies. However, if after consideration of these sites it is still not possible to meet objectively assessed need than the potential for shortfall to be met elsewhere in the housing market area should be considered.

As a last resort, once alternative sites are reviewed and housing need can still not be satisfied then it is open to Medway to take forward a Local Plan that does not meet objectively assessed need, providing it is well justified with reference to the constraints on land allocation within its administrative area.

The RSPB does not consider that there is any scenario whereby the allocation of Lodge Hill, as a SSSI, is justifiable in the context of delivering the Objectively Assessed Needs (OAN) for Medway.

For clarity, the RSPB is not saying that Medway could not deliver the housing within their boundary, as Freeths LLP have clearly identified scenarios as to how this is possible (Appendix 5). But even if this were not the situation we also recognise there is not a situation whereby the allocation of Lodge Hill is necessary or acceptable. The key points which substantiate this approach are provided in advice note by Freeths LLP.

3.1.3 At no point is it acknowledged in either the Development Options Report or the SLAA that Lodge Hill is part of a SSSI, notified, *inter alia*, for its nationally important population of breeding nightingales, except insofar as it is shown as a SSSI on a map in Appendix 1A of the former document, although even here it is not labelled as Chattenden Woods and Lodge Hill SSSI. The SSSI designation is noted just twice in the Interim Sustainability Appraisal Report (March 2017), and this was released eight weeks after the beginning of the Consultation. Furthermore, the SLAA fails to acknowledge anywhere in the text that Lodge Hill is a SSSI. On the Environmental and Green Belt Designations in Medway map (page 71, Section 7 Natural Environment and Green Belt) the SSSI is included but is presented in the same grey tone as urban areas, with the result that Lodge Hill's status as part of a statutorily notified site runs a serious risk of appearing to be concealed from consultees. This is despite the RSPB, having seen a draft of the Consultation in December 2016, sending a letter to the Council on 19 December 2016 requesting that the SSSI status of Lodge Hill be made clear in the final Consultation document.

3.1.4 At Stage 4 (Suitability, Availability & Development Potential and Capacity) the site (described as *Lodge Hill (Chattenden) Ministry of Defence Estate*) is rated as red for Suitability, subject to a footnote stating "Lodge Hill not included as suitable pending the outcome of the Public Inquiry

scheduled for 2018". The RSPB considers that this approach is inappropriate in a plan-making context and predicates the suitability or otherwise of the site for development upon incorrect criteria, whereas the criteria for Stage 3 screening should have removed the site from further consideration at that stage as other SSSI sites were.

The SLAA does not provide a consistent approach and in our view is not in compliance with the requirements of the NPPF and therefore as a robust basis for the emerging Local Plan its soundness should be questioned. We strongly urge Medway Council to revise its approach to its development strategy to ensure it complies with those NPPF requirements

3.2 The Residential Development Pipeline's Lack of clarity about housing numbers

3.2.1 It is noted that, as a result of the research undertaken for the North Kent Strategic Housing and Economic Needs Assessment (jointly commissioned by Medway Council and Gravesham Borough Council) a need for 29,463 dwellings has been identified over the plan period (2012-2035) (Section 3 para.3.1). The policy approach for housing set out in page 29 of the Development Options Consultation is to meet the need identified in the North Kent Strategic Housing and Economic Needs Assessment (SHENA) with the delivery of 29,463 homes over the plan period.

3.2.2 However, it is vital, given that almost 20% of the Plan period (2012-2035) has already elapsed, that consultees are clear how many dwellings have already been delivered and how many still need to be allocated to meet this target. Further, it is not made clear in the Development Options Report whether the dwellings attributable to sites with planning permission (6,251), Medway Local Plan 2003 allocations (356) and windfalls in years 3-5 (606), a total of 7,213, are already accounted for. We asked for clarification of this by letter on 1 February 2017 and again by email on 22 March, but as yet have only received a confirmation informally from one of the Council's Planning Officers (Catherine Smith pers comm. 8 March 2017) that this is indeed the case. On that basis the remaining need is of the order of **20,070** dwellings, 68% of the overall total (meaning that about 32% of the target is already accounted for). This difference significantly influences the present Consultation and people's response to where they think that should be - are consultees to understand that the Council is looking to allocate enough land for almost 30,000 houses or much nearer 20,000? We believe this lack of clarity has compromised the ability for people to respond with any surety.

3.2.3 From the information currently provided it is not possible to relate the delivery and pipeline figures to one another. The details provided should be clearly referenced and the source of dwellings easily identifiable. We welcome suggestions at a recent Workshop hosted by Medway Council (25 April 2017) that a revised consultation would take place where more detail would be provided on housing numbers and we look forward to taking part in that consultation later this year.

3.3 Lack of transparency about sites being considered

3.3.1 The RSPB recognises that the development options paper is not at such a significant stage of advancement that specific sites are being assessed for development. However in identifying the broad areas for development the Development Options document is extremely vague about land

which is being considered. For clarity and certainty we strongly recommend that a clearer picture of potential major housing allocation is required at this stage.

3.3.2 The Appendices to the Cabinet paper *Medway Local Plan* dated 20 December 2016 included a narrative description for each of the four development scenarios, giving an indication of the number of dwellings that might be delivered at several distinct locations. For reasons that are unclear the narrative sections of the Appendices were not included in the Regulation 18 consultation report, although this information is contained in the Interim Sustainability Appraisal Report, which was released eight weeks after the beginning of the consultation period, and one week after the original consultation deadline.

3.3.3 By identifying in more detail the areas which are being considered for growth and the quantity of dwellings which are being proposed, future consultation on the development options will be more meaningful and allow parties to fully consider the impacts of each development strategy and alternatives.

3.4. Failure to consider alternatives

3.4.1 The Consultation sets out, in paragraphs 3.21 – 3.43 and in Appendices 1B – 1E, four different scenarios for delivering housing and other built infrastructure during the plan period. All of these scenarios include housing and other development at Lodge Hill, which means that the delivery of housing at Lodge Hill is presented as integral to the whole plan. There is no consideration by the Council of an option that does not involve the development of Lodge Hill. The RSPB regards this as indicative of how determined the Council is to see Lodge Hill developed, irrespective of National Policy and the actual need for development at this location. The four scenarios are presented in the document (and the public invited to vote) on the basis that they are “alternative” scenarios, the implication clearly being that all four – independently – could meet the identified housing need. We sought clarification of this, as it is critical (in the absence of absolute housing numbers) for consultees, who were asked to vote for their favourite scenario, to be sure that these were mutually exclusive plans. However, we did not gain formal confirmation that this was the case.

3.4.2 The interim Sustainability Appraisal report gives a narrative description of the four development scenarios giving an indication of the number of dwellings that might be delivered at several distinct locations. Reference to these figures gives some indication of the potential new housing capacities of different areas of Medway for delivering the necessary housing without recourse to development at sites carrying environmental designations. Given that the public have been invited to vote on these as realistic options, our comments are on the basis that they are achievable.

The locations, and the number of dwellings Medway Council suggests they could accommodate, are as follows:

Table 1.

Redevelopment of Medway City Estate and Chatham Docks (identified in Scenario 1)	Up to 5,000 homes (note that the SA suggests that even higher densities could
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	allow for 8,000 homes)
Development at higher density in central and waterfront sites in Chatham and Strood, land assembly to achieve further development land in centres, mixed use scheme at Mill Hill, and estate renewal (identified in Scenario 1)	5,500 homes
Suburban development around Rainham, Capstone and Strood (identified in Scenario 2)	10,700 homes
Rural town based around Hoo St Werburgh (identified in Scenario 3)	6,500 homes
Medway valley (identified in Scenario 3)	180 homes
Expanded villages – Cliffe, Cliffe Woods, High Halstow, Lower Stoke, Allhalows, Grain (identified in Scenario 4)	2,600 homes
Total <u>excluding</u> Lodge Hill	30,480 – 33,480

3.4.3 Notwithstanding the lack of absolute clarity about the actual number of new dwellings required during the remainder of the plan period (2017 - 2035) (see Section 3.2 above), nor to oversimplify the balance of sites required to achieve sustainable development, and given that we believe the number of dwellings required to be in the order of 20,070, it appears from the Council's own figures that there are easily sufficient potential sites to deliver the required level of housing provision without the allocation of housing at the Chattenden Woods and Lodge Hill SSSI. In any event, the totals proposed by the scenarios exceed the total required for the entire plan period, take no account of potential windfall development during that period nor housing already constructed, received permission etc.

3.4.4 Fundamentally, as identified, in Section 3.1 above, we do not consider that Lodge Hill should be allocated at all, regardless of the status of the planning application on this land. If this site does get planning permission at the Public Inquiry there is likely to be a considerable amount of mitigation and compensation which means that it is unlikely to be delivered in this plan period. Even if any housing were to be delivered, it could be considered as windfall.

3.4.5 There is an imperative on Medway Council, under the NPPF, to establish if there is an alternative to allocating a SSSI for development (the "avoid-mitigate-compensate" hierarchy). As it stands, the Local Plan sets out a commitment to develop it without even attempting to establish if there is an alternative. There is a lack of clarity with regards to dwellings required across the plan period, the lack of transparency with regards to sites being considered and the flawed approach to assessment of land results in the presentation of four development options all of which include Lodge Hill. This leads consultees into considering that there are no alternatives for delivery except for allocating Lodge Hill.

3.4.6 As mentioned above the RSPB instructed Freeths LLP to consider alternative land development options, and their advice is set out in Appendix 5 (attached below). This work shows development areas which are available to meet housing requirements and identifies that there is not a need for Lodge Hill to be part of every scenario.

3.4.7 Even if there were no alternatives it is incumbent on Medway Council to fully pursue a housing requirement that is less than the objectively assessed need figure. A number of local authorities nationwide have done this successfully where there are significant constraints on land allocation within their administrative area and in so doing the duty to cooperate must also be fully explored, ie the potential for any shortfall against objectively assessed need in Medway to be provided within another local authority area within the housing market area.

3.4.8 The RSPB welcomes Medway's suggestion for a revised alternatives consultation that aims to address these issues as discussed at the Workshop hosted by Medway Council on 25 April 2017.

3.5 Failure to justify departure from the NPPF with regard to avoiding damage to a SSSI and with regard to Previously Developed Land (PDL)

3.5.1 The NPPF states, at paragraph 118:

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

This was confirmed by the Inspector of the Medway submission Draft Core Strategy (2006-2028) who advised the Council in her letter dated 21 June 2013 that:

"Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued"

She continued:

"The policies in the Framework do not impose an absolute prohibition on development on a SSSI, but it is generally accepted by all parties at the hearing that the Framework requires an avoid – mitigate – compensate approach."

3.5.2 It is beyond doubt that a major housing development at Lodge Hill would have a profoundly negative impact on the integrity of the Chattenden Woods and Lodge Hill SSSI and the population of breeding nightingales for which it is, *inter alia*, notified. As the Inspector said:

"In my view this scale of impact constitutes a significant adverse impact. It is therefore necessary, as the first step, to consider whether it can be avoided"

Given that it can be demonstrated that Medway's housing needs are capable of being met without recourse to development at Lodge Hill, it is not possible to justify a conclusion that such development would "*clearly outweigh [both] the impacts that it is likely to have on the features of the site...*" as set out by the Inspector. The Consultation report fails to justify, or indeed to make any attempt to justify, an allocation that would lead to a substantive departure from the terms of the NPPF.

The Inspector, in her comment on the previous draft Plan, concluded:

"The Council's conviction that its aspirations for Medway can only be met through the promotion of a large scale development in a single location means that it has paid little attention to what are referred to as "lesser options"."

The RSPB is concerned that this conviction is still evident in the Council's latest consultation document.

3.5.3 The Council's assertion that the Lodge Hill site can be developed because it is Previously Developed Land is of grave concern for two key reasons. Firstly, the site contains only a small proportion of Previously Developed Land, as confirmed by the previous Local Plan Inspector; indeed it is not on Medway Council's Pilot Brownfield Site Register (July 2016). To continue to categorise the site as "brownfield" clearly contradicts the evidence.

Secondly, even if the site were brownfield, to seek to develop it would again be in direct contravention of national planning guidance for a site that is a SSSI, as was clearly stated by the previous Local Plan Inspector. To quote:

*"One of the main reasons why the Lodge Hill proposal is supported by the Council relates to its view that a significant proportion of the Site can be classed as previously developed land. Various estimates of the amount of the site that can be classified as previously developed land were put to me in evidence, ranging from 15% (RSPB) to 53% (verbal evidence of CBRE for Land Securities). On my site visit I saw that there is a scatter of permanent structures on the site and some fixed surface infrastructure such as metalled roads and the hard surfacing associated with the former barracks. I am, of course, aware that much of the site has been used for military training purposes, and has yet to be cleared of unexploded ordnance but those factors, by themselves, do not meet the Framework's definition of previously developed land. From what I saw, I formed the view that the proportion of the site that could be described as previously developed land is more likely to be towards the lower end of the range set out above. In any event, paragraph 111 of the Framework encourages the reuse of previously developed land provided it is not of high environmental value. **Whatever the proportion of the site that is previously developed, the fact that it has been designated as a SSSI and is therefore of high environmental value means that its development does not benefit from any particular support from the Framework in this respect.**"* (Emphasis added).

It appears that this advice is being totally disregarded. The NPPF clearly states that brownfield sites can have high biodiversity value which should be taken into account. Crucially the draft Plan, including the SA, fails to recognise that the SSSI designation is more important than a brownfield designation.

3.6 An opaque presentation in the Consultation of the legal and planning status of the proposed development site at Lodge Hill

3.6.1 The Development Options Consultation, in each of the four scenarios for development, proposes major development on a site notified at national level for its biodiversity interest. It is therefore remarkable that the Consultation fails almost entirely to draw attention to the legal status of the site and the need, in accordance with national planning guidance, to justify with great rigour the purported need to allocate damaging development there as mentioned in Section 3.1.3. There is not a single written acknowledgment in the Development Options Consultation document or the SLAA that Lodge Hill is part of a SSSI, apart from the area of land being shown as such (although not named) in a single map in Appendix 1A. The closest the document comes to alluding to this status is in para. 3.39 where it is stated:

“However the planning status of land at Lodge Hill is uncertain, and dependent upon the outcome of a Public Inquiry scheduled for Spring 2018.”

3.6.2 We note that the statutory designation is mentioned just twice in the Interim Sustainability Report, in paragraphs 4.16 and 4.25.

3.6.3 We feel that this is deeply and worryingly misleading for the public and other stakeholders taking part in the Consultation, and fails to support them in understanding the implications of national policy that needs to underpin their comments and the final Plan. The piecemeal distribution of documents across the consultation period and extensions as outlined in Section 12 below also contributes to this problem.

4. Section 4 Housing

The RSPB does not wish to make any comments on this section.

5. Section 5 Employment

The RSPB does not have a strong view on the allocation of new employment development within the areas identified in the scenarios set out in the Consultation, subject to any such developments respecting environmental sensitivities, in particular the network of nature conservation designations within the Council’s boundaries.

Redevelopment of industrial sites at Kingsnorth and Grain should have regard to the potential to have impacts on coastal areas of national, European and international importance to wildlife, issues that will normally need to be addressed in environmental assessments supporting planning applications. We note and welcome the reference in para. 5.31 to the RSPB reserves on the Hoo Peninsula at High Halstow and Cliffe and recommend the retention of a policy to avoid development that would prejudice the wildlife and amenity value of the area identified in the 2003 Local Plan as the Cliffe Conservation Park (please see our further comments below in Section 7 Natural Environment and Green Belt).

In view of the uncertainty surrounding the status of Lodge Hill, as set out above under Section 2 Delivering Sustainable Development, we strongly advise against any reliance on this site to deliver significant employment provision.

6. Section 6 Retail and Town Centres

The RSPB does not wish to make any comments on this section.

7. Section 7 Natural Environment and Green Belt

7.1 The RSPB supports the overall approach taken in this section to the protection of the natural heritage of Medway. In particular we welcome the recognition in Paragraph 7.2 of the national and international wildlife designations that apply to about one third of the land area of Medway, and the reference to the protection of their special characteristics set out in paragraph 7.4.

However, as highlighted in our responses to Sections 2 and 3 above, we believe that this commitment is seriously prejudiced by the approach advocated elsewhere in the Consultation to development at Lodge Hill.

7.2 The RSPB is actively engaged in the development and implementation of the Strategic Access Management and Monitoring Strategy (SAMMS) for the Thames, Medway and Swale (being a member of both the Steering Group and the Project Board), and we strongly support the Council's intention, set out in paragraph 7.9, to include in the new Local Plan a policy relating to SAMMS seeking to *avoid damage to the protected characteristics of the Thames, Medway and Swale SPA and Ramsar sites*. The delayed publication of a Habitats Regulation Assessment (HRA) to accompany the Consultation will have inhibited the ability of consultees to reach an informed understanding of the implications of the draft Plan's proposals for those sites.

7.3 We support the approach to Medway's green infrastructure network, set out in paragraphs 7.11 – 7.15 and in the box *Policy Approach: Securing strong Green Infrastructure* and look forward to continuing to work closely with the Council on delivering the benefits deriving from a robust and extensive network of "green" spaces, including the RSPB's own landholdings at and adjoining Northward Hill and Cliffe Pools.

8. Section 8 Built Environment, Section 9 Health and Communities, Section 10 Infrastructure

The RSPB does not wish to make any comments on these sections.

9. Section 11 Sustainable Transport

The RSPB recognises the economic importance of the Thames and Medway rivers as constituent parts of the transport infrastructure of the South East, including the capital city. Linked to this we

support the statement in the box *Policy Approach: Transport and the River Medway* to the effect that *Measures to protect the river as a valuable resource for wildlife and biodiversity*, including wildlife corridors and habitat enhancement, will be supported. We welcome the recognition in paragraph 11.14 of the international importance of the extensive intertidal habitats (mud and sand flats, as well as saltmarsh) and the need for opportunities for new habitat creation to be identified.

10. Sustainability Appraisal

10. 1. The Sustainability Appraisal (SA) was released by the Council on 14 March 2017, eight weeks after the Consultation opened.

10.2 The RSPB had expected that the SA might contain an explanation of the way in which the avoid-mitigate-compensate hierarchy had been applied in relation to the Chattenden Woods and Lodge Hill SSSI. However, the document instead appears to justify the anomalous treatment of this site purely on the basis that it claims that it is Previously Developed Land (section 4.15 and 4.16).

The SA states, in section 4.15: *“In considering further land that may be suitable to allocate for development in the new Local Plan, priority has been given to the use of brownfield land. This is consistent with national planning policy that seeks to make the best use of previously developed land. The council reviewed potential sites in its Brownfield Land Register, development briefs, planning records and sites submitted through the SLAA process. The review of previously developed land provided an indication of potential development capacity and mix.”*

Section 4.16 states: *“The council has considered the inclusion of land designated as a SSSI at Lodge Hill in this context”.*

We refer to the comments made by the Inspector at the examination into the earlier version of the Local Plan, quoted above in section 3.

10.3 The RSPB is also very concerned by the arguments in Section 4.29 concerning alternatives to development at Lodge Hill. Reference is made to a number of potentially negative outcomes in the absence of development at Lodge Hill (namely “unacceptable pressures on the environment, local infrastructure and services”, “decrease in the number of homes and employment land in Medway over the Plan period” and “following the Duty to Cooperate [a need to] make requests to neighbouring areas to meet unmet housing need outside of the borough boundary”). However no explanation is put forward as to why development at locations other than Lodge Hill (ie the application of “avoid” in the avoid-mitigate-compensate hierarchy) would make such outcomes more likely.

10.4. As set out in our response to Section 3 of the Consultation (above) the Council’s own housing figures indicate that the required number of dwellings can be provided during the Plan period without recourse to development in a SSSI. The determination in due course by the Secretary of State of a particular planning application should not be a reason for seeking to abandon required consideration within the Local Plan process.

11. Evidence Base to support the Soundness of the Plan

11.1. Paragraph 182 of the NPPF covers the examination of Local Plans. For ease of reference we set it out below:

182. The Local Plan will be examined by an independent inspector whose role is to assess whether the Plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is “sound” – namely that it is:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure; requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

The RSPB is concerned that the current draft Plan fails to comply with a number of these requirements. While the following points reiterate some of those made earlier in the document, we repeat them here in the context of the soundness tests.

11.2. Procedural requirements: As set out above we are profoundly concerned that there have been and are significant deficiencies in the draft Plan’s procedural requirements especially concerning the availability of information and the consultation process. As you are aware any Inspector at the future examination of the Plan could decide that the preparation of the Plan has been procedurally deficient and such deficiencies cannot be rectified at that stage, and as with a failure to comply with the Duty to Cooperate, the Inspector would have no option but to reject the Plan. We are keen to ensure that the Council avoids this outcome.

11.3. Positively prepared: The RSPB notes the continued reliance on the Lodge Hill site to deliver housing, despite the clear statements from the Inspector of the Core Strategy that it should not be relied upon.

We also note that the Consultation has failed to highlight the environmental value of Lodge Hill for the benefit of the public, whilst stating that it has excluded sites from consideration for development due to their environmental sensitivity. We question how a document which takes such an approach can be considered to be positively prepared.

11.4. Justified: The RSPB has highlighted, as we did at the previous Core Strategy examination, that based on the Council’s own figures Lodge Hill is not required to meet the Council’s housing needs. The Council has presented four alternative approaches to development within Medway which are capable of meeting Medway’s housing need without Lodge Hill if they are amalgamated. Please see the attached Advice Note from Freeths LLP for a more detailed outline of this issue (Appendix 5).

The Council provides no evidence that the sites it has presented within the options are not available or suitable. Consequently, a strategy that will lead to the destruction of a significant proportion of a SSSI when other options are available cannot be considered to be the most appropriate.

11.5. Effective: At present the delivery of housing at the Lodge Hill site is not certain and therefore for the Council to rely upon the inclusion of Lodge Hill within the Plan in order to reach its objectively assessed need would seem unwise as a significant housing shortfall could result and would require an urgent review of an almost new Plan in order to address this problem. By including alternative scenarios without Lodge Hill the Council could ensure its Plan is effective and deliverable over its period.

11.6. Consistent with national policy: Paragraph 111 of the NPPF states that development on brownfield land should be encouraged “provided that it is not of high environmental value”. Lodge Hill is notified as a SSSI, a clear public statement of its high environmental value. This acknowledgment of high environmental value should be enough to exclude Lodge Hill, without needing to move on to consider national policy on development on SSSIs, set out in paragraph 118.

Paragraph 117 requires authorities to “identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity”. The RSPB considers that implicit in the requirement in paragraph 117 is the clear expectation that the sites are capable of being clearly identified by readers of the documents and that maps clearly show the various designated sites. As highlighted above, and in our letter to the Council of 19 December 2016, we do not consider that the Council has achieved this in relation to the Chattenden Woods and Lodge Hill SSSI.

12. The Consultation Process

We are deeply concerned by the way in which the consultation process has been conducted to date, with vital supporting documentation being released in a piecemeal fashion. Best practice would have involved the simultaneous release at the start of the consultation period of the Development Options Report, the Strategic Land Availability Assessment (SLAA), the Sustainability Appraisal (SA), and the Habitats Regulations Assessment (HRA). This did not occur, with the result that consultees have been submitted responses in the absence of the full evidence base. However we welcome suggestions made at the SA Workshop hosted by Medway Council (25 April 2017) to address some of these issues with a focused revised consultation to take place this year.

We have set out below a summary of the manner in which the consultation has occurred with, where appropriate, the RSPB’s response at each stage.

Table 2

Date	Consultation Event
17 December 2016	Having seen in advance the Medway Cabinet paper (in effect the draft Plan) on 17 December 2016, the RSPB wrote to Medway on 19 December 2016 to request that the SSSI status of Lodge Hill be properly highlighted.
6 January 2017	Consultation opened, with the publication of the Development options

	report, and a consultation closing date of 6 March 2017 . No SLAA, SA or HRA were released.
32 January 2017	SLAA published, briefly withdrawn and republished on 27 January 2017
1 February 2017	Letter sent to Medway requesting clarification on a number of points, principally interpretation of housing numbers
8 February 2017	Environmental Stakeholders Workshop attended by RSPB. Questions for clarification were raised verbally with Medway Planning Officer Catherine Smith after the workshop
20 February 2017	SLAA briefly withdrawn and republished (one potential allocation removed)
6 March 2017	Consultation deadline extended until 27 March 2017 . A different and incorrect closing date, 17 March 2017, was posted in a video on Medway's consultation web site.
14 March 2017	Interim SA report published. Deadline extended to 18 April 2017
16 March 2017	Letter from the RSPB sent to Medway seeking clarification on lack of HRA and date of publication of the HRA and other matters
21 March 2017	The RSPB met with Medway Planning Officer Catherine Smith and she gave verbal replies to the questions posed in the RSPB's letter of 2 February
22 March 2017	Email sent to Medway requesting written response to the RSPB's letter of 1 February
5 April 2017	Letter sent to Medway setting out legal requirements for the Plan consultation, requesting clarification on publication of HRA and further extension of consultation period. Acknowledged receipt by email on the same day.
18 April 2017	Publication of the HRA on Medway Council website and extension of the Consultation deadline until 30 May 2017
25 April 2017	SA Workshop where issues were raised and suggestions of a Revised Consultation to focus on alternatives was agreed in order to address some of the issues raised in this consultation response.

As of 23 May 2017 there has been no written response to the RSPB's letters of 1 February and 5 April 2017.

The RSPB's letters dated 19 December 2016, 1 February 2017, 16 March 2017 and 5 April 2017 are appended to this response.

13 . The Habitats Regulation Assessment (HRA) of the Spatial Development Plans

13.1. The RSPB is concerned that the HRA does not go beyond the screening stage, although it does identify further work is needed in assessing potential sites. To identify the preferred development strategy that ensures that adverse impacts on the integrity of the European sites are avoided and mitigation measures put in place, there should be a clearer statement of the implications and risks for the delivery of the Plan of this further work.

13.2 The RSPB would expect an assessment at this stage to be able to give an indication whether any of the various options would have greater challenges to overcome. It would be helpful for consultation purposes to demonstrate which option might be more difficult to deliver or have greater risks associated with it. The HRA states that the potential impact of development on supporting habitats is not fully understood at this stage and further work will be required in assessing potential development locations but we would like to see greater clarity by this stage, even if it is only to quantify the proportion of sites and houses that might be affected by this uncertainty.

13.3 Section 3.9 outlines a 200m buffer distance from protected areas but gives no reason for this choice of buffer which seems arbitrary and does not follow a precautionary approach. We would recommend that the choice of buffer clearly reflects the ecological sensitivities of the site – and that buffers might vary according to the type of development and possible pressure that is being considered.

13.3 Section 3.10 outlines the lack of European Designated Species at Lodge Hill SSSI; for avoidance of doubt this should not be the basis for considering a SSSI for development.

13.4 It is stated that a likely significant effect cannot be ruled out from residential developments within six kilometres of the coastal designated sites and from larger residential developments further away. It would be helpful to see this buffer mapped out within the HRA. It would also be helpful for the Council to consider whether this is likely to have any implications for the delivery of the various plan options. This six kilometres is again referred to when discussing Natural England's advice that large developments beyond the 6km zone could also cause impacts and that these will be considered on a case-by-case basis. Clarity about whether this includes Lodge Hill or not would be useful. Fundamentally the case-by-case approach necessitates an appraisal of the feasibility of the Plan. Given the scale of various proposed large developments within we would expect the Council to map this six kilometres and provide insight into whether this affects the different options, their risks and deliverability.

13.5 While the HRA is not giving clear evidence on the suitability of individual sites for development it is also clearly not ruling any sites out at this stage, this implies that we must consider not just the 4 options but others too. This should form part of the suggested new revised consultation outlined at the Medway Workshop 25 April 2017 and we welcome more detail about these options and others that may also exist.

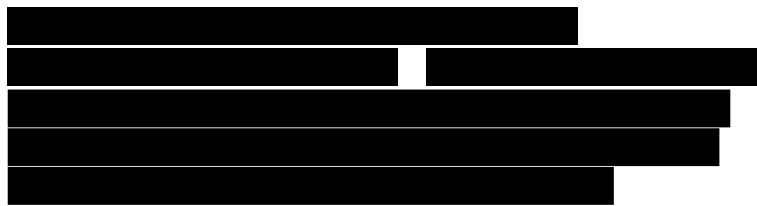
13.6 We are concerned that some of the risks outlined within the HRA regarding water supply and sensitivity may risk impacting designated sites and also affecting the delivery of the housing and therefore the soundness of the Plan. While the Swale draft Local Plan concluded that the plans would not have a likely adverse impact on the SPAs through reduced water levels and quality, Medway Council should check the assumptions made within that assessment before relying on it, particularly in case there are any which relate to Medway's levels of water usage.

Appendix 1

Letter from RSPB to Medway Council dated 19 December 2016



Planning Policy
Regeneration Community @ Culture
Medway Council
Civic Headquarters
Gun Dock Wharf
Dock Road
Chatham ME4 4TR



Dear Sirs and Madams

19 December 2016

Medway Local Plan and Chattenden Woods and Lodge Hill Site of Special Scientific Interest (SSSI)

The RSPB welcomes the forthcoming consultation on the Development Options, the next stage of the formal process of preparing a new Local Plan for Medway. The RSPB took part in the first stage of the preparation of Medway's new Local Plan for the period 2012-2035, the Issues and Options Consultation ("the Consultation"). Whilst we appreciate that at this stage in the plan making process there are no fully formulated proposals we are concerned about the treatment of Chattenden Woods and Lodge Hill SSSI within the draft Medway Local Plan 'Development Options' documentation that you are being asked to approve at Cabinet tomorrow for public consultation starting in January 2017.

The RSPB has read the draft document that you will consider and is concerned that there is a lack of reference to the Lodge Hill SSSI designation or the reasons for the public inquiry for the housing application on this site, which is due in March 2018. We consider that these facts should not be omitted as they help the public in understanding this document and being able to respond effectively. In addition, the map of Medway's protected areas on page 61 of the document shows

the SSSIs in Medway in *grey*, which makes them particularly hard to spot. We urge that this colour is changed before the document goes out to consultation to make it easier to identify them in the map.

As you are aware the principal objective of the RSPB is the conservation of wild birds and their habitats. The RSPB therefore attaches great importance to all international, EU and national law, policy and guidance that assist in the attainment of this objective and plays an active role in the domestic processes by which development plans and proposals are scrutinised and considered. Prior to public consultation beginning in January 2017 Medway Council will have the opportunity to include information on the SSSI and reasons behind the public inquiry for this site and we urge the Council to do so. Should they not, the RSPB reserves the right to draw attention to these omissions in any future response to the consultation and in our correspondence with the Planning Inspectorate.

We hope that it is useful to the Council to raise this matter in this way now.

Kind regards

Steve Gilbert

Conservation Programme Manager

A solid black rectangular box used to redact the signature of Steve Gilbert.

Appendix 2

Letter from RSPB to Medway Council dated 1 February 2017



Planning Policy
Regeneration Community @ Culture
Medway Council
Civic Headquarters
Gun Dock Wharf
Dock Road
Chatham ME4 4TR



Dear Ms Smith

01 Feb 2016

Request for information from Medway Council with respect to Medway Local Plan Development Options consultation

The RSPB welcomes the consultation on the Local Plan Development Options, the next stage of the formal process of preparing a new Local Plan for Medway. The RSPB took part in the first stage of the preparation of Medway's new Local Plan for the period 2012-2035, the Issues and Options Consultation ("the Consultation"). Whilst we appreciate that at this stage in the plan making process there are no fully formulated proposals we are concerned about the lack of clarity within the consultation documentation surrounding the housing figures.

In order to inform our response to the Local Plan Development Options consultation, the RSPB would welcome Medway Council's written confirmation regarding certain information that is unclear within the Council's documentation.

It is clear that the housing allocation Medway Council is endeavouring to fulfil for 2012-2035 is 29,463 extra housing units. The untitled table 3.7 in the Development Options consultation shows the following figures, with text that says this provides an *"overview of the current supply of development land, and the need to identify further sites to meet Medway's growth needs over the plan period"*

- Completions 2012-2016 2180
- Sites with planning permission 6251
- Medway Local Plan 2003 Allocations 356

• SLAA* Pipeline sites	8813
• Windfalls (Years 3-5 only)	606
• Total	18,206

Questions arising from table 3.7 Development Options

- 1) Does the total of sites completed (2,180) mean that the number of new housing units required in 2017-2035 is actually 29,463 minus 2,180, ie 28,283?
- 2) Are the figures shown for Sites with Planning Permission, Local Plan 2003 Allocations and Windfalls (Years 3-5) already accounted for, so that the Council needs to find extra land in its Local Plan to accommodate 20,070 units (ie 29,463 minus 2,180 minus 6,251 minus 356 minus 606)?
- 3) It is possible that you also intend to allocate a windfall total for Years 6 to plan end, which will also form part of the total. Is this correct, and if so do you have an idea of the number?
- 4) The RSPB notes that the SLAA Pipeline figure shown in this table does not correspond with the total identified in the January 2017 SLAA, ie 6,139, not 8,813, a difference of 2,674 (9% of the total number of housing units required by 2035) . Which is the correct figure?
- 5) We have been unable to identify the source of the 8,813 figure, as it does not correspond to either the current (2017) or previous version of the SLAA. Could the Council explain the origin of that figure?
- 6) The Council has clearly presented the four scenarios for development as 'alternatives' (section 3.19). Can the Council confirm that it has calculated that the housing target can be met in each of those scenarios in their own right?
- 7) In order to make sense of the four scenarios being presented, it is imperative to have some sense of the housing numbers per 'geographical area' that are being proposed in each scenario. The draft Development Options paper, signed off by Medway's Cabinet before Christmas, gave clear indications of the numbers of housing units across broad geographical areas that the Council would be seeking to allocate, but these numbers have not been included in the final consultation paper. Therefore, at the foot of this letter, we have inserted screengrabs of the four scenario maps into which we have appended those figures. Were those figures the anticipated new allocations (ie excluding existing allocations, existing sites with planning permission & completions)? Are those figures still broadly accurate? If not, where can we get an idea of the level of housing being proposed for each geographical area in each of the four scenarios?
- 8) The Development Options consultation map, Appendix 1a, shows "Potential areas for consideration for development - residential, employment, retail and community services". We are clear from section 3.18 that "The map should not be interpreted as site allocations for the new Local Plan". However, we assume that the areas shown in blue have been assessed or screened in some way already in order to be shown as 'potential areas for consideration'. However, we cannot see what process has been used to identify those sites. Are you able to clarify the basis for their selection?

Appendix 3

Letter from RSPB to Medway Council dated 16 March 2017



Planning Policy
Regeneration Community & Culture
Medway Council
Civic Headquarters
Gun Dock Wharf
Dock Road
Chatham ME4 4TR



Dear Ms Smith

16 March 2017

Request for clarification regarding questions previously submitted (1 Feb), clarification on publication of the Habitats Regulation Assessment (HRA) and an extension to the consultation period from Medway Council with respect to Medway Local Plan Development Options consultation

The RSPB welcomes the extended consultation and new documents published this week on the Local Plan Development Options. As you know the RSPB took part in the first stage of the preparation of Medway's new Local Plan for the period 2012-2035, the Issues and Options Consultation ("the Consultation") and whilst we appreciate that at this stage in the plan making process there are no finalised or fully formulated proposals we have several concerns:

- the lack of clarity within the consultation documentation surrounding the housing figures, our previous questions submitted by letter dated 1 Feb 2017 have not been addressed
- the lack of Habitats Regulation Assessment (HRA) and not including time for consultation on this document within the extended consultation period
- piecemeal publication of documents and contradictory extension of time dates given for this consultation period creating confusion

The RSPB welcomes publication of the Sustainability Assessment and the extension for an additional five weeks to the 18 April 2017 to allow for comment on the Sustainability Appraisal Scoping and Interim Appraisal reports. However we are concerned to note no HRA has been published yet by

Medway Council. As this HRA has not been published we are concerned that the extended consultation period is not enough time. At a recent consultation event hosted by Medway Council the Planning Officer noted that any documents published late would receive an extended original 6 weeks consultation.

The Medway Council website has created some confusion, with several different closing dates published on the Medway website and the RSPB is concerned that this has caused unnecessary confusion. As the Sustainability Appraisal and associated documents were also not published during the original consultation period and the HRA has not been published yet during the new extended period, we believe this may have resulted in consultation responses being returned to Medway Council during the original consultation period (closed on 6 March) by parties that were not aware of the delay, and that these responses would not have factored in these documents.

Therefore the RSPB is continuing to seek clarification on the questions in our letter dated 1 Feb. The RSPB is also seeking clarification on the publication of the HRA and an extension of time to accommodate these new documents and also to counteract the confusion that may have been created due to piecemeal publication of consultation documents and errors in the dates on the Medway Council website.

We hope that it is useful to the Council to raise these matters now. Please do not hesitate to contact me if anything set out above is unclear and we look forward to receiving the Council's answers.

Kind regards

Steve Gilbert

Conservation Programme Manager

A solid black rectangular box used to redact the signature of Steve Gilbert.

Appendix 4

Letter from RSPB to Medway Council dated 5 April 2017



Planning Policy
Regeneration Community @ Culture
Medway Council
Civic Headquarters
Gun Dock Wharf
Dock Road
Chatham ME4 4TR



Dear Ms Velayutham-Smith

05 April 2017

Request for clarification on the publication of the Habitats Regulation Assessment (HRA) and an extension to the consultation period from Medway Council with respect to Medway Local Plan Development Options consultation

Further to your recent email exchange with the RSPB concerning the above consultation and due to the Habitats Regulations Assessment for the draft Medway Local Plan still not having been published despite this consultation starting on Monday 16 January 2017 we are increasingly concerned about the remaining time available to take account of this assessment and thereby provide the Council with a full consultation response. The Habitats Regulations Assessment (HRA) is used to identify whether any aspects of the Local Plan proposed policies either individually or in combination would have a negative effect on specific, designated sites. Without the HRA we cannot effectively respond to the Sustainability Appraisal (SA) and comment on the environmental effects of the plans and policies and the assessment carried out.

As you are aware all public consultations must comply with the following overarching obligations (as set out in *R v North and East Devon Health Authority, ex p. Coughlan* [2001] QB 213 and confirmed by *R (Greenpeace Ltd) v Secretary of State for Trade and Industry* [2007] EWHC 311 (Admin) and *Evans v Lord Chancellor* [2011] EWHC 1146):

- Consultation must be at a time when proposals are at a formative stage;

- The Council must provide sufficient reasons for its proposals to allow consultees to understand them and respond to them properly;
- The Council must give sufficient time for responses to be made and considered before decisions are made;
- Responses must be conscientiously taken into account in finalising the decision; and
- The consultation process must be substantively fair.

As part of these obligations (as confirmed in *R (Greenpeace Ltd) v Secretary of State for Trade and Industry* [2007] EWHC 311 mentioned above) there is a requirement to provide information to consultees in a form which allows consultees properly to understand and make “meaningful and informed representations” on what is being consulted upon including an explanation of the factors or criteria which the Council considers important to its decision-making. Where the Council has access to important documents which are material to the determination of this local plan such as the HRA, these should be disclosed as part of the consultation process; although information can of course be supplemented during the consultation process, it is clearly unfair to provide such substantial information later in the process.

Therefore it is wholly unacceptable to have had just part of the consultation documentation published in January, with the all important SLAA not being published in its final version until Monday 20 February 2017, a month later than the start date of the consultation, and with still no HRA available another month later and two months after the consultation began. Furthermore, the Interim Sustainability Appraisal Report (SA) was not published until 14 March 2017.

Whilst we appreciate that the deadline for responding has been extended to 18 April due to the late publication of the SLAA and SA, currently there appears to be no proposal to do the same for the late publication of the HRA. Instead, the Council has suggested that the RSPB submits a consultation response on the documents currently available by 18 April but then follow that consultation response with a separate consultation response on the HRA alone. In addition it is suggested that any amendments to the RSPB consultation response submitted on 18 April required to take into account our review of the HRA should then be submitted as a third response.

The reason we have been given for this split consultation is to enable the Council to start reviewing comments and prepare for the SA workshop. However, whilst the SA workshop is welcomed, the split consultation is not. In light of the overarching consultation principles set out above, a split consultation will not enable us to provide a meaningful and informed response. Secondly it is not, in our view, fair to require consultees to consider documentation in a piecemeal manner and in addition to have to reconsider their consultation responses in light of later documentation. Thirdly we would be extremely concerned by the Council taking into account partial responses prepared in the absence of important documentation and shaping its proposed workshop on the basis of those partial responses. And finally the RSPB would be extremely concerned about providing such a partial response as its position may be misunderstood and misconstrued accordingly.

Therefore the consultation period needs to be extended again to allow sufficient time for all necessary consultation documentation to be considered in detail and together. The Council needs to

make this clear and not require partial responses to be submitted on the current deadline as otherwise it will not be in compliance with the consultation principles and objectives set out above.

We look forward to confirmation by return that the deadline will be extended.

Kind regards

Steve Gilbert

Conservation Programme Manager



Appendix 5

Freeths LLP Advice Note:

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MEDWAY SLAA 2017: TECHNICAL ANALYSIS

METHODOLOGY

The methodology in the 2017 SLAA has been amended from that previously used, and the methodology is set out below.

Stage 1, sites removed if:

- smaller than 0.15ha or cannot develop at least 5 units
- completed/under construction
- school site

Stage 2, sites removed if

- have planning permission at 31/12/2016

Stage 3 sites removed if

- Environmental Designations (SSSI, SACs, SPAs, RAMSARS, AONB and Ancient Woodland)
- Flood Risk Unresolvable sites
- Heritage designations

Stage 3a, sites removed if

- Identified for specific uses (employment and open space)

Stage 4, site suitability – criteria reviewed

- Centres, education facilities, open spaces, transport, site access, landscape & environment, heritage, flood risk, air quality, contamination & agricultural land

Stage 5, site availability

- Sites where there is confidence that there are no legal ownership issues such as ransom strips or unresolved multiple ownership.

Stage 6, development potential and achievability

- Capacity phased in the following categories (0-5yrs, 6-10yrs, 11-15yrs and 16+yrs)

In respect of stage 4 sites that were found to be potentially suitable, but only as part of a wider area rather than in isolation will be subject to the outcomes of the Development Options consultation and subsequent work in determining a preferred development strategy for the draft Local Plan.

Suitable and available sites

Development Potential	No. of Sites	Capacity
Residential	54	6,139

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Stages of Sites Removed in SLAA 2017

Stage	No. of Sites	No. of Sites Removed	No. of Remaining Sites
All sites	740	-	
Stage 1	740	227	513
Stage 2	513	58	455
Stage 3 & 3a	455	193	262
Stage 4	262	133	129
Stage 5	129	68	61*

* of those, 54 were identified for residential use. The remaining 7 were identified as suitable for commercial use and will be assessed in the next SLAA iteration.

STAGE 1 SCREENING: 227 SITES REMOVED

Of the 227 sites removed in this stage of screening, only 9 had previously been assessed in the 2015 SLAA

158: Sports Ground, Featherby Road

Identified as a suitable and available SLAA site in 2015. Not clear why this has been discounted in stage 1 screening.

443: Lower Upnor, RSME Land

Identified in 2015 SLAA as having extant residential planning permission – assume this has been implemented and is under construction.

484: Car Par The Terrace, Rochester

Identified in 2015 SLAA as having extant residential planning permission – assume this has been implemented and is under construction.

524: Southern Water Site, Capstone Road, Chatham

Identified in 2015 SLAA as having extant residential planning permission – assume this has been implemented and is under construction.

652: Wilds Yard, Clipper Close, Medway City Estate

Site size of 0.2 hectares but assessed in the 2015 SLAA as only being capable of providing two dwellings.

746: Former Earl Community Centre, Albatross Avenue

Identified in 2015 SLAA as having extant residential planning permission – assume this has been implemented and is under construction.

819: Pump House 7, Laviathan Way, Chatham Maritime

Identified in 2015 SLAA as 'unsuitable' because site has poor access to services and facilities. Site is 0.54 hectares in size and capable of delivering 23 residential units. No apparent planning permission for development. Not clear why this has been discounted in stage 1 screening.

896: 15, 17, 19 New Road Chatham

Identified as a suitable and available SLAA site in 2015. Not clear why this has been discounted in stage 1 screening..

FREETHS

1050:116-118 Twydall Lane, Twydall.

Identified in 2015 SLAA as 'unsuitable' because it was expected that the development of the site would impact upon amenity of nearby residential properties. Site is 0.16ha in size and capable of delivering 7 dwellings. Not clear why this has been discounted in stage 1 screening

As such it is identified that there are four sites, the reason for them being discounted at Stage 1 screening is not clear and in conflict with the assessment in the 2015 SLAA.

It is assumed that the remaining 218 'new' sites have been discounted fairly in line with the methodology, but there is data against which to check this.

STAGE 2 SCREENING: 58 SITES REMOVED

No reason to challenge any of these sites

STAGE 3A SCREENING: 17 SITES REMOVED

Site	2015 SLAA Site?	Previously screened stage 1 restrictive designations?	Previous reason for discounting	Why discounted in 2017 SLAA?
375	Yes	No	Poor access to services and facilities Designated Ancient Woodland Development poses a potential risk to SSSI	Unknown
648	Yes	No	Site has poor access to services and facilities Site has poor access to public transport opportunities	Unknown
737	Yes	Yes	National and International Nature Designation – thought to be Tower Hill to Cockham Wood SSSI	As 2015
762	Yes	Yes	Flood Risk	As 2015
763	Yes	Yes	Flood Risk	As 2015
787	Yes	Yes	National and International Nature Designation – thought to be Medway Estuary and Marshes SSSI	As 2015
788	Yes	Yes	AONB	As 2015
792	Yes	Yes	Flood Risk	As 2015
799	Yes	Yes	AONB	As 2015
801	Yes	Yes	AONB	As 2015
807	Yes	Yes	Flood Risk	As 2015

FREETHS

1060	Yes	No	Poor access to services and facilities Poor access to public transport opportunities Locally valued landscape 'Matts Hill Farmland'	Unknown
1091	Yes	No	Unknown – no site assessment in 2015 SLAA	Unknown
UB1b	No	-	-	Unknown Not on SLAA maps
UB1d	No	-	-	Unknown Not on SLAA maps
UB1e	No	-	-	Unknown Not on SLAA maps
UB12d	No	-	-	Unknown Not on SLAA maps

It is identified that 4 additional sites, not previously discounted in the stage 1 screening of the 2015 SLAA (sites unsuitable as a consequence of 'restrictive' designations as set out in paragraph 14 of the NPPF) are now discounted on the basis of Environmental Designations, unresolvable flood risk issues or heritage designations. There is however no summary or detail as to the specific reason each site has been discounted.

4 further 'urban boundary review' areas have been screened out. As above there is no specific reason for the discounting of each site and no map which identifies the location of the areas.

STAGE 3A SCREENING: 176 SITES REMOVED

Of those sites:

- 125 have been screened out because they are designated as open space, and this is consistent with their assessment in the 2015 SLAA.
- 8 have been screened out because they are designated as either employment land, containing employment uses or as an established employment area. This is consistent with their assessment in the 2015 SLAA.

The following sites (10. no) are not designated as open space, but instead identified as performing a recreational purpose/function:

68: Allotments, Clarendon Drive, Strood (0.53ha, 6 dwellings) – site not designated as open space but being used as allotments.

121: Bligh Way Strood (0.19ha, 8 dwellings) – site not designated as open space but performs a recreational and amenity function.

124: Strood Sports Centre (2.33ha, 126 dwellings) – site not designated as open space but is used for recreational purposes as a sports centre. Part of the site is also designated open space as allotments.

214: Golf Course, Woodlands Road, Gillingham (31.70 ha, 761 dwellings) – site not designated open space but is used for recreational purposes as a private golf course.

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255: Jackson Recreation Ground, Rochester (18.89ha, 462 dwellings) – part of the site designated as open space, much of the site not designated open space but used for recreational purposes as a school playing field.

300: Adj 89 Kenilworth Drive, Rainham (0.16ha, 7 dwellings) – site not designated open space but performs a recreational and amenity function.

327: Adj 52 Mierscourt Road, Rainham (0.80 ha, 30 dwellings) – small portion of the site that is designated as open space, the remainder of the site, although not designated, performs a recreational/amenity function.

368: Tobruk Way, Chatham (0.33ha, 14 dwellings) – site not designated open space but performs an open space/amenity function.

387: North Dane Wood, Lordswood (3.82 ha, 2016 dwellings) - site not wholly designated open space but performs an open space/amenity function.

1062: Shamley Road, Lordswood (0.25ha, 10 dwellings) – site is not designated open space but it performs a recreational and amenity function.

The following sites (30. no) have also been discounted as stage 3A screening. None of these sites are formally designated as open space or employment land, albeit that their descriptions of development do often describe the land as open space.

Site No.	Site Address	Reason for discounting in 2015 SLAA	Comments
24	Davenport Avenue, Gillingham (0.47ha, 20 dwellings)	Site has steep gradients that would make the site difficult to develop	Not clear what allocation this land has
69	Broom Hill Strood (11.51 ha, 139 dwellings (portion of site that falls outside of designated open space))	Site has poor access to public transport opportunities (the assessment identified that the land which fell outside of that designated as open space could deliver 139 dwellings, therefore it recognised that part of the land was open space but not all)	Not clear why the whole site has been discounted
106	Inner Lines, Brompton (2.08ha, 112 dwellings)	Development is likely to have a significant impact upon designated heritage assets	Not clear what allocation this land has
111	Darnley Road, Strood (0.16ha, 7 dwellings)	Development of the site would impact upon the amenity of nearby residential properties	Not clear what allocation this land has
113	Darnley Road, Strood (0.15ha, 6 dwellings)	Development of the site would impact upon the amenity of nearby residential properties	Not clear what allocation this land has
118	Darnley Road, Strood (0.16ha, 8	Development of the site would impact upon the amenity of nearby residential properties	Not clear what allocation this

FREETHS

	dwellings)		land has
120	Darnley Road, Strood (0.19ha, 8 dwellings)	Development of the site would impact upon the amenity of nearby residential properties	Not clear what allocation this land has
194	Beechings Green, Twydall (0.24ha, 10 dwellings)	Development of the site would impact upon the amenity of nearby residential properties	Not clear what allocation this land has
224	Rowland Avenue (0.56ha, 24 dwellings)	Development of the site would impact upon the amenity of nearby residential properties	Not clear what allocation this land has
238	Carlton Crescent, Luton (0.33 ha, 14 dwellings)	Considered unlikely that a suitable access could be created and development of the site would impact upon the amenity of nearby residential properties	Not clear what allocation this land has
246	Mount Road, Chatham (0.31 ha, 13 dwellings)	Development of the site would impact upon the amenity of nearby residential properties	Not clear what allocation this land has
288	Maidstone Road, Rochester (0.66 ha, 28 dwellings)	Site has steep gradients that would make the site difficult to development, development of the site would impact upon the amenity of nearby residential properties	Not clear what allocation this land has
309	Silverspot Wood, Mierscourt Road, Parkwood (0.56ha, 24 dwellings)	Site has poor access to services and facilities	Not clear what allocation this land has
322	Moor Park Close, Rainham (0.24ha, 10 dwellings)	Area of locally valued landscape	Not clear what allocation this land has
356	Weybridge Close, Lordwood (0.15ha, 2 dwellings)	Poor access to services and facilities, poor access to public transport opportunities	Not clear what allocation this land has
361	Rudge Close, Lordwood (0.27ha, 11 dwellings)	Development of the site would impact upon the amenity of nearby residential properties	Not clear what allocation this land has

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362	Abermarle Road, Lordswood (0.2ha, 8 dwellings)	Development of the site would impact upon the amenity of nearby residential properties	Not clear what allocation this land has
365	Maidstone Road, Rochester (0.34ha, 14 dwellings)	Site has poor access to services and facilities, development of the site would impact upon nearby residential properties	Not clear what allocation this land has
392	Adj to Lordswood Shopping Centre (1.09 ha, 59 dwellings)	Site has poor access to services and facilities, considered unlikely that a suitable access could be created and development of the site would impact upon amenity of nearby residential properties	Not clear what allocation this land has
401	401: Opal Green (0.29ha, 12 dwellings)	Development of the site would impact upon the amenity of nearby residential properties	Not clear what allocation this land has
403	Somerset Close, Princes Park (0.16ha, 7 dwellings)	Site has poor access to services and facilities	Not clear what allocation this land has
419	Kingston Crescent (0.34ha, 14 dwellings)	Site has poor access to services and facilities, development would impact upon the amenity of nearby residential properties	Not clear what allocation this land has
420	Walderslade Road, Chatham (0.35ha, 15 dwellings)	Development of the site would impact upon the amenity of nearby residential properties	Not clear what allocation this land has
422	Burma Way, Chatham (0.25ha, 11 dwellings)	Development of the site would impact upon the amenity of nearby residential properties	Not clear what allocation this land has
425	Walderslade Road, Chatham (0.26ha, 11 dwellings)	Development of the site would impact upon the amenity of nearby residential properties	Not clear what allocation this land has
428	Walderslade Road, Chatham (0.32ha, 14 dwellings)	Development of the site would impact upon the amenity of nearby residential properties	Not clear what allocation this land has
434	Allotments, Formby Road,	Site has poor access to services and facilities, site has poor access to public	Half of the land is used for

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	Halling (0.90 ha, 4 dwellings)	transport opportunities	allotments, the other half is undeveloped land given over to pasture
732	Land at Listmas Road, Chatham (0.11ha, 5 dwellings)	Development of the site would impact upon the amenity of nearby residential properties	Not clear what allocation this land has
777	Trechmanns Wharf, Rochester Road, North Halling (3.57ha, 103 dwellings)	Site has poor access to services and facilities, development is likely to have a detrimental impact upon locally valued local landscapes.	Description identifies this as an over grown site with protected trees
784	Site A, west of Chapel Lane, Hempstead (14.54ha, 349 dwellings)	Development is likely to have a detrimental impact upon locally valued local landscapes.	North part of site in use for allotments, south part is open agricultural land. 2015 SLAA recognises that not the entire area is covered by the open space designation and so part of the site may be developable

There are also three new sites, which have been identified as designated open space or employment land:

1161: Stoke Road, opposite Ropers Lane, Hoo

CL05: Urban Boundary Review

ST1d: Urban Boundary Review

However, no further information is given on these sites

STAGE 4 SCREENING: 133 SITES REMOVED

The methodology for screening for 'suitability' has changed. The sites below are those whose suitability has changed as part of the revised methodology. The table below also identifies those sites whose availability has changed. Please note that there is no detailed assessment shown for suitability, so it is not known the grounds on which a site has either been deemed suitable or unsuitable in the 2017 SLAA. If a site has been considered as unsuitable the 2017 SLAA does not assess its availability

FREETHS

Site no	Site Address	2015 SLAA Suitability	Reason discounting for	2017 SLAA Suitability	2015 Availability	2017 Availability
20	Rear of 1-21 Dial Road, Gillingham (0.25ha, 10 dwellings)	No	Site access, site developability	Yes	No	No
50	Lodge Hill (Chattenden) Ministry of Defence Estate (317.39ha, 5,000 dwellings)	Yes	-	No	Yes	Not assessed
102	1-35 High Street, Chatham (former Medway Hyundai) 0.59 ha, 25 dwellings	Yes	-	Yes	Yes	No
144	St Bartholomew's Hospital, New Road, Rochester (0.98ha, 108 dwellings (2015) 86 dwellings (2017))	Yes	-	Yes	No	Yes
249	Sorting Office, The Paddock,	Yes	-	Yes	Yes	No

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	Chatham (0.39ha, 25 dwellings)					
282	Sir Evelyn Road, Rochester (1.54ha, 83 dwellings (2015) 54 dwellings (2017))	No	Development would impact upon amenity of nearby residential properties	Yes	Yes	Yes
286	Sir Evelyn Road, Rochester (0.66ha, 28 dwellings)	No	Site has poor access to services and facilities	Yes	No	No
287	Sir Evelyn Road, Rochester (0.36ha, 15 dwellings)	No	Site has poor access to services and facilities	Yes	No	No
292	Reservoir, Maidstone Road, Rochester (1.33ha, 72 dwellings)	No	Site is understood to be in use as a reservoir the existing use would make it unsuitable for development	Yes	No	No
296	Hill Road, Borstal (1.47ha, 43 dwellings)	No	Site has poor access to public transport opportunities	Yes	No	No
303	The Platters, Rainham (0.55ha, 6 dwellings)	No	Site has poor access to public transport opportunities	Yes	No	No

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FREETHS

346	Wigmore Reservoir & Pumping Station, Wigmore (1.348ha, 73 dwellings)	No	Site has poor access to services and facilities	Yes	No	No
351	Rear of Wigmore Reservoir, Wigmore Road, Wigmore (0.4875ha, 20 dwellings)	No	Site has poor access to services and facilities	Yes	No	No
404	Heron Way, Princes Park (0.51ha, 22 dwellings)	No	Larger part of the site is designated open space as Natural Greenspace and Amenity Greenspace. Whilst the remainder of the site is not designated open space it is used for recreational purposes as a school playing field	Yes	No	No
410	Vixen Close, Lordswood (0.43ha, 15 dwellings)	No	Site has poor access to services and facilities	Yes	No	No
415	Land at 44-46 McKenzie Road, Lordswood (0.2ha, 12 dwellings)	No	Site developability – steep gradients and heavy tree coverage	Yes	No	No
448	Garages off Tobruk	No	Development would impact on amenity of	Yes	No	No

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FREETHS

	Way/Burma Way, Chatham (0.35ha, 19 dwellings)		nearby residential properties			
571	47-48 Second Avenue Industrial Estate (0.17ha, 7 dwellings)	No	Designated employment land and occupies extant employment uses	Yes	No	No
598	R/O 329 - 377 (Featherstones) High Street, Rochester (1.23ha, 66 dwellings)	Yes	-	Yes	Yes	No
603	Strood Service Station, 3 London Road, Strood (0.25ha, 11 dwellings)	No	Site is not designated employment land but in active use as petrol station and therefore unsuitable for residential	Yes	No	No
669	39-41 Mills Terrace, Chatham (0.25ha, 10 dwellings)	No	Development would impact on amenity of nearby residential properties	Yes	No	No
676	Cuxton Station, Station Road, Cuxton (0.24ha, 3 dwellings)	No	Site has poor access to services and facilities, site has poor access to public transport opportunities	Yes	No	No

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FREETHS

686	Diggerland, Roman Way, Strood (8.44ha, 203 dwellings)	No	Site has poor access to public transport opportunities	Yes – employment uses	Yes	Yes
687	National Grid Property, Pier Road, Gillingham (2.12ha, 203 dwellings)	No	Site is designated employment land	Yes	No	No
700	Ex Service Stn, adj 86 Corporation Street, Rochester (0.20ha, 9 dwellings)	Yes	-	Yes	Yes	No
703	31-39 Duncan Road, Gillingham (0.17ha, 7 dwellings)	No	Identified as unsuitable in summary tables but no reason given in detailed assessment	Yes	No	No
705	Pit 2, Roman Way, Strood (3.65ha, 106 dwellings)	No	Site has poor access to public transport opportunities	Yes-employment uses	Yes	Yes
707	LIFT site, 551-555 Canterbury Street, Gillingham (0.28ha, 12 dwellings (2015) 10 dwellings)	No	Site in D2 use as temporary health centre and not considered suitable for redevelopment for other uses	Yes	No	Yes

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FREETHS

	(2017))					
711	North side of Commissioners Road (3.75ha, 110 dwellings (2015) 105 (2017))	No	Site has poor access to services and facilities, site is designated employment land	Yes	Yes	Yes
712	HMP Rochester, Sir Evelyn Road (0.67ha, 28 dwellings(2015) 23 dwellings (2017))	No	Site has poor access to services and facilities	Yes	No	Yes
724	BAE Systems, Rochester (3.50ha, 189 dwellings)	No	Site is designated employment land	Yes	No	No
738	Hoo Common, Chattenden (0.56ha, 6 dwellings)	No	Site has poor access to services and facilities, site has poor access to public transport opportunities	Yes	No	No
743	Fenced area Lordswood Lane (0.38ha, 16 dwellings)	No	Site would impact on amenity of nearby residential properties	Yes	No	No
749	Wooleys Orchard, land south of Lower Rainham Road	No	Site has poor access to services and facilities, area of locally valued landscape, best and most versatile	Yes	Yes	Yes

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FREETHS

	(9.22ha, 221 dwellings(2015) 232 dwellings (2017))		agricultural land			
754	Land at Burneys Farm, Lower Stoke (0.59ha, 6 dwellings (2015) 12 dwellings (2017))	No	Site has poor access to services and facilities, site has poor access to public transport opportunities, best and most versatile agricultural land	Yes	Yes	Yes
755	Former Police Station, Chatham (0.23ha, 10 dwellings)	Yes	-	Yes	Summary tables says available – detailed assessment says site not being actively promoted for development, landowner and intentions unknown	No
759	Whiffens Avenue Car Park, Chatham (1.51ha, 82 dwellings (2015) 70 dwellings (2017))	Yes	-	Yes	No	Yes
760	Tesco, The Brook, Chatham (1.34ha, 60 dwellings)	Yes	-	Yes	Yes	No

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FREETHS

781	218 Main Road, Hoo (0.51ha, 6 dwellings)	No	Site has poor access to services and facilities, site has poor access to public transport opportunities, area of locally valued landscape	Yes	No	No
782	Cuxton Gate, Station Road, Cuxton (2.7ha, 78 dwellings)	No	Area of locally valued landscape	Yes	No	No
783	Land at Capstone Valley, Darland Farm a- Spekes Bottom b – Darland Farm c- East Hill d- Capstone Road (120.89ha, 2902 dwellings)	No	Area of locally valued landscape, likely to have a significant impact upon designated heritage assets	Site not split into 4 (a-d) sites a-c unsuitable but d suitable (84 dwellings)	Yes	Yes
794	Middle Street Farm, Grain Road, Middle Stoke (0.78ha, 9 dwellings (2015) 16 dwellings (2017))	No	Site has poor access to services and facilities, site has poor access to public transport opportunities	Yes	Yes	Yes
800	Land west of Lower Station Road, Rainham	No	Site has poor access to services and facilities, area of locally valued landscape, best and	Yes	No	Yes

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FREETHS

	(1.9ha, 56 dwellings (2015) 47 dwellings (2017))		most versatile agricultural land			
804	Former Officers Mess, Maidstone Road, Chatham (1.08ha, 58 dwellings)	No	Site has poor access to services and facilities	Yes – employment	Yes	Yes
817	Berengrave Nursery, Rainham (6.03ha, 145 dwellings (2015) 151 dwellings (2017))	No	Best and most versatile agricultural land	Yes	Yes	Yes
818	J7, Chatham Maritime (0.51ha, 75 dwellings)	Yes	-	Yes – employment	Summary table says unavailable, detailed assessment says owner actively promoting the site for development	Yes
820a	Interface Land, Chatham Maritime (2.8ha, 285 dwellings)	No	Site has poor access to services and facilities	Yes – employment	Yes	Yes
820b	Interface Land, Chatham Maritime	Yes – although not in summary tables	-	Yes	Yes	Yes

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FREETHS

	(2.23ha, 240 dwellings (2015) 195 (2017))					
829	Medway Bridge Marina, Manor Lane, Rochester (1.78ha, 52 dwellings (2015) 30 dwellings (2017))	No	Site has poor access to services and facilities, site has poor access to public transport opportunities	Yes	Yes	Yes
832	Land to the West of North Dane Wood, Lordswood (0.77ha, 32 dwellings (2015) 27 (2017))	No	Site has poor access to services and facilities	Yes	Yes	Yes
833	Medtha Bungalow, Port Victoria Road, Grain	No	Site has poor access to services and facilities, site has poor access to public transport opportunities	Yes	Yes	Yes
835	Walnut Tree Farm, r/o Longfield Ave, High Halstow (2.83ha, 82 dwellings (2015) 57 (2017))	No	Site has poor access to services and facilities, site has poor access to public transport opportunities	Yes	Yes	Yes
837	Land to the West of Church Street	No	Site has poor access to services and facilities, site has poor access to	Yes	Yes	Yes

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FREETHS

	(7.93ha, 190 dwellings (2015) 159 (2017))		public transport, best and most versatile agricultural land			
845	Woolmans Wood Caravan Site (1.76ha, 95 dwellings)	No	Site has poor access to services and facilities	Yes – employment	No	Yes
846	Garage Court at Sundridge Drive, Chatham (0.15ha, 6 dwellings)	No	Development would impact upon amenity of nearby residential properties	Yes	No	No
848	Land south of View Road, Cliffe Woods (1.08ha, 31 dwellings (2015) 22 (2017))	No	Site has poor access to services and facilities, site has poor access to public transport opportunities	Yes	Yes	Yes
849	Bennetts Orchard, Lower Rainham (4.17ha, 123 dwellings (2015), 104 (2017))	No	Site has poor access to services and facilities, locally valued landscape, best and most versatile agricultural land	Yes	No	Yes
862	296-310 High Street, Chatham (0.17ha, 7 dwellings)	No	Development would impact upon amenity of nearby residential properties	Yes	No	No
868	19 New Road Avenue and	Yes	-	Yes	No	Yes

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FREETHS

	3 New Cut, Chatham (0.23ha, 10 dwellings (2015) 20 (2017))					
876	BT Switch Centre, Green Street, Gillingham (0.41ha, 17 dwellings)	Yes	-	Yes	Yes	No
910	Former School Playing Field Halling (0.44ha, 5 dwellings)	No	Site has poor access to services and facilities	Yes	No	No
976	Petrol Filling Station, Railway Street, Gillingham (0.21ha, 9 dwellings)	No	Designated employment land	Yes	Yes	No
993	Bridgewood Manor Hotel, Walderslade Woods, Chatham (0.5ha, 21 dwellings)	No	Site has poor access to services and facilities	Yes	Rated green but intentions unknown – lapsed application for hotel extension	No
1012	Off Power Station Road, Grain (0.95ha, 10 dwellings)	No	Site has poor access to services and facilities, site has poor access to public transport opportunities	Yes	No	No
1057	North side,	Yes –	-	Yes	Yes	Yes

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FREETHS

	Priory Road	although not in summary tables				
1072	R/O 250 Main Road, Hoo (0.67ha, 7 dwellings)	No	Site has poor access to services and facilities, site has poor access to public transport opportunities, locally valued landscape	Yes	Yes	Yes
1080	Delivery Office, Rochester High Street (0.16ha, 7 dwellings)	Yes	-	Yes	Yes	No
1086	Westmoor Farm, Moor Street, Rainham (0.41ha, 5 dwellings (2015) 6 (2017))	No	Site has poor access to services and facilities, site has poor access to public transport opportunities	Yes	Yes	Yes
1088	Manor Farm, Parsonage Lane (19.06ha, 457 dwellings (2015) 375 (2017))	No	Part of the site is situated on the best and most versatile agricultural land	Yes	Yes	Yes
1092	3 Broad Street Cottages, Main Road, Hoo (0.39, 4 dwellings (2015) 8 (2017))	No	Site has poor access to services and facilities, site has poor access to public transport opportunities, locally valued landscape	Yes	Yes	Yes
1105	Manor Farm,	No	Site has poor access	Yes	Yes	Yes

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FREETHS

	Marsh Road, Halling (1.11ha, 32 dwellings (2015) 22 (2017))		to services and facilities, locally valued landscape, part of the site high level flood risk			
1106	Miles Place, Delce Road, Rochester (0.31ha, 3 dwellings (2015) 11 (2017))	No	Site has poor access to public transport opportunities	Yes	No	Yes
1110	Land at the Alps (5.10ha, 122 dwelling (2015) 119 (2017))	No	Site has poor access to public transport opportunities	Yes	Yes	Yes

The following sites, as a result of the changes identified above, impact on the overall housing land supply position:

2017: Now Suitable (previously unsuitable)		2017: Not Suitable (previously suitable)		2017: Available (previously unavailable)		2017: Not Available (previously available)	
Site no	Dwellings	Site no	Dwellings	Site no	Dwellings	Site no	Dwellings
282	+54	50	-5,000	144	+86	102	-25
707	+10			759	+70	249	-25
711	+105					598	-66
712	+23					700	-29**
749	+232					755	-40***
754	+12					760	-60
783d	+84					876	-17
794	+16					1080	-7
800	+47						
817	+151						
820b	+195*						
829	+30						
832	+27						
833	+8						
835	+57						
837	+159						
848	+22						

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FREETHS

849	+104						
868	+20						
1057	+23****						
1072	+7						
1086	+6						
1088	+375						
1092	+8						
1105	+22						
1106	+11						
1110	+119						
Total	+1,832		-5000		+156		-269
	-3,281 dwellings						

*Site 820b – no change in assessment from 2015 but this site was not included in the summary table in the 2015 SLAA as suitable and available

** Site 700 – 2015 summary says 29 but detailed assessment says 9 dwellings

*** Site 755 – 2015 summary says 40 dwellings but detailed site assessment only identified 10

**** Site 1057 – no change in assessment from 2015 but this site was not included in the summary table in the 2015 SLAA as suitable and available

[It is noted that site 711 which is now being taken forward as suitable and available was identified as designated employment land in the 2015 SLAA and as such should have been screened out in section 3A. There are 5 other sites which were identified as suitable, despite being designated employment land (404, 571, 687, 724 and 976) but none were taken forward because of availability concerns]

The following sites have also had their density amended in the 2017 SLAA

Site no.	2015 density	2017 density	Difference
3	5	6	+1
11	6	23	+17
137	398	414	+16
164	8	12	+4
177	7	6	-1
182	5	6	+1
236	37	31	-6
663	6	11	+5
756	29	Allocated retail	-29
810	25	21	-4
820	525	195 + employment land	-330
822	84	50	-34
824	2000	2577	+577
853	9	7	-2
1048	10	47	+37
1052	17	15	-2
1056	15	25	+10
1089	150	78	-72

FREETHS

1095	50	25	-25
1112	12	39	+27
1114	79	95	+16

This result in an increase of 206 dwellings over the 2015 SLAA assessment.

2 further sites (757 and 1081) both were considered to have extant residential permission in the 2015 SLAA but have been included in the 2017 SLAA as suitable and available (104 and 7 dwellings respectively).

The following sites have received planning permission since the 2015 SLAA and as such have been screened out in stage 2 of the SLAA assessment.

Site 657: 19 dwellings
Site 708: 12 dwellings
Site 731: 27 dwellings
Site 740: 5 dwellings
Site 816: 5 dwellings
Site 896: 8 dwellings

1 site which was identified as suitable in 2015 has been screened out in stage 1 of the 2017 SLAA (site 158)

Of the 56 new sites taken forwarded for assessment for suitability and availability only 8 sites were considered suitable, and of those only three were also available:

1126: 24 dwellings
1127: 32 dwellings
1156: 8 dwellings

The new sites only provide for an additional 64 dwellings. None of the urban boundary reviews or spatial options were considered suitable and available for development.

Summary

The 2017 SLAA has assessed 314 more sites. Of those sites only three have gone through to stage 4 assessment and been considered suitable and available.

The major change is the alteration of the Lodge Hill site for being suitable for development to unsuitable. No reason is given for this change in classification and so the justification behind this amendment is unclear. This is because the 2017 SLAA does not provide a summary for the reasons why a site has been classified as 'suitable' or unsuitable.

However, the change in the methodology has clearly re-classified a significant number of sites in addition to Lodge Hill, and those are identified in the sections above, including where there is concern about the justification for the changes that have taken place (specifically in relation to stage 1-3a screening).

There still also seems to be disparity in the suitability of rating for sites, albeit that it is harder to identify in the 2017 SLAA the reasons why red ratings have been given.

FREETHS

For example the 2015 SLAA discounted 6 sites just on the basis that they were 'best and most versatile agricultural land' (sites 750, 817, 1058, 1084, 1088 and 1113). Of those sites 1058 has been granted planning permission, 817 and 1088 have been re-classified as suitable for development but 750, 1084 and 1113 are still classified as unsuitable for development.

There were 9 sites discounted in 2015 with only a red rating for 'public transport' (sites 69, 293, 296, 303, 705, 715, 1081, 1106, 1110) of those sites one has been granted planning permission (1081), 5 have been considered as suitable (296, 303, 705, 1106, 1110) but two are still considered unsuitable (293, 715) and one has been screened out in stage 3a (69) without explanation.

There were 16 sites discounted in 2015 with only a red rating for 'services and facilities' (sites 286, 287, 309, 346, 351, 403, 410, 712, 795, 804, 819, 820a, 845, 832, 910 and 993), of those 12 are now classified as suitable (286, 287, 346, 351, 410, 712, 804, 820a, 845, 832, 910 and 993) one site is classified as unsuitable (795), one has been completed or is under construction (819) and two have been screened out at stage 3a (309 and 403) without explanation.

There were 6 sites discounted in 2015 with a red rating for 'locally valued landscape' (322, 438, 714, 782, 784, 1067) of those sites two have been screened out at stage 3a (322 and 784) without explanation, three sites continue to be discounted as unsuitable (438, 714, 1067) but one has been re-classified as suitable (782).

Without the detailed assessment behind this sites it is impossible to draw any conclusions regarding the suitability and acceptability of these changes/

Furthermore the published SLAA document does not identify those sites that are potentially suitable but only as part of a wider area.

In the context of those sites which we identified as potentially suitable in 'Advice Note 2' there have been very little changes to the assessment of those sites:

Site No	Reason for 2015 discounting	2017 assessment
Land South of Lodge Hill		
713	Site has poor access to services and facilities and poor access to public transport opportunities.	Has an extant planning permission
714	Within an area of locally valued landscape	Assessed as unsuitable
780	Site has poor access to services and facilities and poor access to public transport opportunities. Within an area of locally valued landscape	Assessed as unsuitable
802	Site has poor access to services and facilities and poor access to public transport opportunities. Within an area of locally valued landscape	Assessed as unsuitable

FREETHS

Land South of Peninsular Way		
753	Site has poor access to services and facilities and poor access to public transport opportunities. Within an area of locally valued landscape	Assessed as unsuitable
1065	Within an area of locally valued landscape Situated on best and most versatile agricultural land	Site split into two – both assessed as unsuitable.
1066	Site has poor access to services and facilities and poor access to public transport opportunities. Within an area of locally valued landscape	Assessed as unsuitable
795	Site has poor access to services and facilities	Assessed as unsuitable
1043	Site has poor access to services and facilities and poor access to public transport opportunities.	Assessed as unsuitable
1044	Site has poor access to services and facilities and poor access to public transport opportunities. Site is situated on best and most versatile agricultural land	Assessed as unsuitable
1084	Site is situated on best and most versatile agricultural land	Assessed as unsuitable
Capstone Valley Extended		
783	Within an area of locally valued landscape Development has the potential to impact upon designated heritage assets	Site split into 4 sites (a-d) Sites a-c considered unsuitable Site d now suitable for 84 dwellings
784	Within an area of locally valued landscape	Screened out in Stage 3a – not clear why
785	Site has poor access to services and facilities Within an area of locally valued landscape	Assessed as unsuitable
786	Site has poor access to services and	Assessed as unsuitable

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FREETHS

	facilities Within an area of locally valued landscape	
438	Within an area of locally valued landscape	Assessed as unsuitable
1067	Within an area of locally valued landscape	Assessed as unsuitable
East Rainham		
814	Site has poor access to services and facilities Within an area of locally valued landscape	Assessed as unsuitable
825	Site has poor access to services and facilities and poor access to public transport opportunities Site is situated on best and most versatile agricultural land	Planning permission granted
847	Within an area of locally valued landscape Site is situated on best and most versatile agricultural land	Assessed as unsuitable
1053	Site has poor access to services and facilities and poor access to public transport opportunities Within an area of locally valued landscape Within or in close proximity to the Moor Street Conservation Area	Assessed as unsuitable
1059	Within an area of locally valued landscape Site is situated on best and most versatile agricultural land	Assessed as unsuitable
1063	Within an area of locally valued landscape Site is situated on best and most versatile agricultural land	Assessed as unsuitable
North Rainham		
750	Site is situated on best and most versatile agricultural land	Assessed as unsuitable

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FREETHS

774	<p>Within an area of locally valued landscape</p> <p>Site is situated on best and most versatile agricultural land</p>	Assessed as unsuitable
778	<p>Site has poor access to services and facilities and poor access to public transport opportunities</p> <p>Within an area of locally valued landscape</p> <p>Site is situated on best and most versatile agricultural land</p>	Assessed as unsuitable
817	<p>Site is situated on best and most versatile agricultural land</p>	Site assessed as suitable for 151 dwellings
1061	<p>Within an area of locally valued landscape</p> <p>Site is situated on best and most versatile agricultural land</p>	Assessed as unsuitable
Land north of Rochester		
796	<p>Site has poor access to services and facilities and poor access to public transport opportunities</p> <p>Within an area of locally valued landscape</p> <p>Site is situated on best and most versatile agricultural land</p> <p>Site is situated within the Green Belt</p>	Assessed as unsuitable
729	<p>Within an area of locally valued landscape</p> <p>Site is situated on best and most versatile agricultural land</p> <p>Site is situated within the Green Belt</p>	Assessed as unsuitable



27TH APRIL 2017.

DEAR SIR,

I WOULD LIKE TO SAY THANK YOU FOR THE MEETING AT THE PENSIONERS FORUM. A VERY KIND AND HELPFUL YOUNG MAN CAME AND EXPLAINED THE PROPOSED BUILDING FOR MEDWAY. IT WAS A VERY INTERESTED MEETING AND HE HAD A LOT TO DEAL WITH.

THERE IS ONE THING I WOULD LIKE TO SAY IT SEEMS WE HAVE A LONG HOUSING LIST IN MEDWAY THESE PEOPLE WANT AND CAN ONLY RENT. WITH THE DEPOSIT TO BUY AND INCREASING COST TO BUY. YOU ARE ONLY GIVING PERMISSION FOR A SMALL % FOR SOCIAL HOUSING. IT SHOULD BE THE

OTHER WAY ROUND TO LOWER THE HOUSING LIST.

ALSO OUR ROADS, SCHOOLS HOSPITALS CANNOT COPE WITH 300,000 PEOPLE I BELIEVE PREDICTED FOR MEDWAY. A SCHOOL WAS TO BE BUILT FOR THE HOUSING AT THE HASTING ARMS AREA ON LOWER FAINHAM RD. IT DIDN'T HAPPEN. IT SEEMS NORMAL FOR THIS TO HAPPEN. WE HAVE 2 WAYS INTO MEDWAY M2 BRIDGE ROCHESTER BRIDGE AND MEDWAY TUNNEL. THESE ARE ALL AT CAPACITY. IT IS TAKING UP TO 3 HRS TO GET INTO LONDON TO HOSPITALS AND WORK.

WE HAVE MANY PEOPLE COMING TO LIVE IN KENT BECAUSE IT IS A NICE PLACE TO LIVE BUT SOON IT WILL LOSE OUR NICE AREAS OF GREEN SPACES.

A PROPOSAL OF 30,000 HOUSES 4 PER DWELLING IS 120,000 PEOPLE EXTRA USING OUR FACILITIES.

YOURS SINCERELY
P.L. Plumptre

RENTPLUS: AN AFFORDABLE MODEL

Affordable Housing Statement

AFFORDABLE HOUSING STATEMENT

Rentplus

January 2016

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Executive Summary

George Osborne pledged in his Autumn Statement to “*choose to build the homes that people can buy*”. The pledge to build 10,000 affordable homes to buy that will allow a tenant to save for a deposit while they rent provides explicit Government support for a new model of housing provision, enabling working households to enter the housing market with assistance not already offered.

Rentplus is a new model that seeks to provide a route to home ownership for those households aspiring to home ownership, but unable to afford to save for a mortgage. It is an affordable, privately financed alternative to the private rented sector, providing a managed route to home ownership in collaboration with housing associations. The delivery of Rentplus will be managed through S106 agreements tailored specifically to the product, and can act as a catalyst for bringing forward stalled developments.

The Government has stated its intention to diversify the form of affordable housing being delivered to meet the needs of those families aspiring to home ownership. This report confirms that the model conforms to the definitions of affordable housing, as set out in the Annex to the NPPF, by providing a hybrid product spanning affordable rent and intermediate affordable housing. As a product complementary to those models of affordable housing already being provided by housing associations, Rentplus will contribute to the NPPF’s aims of boosting housing supply and creating mixed and balanced communities.

This report describes the significant shortfall in affordable housing nationwide and the steady decline in the availability of grant funding over the past decade. Together with the rent reductions to housing associations taking effect from April 2016, it is likely that affordable housing delivery from this sector will be constrained, and so it is clear that there remains a need for further assistance in the market. This has been supported by organisations such as Shelter, which in a 2014 report on improving access to housing makes clear that public and private investment will have multiple, stabilising benefits, including reduced welfare dependency. The social benefits for

those aspiring to home ownership but unable to achieve this security whilst trapped in often prohibitively expensive private rented sector accommodation are numerous.

As housing associations come under strain from reduced public funding, rent reductions and the extension of Right to Buy this new model, which can be delivered quickly and in high volumes with no recourse to public funding, has been explicitly supported by the Government. It should be encouraged on a local level for its clear ability to make a significant contribution to improving lives and communities. The Government's proposed amendments to the definition of affordable housing in the NPPF to include rent to buy housing only confirms this.

Owing to the fixed period of tenancy at affordable rents for Rentplus dwellings before purchase, households have the ability to save for a deposit on the home they have rented. This offers a new product to those households whose needs are not already met by the market, whilst also diversifying the local housing stock and contributing to the development of mixed and balanced communities. Changes to local planning policy both generally and relative to individual sites should be prioritised to encourage early, accelerated delivery.

The Rentplus product has a wide pool of prospective households for whom saving towards a home purchase is not currently possible due to falling outside eligibility for current affordable housing stock. Rentplus should be considered a route towards a more diverse housing sector by local authorities seeking to provide mixed, balanced communities whilst reducing the number of households on the local housing register. The Rentplus model would make a valuable, NPPF-compliant contribution towards significantly boosting housing supply, and most importantly in meeting need for affordable housing without public sector funding. With full Government support, Rentplus will deliver the national aim to turn *Generation Rent* into *Generation Buy*.

Introduction

Section 1

- 1.1 **Tetlow King Planning Ltd.** has been commissioned by **Rentplus** to prepare this Affordable Housing Statement to accompany its promotion of a new affordable housing model aimed at delivering discounted rented homes to buy for people who are unable to acquire a property on the open market. This report sets out Tetlow King Planning's expertise and credentials in the field of affordable housing, and confirms our professional opinion that the Rentplus model fully meets the need for affordable housing.

Who We Are: Qualifications and Experience

- 1.2 Tetlow King Planning Ltd. is a town planning and housing consultancy, co-founded by the current Chairman, Robin Tetlow, in 1985. Over the past 30 years the company has accumulated specialist expertise in affordable housing, becoming acknowledged leaders in the field.
- 1.3 Tetlow King Planning Ltd. provides strategic and detailed advice to *inter alia* housing associations, developers, landowners and investors on numerous sites and developments located throughout the UK. The company has been retained more generically by national research organisations, such as the Joseph Rowntree Foundation, representative/trade organisations, such as the National Housing Federation, professional institutions, such as the Royal Institution of Chartered Surveyors and government/ government related organisations, such as the Housing Corporation/ Homes and Communities Agency. The company is also regularly employed by local authorities.
- 1.4 The principal individual authors of this report have provided expert evidence to courts of law, tribunals and to parliamentary committees and groups; and appeared nationwide at Regional Planning Guidance, Regional Spatial Strategy and Structure Plan examinations in public, Local Plan / Unitary Development Plan inquiries and Local Development Document public examinations.
- 1.5 The principal individual authors of this report have also provided expert evidence extensively at S77/S78 inquiries, including many relating to planning appeals and called-in applications of regional and national significance.

- 1.6 Since the inception of the National Planning Policy Framework in 2012, Tetlow King Planning's input on the need for and the provision of affordable housing as part of planning application and appeal proposals has become of even greater importance in demonstrating the social and economic benefits of developments which decision makers are obliged to weigh in the overall planning balance.

This Report

- 1.7 The report comprises six sections, setting out the national planning policy framework; the evidence calling for a more diverse affordable housing sector; the proposed affordable housing model; how we consider this fits within the planning definition of affordable housing; and our recommendations for how this can best be utilised to help meet diverse housing needs.

Affordable Housing as a Material Consideration and the National Planning Policy Framework

Section 2

Introduction

- 2.1 It is useful to put any affordable housing offer in its historic, legal and planning appeal context. This section sets out the importance of affordable housing as a material consideration, and highlights a number of relevant legal and planning appeal decisions.

Affordable Housing as a Material Consideration: Historic Context

- 2.2 The importance of affordable housing as a material consideration has long been established, originating from PPG3 (1992). A community's need for affordable housing is a material planning consideration which may properly be taken into account in formulating development plan policies; authorities may also seek to negotiate with developers for the inclusion of an element of affordable housing in new schemes and it is Government policy that this approach is appropriate on-site unless off-site provision or a financial contribution can be robustly justified. Where there is a policy as to the provision of affordable housing in the development plan, the willingness of a developer to include an element of such housing in accordance with the policy will be a material consideration. The essence, however, is **reasonable flexibility**; policies should not seek to impose a uniform quota on all developments, regardless of market or site conditions.
- 2.3 As set out in Section 38(6) of the Planning and Compulsory Purchase Act 2004 and the National Planning Policy Framework (NPPF, 2012), where an adopted or approved development plan contains relevant policies an application for planning permission or an appeal should be determined in accordance with the plan unless material considerations indicate otherwise. Account can also be taken of policies in emerging development plans which are going through the statutory procedures towards adoption or approval; the weight to be attached depends upon the stage of plan preparation and the nature of representations relative to particular policies. Most adopted or approved and emerging development plans now include policies on affordable housing. Furthermore affordable housing can be regarded as a '*material*

consideration’ in its own right as per the provisions of the NPPF and other Government advice. Supplementary Planning Documents and Housing Strategies may also be ‘*material*’ subject to the level of public consultation and the extent to which they are broadly consistent with development plan policies.

Affordable Housing as a Material Consideration: Legal Context

- 2.4 The importance of affordable housing has been reflected in a number of court cases including *Mitchell v Secretary of State for the Environment and Another* (1994); *ECC Construction Limited v Secretary for the Environment and Carrick District Council* (1994); and *R v Tower of Hamlets London Borough Council, ex parte Barratt Homes Ltd* (2000). Of particular relevance is the case of *Harry Rowlinson and Lynda Rowlinson as Trustees of the Linson Construction Pension Fund v Warrington Borough Council and the Department of Transport, Local Government and the Regions* (2002).
- 2.5 In this case, the Inspector had concluded that the opportunity to provide 100 affordable dwellings to address unmet need for affordable housing across the Warrington Borough Council area provided an overriding justification for immediately releasing a substantial Greenfield site at Lymm, with a capacity for approximately 200 dwellings, on the edge of the settlement. In reaching this conclusion, the Inspector had weighed other facets of PPG3, in particular the sequential approach towards site selection. This decision was challenged by Warrington Borough Council, with the consent of the Secretary of State.
- 2.6 The High Court initially quashed the Inspector’s decision but the Court of Appeal subsequently upheld it, with leave to appeal to the House of Lords refused. Paragraph 45 of the Court of Appeal judgement concludes that the Inspector’s reasoning was perfectly clear:
- “The provision of affordable housing is a material planning consideration. His assessment was that the assessed need for affordable housing was not likely to be met in the foreseeable future and meeting it was a compelling material consideration in the proposals favour which outweighed the general principle of sequential approach to development land.”*
- 2.7 In a more recent case, of *Oadby and Wigston Borough Council v CLG and Bloor Homes Limited* (2015) the Council sought to challenge the grant of permission at appeal for up to 150 dwellings at Oadby. The Council brought the challenge on the ground that the Inspector failed in his assessment of the full objectively assessed

need for housing. The claim failed, and the application to quash the decision was dismissed on the grounds that the Inspector had not failed in his decision making. . In this case the local planning authority's Strategic Housing Market Assessment (SHMA) had confirmed that private rented sector housing is not affordable housing, however the local authority had sought to rely upon this sector for meeting the shortfall in affordable housing provision to satisfy the full objectively assessed need. The decision reinforces the principle that private rented accommodation does not fall within the definition of affordable housing.

Secretary of State appeal decision: Addlestone, Surrey

- 2.8 A number of important planning appeal decisions demonstrate that affordable housing should meet a wide range of housing needs beyond a local authority's 'Reasonable Preference' obligations, and that permanence is not a prerequisite to appropriate affordable housing provision. An example of this is set out in a Secretary of State appeal decision¹ for 350 dwellings, 100% affordable, on a greenfield site identified as suitable for housing in the Local Plan for development considered the issue of whether a suitable mix of development would be provided. Whilst the development was proposed for 100% affordable housing, the tenure mix was offered as 49% social rented and 51% intermediate affordable housing. The Inspector's Report notes that the proportions of social rented and intermediate housing were "*at odds with the proportions identified as needed in the Council's own Housing Needs Assessment*" and in local policy (paragraph 3.65). One of the issues at the heart of the appeal was therefore the Council's intention for affordable housing to be delivered that would meet their Reasonable Preference groups.
- 2.9 Reasonable Preference groups are defined as those households with high levels of assessed housing need. The law requires that reasonable preference is given to the following categories:
- People who are homeless, including those who are intentionally homeless and in priority need;
 - People who are owed a re-housing duty under the homelessness legislation, where this duty has not been discharged by an offer of suitable accommodation, which may be to a letting in the private sector;
 - People occupying insanitary or overcrowded housing or otherwise living in unsatisfactory housing conditions;

¹ Appeal decision relating to Land at Franklands Drive, Addlestone ref. APP/ Q3630/A/05/1198326

- People who need to move on medical or welfare grounds, including grounds related to a disability; and
- People who need to move to a particular locality, where failure to meet that need would cause hardship to themselves or to others.

2.10 In other words they are those households in most priority need. The Housing Register is a limited source for identifying the full current need for affordable housing. The Inspector drew an important distinction between the narrow statutory duty of the Housing Department in meeting priority need, and the wider ambit of the planning system to meet the need for affordable housing. As such the number of households on the Register will only be an indication of those in priority need and who the housing department have a duty to house. But it misses thousands of households who are in need of affordable housing, a large proportion who will either be living in overcrowded conditions with other households or turning to the private rented sector and paying unaffordable market rents.

2.11 Paragraph 7.13 of the Inspector's Report on the Secretary of State appeal decision states:

"The case advanced by the Borough Council was founded on the long established experience of the Council in grappling with issues of 'housing need'. This has long been an area of concern for local authorities, initially through the active twentieth century tradition of Council House building and transformed, via the process of producing Housing Investment Programmes (HIPs), into a general concern with Social Housing and the production of local housing strategies.

The direct link between such local housing strategies and assessment of 'housing need' is made explicit within the Department of the Environment, Transport and the Regions' "Local Housing Needs Assessment: A Guide to Good Practice" (CD199). This document published in 2000 remains the source of guidance for Runnymede's January 2005 Housing Needs Assessment (CD72) carried out by Fordham Associates. However, while I recognise that this approach will have value in identifying groups most in need of assistance in realising their housing aspirations, I regard the approach as retaining a relatively narrow and unduly restrictive approach to the concept of what comes within the ambit of the term Affordable Housing."

2.12 In this case, the Inspector noted evidence that most households in the Borough aspired to home ownership but many would be unlikely to purchase for a significant

period, or not at all, remaining instead in the private rented sector. As summarised by the Inspector, such households:

“should not be confused with those who can only afford social rented or intermediate housing. Ignoring the private rented sector as part of the housing market ... not only deprives the more hard pressed household of appropriate intermediate housing, but frustrates Government’s intention to develop a ‘ladder’ up which those able to do so may ‘climb’ to full owner occupation.” (Paragraph 3.116)

- 2.13 In this case, the Inspector concluded that the scheme for 100% affordable housing would provide an acceptable mix of tenures, and that the range of house types would therefore not produce a uniformity of house types. The Inspector posed the question of whether the *“households residing in this development would be a sufficient mix of social and economic groups”* (IR7.18), taking account of the mix that would result from the particular cascade arrangement for this scheme. The total mix on the scheme, the Inspector concluded, would be:

“likely to accommodate households of differing character, such that the overall development would be accommodating a range and variety of households. Even if the mix of tenures being made available by the operation of the cascade mechanism, were to alter the balance of these tenure groups, the result would be to increase the proportion of equity sharing households and I see no reason to anticipate that there would be any unusual concentration of socially disadvantaged households.” (IR7.19)

- 2.14 The Inspector’s overall conclusions found that the scheme represented a *bona fide* 100% affordable housing scheme which would *“result in a mixed development, accommodating households of different sizes and with a variety of socio-economic characteristics”* (IR7.72). He recommended that planning permission be granted. The Secretary of State agreed with her Inspector’s conclusions, noting in particular that:

“if the mix of tenures being made available by the operation of the cascade mechanism secured in the Unilateral Undertaking were to alter the balance of the proposed tenure groups, the result would be to increase the proportion of equity sharing households. She therefore agrees with the Inspector that there is no reason to anticipate that the proposed scheme would result in any unusual concentration of socially disadvantaged households.” (DL16)

- 2.15 The appeal was allowed on this basis.

Appeal Decision: St Albans

- 2.16 An appeal decision² considered the 6 units of affordable housing offered as part of an approved scheme for 55 dwellings in St Albans. There was an issue as to whether the proposed key workers accommodation would meet the need for affordable housing in the area. The appellants proposed the freehold sale of 6 units to a housing association at 60% of market value. The housing association would then liaise with local employers and let the units to key workers at affordable rents to those with incomes below £25,000 per annum. The local authority argued that such housing would not meet priority needs. The Inspector agreed but ruled that the needs of key workers were not being addressed in the District, noting that the Council's housing evidence had not investigated the needs of key workers, and that it was legitimate to provide for the full range of housing needs, not just those with priority needs.
- 2.17 The appellants referred to the 'polarisation' that can result if only those who can afford market prices and rents, and those with priority needs for affordable housing, have access to local housing stock. The Inspector agreed that the scheme would offset that tendency, meeting the national objectives to provide for the housing needs of the whole community and to increase choice. The Inspector concluded on this point that the Council should *"aim to meet a wide range of housing needs for middle as well as low income earners"* (paragraph 19). As local housing prices are too high and private renting too expensive, the needs of key workers were not being met. The scheme would meet this need.
- 2.18 The local authority also objected to the fact that the housing would not be secured *in perpetuity* as affordable housing. The Inspector noted that the privately financed model indicated that they would be lost as affordable units at the end of 20 years. However, it was concluded that permanence was not a realistic objective for affordable housing even when a housing association is involved; it is worth quoting these paragraphs at length:
- "When a RSL uses Social Housing Grant to provide dwellings for rent, every tenant has the right to purchase by virtue of the Housing Act 1996. Every 'shared owner' has the right to 'staircase' to 100% ownership. ...*
- The Council brought no evidence to the Inquiry to support its judgment that 20 years was not a sufficiently long period of time for the provision of affordable housing on a*

² Appeal decision relating to Old Albanians Sports Ground, St Albans ref. APP/B1930/A/01/1073344

site. I consider that this is a long period in development plan terms. Also, there would be a reasonable prospect of the units being retained for affordable housing for a longer period as they would be in the hands of a RSL ... The Council argued that the scheme should be differentiated from one wherein the tenant exercised the right to buy, because that would benefit someone in housing need. However, I agree with the Appellants that the tenant exercising the right to buy would be no longer in need.

On permanence, I conclude that this is not a realistic objective for affordable housing even where a RSL is involved. I consider that the scheme, in the hands of a RSL operating under the auspices of the Housing Corporation, would offer benefits to the District for a substantial period of 20 years.” (Paragraphs 24-26)

- 2.19 The Inspector also rejected the Council’s concerns about enforceability in relation to rent control and the timing of individual sales of units, since the scheme would be run by a housing association.

National Planning Policy Framework (NPPF, 2012)

- 2.20 The National Planning Policy Framework (NPPF) is a material planning consideration, central to setting out the role of affordable housing in the planning and decision making process. The delivery of sustainable development, encompassing social, economic and environmental roles, is at the heart of the NPPF; the paragraphs below set out the key points in relation to affordable housing.
- 2.21 Fundamental to the social role is *“supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations”* (paragraph 7).
- 2.22 Paragraph 8 is clear that these roles *“should not be undertaken in isolation, because they are mutually dependent”*. Therefore, to achieve sustainable development, economic, social and environmental gains should be sought jointly through the planning system.
- 2.23 In pursuit of sustainable development paragraph 9 notes the importance of *“widening the choice of high quality homes”*.
- 2.24 Paragraph 14 sets out a presumption in favour of sustainable development, stating:

“at the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision taking.

For decision taking this means:

- *Approving development proposal that accord with the development plan without delay; and*
- *Where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:*
 - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
 - *specific policies in this Framework indicate development should be restricted.”*

2.25 Paragraph 17 sets out 12 core principles which underpin both plan making and decision taking. These include that planning should:

- *“be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area. Plans should be kept up-to-date, and be based on joint working and co-operation to address larger than local issues. They should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency;*
- *not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives;*
- *proactively drive and support sustainable economic development to deliver the homes, businesses and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities;*
- *... actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling and focus significant development in locations which are or can be made sustainable; and*

- *take account of and support local strategies to improve health, social and cultural well being for all, and deliver sufficient community and cultural facilities and services to meet local needs.”*
- 2.26 There is a clear emphasis on supporting enterprise, including the statement at paragraph 19 that planning *“should not act as an impediment to sustainable growth”*, and at paragraph 21 that investment in business *“should not be over-burdened by the combined requirements of planning policy expectations”*.
- 2.27 Section 6 sets the Government’s agenda for delivering a wide choice of high quality homes. Paragraph 47 clearly sets out the Government’s aim to *“boost significantly the supply of housing”* through a number of methods. Local Planning Authorities (LPAs) should *“use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing”* and identify and update annually a five year supply of housing.
- 2.28 The NPPF is clear that delivering sufficient housing is a key consideration for LPAs; and in particular that this should widen opportunities for home ownership and create sustainable, inclusive and mixed communities. LPAs should:
- *“plan for a mix of housing based on current and future demographic trends, market trends and the needs for different groups in the community (such as but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);*
 - *identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand; and*
 - *where they have identified that affordable housing is needed, set policies for meeting this ... and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.”* (Paragraph 50)
- 2.29 The section on plan-making emphasises the need for LPAs to reflect the vision and aspirations of local communities in Local Plans (paragraph 150), and for Plans to be aspirational but realistic (paragraph 154). Opportunities should be sought to achieve the economic, social and environmental dimensions of sustainable development, and net gains across all three.
- 2.30 The NPPF is clear that LPAs should have a *“clear understanding of housing needs in their area”* by assessing *“their full housing needs”* (paragraph 159) through a

Strategic Housing Market Assessment (SHMA). This should *“identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period”*, including *“the need for all types of housing, including affordable housing.”*

- 2.31 Paragraph 173 states that Plans should be deliverable, with developments not subject to *“such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs ... [should] provide competitive returns to a willing land owner and willing developer”*.

- 2.32 The NPPF encourages a positive and proactive approach to the delivery of development through positive decision-taking. Paragraphs 186 and 187 indicate:

“Local Planning Authorities should approach decision-taking in a positive way to foster the delivery of sustainable development. The relationship between decision-taking and plan-making should be seamless, translating plans into high quality development on the ground.

Local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area.”

- 2.33 The NPPF also notes that planning conditions and obligations should be used to address unacceptable impacts or otherwise unacceptable development. Planning obligations should only be sought where they *“meet all of the following tests:*

- *necessary to make the development acceptable in planning terms;*
- *directly related to the development; and*
- *fairly and reasonably related in scale and kind to the development”*

- 2.34 **Annex 2: Glossary** defines affordable housing for planning purposes as follows:

“Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.

Social rented housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency.

Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable).

Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing.

Homes that do not meet the above definition of affordable housing, such as 'low cost market' housing, may not be considered as affordable housing for planning purposes."

National Planning Practice Guidance (PPG)

2.35 The Planning Practice Guidance (PPG) was first published in 2014 to complement the NPPF in providing guidance on its practical implementation. The PPG is an online-only resource divided into 47 sections. The principal section relevant to this statement is the section entitled *Housing and economic development needs assessments*.

2.36 The guidance is clear that there should be an objective and unconstrained assessment of the total housing need. It states:

"The assessment of development needs is an objective assessment of need based on facts and unbiased evidence. Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic under performance, viability, infrastructure or environmental constraints. However, these considerations will need to be addressed when bringing evidence bases together to identify specific policies within development plans."

- 2.37 A methodological approach is set out for assessing housing need. Councils are required to take into account under-supply and worsening affordability of housing, with assessments needing to reflect past under delivery of housing. Affordability is highlighted as a key factor in assessing overall housing targets.
- 2.38 Under the heading *How should plan makers respond to market signals?* the guidance states that *“A worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections.”*
- 2.39 It goes on to state:
- “Assessing affordability involves comparing house costs against the ability to pay. The ratio between lower quartiles house prices and the lower quartile incomes or earnings can be used to assess the relative affordability of housing. The Department for Communities and Local Government publishes quarterly the ratio of lower quartile house prices to lower quartile earnings by local authority district.”*
- 2.40 Other factors to be considered are land prices, house prices, rents, rate of development and overcrowding.
- 2.41 The Viability section of the PPG notes that Local Plans’ visions for an area should *“not undermine ambition for high quality design and wider social and environmental benefit”* (Paragraph: 001 Reference ID: 10-001-20140306).
- 2.42 The Government introduced the Starter Homes model through a new section in the PPG. This enables exception sites to come forward specifically to meet the housing needs of first time buyers through the provision of below open market value homes. This product is to be delivered on under-used or unviable industrial and commercial land not currently identified for housing. The Government encourages LPAs to make these sites exempt from affordable housing and tariff-style contributions. The introduction of this model shows the Government’s clear intention to widen the availability of home ownership through more affordable models of delivery.

Summary

- 2.43 Over the past 30 years, the need for affordable housing has been recognised as being integral to the planning system. A consistent thread has run through various policy documents, with the need now firmly stated in the NPPF and the PPG.
- 2.44 The Courts have confirmed that affordable housing is capable of being a compelling material consideration in the determination of planning applications, the weight

attached to any material consideration being at the discretion of the decision maker. As confirmed by a Secretary of State appeal decision, housing provision need not be exclusively for the benefit of those households at the extremes of need. Affordable housing such as Rentplus rent to buy will, as with the schemes referenced above, accommodate a range and variety of households of different character while freeing up existing social rented housing for those in need.

- 2.45 There is no requirement for all affordable housing to be retained *in perpetuity*. As set out in the St Albans appeal decision, it is unrealistic to expect affordable housing to be retained for a period longer than 20 years, due to the Right to Buy for social housing tenants and for shared ownership occupiers to 'staircase' to full ownership. Even though these homes are lost from the general affordable housing stock, housing associations are not required to replace each home on a one-for-one basis in the local authority area, nor to recycle receipts for future investment. The commitment by Rentplus to replace each home sold on a one-for-one basis, securing long term delivery of homes to rent to local people, will fulfil local authority duties to meet local needs whilst also diversifying the local housing stock.

Making the Case for Diversity of Supply

Section 3

Introduction

- 3.1 This section highlights those reports and statements from Government that define the case for a diversity of affordable housing supply to meet the full range of housing needs, as required by the NPPF and PPG. This encompasses reports from Government departments, including CLG and HM Treasury, leading think tanks, and respected charities such as Shelter.

Government Statements

George Osborne MP, Chancellor of the Exchequer, Autumn Statement (25 November 2015)

- 3.2 In his Autumn Statement, George Osborne verbally pledged:

*“For another of the great social failures of our age has been the failure to build enough houses. In the end Spending Reviews like this come down to choices about what your priorities are. And I am clear: **in this Spending Review, we choose to build.***

Above all, we choose to build the homes that people can buy. For there is a growing crisis of home ownership in our country.** 15 years ago, around 60% of people under 35 owned their own home, next year it's set to be just half of that. We made a start on tackling this in the last Parliament, and with schemes like our Help to Buy the number of first time buyers rose by nearly 60%. But we haven't done nearly enough yet. So it's time to do much more. **Today, we set out our bold plan to back families who aspire to buy their own home.

*First, I am doubling the housing budget. Yes, doubling it to over £2 billion per year. We will deliver, with government help, 400,000 affordable new homes by the end of the decade. **And affordable means not just affordable to rent, but affordable to buy.** That's the biggest house building programme by any government since the 1970s. Almost half of them will be our Starter Homes, sold at 20% off market value to young first time buyers. 135,000 will be our brand new Help to Buy: Shared Ownership which we announce today. We'll remove many of the restrictions on*

shared ownership – who can buy them, who can build them and who they can be sold on to.

*... So this Spending Review delivers: A doubling of the housing budget. 400,000 new homes; with extra support for London. Estates regenerated. Right to Buy rolled-out. Paid for by a tax on buy-to-lets and second homes. **Delivered by a government committed to helping working people who want to buy their own home. For we are the builders.***

3.3 Most importantly, the written statement clarifies the Government's:

*“...**Five Point Plan for housing to:***

*1. **Deliver 400,000 affordable housing starts by 2020-21, focussed on low cost home ownership. This will include:***

- ... **10,000 homes that will allow a tenant to save for a deposit while they rent.** This will be in addition to 50,000 affordable homes from existing commitments*

*The scale of this programme of house building will require all sectors to play a role in delivery. **As a result, the government will remove constraints that prevent private sector organisations from participating in delivery of these programmes, including the constraints to bidding for government funding.*** [Underlining added]

DCLG Statement (25th November 2015)

3.4 The Department for Communities and Local Government announced as part of its settlement at the Spending Review 2015:

*“The government will double the housing budget from 2018 to 2019 to deliver at least 400,000 affordable homes [over this Parliament] including 200,000 Starter Homes, 135,000 new Help to Buy Shared Ownership homes and **10,000 Rent to Buy homes.**”*

3.5 In these statements the Government at the highest levels has set out its explicit support for the affordable Rent to Buy model being offered by Rentplus.

Impact of Social Rent Changes on the Delivery of Affordable Housing (Minister of State for Housing and Planning Brandon Lewis MP, 9 November 2015)

3.6 The Minister wrote to all local authorities to ask that a more flexible approach is taken to S106 agreements and negotiations on tenure mix. In this letter he notes that

following the announcement of rent reductions some approved or emerging schemes:

“are not being built out at the anticipated rate. Delay risks planned homes not coming forward and the ability of councils being able to demonstrate a five-year supply of deliverable housing land”.

- 3.7 Whilst the ability to renegotiate S106 agreements is already in place, the Minister has used this letter to encourage local authorities to:

“respond constructively, rapidly and positively to requests for such renegotiations and to take a pragmatic and proportionate approach to viability.”

- 3.8 The letter specifically asks that local authorities expedite negotiations where simple adjustments to tenure mix are proposed, without the need for full open book viability appraisals. In circumstances whereby the overall amount of affordable housing is proposed, the Minister is encouraging the “minimum amount of viability information necessary” to be sought. The letter also indicates that CLG will produce guidance on cascade mechanisms for S106 agreements to encourage flexible arrangements.

Greg Clark MP, Secretary of State for Communities and Local Government (5th October 2015)

- 3.9 At the Conservative Party Conference Greg Clark spoke of the need to deliver more housing for those increasingly shut out of home ownership:

“... the opportunities that our generation took for granted, have been slipping out of reach for the next generation. In the 20 years to 2012, the proportion of 25-34 year olds owning their own homes fell from 67% to 43%. The number of 20-34 year olds living with their parents increased by two thirds of a million.

...

*Most people in our country want to own their own home. For years governments have talked about affordable homes but in my view, not enough of them have been affordable homes to buy. I want us to put that right. I want us to build many more homes and I want to build homes that people can buy as well as rent. Shared ownership homes, starter homes for young people. **Now, homes for rent will always have a role. But why should signing a tenancy agreement mean signing away your aspirations to become a homeowner?***

David Cameron MP, Prime Minister, Conservative Party Conference Speech (7 October 2015)

- 3.10 The Prime Minister in his conference speech said that he wants to turn ‘Generation Rent’ into ‘Generation Buy’:

“But for me, there’s one big piece of unfinished business in our economy: housing. A Greater Britain must mean more families owning a home of their own. ... If you’ve worked hard and saved, I don’t want you just to have a roof over your head – I want you to have a roof of your own.

In the last 5 years, 600,000 new homes have been built. More than 150 people a day are moving in thanks to our Help to Buy scheme. ... 1.3 million to be given the chance to become homeowners. ... But the challenge is far, far bigger. When a generation of hardworking men and women in their 20s and 30s are waking up each morning in their childhood bedrooms – that should be a wakeup call for us. We need a national crusade to get homes built. That means banks lending, government releasing land, and yes – planning being reformed.

... Increasing home ownership means something else. For years, politicians have been talking about building what they call “affordable homes” – but the phrase was deceptive. It basically meant homes that were only available to rent. What people want are homes they can actually own. ...

*So today, I can announce a dramatic shift in housing policy in our country. Those old rules which said to developers: you can build on this site, but only if you build affordable homes for rent, we’re replacing them with new rules: you can build here, and those affordable homes can be available to buy. **Yes, from Generation Rent to Generation Buy**”*

Brandon Lewis MP, Housing Minister

- 3.11 In oral evidence delivered to the CLG Select Committee on 9th November 2015, the Housing Minister emphasised the Government’s aim to increase access to home ownership, *“whether it is rent-to-buy schemes”* or other avenues; *“all these avenues will play an important part”*.
- 3.12 On 15th December the Housing Minister answered two questions posed by Solihull MP Julian Knight on affordable rent to buy housing. The first of which asked if the Government would make rent to buy housing exempt from pay to stay proposals for higher income social tenants. The Minister responded:

“Higher income social tenants in a Rent to Buy scheme will not face increased rent under proposals for pay to stay. This is because the rent they pay is an intermediate rent which is excluded from social rent policy.”

- 3.13 A further question on whether the Government will include rent to buy housing as part of the Housing and Planning Bill’s proposed general duty on local authorities to promote the supply of Starter Homes. The Minister referred to rent to buy:

*“The Housing and Planning Bill will support our manifesto commitment to build 200,000 Starter Homes to help more young people into home ownership. **Like other valuable products which support access to home ownership, affordable rent-to-buy, can be considered by councils as part of their wider affordable housing requirements for their area.**”*

Housing and Planning Bill: Committee Stage

- 3.14 The Housing and Planning Bill includes a number of proposed reforms to both the planning system and the way in which affordable housing is managed. One of the proposed reforms is to phase out ‘tenancies for life’, removing security of tenancy by changing to fixed terms of 2 to 5 years which will not automatically be removed. Should the proposed clauses be accepted as part of the Bill, the availability of fixed term tenancies will be much reduced.
- 3.15 The Bill is currently at report stage; further amendments to the Bill were first considered in the House of Commons on 5th January 2016. Amongst these Greg Clark tabled a series of amendments confirming that private registered providers of affordable housing will not be required to charge high income social tenants specific rents, confirming that ‘pay to stay’ will not be mandatory. Consideration of the Bill continues.

Other Publications

Laying the Foundations – A Housing Strategy for England (CLG, 2011)

- 3.16 This document sets out an intention to ‘unblock’ the housing market and tackle the social and economic consequences of the failure to develop sufficient high quality homes over recent decades.
- 3.17 The problems noted in this Strategy and the methods to achieve the ‘unblocking’ include the following:

- A thriving, active but stable housing market that offers choice, flexibility and affordable housing - this is critical to England's economic and social wellbeing;
- *"The problems we face are stark"* and have been compounded by the impact of the credit crunch;
- *"Urgent action to build new homes"* is necessary as children will grow up without the opportunities to live near their family;
- *"Housing is crucial for our social mobility, health and wellbeing"*;
- *"Housing is inextricably linked to the wider health of the economy"*; and
- Fundamental to the whole approach of the strategy is communities (including prospective owners and tenants), landlords and developers working together.

3.18 The Strategy proposed an increase in the estimated output of affordable homes between 2011 and 2015 to 170,000 dwellings (from the 150,000 dwellings proposed by the previous Government).

3.19 The Strategy also sets out the support needed to deliver new homes and 'support aspiration', including ***"including encouraging new private entrants into the social housing market, and considering innovative new approaches to funding affordable housing in the medium term"***. This Strategy gives explicit support for the entry of for-profit providers into the affordable housing market. The ability to charge rents at up to 80% of market levels is encouraged to provide additional financial capacity to:

"deliver more housing than would otherwise be possible ... reducing the pressure on funding from the taxpayer ... This means that we can ... help a greater number of households experience the benefits of an affordable rented home".

3.20 The Strategy further states that the entry of for-profit providers adds to the affordable housing sector's diversity and potential financial capacity, as raised by the investment opportunity presented to institutional investors such as pension funds.

Fixing the Foundations: Creating a More Prosperous Nation

3.21 Planning reforms were announced in this document, itself following on from *Laying the Foundations*. These reforms are aimed at driving up living standards and providing a better quality of life in Britain. At paragraph 9.23 the report commits the Government to delivering affordable homes to buy, confirming this Government's

support for models of extending opportunities for affordable home ownership to many more households.

Building the Homes We Need (KPMG and Shelter, 2014)

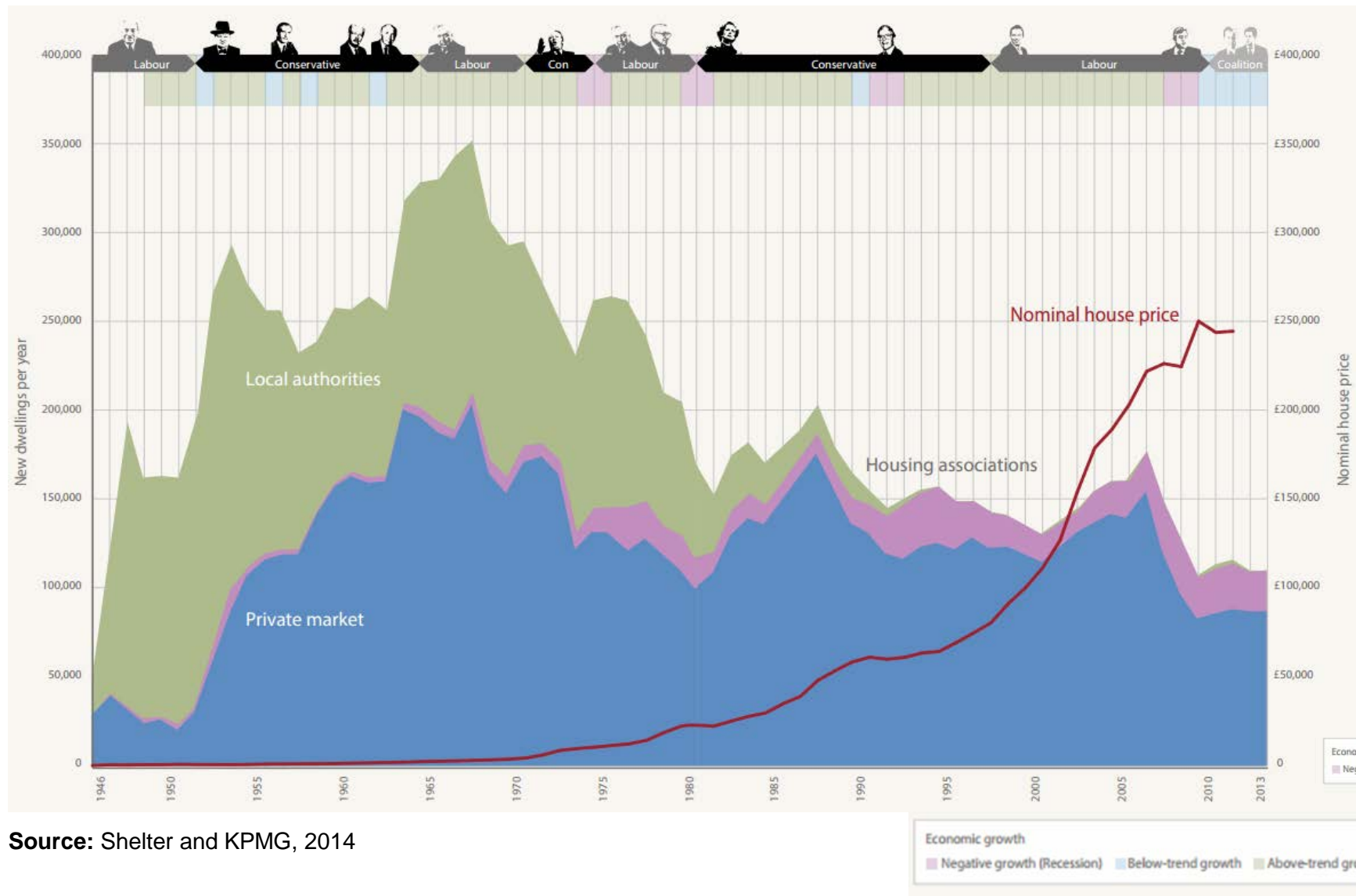
- 3.22 This report is the result of a year-long project by KPMG and Shelter to understand the housing shortage and provide advice to the Government on the housing crisis following the 2008 recession. The report starts by setting out:

“Everyone now accepts that we have a desperate housing shortage in England.

Each year we build 100,000 fewer homes than we need, adding to a shortage that has been growing for decades. What’s more, our current house building system seems incapable of delivering growth on the scale required. Growing demand means that without a step change in supply we will be locked into a spiral of increasing house prices and rents – making the current housing crisis worse”.

- 3.23 The report highlights that if firm action is not taken to build more homes there will be significant adverse consequences for the UK economy and society, including rising homelessness, stalled social mobility, declining pension saving and an ever-rising benefit bill.
- 3.24 The report includes the graph shown on the following page, displaying the levels of house building in England since 1946.

Figure 3.1: House building since 1946



Source: Shelter and KPMG, 2014

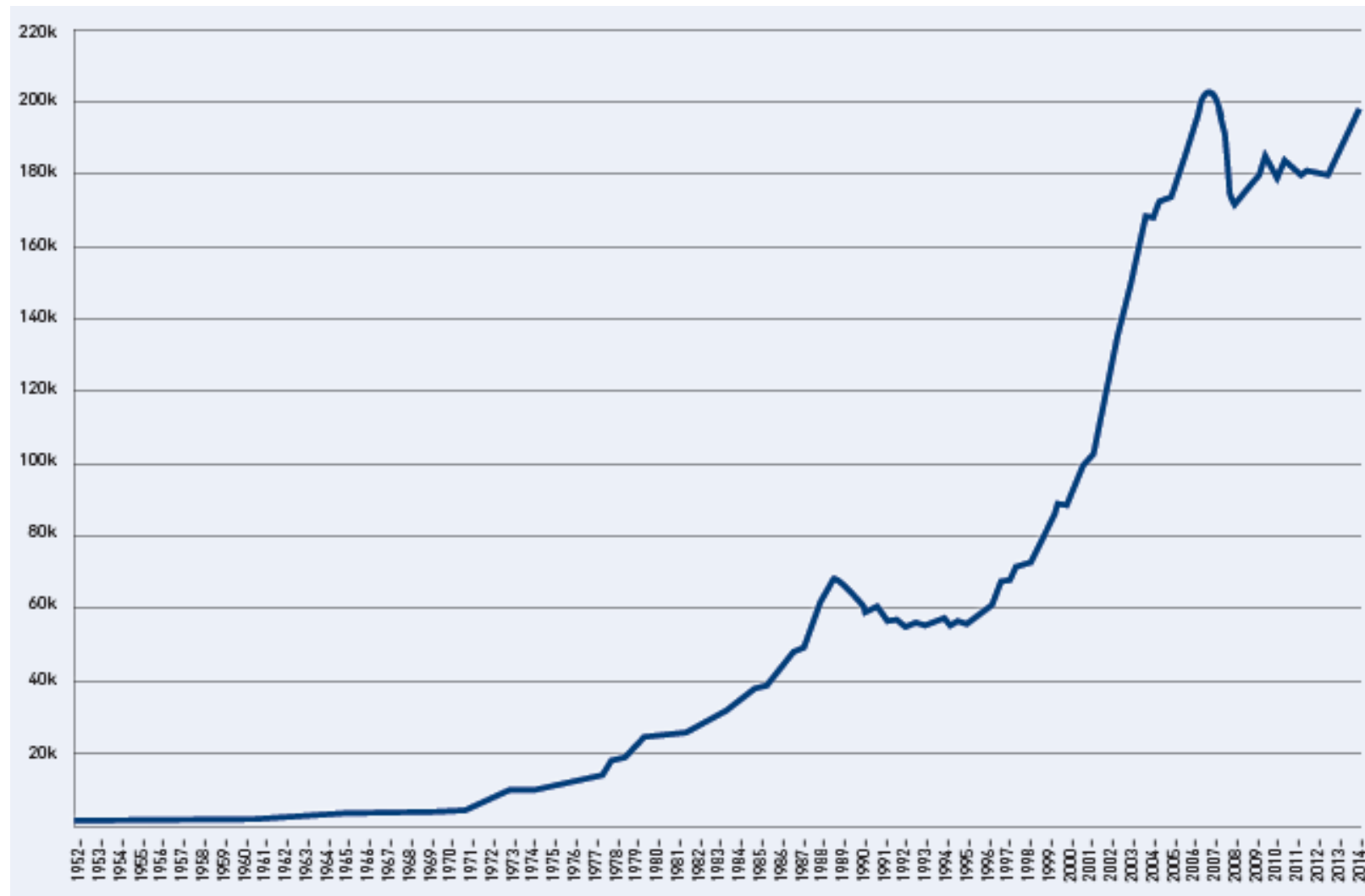
3.25 This shows four interrelated trends:

- An overall decline in house building since 1946, including two recessionary declines after 1980 and 2007;
- High levels of social housing provision by local authorities until the mid-1970s;
- The growing contribution to affordable housing provision by housing associations since the late 1980s; providing most of the new affordable housing stock but not matching anything like the previous local authority contribution; and
- The gradual increase in the nominal house price through until about 1985 which then grows significantly over the subsequent 30 years.

Home Truths 2014/15: Broken Market Broken Dreams (NHF, 2014)

- 3.26 The report sets out that England is suffering a catastrophic housing crisis that has been more than a generation in the making. The number of new homes built each year is not nearly enough – to keep pace with demand another 245,000 homes per year are needed in England; currently only around half of this is built each year.
- 3.27 The report illustrates that house prices and private sector rents are rising ever higher, locking more people out of home ownership, as demand has outstripped supply for many years. It notes that a rising number of people are now private renters and face high costs. As well as impacting on day-to-day living, high housing costs have also previously increased the benefit bill. The number of people who claim housing benefit but are also in employment has doubled over the last six years. Increasingly, earnings do not cover all living costs and so households need assistance from the Government and the taxpayer.
- 3.28 The report offers alarm bells: people struggling with rent, needing housing benefit to keep a roof over their heads, being unable to be near family, unable to buy their own home or downsize to suitable and more affordable homes. This would be mitigated if more homes of all types were built at different price points in the market to meet more needs.
- 3.29 Demand for housing - through increasing population, decreased household size and other factors is outstripping a chronic undersupply of housing. Estimates show around 245,000 new homes are required each year to keep up with demand, and even more would be needed to clear the backlog of demand. As a result, house prices have more than doubled (after accounting for inflation) in 40 years, as illustrated by Figure 3.2, overleaf.

Figure 3.2: Nominal House Prices in the UK



Source: Home Truths 2014/15: Broken Market Broken Dreams (2014)

- 3.30 In the 1960s, a home was four and a half times the average salary and within the realms of being attainable with a reasonable deposit. As house prices have risen, wages have not been able to keep up; across the UK the average home now costs almost seven times the average salary, making home ownership largely unattainable for most young people.

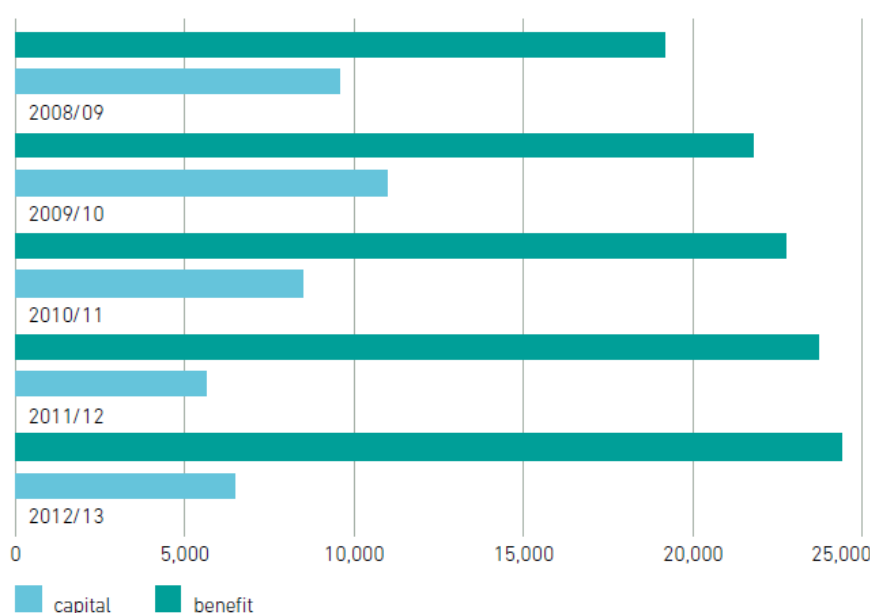
Housing Britain: Building New Homes for Growth (CBI, 2014)

- 3.31 This report states that the UK's housing market has not functioned healthily for decades, with an imbalance between the supply of new homes relative to demand being at the centre of this problem. This has created the current situation whereby half the number of houses needed every year has been built over the last decade.
- 3.32 The report notes that UK house prices have increased 54% since 2004. Housing shortages are also pushing up market rent at a time when forecasts for disposable income remain weak, putting severe strain on household finances and limiting housing choice. This demand gap has inflated the cost of buying or renting a house, making it more difficult for people to join and move within the housing market. Following the 2008 recession, from 2011 UK house prices once more began rising.
- 3.33 The report notes that the 1.8 million people on local authority waiting lists for social rented properties clearly demonstrate the strong demand for affordable housing from families up and down the country³.
- 3.34 Figure 3.3 (overleaf) shows the upward trend in levels of housing benefit paid out in recent years, compared to increasingly low levels of capital investment in boosting the housing stock. In 2013 over £24bn was spent on housing benefit in total, whilst just under £6.5bn was used for capital development⁴. Rising government spending on housing benefits is symptomatic of a housing market unaffordable for many people.

³ *Improving the Rented Housing Sector*, Department for Communities and Local Government

⁴ It should be noted that the Government has implemented rent reductions for housing associations; this may impact overall supply of affordable housing from the sector due to financial capacity being limited.

Figure 3.3: Housing Benefit and Capital Spend Comparison 2008/09 to 2012/13



Source: Housing Britain: Building New Homes for Growth (2014)

In the Mix: The Need for a Diverse Supply of New Homes (Shelter, 2014)

- 3.35 In this briefing, Shelter set out the need for a balance of tenures across the housing growth in England, following on from the KPMG and Shelter report described above, at paragraph 3.10. It emphasises the need for a balanced mix of tenures, from a diverse range of funding sources and delivery models “*involving both the private and public sectors*” in order to achieve a more resilient housing stock:

“...this diversity makes the housing system more productive over the long term by making it more resilient to fluctuations in house prices and less prone to cyclical shocks. Diversity of supply will not only help us to increase supply to 250,000 homes a year, but will help ensure that high levels of output can be sustained over time.”

- 3.36 The benefits of this diversity will not only provide longer-term benefits to the economy, but also have wider social benefits:

“England’s housing crisis has impacted different people in different ways, and no single tenure can offer the best solution for everyone. Each different type of housing plays a different role in the English housing system, catering for different preferences and needs – and we need more of all of them. Just as not everyone needs an intermediate or social rented home, not everyone will be able to afford to buy, even if total housing output is dramatically increased and house prices stabilised.”

- 3.37 Shelter note that by building a mix of housing, including intermediate homes, more people’s aspirations to home ownership can be met; a “*better alternative to private*

renting” may be provided and the “steady rise of in-work housing benefit claimants” can be halted. To achieve the upswing in delivery required (as set out in the earlier KPMG and Shelter report) to achieve a more balanced housing market, the briefing states that there should be a boost to public and private investment in affordable housing. Of the 6 recommendations set out in this briefing, one is for the Government to “explore new forms of intermediate tenure to widen access to intermediate homes, including low share shared ownership and affordable rent-to-buy homes.”

- 3.38 The briefing notes the national preference for home ownership, as set out in a prior Shelter report⁵, for reasons such as greater stability and control over the home. It also recognises that achieving a significant boost in housing supply is likely to achieve political legitimacy by *“the majority of new homes offering a route to some form of ownership”*. Research⁶ has shown that:

“66% of private rented are unable to save anything towards a deposit for purchasing their own home ... [the] net result is that fewer people can cross the widening financial gap between renting ... and market homeownership in one leap: if ownership is to be extended to more people a substantial increase in the intermediate options for people who can’t afford to buy a suitable home is needed.”

- 3.39 Without intervention, many families will continue to be trapped in the ‘insecure’ private rented sector, spending significant proportions of household income on rent. To meet the needs of those households currently priced out of accessing home ownership, Shelter suggest more affordable, intermediate homeownership solutions to be vital to helping those out of private renting and a commensurate reduction in in-work housing benefit claimants. Rent-to-buy offers one solution to these problems.

NatWest Millennials Home Buying Survey (NatWest, June 2015)

- 3.40 This Survey has shown that of those polled, 69% of young adults (aged 22-30 years old) currently either renting or living with parents believe they will not save enough for a house deposit within 5 years. 44% considered their prospects of buying a home to be more optimistic as a result of the Help to Buy scheme.

⁵ Homes for Forgotten Families (Shelter, 2013)

⁶ England’s ‘rent-trap’: just another reason housing is now a top 5 issue for voters (YouGov for Shelter, 2014)

Build to Rent: Funding Britain's Rental Revolution (Addleshaw Goddard and BPF, July 2015)

- 3.41 This report sets out an overview of the 'transformation' of the housing market in Britain over the past 15 years, in which time homeownership has steadily declined from a peak of 69% in 2001. The private rented sector has grown significantly over the same period, overtaking the social rented sector in providing homes and forecast to provide homes to one in four households by 2020:

"Growing demand for rented accommodation and the response to this demand from professional investors looks set to change the market, perhaps permanently.

... businesses are looking to create new clusters of homes for rent, as long-term investment opportunities. The result has been dubbed Build to Rent".

- 3.42 The report references research which estimates that Build to Rent could generate over £30 billion of new investment in Britain over the next five years, delivering over 150,000 homes. The report notes the 'dire' need for affordable housing, *"but this must not diminish the need for quality market-rented housing or housing for sale either".*

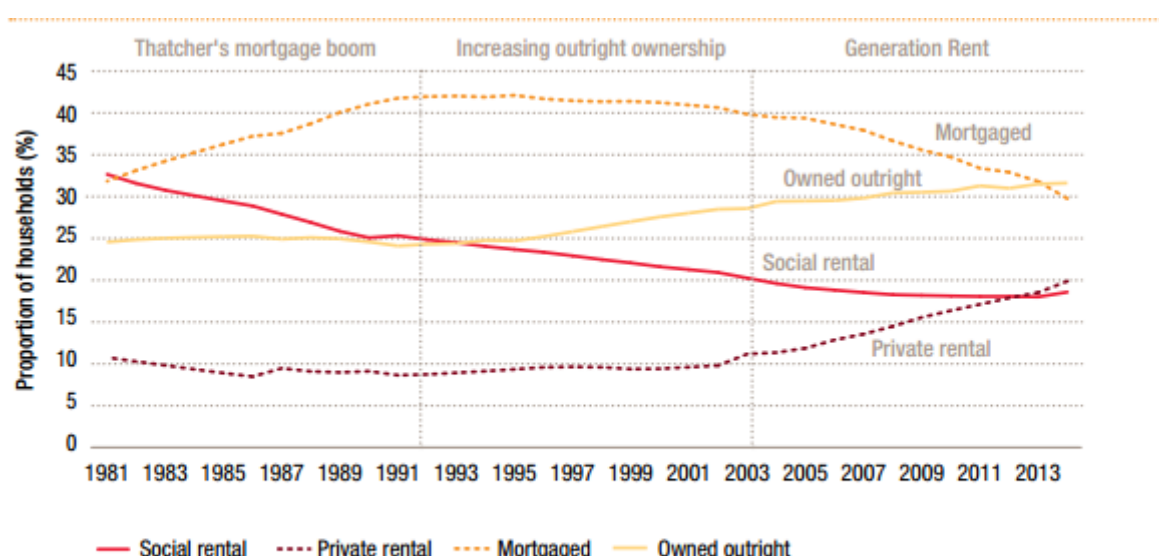
UK Economic Outlook – UK housing market outlook: the continuing rise of Generation Rent (PwC, July 2015)

- 3.43 This report notes:

"As house prices have risen and social housing supply remains constrained, the number of households in the private rented sector has more than doubled since 2001, rising from 2.3 million to 5.4 million by 2014, around 20% of the total. We project that this trend will continue with an additional 1.8 million households becoming private renters by 2025. This would take the total to 7.2 million households – almost one in four of the UK total. The trend is particularly strong in the 20-39 age group where more than half will be renting privately by 2025. The rise of 'Generation Rent' will continue."

- 3.44 The report also notes the fall in households who own a home with a mortgage (from almost 45% in 2001 to under 30%), linking this with a limited housing supply, affordability of the housing market and poor mortgage availability. This is shown in the graph, overleaf:

Figure 3.4: UK share of households by tenure type (%)



Source: PwC analysis of English Housing Survey, DCLG

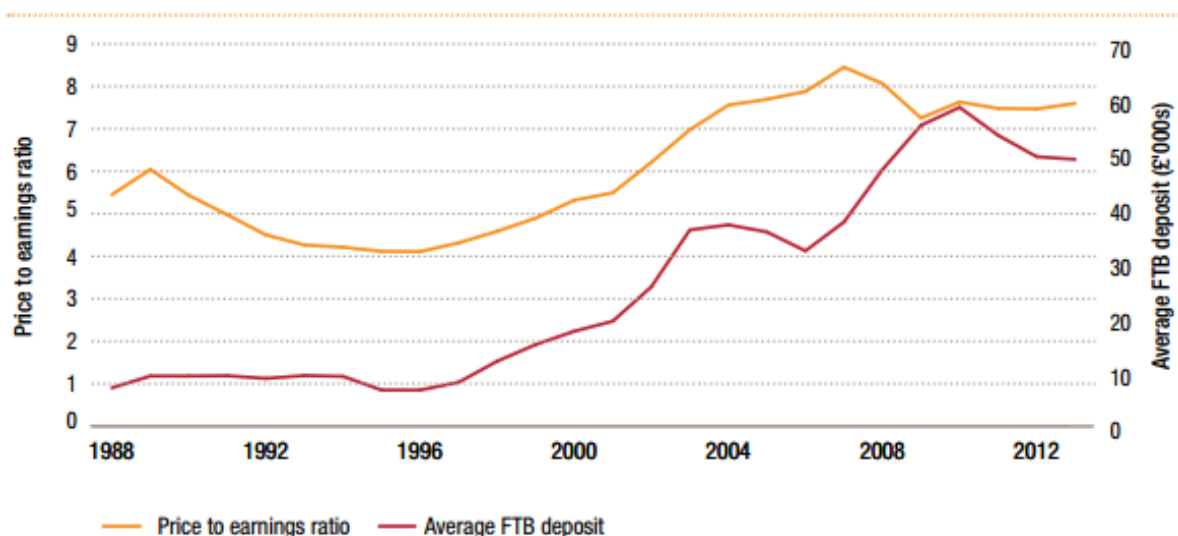
3.45 It adds:

“A significant rise in the supply of affordable housing might change this in the long run, but seems unlikely to occur fast enough to stem the rise in Generation Rent between now and 2025.

... the ability of people to use the mortgage market to make the transition from renting to owning appears to be diminishing, with younger generations having to wait longer to buy in many cases.”

3.46 The report notes that this affordability crisis, and inaccessibility for many to mortgages, stems from the *“combined effect of rising house prices and lenders withdrawing higher Loan-to-Value mortgages”*. This point is highlighted in the graph, overleaf. Average first time buyer deposits have increased almost five-fold, an increase much greater than the growth in average earnings over the same period.

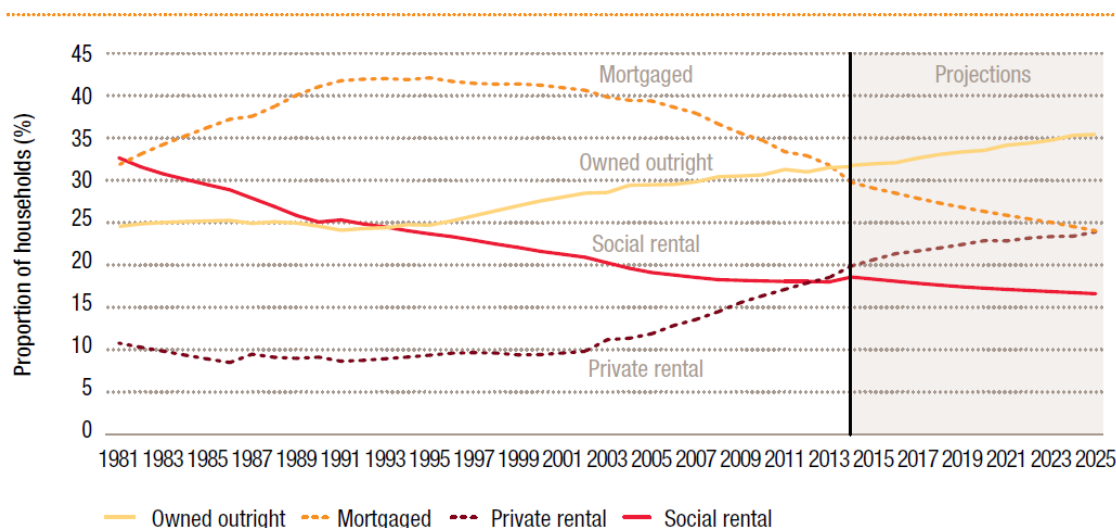
Figure 3.5: House price to earnings ratio and average first time buyer deposit, 1988-2013



Source: PwC analysis of ONS data

- 3.47 The report summarises: *“This trend threatens to lock large segments of society out of the housing market, especially those on middle or low incomes, and who live in higher priced areas”*. Forward projections for housing tenure in this report suggest that current trends will continue (see Figure 3.6, below).

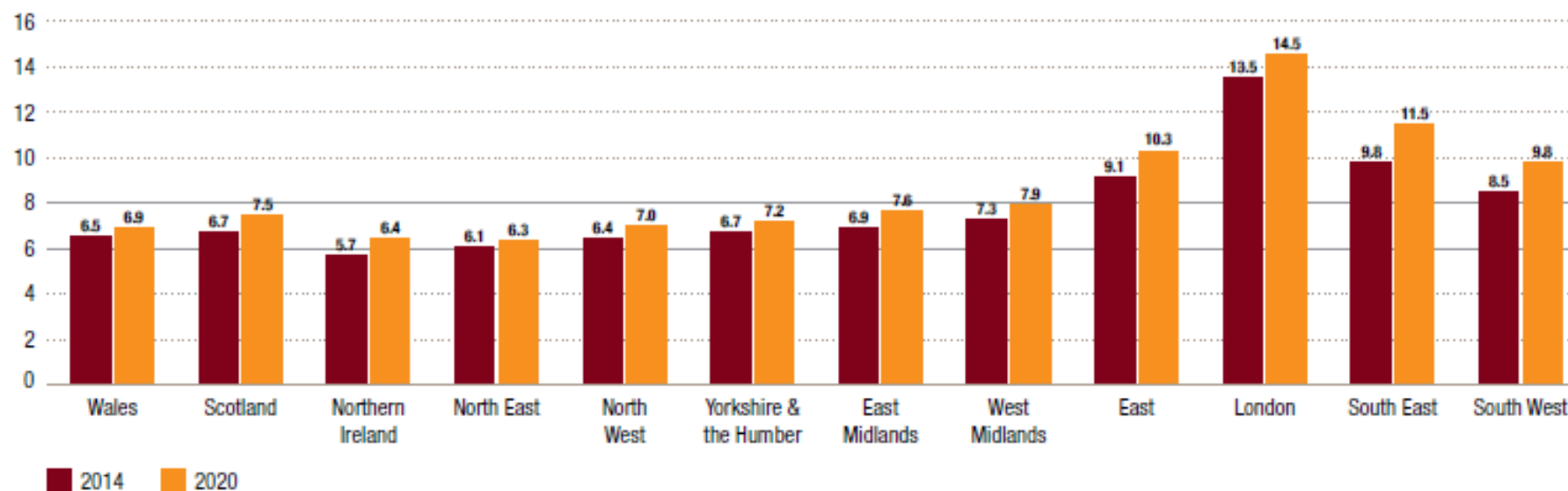
Figure 3.6: Projections for UK housing tenure, share of households



Source: PwC analysis, English Housing Survey

- 3.48 The report also sets out house price projections for the UK regions, indicating that the current difficulties of affordability across the country will continue (see overleaf).

Figure 3.7: Regional average house price to individual full-time earnings ratios



Source: ONS for 2014, PwC main scenario projections for 2020

National Housing Federation Statement (NHF, 20 August 2015)

- 3.49 The National Housing Federation's Assistant Director of Campaigns commented on the May-July 2015 quarter housing statistics released by CLG:

"Britain is in the grips of a housing crisis, and at the centre of this huge national issue is the fact that we've failed to build enough homes for a generation or more.

Today's figures are encouraging as they show housebuilding is at its highest level since 2008. However, we need to continue to increase our efforts as a nation to build the homes that are desperately needed. Last year alone we built less than half of the homes needed, pushing house prices and home ownership further out of reach for millions of families and young people.

... We want to work together to end the housing crisis and provide quality affordable homes to everyone who needs them."

Summary

- 3.50 The Chancellor of the Exchequer in his first Autumn Statement of this Parliament and the Prime Minister during PMQs announced explicit support for the development of affordable homes to buy. The recognition of affordable housing to buy in helping to resolve the nation's housing crisis follows on from a growing wealth of evidence that demonstrates a clear and pressing requirement to build more homes to meet a significant level of unmet need. The Minister for Housing and Planning, Brandon Lewis MP, has also recently expressed his support for local authorities taking a more flexible approach to negotiating tenure mix, expediting negotiations in order to speed up delivery of affordable housing.
- 3.51 The need for affordable housing is not solely met by social rented homes, which only meet the needs of the poorest. The evidence in this section highlights the ability of more affordable homeownership solutions to help households out of private renting. Those who cannot yet afford to buy on the open market because they are either trapped by poor quality and expensive private rented accommodation, or have not yet been able to leave the parental home due to the inhibitive cost of buying have had their needs recognised by this Government. The Chancellor's Statement clearly signals this Government's intention to widen opportunities for home ownership by removing barriers to private for-profit providers entering the market to deliver more affordable homes – specifically including £200m to support delivery of 10,000 Rent to Buy homes – and add to the diversity of the sector.

Rentplus: The Model

Section 4

- 4.1 The Rentplus model is aimed at providing an affordable rented home to households until such time as the occupier can afford to purchase the property. In this way it aims to assist those households who cannot currently purchase a house on the open market but who would otherwise not be considered a priority, or qualify for social or affordable rented homes.
- 4.2 The model is essentially one of rent to buy, with a five year renewable tenancy at an affordable rent, managed by a housing association. All dwellings are to be leased to Registered Providers at an affordable rent for up to 20 years; the housing association will be responsible for managing and maintaining the properties. Homes will be sold on a phased basis every 5 years; those homes not sold at year 5 will be re-let to tenants for a further 5 years.
- 4.3 Upon registering interest in a scheme households are assessed on their suitability for a 5, 10, 15 or 20 year tenancy after which it is expected that the home will be purchased at market value. At the time of purchase, the occupier will be gifted 10% of the purchase price as a deposit towards a mortgage by Rentplus.
- 4.4 Rental of the property before purchase will be at the lower of 80% open market rental (including service charge) or Local Housing Allowance (LHA). The household will be supported through the term of their tenancy by the managing housing association to save and increase the deposit to assist the mortgage application. The assured tenancy period also benefits from improving a tenant's ability to prove credit-worthiness.
- 4.5 The Rentplus model aims to improve the ability of purchasers to build a suitable deposit, as well as improving, or creating a good credit rating, by paying a reduced (affordable) rent rather than a private market rent for the duration of the tenancy (as set out at paragraph 4.4, above).
- 4.6 During the period of rental tenancy occupiers can serve notice to vacate a Rentplus unit on one month's notice. Assistance may be sought from the managing housing association to assist in re-housing.

- 4.7 The Rentplus model permits tenants to swap with other tenants who are able to bring forward an early purchase of the unit, to assist those who are unable to purchase the property at the programmed time.
- 4.8 If the property is sold within 2 years of the original occupier purchase then all or a part of the gifted deposit will be repayable to Rentplus on such disposal, subject to a maximum cap of the original sum gifted.
- 4.9 All Rentplus homes are sold after 20 years. If the occupier does not purchase the property then the housing association has the option to acquire the unit, with Rentplus providing a 10% discount on open market value to the housing association. The future use of the unit as any other NPPF compliant affordable property can then be determined by the housing association.
- 4.10 In the circumstances of neither the tenant nor housing association purchasing the property after 20 years, the property is sold on the open market and 7.5% of the net sales proceeds are paid to the Local Authority to reinvest in new affordable housing provision.
- 4.11 A Memorandum of Understanding may be entered into with each individual LPA to seek to replenish the stock of Rentplus homes on a one for one basis, retaining a proportion of the affordable housing stock in the local area.

Considering the Definition

Section 5

- 5.1 This section discusses the model's compliance with the planning definition of affordable housing as in Annex 2 of the NPPF, set out below for ease of reference:

“Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.”

- 5.2 Affordable rent and intermediate affordable are defined in the Annex as:

“Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable).

“Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing.”

- 5.3 The Rentplus model is unusual in that it conforms to two of the three definitions of affordable housing, falling under the remit of affordable rent and intermediate for sale at different points of its lifetime. It cannot be considered a social rent product due to the rent falling outside the guideline level of the national rent regime. The definitions set out within the Annex are not prescriptive, but offer a number of different terms within which to describe various affordable tenures and products. The Rentplus model is not unique in this aspect of diverging from the more traditional social rented / intermediate affordable tenures, as there are other models of affordable tenure being delivered by private registered providers across the UK.

- 5.4 The Rentplus model is considered to be a hybrid form of affordable housing. Unlike widely understood shared ownership or shared equity products, in which an initial percentage of the home's value is purchased and rent is paid on the remaining share, Rentplus households have the opportunity to save towards the deposit before purchase of that same home. This is achieved by paying a reduced, affordable rent

during the agreed period of tenancy which is fixed (and secure) for a period of 5 years, the same as currently offered by housing associations for affordable rent units.

- 5.5 As set out in Section 4, the model fixes the rent at an affordable level, being the lower of either 80% below market rent or the Local Housing Allowance (LHA), including service charge. This is strictly in accordance with the definition of affordable rent as defined in the NPPF Annex. The model will be managed by a registered provider to households who are allocated according to local authority priorities through the local housing register or other local mechanisms (such as choice based lettings or Help to Buy agents), further bringing this into compliance with the NPPF definition of affordable rent.
- 5.6 As defined by the Annex, the sale of Rentplus properties will be in line with other intermediate affordable homes, at a cost above social rent. The purchase price will be at the level of open market value, but will effectively be discounted by 10% by the 'gifted' deposit from Rentplus. The model should also therefore be considered a low cost home for sale under the definition of intermediate affordable. This is also comparable with rented properties on which tenants can exercise the Right to Buy through existing legislation.
- 5.7 The NPPF definition includes the provision that affordable housing should *"include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision."* Such provisions are secured by the Rentplus model by direct subsidy (in the form of a 10% discount to the Housing Association and 7.5% of net proceeds payable to the local authority upon sale) for future affordable housing.
- 5.8 Where a Memorandum of Understanding (MoU) has been agreed Rentplus will, upon the sale of homes, use its best endeavours to invest in new units on a one-for-one basis. Each MoU is to be negotiated on an individual basis with each local planning authority, but is considered an integral part of the product, comparable with the recycling of receipts from shared equity units by housing associations. The recycling of funds by housing associations is not guaranteed to be reinvested within the same local authority area as the original units, whereas the Rentplus MoU provides a best endeavours commitment to deliver further affordable units on a one-for-one basis in that local authority area. This thereby raises the overall level of affordable housing that is delivered, whilst reducing the numbers on housing registers and increasing the financial investment in the creation of sustainable communities in that area.

- 5.9 Each subsequent unit delivered by Rentplus would be on the same affordable rent basis. Where a property is not purchased by the occupier, the managing housing association has the opportunity to purchase instead, retaining this as part of its stock of affordable units. Whether through direct reinvestment by Rentplus or recycling by the managing housing association, where an MoU has been agreed, this ensures the affordable housing subsidy is reinvested for the benefit of local people.

Recommendations

Section 6

We Are the Builders: Generation Rent to Generation Buy

- 6.1 The Government has announced its full, explicit support for private investors to deliver affordable Rent to Buy homes in order to extend the opportunities for home ownership to back families *“who aspire to buy their own home”*. The Chancellor of the Exchequer, George Osborne MP, in his Autumn Statement pledged to deliver *“10,000 homes that will allow a tenant to save for a deposit while they rent”, “removing constraints that prevent private sector organisations from participating in delivery”*. The Prime Minister also announced in his Party Conference speech to turn *Generation Rent* into *Generation Buy*; this Government is explicit in its support for affordable homes available as rent to buy.
- 6.2 Rentplus seeks to fulfil that role to extend a hand to those households currently unable to save for and access the open market to purchase their own home whose needs are not met by the current affordable housing sector and other home ownership initiatives.

Moving In: The Benefits of Rentplus

- 6.3 The purpose and practical detail of the Rentplus model, as described in **Section 3**, demonstrates that Rentplus has been developed as an investment product that will enable a rolling stock of homes for rent and eventual sale to complement other affordable housing products. As set out in **Section 2**, the delivery of a large quantity of affordable housing is considered highly beneficial in areas of high need. As Rentplus homes are sold on a phased basis every 5 years the model also creates its own mixed tenure development over the lifetime of the scheme. As Rentplus is a fully funded model and does not require any public subsidy to deliver homes, it will result in significant additional investment that would not otherwise be available.
- 6.4 As noted in **Section 3**, the current problems with the housing market do not meet the diverse needs of all, but are instead forcing greater welfare dependency through an increasing reliance on the private rented sector. This includes those who are in-work housing benefit claimants, for whom rent costs take up such a proportion of income that it is very difficult to save towards a house deposit. There is considerable

aspiration towards home ownership; this is recognised in Government policy and encouragement towards intermediate affordable housing delivery.

- 6.5 This is also supported by planning decisions; as set out in the Secretary of State appeal decision referred to in **Section 2**, it is important to recognise that affordable housing delivery should not be restricted to meet a narrow definition of need, providing homes only for those households with 'Reasonable Preference'. This is regarded as 'unduly restrictive', failing to recognise the needs of 'hard pressed' households for appropriate affordable housing which meets the Government's intention to enable households to *"climb' to full owner occupation"*. Households entering a scheme with a mix of house types and with the ability to save towards accessing home ownership at a flexible point in time will create a full mix of social and economic groups.
- 6.6 Those reports referenced in **Section 3** demonstrate that current affordable housing tenures do not meet the full needs of all those aspiring to ownership, principally as these rely on ready availability of savings to access shared ownership mortgages. Equally, this product will be a realistic alternative for those households who are not able to purchase their home through the Government's Starter Home Initiative, as acknowledged in the Autumn Statement. As a great number of those households would not be considered eligible for social rented homes, access to any affordable product is significantly constrained. The Rentplus model will diversify the affordable housing stock available to those households, and enable a greater number of households to access affordable housing without recourse to welfare support. This diversity of supply is a crucial factor in solving the nation's significant housing crisis.
- 6.7 The Rentplus product offers the security of rental at an affordable level whilst allowing households aspiring to home ownership the opportunity to save towards and purchase with a gifted deposit. The basis for setting and charging rent levels is guaranteed through an assured shorthold tenancy, giving added certainty to those households who may otherwise be subject to private rent level fluctuations (typically rent rises) and insecure tenancy agreements. This is a significant benefit of the model which is likely to be very attractive to those not able or desiring to access other forms of affordable housing before obtaining a mortgage. This will also remove households from the housing register, allowing local housing authorities the ability to focus greater resources on those most in need.
- 6.8 The product also offers the flexibility to alter the point of purchase on a phased basis at five year intervals, as well as the benefit of a property being managed and

maintained by a housing association throughout the period of it being a Rentplus property.

- 6.9 The product is new, and therefore not previously considered within either housing evidence documents such as SHMA or in Local Plan policies. Section 4 has set out the model's compliance with the NPPF definition of affordable housing. The NPPF seeks to encourage LPAs to plan for a range of housing to meet all needs, across market and affordable tenures, whilst the Government has made it clear that encouraging home ownership is central to the country's economic stability and social justice⁷. It is clear that mixed, sustainable communities are at the heart of planning and that planning should not seek to threaten the ambition of business, or to prevent viable schemes from bringing forward social, economic and environmental benefits.
- 6.10 By providing a rental product at the lower of 80% below market rent or at Local Housing Allowance (LHA), households are also given a hitherto-unavailable opportunity to save towards a deposit without the need to revert to parental handouts, remain living with parents in their teenage bedrooms, or possibly to live in poor quality cramped rental conditions. Not only does the Rentplus model offer households the opportunity to be able to afford to save for a deposit and the costs associated with purchasing a property, but the gifted 10% deposit effectively offers the property for sale at below-market rate at the point of purchase.
- 6.11 Certainty is also offered to local planning authorities as units are managed and maintained by a housing association, with the product only being offered to eligible households on the local housing register. Those households may otherwise fail to be offered an affordable property due to not being categorised as a high priority household. As described in **Section 3**, this situation traps a considerable number of the non-home owner population, and in particular what has become known as *Generation Rent*, in a hard to escape cycle of renting at private market rates. Unable to save any significant sum for a deposit this generation is struggling to obtain a mortgage; this has contributed to the ever-rising age at which Britons enter home ownership.
- 6.12 A further point to note is the potential for delivery on rural exception sites where a small quantity of market housing is already accepted to improve scheme viability. In rural areas affected by poor affordability the existing supply of affordable housing products would be complemented by Rentplus homes. These would further support

⁷ Here's how to build a homeowning Britain (David Cameron and George Osborne, The Times, 4 July 2015) and the Autumn Statement (HM Treasury, 25 November 2015)

the diversity of housing delivered in rural areas, contributing to the ongoing sustainability of those communities and assist those trapped by being unable to afford market housing but not high priority enough to receive social or affordable rented homes.

Plan-Making to include Rentplus

- 6.13 Local Planning Authorities are encouraged by the NPPF to significantly boost the supply of housing, including through the provision of affordable housing which is a material planning consideration, and an inherent part of planning for housing through a proper, full objective assessment of housing need. By including a proportion of Rentplus units within the mix of any scheme, the local planning authority is also given the opportunity to increase the diversity of homes on offer. Together with open market, social rented, affordable rent, and intermediate affordable units local authorities have the ability to approve schemes that fully accord with the NPPF's aim to create mixed and sustainable communities.
- 6.14 People also aspire to home ownership. This provides households with a financial stake in the local community. The specific Rentplus model, together with other forms of affordable housing, also widens local housing choice adding to a more mixed, balanced local community.
- 6.15 It is the intention of the Rentplus model to be delivered alongside other forms of affordable housing, acting as a complementary product as part of the housing mix to meet the needs of those households whose aspirations towards home ownership are not currently achievable through other intermediate affordable tenures. This can also deliver the benefit of enhancing the overall affordable housing offer and increasing the certainty of deliverability on sites where viability may be an issue. Early delivery of Rentplus homes, in volume, is a further benefit of this diversity of tenure offer.
- 6.16 Whilst the transitional nature of the product (from affordable rent to ownership) may present a difficulty for local planning authorities in defining it for the purposes of determining applications or counting for housing land supply, it should be considered a suitable method of diversifying local affordable housing offer without recourse to public funding. This also enables a greater overall level of affordable housing to be delivered both in the short term on individual sites, and in the longer term, as Rentplus stock is replaced.

- 6.17 We recommend that to incorporate the Rentplus model into the local plan, that the below text is included within an affordable housing policy. This will enable a degree of flexibility to be employed when negotiating the tenure mix on individual sites.

“The Council will seek a developer contribution of X% towards the provision of affordable housing on residential developments of X dwellings or more. The mix of affordable dwellings may be negotiated, taking into account site specific issues and viability. The mix should take into account local need for social rented and intermediate affordable tenures, including Rent to Buy models, such as Rentplus.

There will be a strong presumption in favour of the affordable homes being fully integrated within proposed development. However the Council may consider off site provision, for instance to enable other policy objectives to be met, subject to an equivalent level of developer contribution being provided. There will be a presumption in favour of cross-subsidy to enable a higher proportion of affordable housing to be provided, preferably through an element of affordable Rent to Buy, such as Rentplus, or market housing. Off site provision could be by way of direct affordable housing provision on an alternative site, or by a financial contribution which would enable provision elsewhere in the local authority area.”

Incorporating Rentplus: S106 Sites and Current Developments

- 6.18 Rentplus has been established as a specialist provider of affordable housing in the private sector. The model as described in **Section 3** is specifically designed to provide housing which is affordable to local people aspiring to home ownership. The involvement of a housing association should give the security and assurance that such homes are to be properly managed, whilst the sale of the homes provides Rentplus with a capital sum return. This enables replacement affordable housing delivery in the local authority area by Rentplus as well as a return to the local authority in the case of sale on the open market to reinvest in local affordable housing. The ability for the managing housing association to purchase the unit at a 10% discount if the occupier does not wish to purchase offers a further method of retaining an affordable unit within the local stock.
- 6.19 Other social benefits which are a material consideration in decision making include the ability of households to integrate with neighbours over a longer period before purchasing the property; the ability to renew tenancies; and swapping with other tenants at the time of purchase which offers flexibility to those not ready to purchase at the previously envisaged date.

- 6.20 As noted in **Sections 4 and 5**, upon the sale of each Rentplus property a Memorandum of Understanding, where agreed with each individual LA, will set out the basis for the replacement of those units on a one-for-one basis in that local authority area. Other forms of affordable tenure result in a loss of housing stock, such as with shared ownership in which households can 'staircase out'; where a LA has agreed a MoU, the Rentplus model would secure the replacement of units in accordance with the terms of the MoU in order to continue meeting local needs over the longer term through continued housing stock replenishment. This is an important consideration at a time when Right to Buy is being further encouraged, and established rented tenures no longer have permanence.
- 6.21 The availability of funding for the product also makes this model potentially attractive on stalled developments where this model could improve scheme viability. As the model has readily available private funding, it is also easily translated to high volume output which could assist in areas of particular need or where housing land supply could benefit from being boosted.

Conclusions and Recommendations

- 6.22 There is a significant shortfall in affordable housing nationwide and the availability of grant funding has steadily declined over the past decade. The Rentplus product has a wide pool of prospective households for whom saving towards a home purchase is not currently possible due to falling outside eligibility for current affordable housing stock. The private rented sector offers no security, and security of tenure for traditional affordable housing looks likely to be removed by changes in the Housing Bill. The fixed period of tenancy at affordable rents in Rentplus dwellings before the point of purchase offers a significant benefit to households who will have the ability to save for a deposit - on the home they have rented - for the first time. Rentplus homes will be excluded from Pay to Stay policy, offering further certainty to those households wishing to save for home ownership.
- 6.23 Rentplus therefore offers a new product to those households whose needs are not already met by the market, whilst also diversifying local housing stock and contributing to the development of mixed and balanced communities.
- 6.24 In order for Local Planning Authorities to enable those households for whom access to social rented housing is not suitable, and whose needs are not otherwise met by affordable and intermediate tenures to enter the housing market it may be necessary to review affordable housing policies in the Local Plan, or to consider revising model conditions and clauses for S106 agreements.

6.25 The Government has pledged to significantly raise the numbers of affordable homes being delivered during this Parliamentary session, and to meet the diverse needs of those in need. This includes a significant drive towards meeting families' aspirations to home ownership. The Autumn Statement included a commitment to remove constraints that prevent private sector organisations from delivering affordable homes to deliver this promise. CLG has had its housing budget doubled and will over the period of this Parliament be focused on the delivery of at least 400,000 affordable homes, including 10,000 Rent to Buy homes. As supported by the Government, the Rentplus model would make a valuable, NPPF-compliant contribution towards significantly boosting housing supply, and most importantly in meeting need for affordable housing without further recourse to public funding.

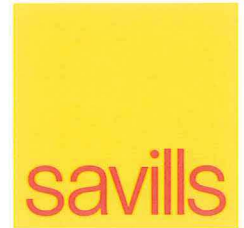
[REDACTED]

From: Sandra Ingrey [REDACTED]
Sent: 23 March 2017 12:31
To: futuremedway
Subject: New homes

Follow Up Flag: Follow up
Flag Status: Completed

Hi,
I see in medway matters on the local plan page that 30,000 new homes could be built by 2035, I see that new homes are being built in Merescourt road and at the bottom of Station road on both sides of the road, that is all well and good but where are the new hospitals and schools, yes we need affordable housing but more homes means more people, years ago we had St Barts hospital, All Saints hospital and the newly built Medway hospital, now we only have medway hospital and that is near breaking point.
Please build hospitals and schools, they are desperately needed.
Thank you
Sandra Ingrey
Rainham resident

6th April 2017
PWDJ387454



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Andrew Watson

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Dear Sirs

Re: Medway Local Plan – Development Options Consultation

Introduction

The Rochester Bridge Trust (hereafter referred to as the "Trust") would like to thank Medway Council for the opportunity to comment on the Draft Medway Local Plan. This letter should be read in conjunction with previous Local Plan representations made by the Trust, including comments on the Strategic Land Availability Assessment (SLAA). Copies of these letters can be provided on request.

Background the Rochester Bridge Trust

Formally established by Richard II in 1399, the Trust provides three bridges over the Medway at Rochester at no cost to the public. All its income is derived from 14th century endowments.

Today, the Trust is a modern charity registered with the charity commission. It has a board of 12 unpaid trustees, informally known as the Bridge Wardens. Six of the trustees are nominated by Medway, Maidstone Borough and Kent county councils. The other six are appointed by the Trust for their skills and experience. They are supported by a small team of salaried part-time staff.

The Trust is a unique survivor of the medieval system of providing bridges. It is the only major independent bridge trust still serving its original purpose – to provide river crossings free of charge to the public. This purpose is delivered through a long-term plan to maintain the bridges with careful planning and management. In addition to this, a series of educational initiatives are offered with the aim to inspire young people to gain the knowledge required to become the civil engineers – in particular bridge engineers – of the future. The Trust also makes grants for a range of charitable projects.

The Trust is also a landowner with a land portfolio that extends around Kent, including land in the Medway Council area, notably in Rochester, Rainham, Cooling and Grain. The property portfolio is held primarily for investment purposes to fund the Trust's charitable objectives.

Impact on Bridges

The Trust's primary purpose is to provide and maintain its bridges at Rochester. In light of this, the Trust has concerns over the cumulative impact of new development on the Trust's assets (i.e. the road bridges connecting Rochester and Strood - the A2). This is especially in relation to the potential impact associated with growth scenario 1 (maximising the potential of urban regeneration).

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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The impact of development on the Trust's assets needs to be fully understood. Mitigation measures need to be considered by the Council to offset the development impact on this important transport infrastructure. Furthermore, the Council needs to take full account of the impact on the junctions at each end of the road bridges (i.e. Corporation Street with The Esplanade and Canal Road with Strood High Street).

If these important junctions cannot provide sufficient capacity for the anticipated traffic flows then this will cause serious congestion, which will have significant environmental, social and economic consequences. The continuing problems of traffic congestion on the Strood gyratory system will worsen with significant new development and lengthen the duration of delays on the approach to the Old Bridge, which are already significant.

The Trust would encourage the Council to consider the use of Section 106 and/or Community Infrastructure Levy (CIL) to fund junction improvements and ensure that sufficient capacity can be achieved. This principle should apply to both sides of the bridge.

There are few road crossings on the river in Medway, and only two which are available to all classes of road traffic. Therefore, the strategic importance of Rochester Bridge to the transport network of the area should not be underestimated or undervalued.

Growth Strategy

The Trust supports the strategy set out in growth scenario 4, which it is explained, combines the elements of the other three growth scenarios. The Trust supports scenario 4 because it will provide an opportunity to spread development throughout the area, focussing it on sustainable locations. This will help to ensure that the Council does not 'put all its eggs into one basket' in terms of housing delivery so as to avoid the risks associated with relying on a few large strategic allocations, which may impose unsustainable pressure on local transport infrastructure.

Housing Supply

Paragraph 3.7 of the draft Local Plan shows that the Council can only identify a housing supply of 18,206 dwellings over the plan period. This is set against the need for 29,463 homes identified in the Strategic Housing Market Assessment. It is unclear on why the Council has excluded certain sites, such as those at Cooling and Rainham (Westmoor Farm), when there is clearly a substantial shortfall in housing supply. This needs some further thought as part of ongoing Local Plan process.

Site Specific Comments - Cooling

The Trust owns land in the village of Cooling (SLAA ref: 1104) for which representations have previously been made. The current version of the SLAA (January 2017) explains that the Cooling site is not considered 'suitable' for development. However, no rationale for why this is the case is given. It is therefore unclear on why the Council have chosen to identify the site as being not suitable.

The Trust is keen to work collaboratively with Medway Council and has produced technical information to demonstrate the constraints identified by the Council can be overcome (a summary of the work done to date is provided at the end of this letter). Through this work, it has been demonstrated that the site is relatively unconstrained, and will bring forward a number of benefits. The Trust would be grateful if the Council could please clarify why the site is not considered 'suitable' and provide feedback on the technical work that has previously been submitted.

Diversity of Housing

Paragraph A.54, the recently published Housing White Paper (2017) explains that government will encourage:

‘encourage local planning authorities to identify opportunities for villages to thrive, especially where this would support services and help meet the need to provide homes for local people who currently find it hard to live where they grew up;’

It goes on to explain that:

‘at least 10% of the sites allocated for residential development in local plans should be sites of half a hectare or less’ (A.55).

Development on the Cooling site will ensure that there is diversity in the number and type of housing sites across the local authority area so that different needs (e.g. rural housing, larger units, affordable housing, etc.) are met. The Cooling site is also less than half of a hectare and will therefore meet an important element of the housing need that the Government is clearly trying to encourage through the recent White Paper (i.e. smaller sites).

Settlement Boundary

It is notable that Cooling has a defined settlement boundary which identifies the village as a potential location for growth (rather than treating it as being open countryside). The Trust owns a site next door to the plot in Cooling (SLAA ref: 1104). A recent pre-application response (ref: PRE/15/3157) has been received to suggest that the site would be suitable for development:

‘Given that the plot is located within the village boundary of Cooling, the principle of residential development is accepted under Policy H11 (Residential Development in Rural Areas) of the Local Plan. This policy seeks to adopt a policy of minor development within the confines of villages and rural settlements.’

If a site next door to the proposed allocation is deemed suitable for development then it is unclear why the proposed allocation could not accommodate additional minor development given its adjacency to the current settlement boundary.

Overcoming Constraints

The previous representation and the enclosed technical assessment work demonstrate that the Cooling site (SLAA ref: 1104) is unconstrained. The allocation of the site for a sensitive development comprising a modest amount of housing would not compromise the character of the village. The site also provides the opportunity for new rural housing to contribute towards community infrastructure within the village. This would include contribution to a critical mass of people which may make local facilities and services viable (e.g. an extension of the bus service from Cliffe).

The Trust has prepared an illustrative layout to demonstrate that a suitable scheme could be delivered on the site; and the relevant constraints can be overcome (please refer to Appendix A). The key features of the illustrative design are as follows:

- An area of potential public open space is provided to the west of the site (in front of the Church) to preserve its setting, including views to and from the agricultural land to the north;
- The open space will provide a rural edge to the village to minimise landscape and visual impacts. It also means that new development is sited next door to adjacent development on the Main Road;
- Potential opportunities for ecology and biodiversity enhancements exist;
- One point of access is provided to ensure a safe highways design can be achieved; and
- Appropriate levels of off-street parking are achievable.

Site Specific Comments – Rainham (Westmoor Farm)

The Trust is also promoting land for development around Rainham. This comprises two sites in the SLAA:

- Site 1 – SLAA ref: 1053 (Westmoor Farm (North) Moor Street, Rainham); and
- Site 2 – SLAA ref: 814 (Westmoor Farm, Moor Street, Rainham).

Further detail on both of these sites is provided below.

Site 1 Westmoor Farm (North) Moor Street, Rainham

Site 1 has been the subject of a planning appeal (ref: APP/A2280/W/15/3012034) which was recently dismissed. The reason the appeal was dismissed was predominantly on heritage grounds. Significantly, the Inspector concluded that (emphasis added):

'However, if one ignores for a moment the heritage impacts, it is fair to say that the benefits the proposal would bring forward would easily outweigh the landscape harm. LP Policy BNE34 is clearly relevant to the supply of housing and would have to be considered not to be up-to-date. In any event, on the basis of what I set out above, there would be accord with limb (ii) of the policy. I would draw similar conclusions on the issues around the loss of best and most versatile agricultural land, and LP Policy BNE48, which works in a similar way to LP Policy BNE34, had I been in a position to do so.' (paragraph 61)

The conclusion the Inspector came to was that the harm of the particular scheme he was assessing would be 'less than substantial' (para 38). However, when the planning balance was applied he felt that he could not support the scheme because of the negative impact on heritage assets. This conclusion implies that, subject to an appropriate design being achieved, the site would be a good candidate for development. Significantly, it is also recognised in the SLAA assessment table for site 1053:

Although it may be possible to mitigate any detrimental impacts through a sensitive approach to the design. (November 2015 SLAA)

The Trust would concur with this SLAA response and subject to an appropriate design the site is an excellent candidate for sustainable residential development, close to one of Medway's larger towns. There is therefore no reason why the site should not be allocated on the basis that a suitably high quality design can be achieved, especially given the substantial shortfall in housing supply.

Site 2 – SLAA ref: 814 (Westmoor Farm, Moor Street, Rainham)

It is noted that consent has recently been granted for:

'Construction of 134 dwellings with associated parking, access, landscaping and infrastructure works'

At Land To The East Of Mierscourt Road / South Of Oastview Rainham Kent ME8 8JF (MC/15/4539). This sets a strong precedent for development. Further, it is noted in the officer's committee report, which recommends the application for approval, that:

'It is also noted that the development is in a sustainable location, providing the opportunity for residents to walk or cycle to the shops and facilities within Rainham town centre, as well as the train station. The site is also well served by bus services. As such the site is considered to be within a sustainable location which has the potential to support sustainable travel choices.' (page 34 of officer report)

It is also noted that:

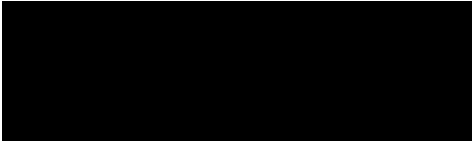
'...that the structural landscaping proposed will go some way to mitigate that impact and furthermore the site has relatively limited visibility from public vantage points.' (page 34 of officer report)

The same conclusions could be reached for any scheme on site 2 (ref: 8104). On this basis, there is no reason that the site should not be allocated, especially given the substantial shortfall in housing supply.

Conclusion

The Trust would also like to thank Medway Council for the opportunity to comment on and influence this important process. Should officers want to meet with the Trust's representatives to discuss this letter, we would be more than happy to do so. Finally, if you consider that any additional technical assessment work is required to further evidence the points made in this letter then please do let me know.

Yours Sincerely

A large black rectangular redaction box covering the signature area.

Andrew Watson • MRTPI
Associate Planner

A black rectangular redaction box covering the contact information.

CC – Tim Cathcart, Savills

Summary of Previous Comments on SLAA Site 1104

Page 477 of the November 2015 SLAA identifies the site as being suitable in terms of: highway capacity, landscape, heritage, site developability and open space. However, a number of potential constraints are identified where additional information is required, including:

- Site Access;
- Ecological Potential;
- Designated Habitats;
- Contamination; and
- Agricultural Land.

As these issues are unresolved, the conclusion is drawn that:

'The site is considered unsuitable for development unless identified constraints can be addressed.'

The Trust's previous representation (March 2016) sought to address these constraints through the provision of supporting technical assessments. Below, I have summarised the previous work that has been undertaken in support of the allocation.

- Transport and Access
- Ecology
- Agricultural Land
- Contaminated Land

These reports demonstrate that the constraints can be overcome. A number of other points were raised on:

- Facilities and services accessibility;
- Public transport accessibility; and
- Air quality.

A summary of the previous comments on these points is provided below.

Services Accessibility

In response to this point, it should be noted that Cooling contains the following services:

- A local pub (the Horseshoe and Castle);
- A church;
- Children's playground; and
- A public toilet.

Public transport and accessibility

Cooling does not currently benefit from good public transport accessibility. However, the provision of a modest amount of new residential development might help the village to reach a point where public transport becomes more viable as a result of an increased population. This could take the form of an extension of the bus service that currently serves Cliffe.

Air Quality

Air quality is also raised as an issue. However, the accompanying table, states that:

'site may be constrained by air pollution but mitigation is likely to be deliverable'.

It is not anticipated that air quality impacts would be so significant to preclude the site from being allocated. This is largely based on the fact that only a modest amount of development is likely to come forward on the site to the level where an air quality assessment would not normally be required as part of a planning application.

Summary

In summary, the Trust has demonstrated that there are no major constraints affecting the site. Where there are constraints then appropriate mitigation can be provided in the majority of cases.



NOTES

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A Notes amended APB 10.03.17

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Project
**COOLING
PLOT 2**

Drawing Title
FEASIBILITY

Scale	Date	Drawn	Checked
1:500 @ A3	FEB17	APB	

Drawing Number	Rev	Project Number
F001	A	PWDJ387454

Medway Council Local Plan 2012-2035: Development Options

Planning Representations

Prepared by Savills UK on behalf of Bellway Homes Ltd

March 2017

Savills UK

33 Margaret Street

London

W1G 0JD



Representations

- 1.1 The enclosed representations are prepared on behalf of our client Bellway Homes Ltd in response to Medway Council's (MC) formal consultation on the 'Development Options' for the New Local Plan.
- 1.2 The representations are made specifically in connection to the redevelopment of two parcels of land on either side of Bells Lane in Hoo, to provide new residential units, together with access, open space, landscaping, parking and a new club house for the Bowls Club. A site location plan is enclosed as Appendix 1.
- 1.3 Bellway is currently developing proposals for the site and intends to submit a full planning application shortly. Bellway Homes is a leading national housebuilder which has been operating for more than 50 years and has significant experience in delivering sustainable mixed communities. They are well placed to commence on site as soon as planning permission is granted and are fully committed to developing the site to provide much needed housing in Hoo. If planning permission were granted by the end of 2017 it is envisaged that work could commence in Spring 2018 at a rate of 75 units/yr.

Site Description

- 1.4 The site straddles either side of Bells Lane in Hoo St. Werburgh. The land to the western side of Bells Lane comprises the former Rochester Sports and Social Club (RSSC) and facilities. The former Club has been vacant and closed since October 2014. This part of the site includes a number of former sports pitches and a vacant main club house which is part two storey and part single storey as well as some smaller ancillary buildings. Car parking is provided to the front of the building, extending in a narrow strip along the Bells Lane frontage. The eastern parcel incorporates the Bowls Club. The site is bound to the south east by the Old Stables development and the Ratcliffe Highway immediately to the north. To the north east of the site lie open fields in agricultural use.
- 1.5 The site is not located in a Conservation Area, nor are there any Listed buildings in the vicinity. The site is within Flood Zone 1.
- 1.6 The site comprises former playing pitches and a former sports and social club that closed in October 2014 and therefore the site performs no useful or positive contribution towards sports provision in the local area. Since then the site has been unmaintained, has already started to fall into disrepair and would be costly to bring back into a sports or leisure use.
- 1.7 Medway published a "Playing Pitch and Outdoor Sports Facilities Study" in 2012 which was undertaken in accordance with Sport England's guidance. Even though the site was in private use and not open to visiting members of public at the time the Study was undertaken, the site is still included in overall capacity of the catchment area. The Study identifies the site as The Village Community Sports and Social Club and as having the following pitches at that time:
 - 2 adult football;

- 1 youth football;
- 1 mini-soccer; and
- 1 cricket.

- 1.8 The Study concludes that there was a notional surplus of adult and youth football and rugby pitches in the Strood and Rural catchment area and this would remain the case without the inclusion of the above pitches located at the site. In accordance with the latest Study, there is therefore sufficient capacity within the catchment area to accommodate the loss of the former football pitches.

Pre Application Engagement

- 1.9 Meetings have been held with senior officers at Medway on several occasions to discuss the principle of achieving residential development. In general, the proposals have received positive feedback given the Council's acute need for housing.
- 1.10 The pre-application proposals have also been presented to Members where there was general support for the approach adopted.
- 1.11 A public consultation event was also held on the 25th January 2017. The event was attended by approximately 150 people and Bellway will continue to engage as the development of the proposals progresses.

New Local Plan: Development Options

- 1.12 Medway Council is preparing a new Local Plan to guide the development of Medway up to 2035. The Council is consulting on the Development Options 2012-2035 document. The Development Options: Regulation 18 Consultation Report (January 2017) represents the next formal stage in preparing the Local Plan which aims to ensure that Medway grows sustainably, to provide land for the homes, jobs and services that people need, whilst protecting and enhancing the qualities of the area's environment and heritage. This document builds on the earlier consultation work carried out on Issues and Options in 2016.
- 1.13 The Development Options document states that 'this consultation stage seeks to provide comprehensive options for how Medway could accommodate this scale of growth in the Local Plan.' We consider that the site at Bell's Lane is a highly sustainable site suitable for residential development which will assist in meeting Medway's housing needs and should therefore be taken forward as an allocated site within the next stage of the Local Plan process.
- 1.14 We support paragraph 1.17 which states that the Council wants to give people a say on the available choices for allocating development sites.
- 1.15 The consultation presents four development options that could provide possible approaches to managing Medway's growth over the plan period:
- a. Option 1: Maximising the potential of urban regeneration
 - b. Option 2: Suburban Expansion
 - c. Option 3: Promoting development on the Hoo Peninsula

d. Option 4: Securing urban regeneration and a rural town

- 1.16 In order to meet the Council's development needs, we support Options 2 and 3, which include the expansion of Hoo.

Residential Development Pipeline

- 1.17 The Housing Position Statement published in June 2014 sets out Medway's Objectively Assessed Housing Need (OAN). A new annual housing target figure of 1,000 dwellings is recommended to replace the 815 dwellings per annum housing requirement figure set out in the withdrawn South East Plan and Medway Draft Core Strategy. This has fed into the North Kent Strategic Housing and Economic Needs Assessment published 2015 which concluded that Medway needs to deliver 29,463 homes over the plan period. There is clearly a pressing and acute need for new housing within the Borough.
- 1.18 Medway's Strategic Land Availability Assessment (SLAA) published in 2015, and reviewed in 2017, identifies a cumulative deficit delivery of housing for each year from 2006. The most recent Authority Monitoring Report (AMR) (December 2015) shows that over the period 2011–2014/15, 2,436 units were completed against a target of 4,000. The Housing Trajectory identifies anticipated delivery of 5,587 units against a target of 5,000 between 2015/16 to 2019/20. Taking account of the under delivery of 1,564 units during the period 2011 to 2014/15, it is calculated that the Council has between 3.5 and 4 years housing land supply and does not therefore have a five year housing land supply. This demonstrates the importance of the Council bringing forward a Local Plan that will boost delivery of housing to meet their development needs, particularly in the early years. This is consistent with the requirements of paragraph 47 of the NPPF.
- 1.19 The Development Options document notes that this 'scale of growth is challenging' and calls for careful consideration of how Medway's environment and infrastructure can accommodate development that is sustainable. It also recognises that 'meeting this challenge and achieving successful growth in Medway is the central purpose of the Local Plan.' Whilst the Council is following Government policy to promote the use of brownfield land over Greenfield sites, the Council also recognises that the full range of development needs will not be solely met by the regeneration of brownfield sites.
- 1.20 We support the text in the Development Options document which states that, 'given the scale of development needed in Medway, the Council has had to look widely at a broad range of locations and sites that may be able to deliver sustainable development.' The site at Hoo is a prime example of such a location. It represents a sustainable and achievable opportunity on a site which is well connected to the existing settlement of Hoo and is free of technical and environmental constraints.
- 1.21 Paragraph 3.9 states that '...it is unlikely that the full range of development needs could be met solely in the identified regeneration areas on brownfield land'. The paragraph goes on to states that '...therefore Greenfield sites in suburban and rural areas may have to form a part of Medway's development strategy for the new Local Plan.' The type of land the Council seeks is 'free from environmental constraints, of lesser value for landscape and agricultural purposes and well related to services and infrastructure.'

- 1.22 The subject site complies with the Council's identified criteria in that it is located in a suburban area and would be seen as an extension of the existing settlement to the south. The site is well connected to existing infrastructure and services within Hoo and would contribute to enhancing these through the redevelopment proposals. The site is relatively self contained by the Ratcliffe Highway to the north and would not therefore represent an uncontrolled form of 'sprawl'. Given the contained nature of the site, it should be noted that The SLAA (November 2015) states that 'Whilst the site is situated outside of the built up area, the landscape is considered less sensitive and to have some potential to accommodate change.' The site was considered unsuitable for residential when considered in 2015 due to the land being designated as playing fields that would be lost, and access to services. We consider that as it has since been demonstrated that these playing fields are redundant and that there is a notional surplus of this type of facility in the area, this constraint can be overcome. Furthermore as part of the Hoo expansion, it is envisaged that 2000 new homes will be accommodated in the area. There will be a commensurate increase in local services and facilities which any residential scheme would contribute to as part of a Section 106 agreement with the Council. We therefore consider that this site should be considered in the SLAA as land is suitable for development, available and deliverable.
- 1.23 Paragraph 3.11 notes that 'a particular characteristic of Medway is the high proportion of land covered by environmental designations where development should be restricted.' The paragraph goes on to state that 'these designations aim to prevent urban sprawl and coalescence'. Given that the subject site is bound to the north by Ratcliffe Highway, we consider that the parcels of land would not contribute to coalescence but rather pose a chance to 'round off' the existing settlement to the south.
- 1.24 A significant amount of work has already been undertaken in the form of technical reports and pre-application discussions and the scheme is at such a stage to present an opportunity for the early delivery of over 200 homes. This will assist the Council in meeting their significant housing needs, particularly in light of their lack of 5 year housing supply. Although the site contains an element of previously developed land on the western parcel, it is mainly Greenfield. We therefore support the Council's consideration of sustainable development on Greenfield land and strongly contend that the subject site, being a relatively self contained site in a sustainable location is a positive option which could contribute significantly to delivering 2,000 homes in Hoo as identified in the Development Options document.

Option 2: Suburban Expansion

- 1.25 The document states that within this scenario, although urban regeneration as part of a balanced development strategy is retained as a core component, greater consideration is given to the potential of the suburban areas to meet the shortfall between development needs and the identified pipeline of sites.
- 1.26 It is recognised that the suburban areas would be placed under significant pressure to meet Medway's development needs, and some growth would also need to be considered in rural areas, particularly on the Hoo Peninsula. Appendix 1c of the Development Options Document recognises the potential for the expansion of Hoo to deliver 2000 homes, with supporting services, including schools, health and community centres, retail and employment land.'
- 1.27 We note that many development opportunities which border Medway's urban areas were put

forward in the Call for Sites that informed the SLAA. However, the document points out that 'many of these sites were subject to environment constraints or lack of infrastructure and access to services that would be required for sustainable development.' It is important to note that the site at Hoo already has the advantage of being situated in a sustainable location with good access to infrastructure and services, and as set out previously is free of environmental or technical constraints which would restrict or prevent development.

- 1.28 Paragraph 3.29 talks of a preference of Greenfield sites which may be 'quicker to develop than large brownfield sites.' The site, although predominantly Greenfield, contains an element of previously developed land, particularly on the western parcel which contained the former sports club buildings. Given the subject site is already at pre planning stage with a planning application being developed for submission shortly and many of the technical reports already completed, this proposal has the potential for the early delivery of a significant number of homes, thus meeting the aims and ambitions for the expansion of Hoo.
- 1.29 Paragraph 3.31 notes that 'given the proximity of Medway's borough boundaries and important landscape features, there is limited capacity for suburban expansion, and it is likely that a proportion of development would also need to be accommodated in the rural areas of the Hoo Peninsula....this includes incremental growth in a number of villages and expansion around the large village of Hoo St Werburgh.' We support this approach to meeting the housing need and the recognition of the opportunity that the Hoo area presents. Again, the site is in the process of being brought forward under a planning application, with pre-application engagement already having taken place and many of the technical and supporting work complete. No technical or environmental constraints have been identified through this process to suggest that the site is not deliverable.

Option 3: Hoo Peninsula Focus

- 1.30 The document states that 'this scenario again commits to the continuation of the urban regeneration of waterfront and town centre sites as a core component of the spatial strategy, and then looks at how the balance of development needs can be made up across the wider area.' In addition, it suggests that 'a key strand of this scenario is the expansion of the large village of Hoo St Werburgh into a small rural town.' We support this approach and urge that the subject site is allocated for residential development.
- 1.31 Paragraph 3.33 focuses on developing a sustainable rural town, avoiding sprawl into wider countryside and delivering a range of housing types. The subject site is able to contribute to each of these aims. The location is accessible with access to local services and infrastructure. Additionally, the site is naturally well contained being bound by Ratcliffe Highway to the north which forms a natural boundary, limiting potential for development to encroach beyond the site. Finally the proposal will provide a range of housing types to suit local need and significant enhancements to the Bowls Club, which will contribute to delivering early sustainable development at the site.
- 1.32 Paragraph 3.34 sets out another key component of this scenario which is the provision of and investment into education health and leisure facilities to meet community needs. It notes that 'the greatest care would be needed to deliver balanced development. Contributions would be made as appropriate. A programme of improvement works is proposed for the existing Bowls Club on the eastern parcel ensuring its future success as an important part of the local

community.

- 1.33 We are working with the Council on how to address the loss of the former redundant sports pitches and this will form part of the negotiation of any planning application.

Summary

- 1.34 The proposal for the redevelopment of the former BAE site represents an opportunity to deliver much needed housing in light of the evident shortfall of delivery and the identified OAN. We strongly support Options 2 and 3 as suitable and appropriate options for achieving the Council's objectively assessed development needs. The subject site could contribute to achieving these aims and therefore it would be highly appropriate to allocate it for up to 250 residential units in the emerging Local Plan. It is also of significant importance to acknowledge the contribution this site will make to the early delivery of housing within Medway. Bellway Homes is a leading national housebuilder which has been operating for more than 50 years and has significant experience in delivering sustainable mixed communities. They are therefore well placed to commence on site as soon as planning permission is granted and are fully committed to developing the site to provide much needed housing in Hoo. If planning permission were granted by the end of 2017 it is envisaged that work could commence in Spring 2018 at a rate at of 75 units/pa.
- 1.35 It is imperative that the Council takes a holistic approach to seeking to meet their development needs through consideration of both previously developed land and Greenfield sites that can deliver sustainable development. This site represents both in that the western parcel contains an element of previously developed land by virtue of the former sports club buildings with the remainder of the site being Greenfield. It has been demonstrated that this site is free of environmental and technical constraints and can deliver a sustainable extension to Hoo.
- 1.36 Set out below is our suggested policy wording for inclusion in the emerging Local Plan:
- Planning permission will be granted for residential development and associated infrastructure on land at Bells Lane, Hoo, as shown on the Proposals Map. This allocation could accommodate up to 250 dwellings along with associated parking and open space. The development should also include provision for improvements and enhancements to the existing Bowls Club.*

Representation to the Emerging Medway Local Plan “Future Medway” Development Options Regulation 18 Consultation

Land at The Alps, Borstal Road, Rochester.

Prepared for:

King's School, Rochester

Prepared by:

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Appendices

Appendix 1.0 Location Plan

Appendix 2.0 Illustrative Masterplan

Appendix 3.0 SLAA Map of Suitable and Available Sites

1. Executive Summary

- 1.1. These representations are made to the Medway Council Development Options Consultation on the Emerging Medway Local Plan “Future Medway”. The Plan will replace the adopted Local Plan 2003, and cover the period 2012 to 2035. The consultation period closes on 10 April 2017.
- 1.2. The Development Options forms the second consultation in the emerging local plan process, with Medway having undertaken an Issue and Options Consultation in January / February 2016.
- 1.3. These representations are submitted on behalf of Kings School, Rochester and seek to promote land at The Alps, Borstal Road, Rochester for residential development. The Land, as outlined in red on the attached location plan (see **Appendix 1**) would provide an excellent opportunity for additional housing provision in the Borough, helping to ensure that Medway can at the very least meet the housing needs of the community whilst ensuring that the Emerging Plan meets the objectives of the NPPF to boost significantly the supply of housing.
- 1.4. The Site is currently shown in the adopted Local Plan as a protected area of open space. However, it is demonstrated in this representation that The Site does not serve such a purpose and it would be put to a more efficient use, which is of more benefit to the community, if it were utilised for provision of new housing.
- 1.5. The Site is currently located behind existing residential development and has a direct relationship to the settlement of Rochester. It also has an existing access onto the main highway, which has good visibility and would therefore be considered suitable to serve a residential development scheme.
- 1.6. An illustrative layout has been prepared and submitted with these representations. The intention of this is to emphasise the suitability of The Site to accommodate 120 dwellings as a contribution towards housing provision. The masterplan also shows how the scheme can provide an important connection to the Neighbourhood Park to the rear, through provision of additional public open space. It is emphasised that this does not show a final layout, but is merely presented as a reference tool and to assist in The Council appreciating the capacity and capabilities of this site.
- 1.7. Development of The Site would meet all requirements of the National Planning Policy Framework in respect of the social, economic and environmental dimensions of sustainability. The development would provide housing that is needed in a popular location and that is highly accessible for local facilities and a range of public transport modes. The quantum of development proposed would draw an appropriate balance between making an efficient use of land, and protecting the character of the natural and built environments in the immediate vicinity. Provision of some open space to the rear (east) of The Site would also serve the dual purpose of amenity value for the community and a direct link with the Neighbourhood Park to the east. Development would also be of a high quality design to create an attractive, welcoming setting for future occupiers.

- 1.8. Medway has an Objectively Assessed Need for housing of over 29,000 dwellings over the plan period, equating to nearly 1,300 units a year. It also has a history of under-delivery, with completions falling short of the current 1,000 dpa target every year between 2013 and 2016. This has resulted in a shortfall of 1,800 units to date. It is therefore essential that Medway seeks to secure the allocation of all appropriate, suitable, available and developable sites in the Borough as part of the Emerging Plan, to ensure that the OAN for housing can be met, and exceeded as required by the NPPF.
- 1.9. At present, the Emerging Plan does not provide an indication of likely housing targets, or the quantum of development that will be delivered through each of the four development options proposed. What is clear however is that even if all of the sites assessed as being suitable and available in the 2017 SLAA are taken forward, Medway would still fall considerably short of meeting the OAN.
- 1.10. The Site is not subject to any statutory designations and there are no known physical or legal restrictions over the land that would prevent it from coming forward early on in the Plan Period. The Site can make a valuable contribution towards housing delivery and therefore it should be included in the Emerging Plan as a housing allocation site.
- 1.11. These representations comment on the published consultation documents, including the various policy options and development proposals put forward by Medway Council. Where applicable, reference will also be made to the evidence base documents in light of the Emerging Plan and in the context of promoting land at The Alps.
- 1.12. These representations conclude that the Medway Emerging Local Plan would be a much stronger, efficient policy document with the inclusion of land at The Alps as a residential allocation. The inclusion of the Site is essential to ensuring that Medway can sufficiently address the Objectively Assessed Housing Needs of the Borough and ensure that the Plan, upon examination, is ultimately found to be sound.

2. Introduction

- 2.1. On behalf of our client King's School, Rochester ("our client"), Savills is responding to the Development Options Consultation on the Emerging Medway Local Plan "Future Medway". The Consultation closes on 10 April 2017 and is the second stage of the consultation process for the Emerging Plan. Medway anticipates that the Emerging Plan will be adopted in 2019.
- 2.2. The Government, through the National Planning Policy Framework (NPPF) requires local planning authorities (LPAs) to plan positively, seeking new opportunities for development that can meet the identified needs of their respective District or Borough. Sufficient flexibility must be applied to allow for rapid change. To achieve this, LPAs must have an update to date Development Plan that has been informed by an extensive evidence base, formed of various technical studies and reports that have been through a rigorous consultation process and, essentially, justify the proposals within the Emerging Plan.
- 2.3. To support the Emerging Plan, Medway has published a number of evidence base documents, including:
- Strategic Land Availability Assessment (Jan 2017 update);
 - Strategic Housing and Economic Needs Assessment;
 - Landscape Character Assessment 2011.
- 2.4. This list is not exhaustive, and where relevant the various evidence base documents will be reviewed as part of this representation.
- 2.5. Medway is one of the largest urban areas in the region and forms part of the Thames Gateway, with good commuter routes throughout. As a result the Borough is fast growing, and there is a need to ensure that the overall strategy for the Borough appropriately addresses this rapid change. In this regard, the Strategic Housing Market Assessment illustrated an Objectively Assessed Need for 32,025 dwellings over 25 years. The Emerging Plan covers 23 years between 2012 and 2035. Subsequently, the OAN amounts to 1,281 dpa, or 29,463 over the plan period. This is a considerable target and if Medway is to exceed this as required by the NPPF para 47, it is essential that all appropriate, developable, and suitable sites are brought forward in the Emerging Plan. This matter is examined further in these representations.
- 2.6. This representation is divided into the following sections:
- Section 3: The Site
 - Section 4: Review of relevant evidence base documents
 - Section 5: Review of the Vision and objectives of the Plan
 - Section 6: Sustainable development and Development Options
 - Section 7: Other Policy Approaches
 - Section 8: Conclusions and Summary.
- 2.7. Savills reserves the right to comment further on any of the above documents, or those included in the consultation at a later date, where applicable to representations that may be made before adoption of Emerging Local Plan.

3. The Site and Development Opportunity

The Site

- 3.1. The Site is located to the east of Borstal Road, Rochester and comprises former sports pitches used and owned by our Client The King's School Rochester (herein referred to as "out Client"). The Site has an area of 3.4 hectares with a close cut grass appearance. There are structures on The Site, comprising a small pavilion and what appear to be containers used for storage. The Site is located outside of but adjacent to the settlement boundary. It is currently shown in the adopted Local Plan to form an allocated open space.
- 3.2. The Site is bound to the east by an area of woodland scrub. This has an area of 1.77 hectares, is also owned by The King's School, Rochester. Beyond this to the east is a neighbourhood park with abuts existing residential development. To the north, tennis courts and a bowling green adjoin The Site, whereas to the south, The Site is adjacent to a large block of flats with associated parking area. To the west, the boundary is formed by existing residential properties.
- 3.3. The playing fields at The Site are considerably constrained and having undertaken a strategic review of the school's sports offering, our Client has become increasingly aware of the need to invest considerably in sports pitches and facilities to enable it to compete with other leading independent schools. The review concluded that owing to the need to create a sports site with a great range of pitches which are served by a purpose built pavilion, the existing sports facilities at The Alps must be relocated. This has subsequently been progressed with the acquisition of alternative land east of the River Medway.
- 3.4. A location plan of The Site is produced in **Appendix 1**, and an extract for reference is also contained in figure 1 below.

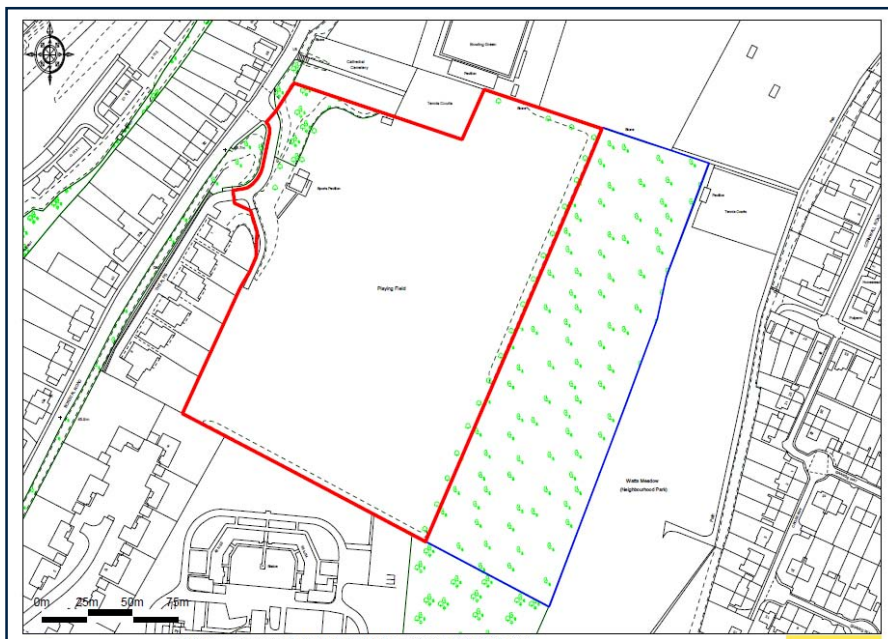


Figure 1: Site Location Plan Extract (not to scale)

- 3.5. In the wider area, there is a range of local shops and facilities which serve the local community, including for example, medical centres, health centres / gyms, supermarkets and convenience stores, a vets, restaurants and takeaways and hotels / overnight accommodation. There are also a number of educational establishments, including primary schools, secondary schools and grammar schools.
- 3.6. In addition local bus services traverse along Borstal Road, with regular services including to Chatham, Borstal and Medway town centre. There are three train stations within proximity of The Site, namely, Rochester (1.5 miles from The Site), Chatham (2.2 miles from The Site) and Cuxton (4.6 miles from The Site). The nearby towns of Chatham and Strood both benefit from additional services including high streets, shopping centres and recreational facilities. There are also a number of independent schools in the area, including the King's School, Rochester, which are within walking distance of The Site.
- 3.7. The Site is not subject to any landscape designations but does lie within the impact zone of the SSSI whereby Natural England would need to be consulted on proposals for new development. The SSSIs are located on the opposite (north western) side of the River Medway. The closest designation to The Site is the Baty's Marsh Local Nature Reserve, which lies to the north west, adjacent to the River Medway. This is separated from The Site by existing residential development and associated highway infrastructure.

The Development Opportunity at The Site

- 3.8. This representation proposes that The Site is allocated in the Emerging Local Plan for 120 dwellings with an area of open space to the east, utilising the existing area of woodland scrub, and enabling direct links to the adjacent Neighbourhood Park.
- 3.9. An illustrative layout plan has been prepared, a copy of which is included at **Appendix 2**. This includes a range of dwelling types, sizes and tenures, including 30% affordable housing. This mix is only indicative at this time but is based on the assumption that a normal mix of dwelling types and sizes will be sought as part of any future allocation of The Site.
- 3.10. As can be seen, The Site can easily accommodate the quantum of development proposed without appearing cramped or overdeveloped. It is noted that the proposal as shown would have an approximate density of 35 dwellings per hectare, which is not only suitable for this location, but would appropriately reflect the character, appearance and density of existing surrounding development.
- 3.11. At this time, the illustrative masterplan is provided predominantly for discussion purposes, and to highlight the opportunities that arise at The Site. No design has been finalised or progressed further at this stage. However, should Medway Council look to allocate The Site, our Client would be pleased to liaise with planning policy and development management officers to secure an acceptable scheme for this sustainable parcel of land.
- 3.12. Throughout this representation, reference will be made to the masterplan.

4. Evidence Base

Sustainability Appraisal

- 4.1. There are four documents published as part of the Sustainability Appraisal (SA), namely, a scoping report, an interim SA report and two separate appendices which review the objective of the Emerging Plan against the SA objectives and the appraisal of the development options and policies being consulted upon.
- 4.2. The SA assessment of the policies and development options is based on the following scoring matrix:

Key	Effect
++	Likely to have significant positive effects
+	Likely to have positive effects
0	Neutral
?	Uncertain/insufficient evidence or information available
-	Likely to have negative effects
--	Likely to have significant negative effects

Figure 2: Sustainability Appraisal Scoring Matrix

- 4.3. Each has also been assessed on the basis of short, medium and long term implications.
- 4.4. Appendix 2 of the SA reviews the four development options and all proposed policies of the Emerging Plan against the SA objectives, of which there are 11 in total. Not all are applicable to this representation or to our client's site in Rochester. As such, consideration at this time is only given to the SA of the four development options. Savills and King's School, Rochester, do however reserve the right to comment accordingly on further iterations of the SA including the policies, development options and sites that may be selected as the plan progresses.
- 4.5. In summary, table 1 indicates the Council's SA scoring of the four development options, over the short (S), medium (M) and long (L) terms.

SA objective / Option	Option 1			Option 2			Option 3			Option 4		
	S	M	L	S	M	L	S	M	L	S	M	L
1. Employment Opportunity	+	+	++	?	O	O	O	+	+	O	+	+
2. Economy	+	++	++	-	-	O	O	+	+	O	+	++
3. Borough Centres	+	++	++	-	-	--	-	O	O	O	+	+
4. Green Networks	+	+	+	?	O	+	O	+	+	O	+	++
5. Climate Change	?	+	+	-	-	--	-	-	O	-	O	O

6. Mitigation	?	+	+	-	O	O	-	O	+	O	+	++
7. Heritage Assets	O	+	+	O	O	O	O	O	+	O	+	+
8. Natural Assets	O	+	++	-	--	--	-	-	--	-	O	+
9. Health / Wellbeing	O	+	+	-	-	O	-	O	+	O	O	+
10. Strong / Inclusive Communities	O	+	+	--	--	-	-	O	+	O	+	+
11. Housing	+	+	++	+	+	++	+	+	++	+	+	++

Table 1: SA scoring of the four development options.

- 4.6. In simple terms, the Council has scored development option 2 as the lowest in terms of its likely negative impacts against Sustainability objectives over the long, medium and short term. This is closely followed by option 3. The favoured option, against the objectives is clearly option 1. In our opinion, as discussed further in detail below, option 1 should be rejected. Whilst it may measure well against the SA objectives, it is not considered to provide the broad range of development required across the Borough to meet needs or ensure that the borough, as a whole, can be made more sustainable.
- 4.7. In particular, it is demonstrated below that there is a limit to the amount of expansion a single urban area can accommodate without its overall sustainability being affected. Subsequently, climate change adaption and mitigation may not result in positive effects as suggested, as the reliance on private cars as opposed to alternative, sustainable means of transport such as walking or cycling, may still remain limited.
- 4.8. Furthermore, Medway acknowledges that scenario / option 1 would result in housing being delivered as flats. Whilst this may provide the number to meet housing targets, it is questionable whether such development would “provide sufficient and affordable housing suitable to peoples lifestyle and needs” as required by the SA objective. Subsequently, such an approach cannot reasonably be considered to result in likely positive effects or likely significant positive effects against objectives 10 or 11. This should therefore be corrected.
- 4.9. With regard to Development Option 2, (suburban expansion) it is demonstrated below that this may result in one of the most appropriate options for the Council to consider, subject to allocations being included in Rochester which is a sustainable, accessible town with a range of local services, employment and educational establishments available for the community. Expansion of such locations would have a positive effect on the local economy, bringing in new investment, increasing jobs and helping to create a more competitive economy.
- 4.10. It must also be remembered that local economies can make an important contribution to the wider economy of the borough, and this is emphasised in the NPPF. Medway suggest that against objective 2 “to have a successful economic base able to sustain economic growth and competitiveness”, development option 2 would result in likely negative effects. We cannot agree with this outcome, as clearly economic and general growth of urban, as well as suburban areas, can make a very positive contribution to the wider economy. This too should be reassessed by the Council as the SA is developed.

- 4.11. As set out below, it is considered that scenario / option 4 also provides a potentially appropriate option for the Plan, subject to the inclusion of all suitable, available and deliverable sites for allocation. This scenario has scored well against the SA objectives, save for in two instances where a likely short term negative effect has been suggested. One of these relates to climate change.
- 4.12. At this time and owing to the level of detail available for the various development scenarios, it is difficult to fully appreciate how Medway has drawn such variance on the matter of climate change between the 4 scenarios. There are no sites selected at this time, and whilst in theory an edge of town site may appear more sustainable and better able to adapt to climate change compared to a suburban site, this may not be the case on the ground. Subsequently, the results of this SA cannot set an accurate picture of the development scenarios, or the options truly available to the Council; that is until sites are selected and included as draft allocations in each scenario.
- 4.13. Further comments on the Sustainability Appraisal of the Plan will be provided in the next consultation stage of the Plan as applicable to our client's site, and when additional detail is made available as to the Council's preference for a development strategy.

Housing and Economic Needs Assessment

- 4.14. The NPPF requires LPAs to prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs. NPPF para 159 states that the SHMA should identify the scale and mix of housing and the range of tenures that is needed by the local population over the plan period, which achieves the following:
- *“meets household and population projections, taking account of migration and demographic change;*
 - *addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and*
 - *caters for housing demand and the scale of housing supply necessary to meet this demand;”*
- 4.15. A SHMA for Medway was undertaken in November 2015 and utilises the 2012 sub national population projections (SNPP) and household projections (SNNP). The SHMA recognises that additional SNPPs would become available in 2016 (2014 based) but the 2012 projections were the most up to date at the time of completion.
- 4.16. Based on the 2012 SNPP and SNNP, the SHMA indicates that Medway's population will increase by 21.8%, equivalent to 58,600 people by 2037 (end of the plan period) or an annual average of 2,344 people. This is stated to be considerably higher than the growth assumed under the 2006 and 2008 projections. When converting this from population to household growth, and taking into account matters including market and economic signals, and general affordability, the Objectively Assessed Need for housing (OAN) in Medway is stated to be 1,281 dwellings per annum, equivalent to 32,025 dwellings over a 25 year period. The Emerging Plan covers a 23 year period between 2012 and 2035. Subsequently, the OAN over this period, at 1,281 dpa, amounts to 29,463 dwellings.

- 4.17. This is a substantial target which Medway must meet if it is to achieve the Plan's objectives and vision for the Borough. Although it is appreciated that the OAN is unconstrained, it is essential that housing is provided to meet the identified needs of the community. To achieve this, Medway must identify a suitable range of sites, or varying sizes and in varying locations, where the identified needs of the community can be met. This is clearly set out in paragraph 47 of the NPPF, which states that LPAs should use their evidence base to meet the "full, objectively assessed needs for market and affordable housing..."
- 4.18. Medway has a history of under-delivery against its current 1,000 dpa target set by the 2003 Adopted Local Plan. Since 2013, it has persistently fallen short of the housing target, resulting in an undersupply of 1,820 dwellings over a 4 year period, just short of 2 years worth of housing. Table 2 summarises the completions as contained in the 2016 Annual Monitoring Report.

	Completions	Requirement	Surplus / deficit
2013	565	1,000	-435
2014	579	1,000	-421
2015	483	1,000	-517
2016	553	1,000	-447
2013-2016	2,180	4,000	-1,820

Table 2: Net additional completions between 2013 and 2016

- 4.19. It is essential that sufficient sites are allocated as part of the Emerging Local Plan to ensure that housing can be delivered against the new target which, although not currently determined, will form part of the strategy for the Borough. Evidently, insufficient housing sites have been allocated to meet the targets in the current Local Plan and it is clear from table 1 that reliance cannot be placed on previously developed / brownfield land to meet housing need. Greenfield sites will need to be allocated and must form part of the development strategy in the Emerging Plan. This is essential in boosting significantly the supply of housing, and ultimately meeting the requirements of the NPPF.
- 4.20. Our Client's Site in Rochester offers an excellent opportunity to achieve the aims of the NPPF and help make a valuable contribution towards housing in the Borough. As illustrated in **Appendix 2**, The Site can accommodate 120 dwellings, with 30% being affordable. To the rear, the area of woodland scrub is proposed to be used as open space which will provide direct access from the development and Borstal Road, to the Neighbourhood Park. The Site is not heavily constrained and can accommodate this quantum of development without having a detrimental impact on the built or natural environments. Development of The Site, and its allocation in the Emerging Plan would make a very positive addition to the Borough and should therefore be considered favourably.
- 4.21. As recognised in the SHMA, the assessment is based on 2012 projections and therefore, the published OAN itself may now be out of date. Medway should look to review this in light of the more recent 2014 projections as this would ensure that the Emerging Plan is as up to date and accurate as possible.

Strategic Land Availability Assessment

- 4.22. As set out above, paragraph 159 of the NPPF, states that local planning authorities should have a clear understanding of housing needs in their area. As part of this, in addition to a SHMA, there is a requirement for LPAs to:

“prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.”

- 4.23. Medway published an updated SLAA on 20 February 2017, which corrected errors in the January 2017 version. The 2017 SLAA updates the findings of the November 2015 SLAA, following comments received as part of the Issues and Options Consultation on the Emerging Plan.
- 4.24. The 2017 SLAA has assessed over 1000 sites, and provides a very basic review of them compared to the more detailed assessment in the 2015 version, although it is appreciated that this can be referred to if required. Our Client’s Site has been identified in the SLAA as **site no. 1110**, and is shown on Map 11.
- 4.25. The 2017 SLAA has ruled out a number of sites, and subsequently only 264 have been reviewed for their suitability, availability and development potential and capacity. The results are detailed in Appendix 5 of the SLAA, and this excludes sites with extant permissions (58 listed in SLAA Appendix 3).
- 4.26. Of the 264 sites assessed for their suitability, availability and development potential and capacity, only 60 are shown to be both available and suitable for development. The total capacity of these sites, as suggested in the SLAA, is 5,980. Notwithstanding any completions or consented schemes, this figure is considerably lower than the OAN identified in the SHMA of 1,281 dpa or 29,463 dwellings over the plan period. In fact, this amounts to only 20% of the housing required to meet objectively assessed needs in the Borough.
- 4.27. It is appreciated that that OAN is an unconstrained figure. However, the NPPF (para 47) is clear that local planning authorities should boost significantly the supply of housing, and this can only truly be achieved if LPAs are using their evidence base to ensure that their plans meet the full, objectively assessed need for market and affordable housing in their area. The available supply from all SLAA sites is clearly insufficient, and bearing in mind the history of under-delivery, as illustrated in table 1 above, it is clear that Medway should be doing more to secure appropriate housing land as part of the Emerging Plan, to meet its obligation to supply housing for the community. Equally, the vision, and associated objectives of the Emerging Plan, as examined below, can only truly be met if the right amount of housing is provided in the right location.
- 4.28. **Site no.1110 is positively reviewed by Medway as being suitable and available.** In summary, the findings for The Site, as set out in Appendix 5 of the 2017 SLAA state the following:
- **Site area: 3.4ha**
 - **Suitability: Green**
 - **Availability: Green**
 - **Development Potential: Residential**

- **Phasing 0-5 years: Yes**
- **Phasing 6-11 years: Yes**
- **Capacity: 119 units**

- 4.29. The illustrative layout (**Appendix 2**) supports the conclusion of the 2017 SLAA, demonstrating a potential layout of circa 120 dwellings, which would reflect the character, appearance and local distinctiveness of the area. **When read alongside each other, the SLAA assessment of The Site and the illustrative masterplan fully support the allocation of The Site for this quantum of development.**
- 4.30. It is recognised that the outcome of the 2017 SLAA are broadly based on the 2015 SLAA, but have been updated following the Issues and Options Consultation. This update has resulted in The Site area and expected quantum of development changing to reflect the details of this representation and this is supported. It also appears that this update to size and quantum has enabled removal of some of the “red” scores for The Site, particularly those relating to the woodland. However, one concern, that must be appropriately reflected in future SLAA reviews, is the “red” score for The Site’s accessibility and the availability of public transport. The Site falls within Rochester, recognised as a tier 2 settlement (District Centre), alongside Strood, Gillingham, Rainham and Hempstead Valley Shopping Centre in the hierarchy of Centres set out in section 6.2 of the existing 2003 Medway Local Plan. These towns are second only to Chatham (main retail / city centre) , which is within relatively easy access of The Site. As a district centre, it is clear that Rochester has good availability to public transport, local shops and facilities that serve a wider area. There are also numerous train stations within a short distance of The Site (see section 2 above) and it is clear that this location is sustainable and accessible. Subsequently, a red score is inaccurate and should be updated accordingly.
- 4.31. In this regard, the SLAA indicates that a further review will be undertaken, expected in Spring 2017, based on the responses received to the Regulation 18 consultation. From this review, development allocations will be taken forward as part of the Regulation 19 publication version of the Emerging Plan. This provides the opportunity to ensure that the assessment of The Site is accurate and based on current, available information (including that within this representation). On this basis, additional comments will be made, where applicable to The Site, to the Spring 2017 update of the SLAA.

Landscape Character Assessment

- 4.32. The Site falls within the “urban and industrial area” as identified on the initial “principle landscape areas” map in the Landscape Character Assessment. Figure 3 provides a copy of this plan for references purposes, with the general location of The Site highlighted.

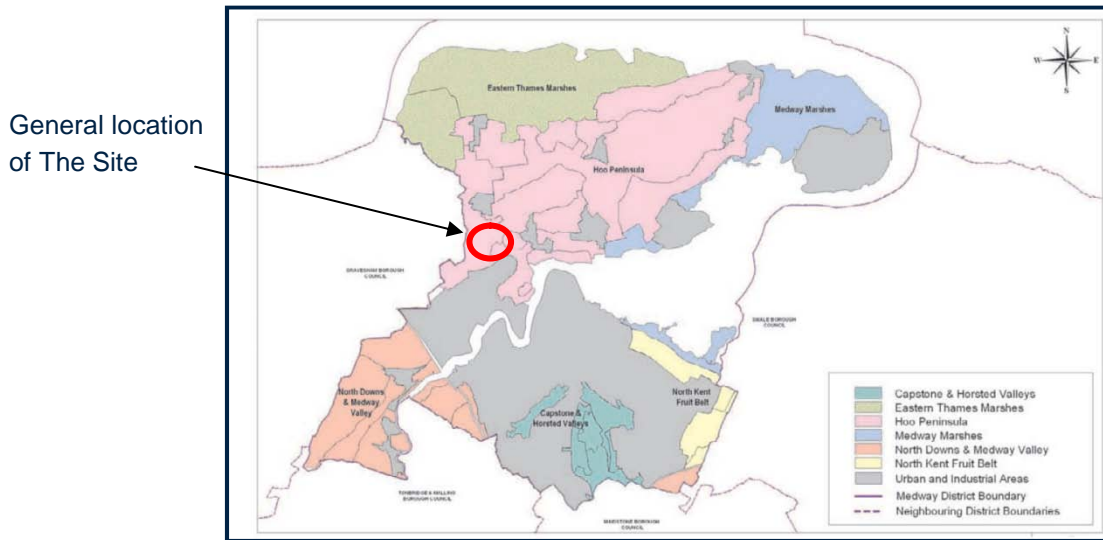


Figure 3: Copy of the Principal Landscape Areas Map from the Landscape Character Assessment.

- 4.33. The urban areas has not been assessed in the LCA which instead looks to examine key characteristics and features of the Borough's rural and semi rural landscape as a means of ensuring the best use of land is made and where appropriate, the landscape is protected.
- 4.34. It is positive that The Site falls outside of the areas assessed in the LCA, as this supports the proposition that The Site should be developed for housing and should form an allocation in the Emerging Plan. The Site clearly does not have a direct relationship to the surrounding, high quality landscape of the Borough, and therefore, its use for housing should be prioritised as a means to protect more valuable landscapes elsewhere. Furthermore, the fact that The Site could incorporate landscaping and habitat enhancements, including through use of the adjacent woodland area, further supports the use of The Site, as this type of enhancement would help to potentially improve the landscape and its character, in this location.

5. The Vision and Objectives

- 5.1. Chapter 2 of the Development Options Consultation includes a range of opportunities for development strategies and associated delivery policies that are intended to contribute towards the vision for Medway to 2035.
- 5.2. This vision requires commitment to and securing the delivery of extensive development across the Borough, both of a residential and commercial nature. This is not however limited to the delivery of large scale strategic sites, but will encompass the spread of development throughout the area in locations where a positive contribution can be made to local life, community aspirations and general sustainability of each village, town or settlement. Development should not be constrained by existing site features or local factors, particularly those which can be overcome as a direct result of new development, investment and additional infrastructure.
- 5.3. Equally, some essential upgrades to the Borough cannot take place without development coming forward. For example, the vision looks to ensure that *“distinct towns and villages that make up Medway will be connected through effective transport networks and green infrastructure links supporting nature and healthy communities”*. Appropriate new housing development which includes green infrastructure, and new landscaping can achieve this. Essential new infrastructure can also be supported through collection of CIL or S106 obligations (where appropriate), or indeed through any comparable charging schedule that may come into play following the publication of the Housing White Paper.
- 5.4. Medway has acknowledged that the Borough’s population is set to increase by 20% by 2035, and has already risen by 10,000 between 2012 and 2015. To ensure that its vision for the Borough can be achieved, it is of paramount importance that Medway plans for the required level of housing to accommodate this considerable growth and is able to secure high quality new housing that attracts people to the area. This is particularly relevant to the following aspirations of the Vision (extracts only):
- *New development in Medway’s towns and villages will have responded positively to the character of the surrounding environment and needs of existing communities;*
 - *Have secured the best of its intrinsic heritage and landscapes alongside high quality development to strengthen the area’s distinctive character.*
 - *Medway will have established a regional profile for successful and ambitious growth*
 - *Planned growth will have delivered a city that its residents have pride in, providing homes for all sectors of the community, supported by infrastructure to deliver education, transport, health and community services. Vibrant and complementary town, local and village centres will provide a focus for community life.*
- 5.5. In fact, paragraph 2.35 of the Emerging Plan recognises the need for development across the Borough, in some places it will be greater than others, but in any event it is essential that Medway ensures that the right type of development is provided in the right location and at the right time. This would directly reflect the aspiration of the National Government, which are embedded in the NPPF.

- 5.6. This vision is to be achieved through delivery of 4 strategic objectives. Of most interest to this representation is objective no.3, namely;

“Medway recognised for its quality of life.

To reduce inequalities in health by promoting opportunities for increasing physical activity, through walking, cycling, parks and other recreation facilities, and improving access to healthy food choices; and to reduce social isolation by supporting retention and development of local services and dementia friendly environments;

To provide for the housing needs of Medway’s communities, that meets the range of size, type and affordability the area needs;

To strengthen the role of Medway’s town, neighbourhood and village centres, securing a range of accessible services and facilities for local communities, and opportunities for homes and jobs.” (own emphasis added)

- 5.7. This objective, and ultimately the vision for the Emerging Plan, can only be met through the identification and allocation of an appropriate number of sites, of varying sizes and locations, that can meet the housing and development needs of the Borough.
- 5.8. Our Client’s Site at The Alps, Borstal Road, Rochester provides an excellent opportunity for housing development, in close proximity to an existing, vibrant settlement. Development of The Site would provide much needed housing in an area where future occupiers can walk or cycle to nearby facilities and educational institutions reducing the need for use of private cars. The illustrative masterplan (**Appendix 2**) clearly demonstrates that The Site is capable of accommodating a range of dwelling types, sizes and tenures. This would assist not only in providing the range of housing needed in the Borough, but strengthening the role of the town by increasing the potential amount of local footfall to the shops and services offered. This would positively improve the vitality and viability of the town, essential to securing the Borough’s place in this ever-changing market. This is particularly relevant in light of the concerns expressed in the Emerging Plan regarding impact of other nearby towns and shopping centres on the local economy.

6. Sustainable Development and Development Options

- 6.1. Chapter 3 relates to sustainability development and reiterates the findings of the Housing and Economic Needs Assessment for the Borough, including the findings of the SHMA for *at least* 29,463 new homes over the plan period.
- 6.2. At paragraph 3.3 the Council recognises that the development requirements for the Borough are challenging and that a careful review of how the environment and infrastructure can accommodate new development. In this regard, it is entirely relevant that the LCA for Medway places The Site in the urban and commercial area, an area which is not assessed for its visual or physical contribution to the landscape character of the area. from an environmental perspective therefore, it is argued that The Site is within a good location for development to take place, where it can have the least impact on the protected and prized landscape of the wider Borough. This is supported by paragraphs 3.10 through to 3.13 which refer to the value of the landscapes in the Borough, including the Hoo Peninsula (a RAMSAR, SPA and SSSI) and the Medway Valley which is within the Kent Downs AONB.
- 6.3. This chapter goes on to put forward comprehensive development options for how Medway could accommodate the identified quantum of development over the plan period.
- 6.4. In terms of the strategies, Medway raises preference for the use of Brownfield land over Greenfield land to meet development requirements. Although this appropriately reflects the strategy and policy objectives of the NPPF, it is clear that the authority cannot meet its considerable development requirements, as identified in the HENA, through use of Brownfield sites alone. Medway must release Greenfield land to secure the required quantum of development, and to ultimately ensure that such development is provided in the most appropriate locations where it can sufficiently contribute to the sustainability of the settlement, town or village.
- 6.5. Before reviewing the strategic development options, it is essential first to consider the residential development pipeline that is set out in chapter 3. Paragraph 3.7 and the associated table provide an overview of the “current” supply of development land. For ease of reference, figure 4 below provides an extract of this table.

Status	Number of dwellings
Completions 2012-2016	2180
Sites with planning permission	6251
Medway Local Plan 2003 Allocations	356
SLAA* Pipeline sites	8813
Windfalls (Years 3-5 only)	606
Total	18,206
(*Strategic Land Availability Assessment)	

Figure 4: Extract of table in chapter 3 of the Emerging Medway Local Plan.

- 6.6. This table incorrectly states the contribution arising from identified SLAA sites as 8,813 dwellings. This is 2,833 dwellings above the 5,980 dwellings identified in the 2017 SLAA. It is unclear where this figure is from, or whether it is broadly based on the 2015 SLAA figures. What is clear however is that the figure of 18,206 dwellings is skewed and projects a false image of what is expected to come forward. Subsequently, this table should be corrected, to give an accurate and realistic picture of the housing quantum expected to be delivered, and how this measures against the OAN of 29,463 dwellings.
- 6.7. With regard to housing provision, the first matter to highlight is that none of the four published development options clearly identify the amount of development that will come forward if that scenario was taken forward in the Plan. This is of considerable concern owing to the high development targets that will inevitably need to be set if Medway is to produce a positive Plan that meets the OAN. None of the options currently show that the OAN will be met over the plan period, or indeed that Medway has even considered the likelihood of the identified needs being met by the various scenarios. Given that large proportions of the Borough appear to be excluded from the development scenarios, as is discussed below, it is considered highly improbable that the needs would be met by any one of these scenarios as currently presented.
- 6.8. Overall, this represents a significant shortcoming of the development options consultation and highlights the extensive work that is still required on the Emerging Plan before the next consultation is undertaken.

Scenario 1: Maximising the Potential of Urban Regeneration

- 6.9. This scenario focuses heavily on employment, commercial and mixed use development. Although some residential development is suggested in the accompanying text, this appears to be shown only as “incremental expansion”, suggesting that no significant schemes or allocations will come forward as part of this option. In such an instance, the likelihood of Medway meeting its housing targets are reduced.
- 6.10. Medway suggests that the focus of development in scenario 1 would be on a transformation of the urban centre and regeneration of waterfront sites reflecting development that has already come forward in recent years. Although this strategy would increase the opportunity to create a more attractive urban centre, and therefore potentially encourage local community members to stay within the Borough for employment and recreation, Medway needs to be aware of the limitations of such an approach.
- 6.11. Of particular importance is an awareness that there is a limit to the amount of expansion a single urban area can accommodate without its overall sustainability being affected. For example, a residential development on the edge of a significant built up town or city would have access to local facilities and services, but the likelihood of residents walking, cycling or using public transport to access these service centres will reduce the further away development is from the centre. As such, it is essential that Medway does not rely solely on the expansion of larger urban areas, and existing high density development locations, but should, instead, look to provide a broad range of development in various locations across the Borough where each can make a positive contribution to the sustainability of their respective settlement.

- 6.12. Medway also acknowledges that this scenario would result in housing being delivered as flats. Evidently, this will not meet the various needs for housing identified in the SHMA, in terms of size, type, tenure and location. A variety of housing types are required.
- 6.13. In terms of the locations for expansion, there is no development shown around Rochester. This contradicts with the service centre hierarchy contained in the Adopted 2003 Plan which clearly shows Rochester as a second tier settlement. To ensure the Emerging Plan reflects the requirements of the NPPF, not only in terms of housing provision but also the creation of sustainable mixed communities, it is fundamental for Medway to seek to expand existing settlements where it will contribute to the sustainability of the location. By bypassing opportunities around Rochester, this scenario does not reflect the strategic objectives of the NPPF or support the vision and objectives of the Emerging Plan.
- 6.14. **Scenario 1 should be rejected.**

Scenario 2: Suburban Expansion

- 6.15. This strategy retains an element of scenario 1 (urban regeneration) but focuses on suburban development with the aim of creating sustainable communities with “real alternatives” to car based transport, and good links to local services and green space. Urban extensions are focused around the areas of Rainham, Capstone and Strood, in addition to the regeneration of central Medway. Suburban development is shown around areas including Chatham and Gillingham.
- 6.16. There is clearly some theory and policy behind this approach. However, when reviewing the illustrative Plan which accompanies the scenario, it becomes apparent that the development strategy would not provide the range of development, across the Borough, that is required to create sustainable mixed communities. Development is predominantly focused to the north of the River Medway, with significant development shown around Hoo St Werburgh, and the majority of incremental expansions taking place in / around villages within proximity of this village. More development needs to be directed to the south of the River, around other sustainable settlements in addition to those identified by Medway. A detailed SA also needs to be provided to illustrate that such options, including those currently shown, are the most sustainable and represent the best options for development going forward.
- 6.17. In this regard, the SLAA plan (copy provided in **Appendix 3**), identifying the location of assessed suitable and available sites, does not demonstrate a sufficient quantum of sites north of the river that would contribute to this scenario. This further highlights the need for more allocations to the south.
- 6.18. Based on the details provided in the Consultation, it is considered that scenario 2 provides insufficient expansion of Rochester, a sustainable, diverse settlement that should be high up on Medway’s agenda for development. Our Client’s Site should also form a fundamental addition to this development strategy as part of a reasonable, much needed expansion of wider Rochester.

- 6.19. It is also noted that this scenario proposes to remove land from the Green Belt and provide new development around Strood. The NPPF is clear that the Local Plan production process is the only opportunity a LPA has to review its Green Belt boundaries and amend them, where necessary. As part of this process, LPAs must prepare a detailed Green Belt Review. To date, Medway has not produced a review of the Green Belt, although this is suggested to be in the pipeline. However, a review is typically carried out early on and forms part of the consultation process. Medway risks progressing a development strategy for the Emerging Plan which is unjustified and unsupported by sufficient evidence, particularly regarding the appropriate release of land from the Green Belt and its consideration of reasonable alternatives, in sustainable settlements, to Green Belt release.
- 6.20. **This approach should be considered further but should include additional development to the south of the River Medway, in and around existing sustainable settlements, including Rochester. The best use should be made of land in the existing urban and industrial area. Our Client's Site should be allocated as part of this approach.**

Scenario 3: Hoo Peninsula Focus

- 6.21. This scenario focuses development around the waterfront and town centre, again to the north of the River Medway, although additional development is shown around Rainham in the south east of the Borough. This is particularly in what Medway refers to as the "suburban areas" of the Borough.
- 6.22. The main strategy in this scenario is to build in the Hoo Peninsula and particularly around Hoo St Werburgh, with the aspiration of creating a sustainable rural town, expanding an existing large village and seeking to avoid sprawl into the countryside. The structure of development is more compartmentalised around the village as opposed to being in a large ring around the village as suggested in scenario 2.
- 6.23. It remains of concern that the centre of the Borough, within which Rochester is located, remains exempt from any considerable development as part of this scenario. As emphasised elsewhere in this representation, the centre of the Borough contains many sustainable settlements, most notably Rochester. To avoid provision of development in and around this sustainable town would contradict the aims of the NPPF in terms of creating diverse, mixed and sustainable communities. The centre of the Borough is by and large, within the urban and industrial area of the Borough. Rochester is firmly within this area. It is not subject to any landscape designations that would prevent development from coming forward or that would raise concerns regarding the visual impact on protected landscapes.
- 6.24. In this regard, the majority of development proposed in Scenario 3 takes place within the Hoo Peninsula as defined in the LCA (see map in figure 3 above). This area is described in the LCA as having characteristics including the following (summarised):
- *Predominantly agricultural area links to extensive tracts of marshland*
 - *Broad leaved woodland forms significant landscape feature including extensive woodlands around Chattenden Ridge, at Beacon Hill and Cockham Wood and the RSPB Reserve at Northward Hill*
 - *Three dominant rural landscape types – 1) flat or undulating arable farmland – large open arable fields with long views 2) mixed farmland with orchards and shelter belts – smaller fields with stronger sense of containment 3) isolated wooded or farmed hills*

- *Includes large areas of grade 1 agricultural farmland*
- *Includes most of the principal rural settlements on the Peninsula*
- *Includes a number of RSME sites*
- *Role of countryside of Hoo Peninsula (farmland, woodland and villages) to provide a rural green buffer*

6.25. The issues facing this landscape character area include, but are not limited to, the following:

- *Loss of landscape structure and fragmentation caused by infrastructure*
- *Proximity of rural settlements; poor quality edge treatments; intrusion of urban-rural fringe activities (often prominent in views from main roads) into countryside; trend towards loss of rural character with threat of settlement coalescence and loss of local distinctiveness*
- *Impact on countryside and landscape character of major new development plans on Peninsula for sites at Chattenden, Grain and Kingsnorth; Park and Ride scheme at Whitewall Creek, Upnor and Frindsbury Barn*

6.26. Clearly more development, and associated infrastructure will not help to resolve these issues, and therefore, the proposals in scenario 3 do not appear to sufficiently accommodate the landscape limitations or concerns stated in the LCA relating to the Hood Peninsula. There are clearly, other more appropriate locations for new development to be focused, most notably the urban and industrial areas of the Borough which are relatively unconstrained. Due consideration should therefore be given to development in such areas, including our Client's Site in Rochester, to secure the required level of housing and general development needed over the plan period.

6.27. Scenario 3, in this regard, recognises at para 3.35 that the scale of growth proposed in the Peninsula would "*inevitably have an impact*" and that green infrastructure would need to be included to ensure villages remain separate and distinctive. Clearly, if Medway looked to provide a broad range of development across the Borough, rather than focusing it in a location that is clearly very sensitive to change, this "inevitable impact" would considerably reduce. Medway therefore needs to consider alternative options that can not only deliver the development required over the plan period, but can do so without having such a considerable impact as is otherwise anticipated as a result of scenario 3.

6.28. At paragraph 3.36 Medway suggests that the scenario also proposes expansion of villages that "*have a range of services and facilities that could support an increased population*". Rochester has various services and facilities that can support an increased population; yet there are not proposals for its expansion. There is no justification in the Plan or evidence base to support this approach. Subsequently, by failing to consider opportunities in Rochester, and our Client's Site, Medway is compromising its opportunity to meet its vision and objectives for the Emerging Plan.

6.29. Equally, from an access perspective, Rochester has good access to the local highway network, including the A2 trunk road. This is in contrast to the Hoo Peninsula, which is recognised in paragraph 3.37 of the consultation to have infrastructure and highway limitations. It is illogical for Medway to put forward a development strategy that will ultimately require considerable infrastructure improvements when there are clearly other, more appropriate options available.

6.30. Scenario 3 should be rejected.

Scenario 4: Urban Regeneration and a Rural Town

- 6.31. This represents the final development option and combines scenarios 1 to 3 to provides high density development at the waterfront and urban centres of Strood and Chatham, suburban expansion and some development in rural areas of the Borough.
- 6.32. A combined approach to development across the Borough is clearly a more favourable option to meeting housing and development needs. However, as highlighted above, it is essential that other, reasonable alternatives are also examined to ensure that the most suitable development proposals are taken forward. None of the scenarios, including this combined approach in scenario 4, consider the opportunities around Rochester. This is a shortcoming of the Plan and is not consistent with the NPPF's sustainability agenda.
- 6.33. Overall it is considered that scenario 4 should be considered further. However, it is essential that Medway includes all suitable and available sites in their strategy to ensure that housing and development needs of the community can be met. It is appreciated that on some sites there may be constraints. However, this does not apply to our Client's Site at Rochester. The Site is positively assessed in the SLAA. It is available, achievable and suitable. Development can be delivered at The Site quickly, helping to address current housing shortfalls and to meet the OAN for housing in the area. Medway should therefore fully consider the capabilities of The Site to helping achieve its vision and objectives for the Plan.
- 6.34. **Scenario 4 should be considered further subject to modifications that ensure all suitable and available development sites are included in urban areas. Our Client's Site in Rochester should also be allocated as part of this scenario.**

General Comments on the Development Options

- 6.35. It is appreciated that the various scenarios are general, and at this stage there are no specific sites selected to form part of them. However, the scenario Plans provide sufficient indication of where Medway is expecting to focus development, and in their current form, these scenarios do not reflect the requirements of the NPPF. Further work is therefore needed and sustainable sites such as our Client's land, which has been positively assessed in the SLAA, must form allocations.
- 6.36. As illustrated in figure 4, there is a considerable shortfall in expected housing delivery against the published OAN. It is unlikely that any of the 4 scenarios will be fully capable of meeting the published OAN and therefore further work is required to support them. The scenarios do not illustrate with clarity that Medway is seeking to address its diverse housing needs, particularly in terms of unit types, sizes and locations. The focus of development essentially appears to be on high density flats, in areas that are already subject to growth. This approach would not accommodate the needs of the wider community.
- 6.37. Overall there is a lack of detailed evidence to support the scenarios or to demonstrate that they are sustainable. Equally, there is no indication that Medway has considered the development capacity of the Borough and how this relates to the published OAN. Until such information is made available, there is little detailed substance to Medway's proposed development strategies.

7. Other Policy Approaches

Housing

Housing Delivery

- 7.1. The policy approach to housing delivery is stated as follows:

“The council will seek to provide a supply of land to meet the needs for market and affordable housing for 29,463 homes over the plan period, meeting the principles of sustainable development.

Allocations for sites and broad locations for development will be established in the Local Plan, phased to ensure a supply over the plan period.

Housing delivery will be required to contribute to the development of sustainable communities, with the coordination of infrastructure and service provision. Masterplans will be produced for major residential schemes in broad locations identified in the Local Plan.”

- 7.2. As explained above, the development strategies shown by Medway are unlikely to meet housing needs or create sustainable communities across the Borough. Further work is required to ensure that this approach to housing can be sufficiently addressed in the plan and that the policies meet expectations in terms of delivery and the overall vision of the Plan. It is however positive to see that the proposed policy approach fully recognises the published OAN and that Medway is committed to ensure that it can be addressed over the plan period. This needs to be suitably reflected in the remainder of the Plan however.

Housing Mix

- 7.3. The proposed approach to housing mix provides sufficient detail to enable applicants to understand the need for a range of housing types and tenures within schemes. However, it also provides flexibility to adapt to identified needs of the area at any given time. In order to ensure that this approach works in the long term, Medway must ensure that the SHMA is kept up to date.
- 7.4. The approach to affordable housing is mentioned, particularly regarding mix. Requiring evidence to be submitted to demonstrate how affordable mix has been determined seems quite onerous, particularly as larger scheme are typically discussed with the LPA and housing officers before applications are submitted.

Affordable housing and Starter Homes

- 7.5. Paragraph 4.11 states that there is a need for 17,112 affordable houses over the plan period, and that a potential (viable) option would be to require 25% affordable housing provision on sites of 15 or more units. It is also suggested that some areas could accommodate a higher provision. At this time however there is no indication of where these other areas lies, and so it is difficult to comment on the policy approach. Further comments will therefore be provided at the next plan consultation stage.

- 7.6. Notwithstanding this, Medway must ensure that the policy includes a mechanism to account for reduced levels of affordable housing in cases where viability is an issue, as this will ultimately ensure schemes are deliverable.
- 7.7. With regard to development threshold, the policy approach taken must ensure that it is considered with Government advice, as now firmly embedded in the Planning Practice Guidance. Any departure from this, in terms of lower thresholds, would need to be robustly justified.
- 7.8. Although the policy approach refers to starter homes, there is limited commentary provided at this time. It is not unreasonable for Medway to essentially hold fire on decisions regarding starter homes, given the recent publication of the Housing White Paper. However, Medway needs to be mindful of the White Paper's suggestion that the NPPF is intended to be amended to "*introduce a clear policy expectation that housing sites deliver a minimum of 10% affordable home ownership units*" (para 4.17, Housing White Paper) and that Medway will ultimately need to determine an approach to starter home provision.
- 7.9. In relation to this, the White Paper Stated that "*it will be for local areas to work with developers to agree an appropriate level of delivery of starter homes, alongside other affordable home ownership and rented tenures*". It may therefore be more appropriate for Medway to leave the matter to national Government for inclusion in the NPPF. If necessary, a SPD could be produced at a later date to secure any standardised strategy that Medway may want to follow.

Built Environment

Housing Design

- 7.10. The policy approach states 9 requirements, including as a minimum that the nationally described internal space standards are met, that the Medway Housing Design Standards are met for external space including amenity space, access, circulation and private outdoor space, that all habitable rooms receive direct sunlight and outlook, and that there is extensive use of trees within development.
- 7.11. Although it is necessary to ensure that a high quality of living accommodation is provided both internally and externally, Medway has a considerable OAN over the plan period, and there may be instances when these minimum standards cannot be followed as strictly as suggested. This may be necessary to secure an otherwise acceptable design and layout for a scheme. Subsequently, Medway should include a mechanism in the policy that allows for some flexibility, in very special circumstances and when it can be justified on a case by case basis.

8. Summary and Conclusions

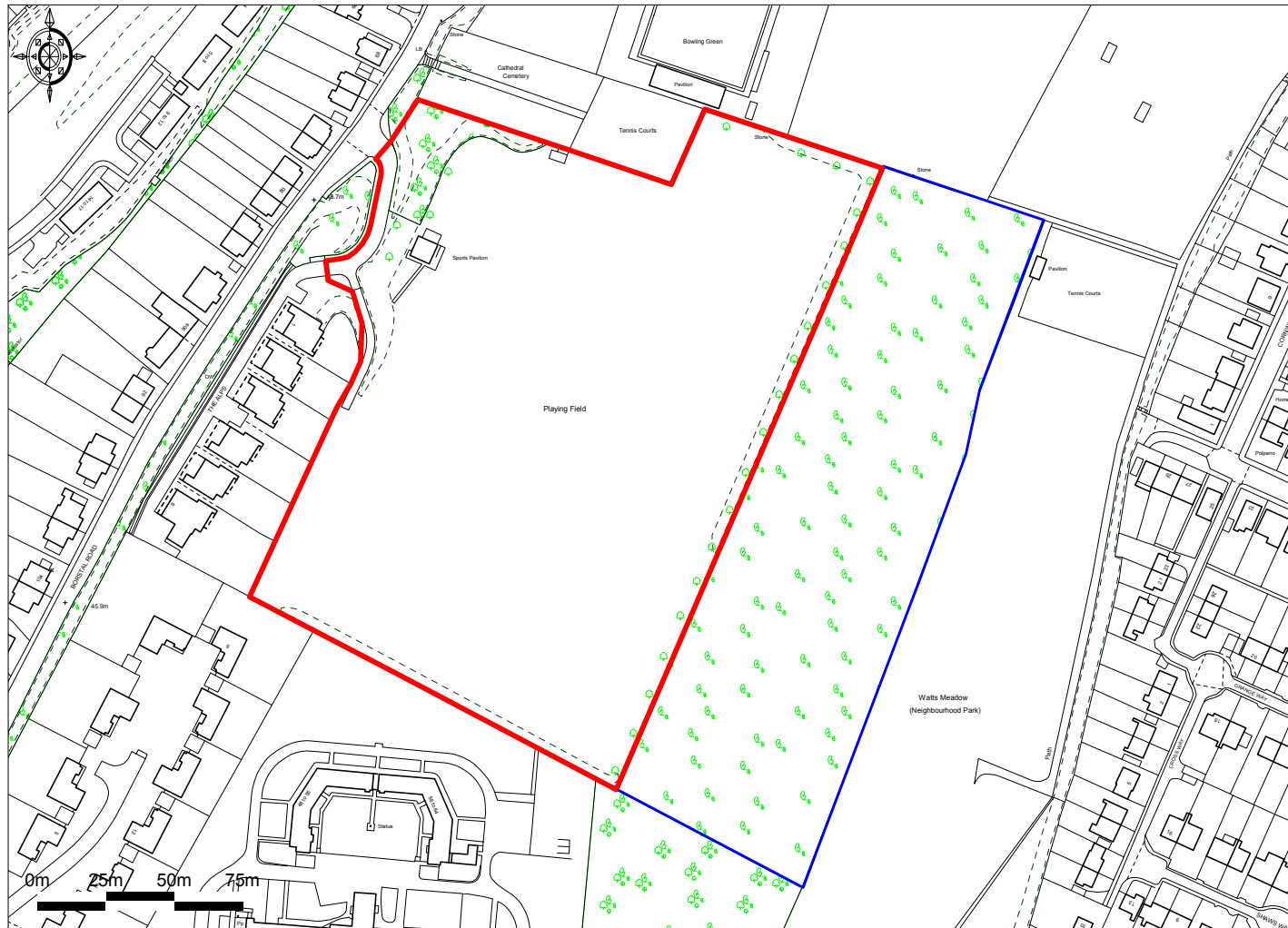
- 8.1. The Development Options Consultation puts forward a suggested policy approach and four development strategies for the Borough, to achieve the vision and objectives contained therein. However, the development options are very vague and provide little insight at this time as to how Medway expects to meet its exceptionally high needs for housing and development over the plan period. Although they provide a rough indication of preferred locations for development, there is a severe lack of justification for these approaches as part of the evidence base.
- 8.2. This is particularly relevant as the existing urban and industrial areas of the Borough are not shown to be subject to much, if any development, despite this area clearly having the least restrictions in terms of protected landscapes and designations compared to the wider district.
- 8.3. The published Sustainability Appraisal is not considered to provide any significant, additional justification to support the Council's approaches, but is instead very generalised at this time owing mainly to the fact that the appraisal of development options does not consider any specific sites for allocation.
- 8.4. The four development options also do not clearly state the amount of development that is expected to be provided in each location, whether as an indicative figure or more specifically having regard to sites that have been put forward and assessed in the SLAA. In fact, the SLAA assessment does not tie in to the development options, with the suitable and available sites not appearing to be reflected in any way in the strategies Medway is proposing to take forward. This inconsistency needs to be addressed.
- 8.5. Medway has a published OAN of 29,463 dwellings, equivalent to 1,281 per annum. The housing policy approach clearly indicates support to achieve this. It is essential that the remainder of the plan does the same. At present, it does not appear that the development options would be capable of providing sufficient housing to meet the OAN over the Plan Period.
- 8.6. Equally, the SLAA assessment concludes that only 60 sites are suitable and available for development. If all were to come forward, 5,980 dwellings would be provided. This falls considerable short of the OAN. Even if completions and commitments were taken into account, it has been demonstrated that Medway would still fall short of meeting the OAN, by circa 10,000 dwellings over the plan period. The Development Options suggest that allocation of all suitable and available sites would result in unsustainable development and therefore, it is clear that Medway will not be pursuing all sites. Consequently, the Council is not showing a sufficient commitment to meeting housing needs of its residents, over the plan period, and creating mixed, sustainable communities throughout the Borough. Further work is therefore needed to the Emerging Plan to ensure that a suitable development option is progressed that can meet the OAN. This is essential to ensuring compliance with the NPPF, and ultimately, ensuring that the plan is found sound at examination.

- 8.7. Our Client's Site is located in Rochester, a sustainable settlement within the Borough. There is access, from The Site, to a range of local services, facilities, education and employment. There is good public transport connections and access to the strategic highway network. The Site is clearly in a good location for development to take place. An illustrative masterplan is appended to this representation. This shows that The Site has capacity to accommodate 120 dwellings, including 30% affordable. The inclusion of public open space to the east would also provide an important addition to the local community, in addition to a direct connection to the adjacent Neighbourhood Park. This will clearly be of benefit to existing and future residents of the area.
- 8.8. The Site would make a very positive contribution to the housing provision in this location. The Site is not subject to any landscape or heritage designations and is within the urban and industrial area as defined by the landscape character assessment. It is clear that The Site should be considered favourably for development and allocation purposes. It would positively contribute to meeting the OAN for the Borough over the early stages of the Emerging Plan.
- 8.9. The Site has also been assessed positively in the SLAA as being suitable and available. This representation has also illustrated that The Site is deliverable within the early stages of the plan. It would therefore make a valuable contribution to the housing allocations in the Plan, again, helping to secure housing delivery to meet OAN.
- 8.10. Various policy approaches have been published as part of the consultation. Of these, comments are provided in relation to housing and the built environment. Notwithstanding the fact that no comments are provided at this time on other policy approaches, Savills and King's School Rochester, reserves the right to comment further on all policies and approaches published in future iterations of the Plan, and particularly where they relate directly to land at The Alps, Borstal Road, Rochester.
- 8.11. Overall it is clear that Medway has a long way to go before it is able to produce a Plan that will be found sound at examination. This includes, but is not limited to the need to prepare new evidence base documents and expand on those already produced. As part of this approach, Medway needs to openly consider all development options to ensure the objectives, and ultimately the vision for the plan, can be achieved.

Appendices

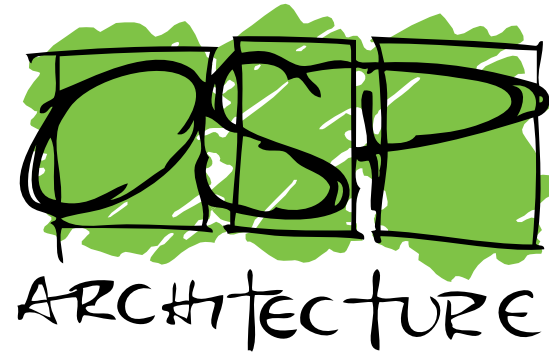
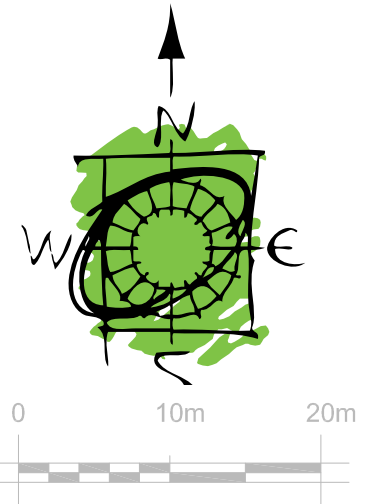
Appendix 1.0 Location Plan

Land at The Alps, Borstal Road, Rochester, ME1 3FD



Ordnance Survey © Crown Copyright 2016. All rights reserved. Licence number 100022432. Plotted Scale - 1:2500

Appendix 2.0 Illustrative Masterplan



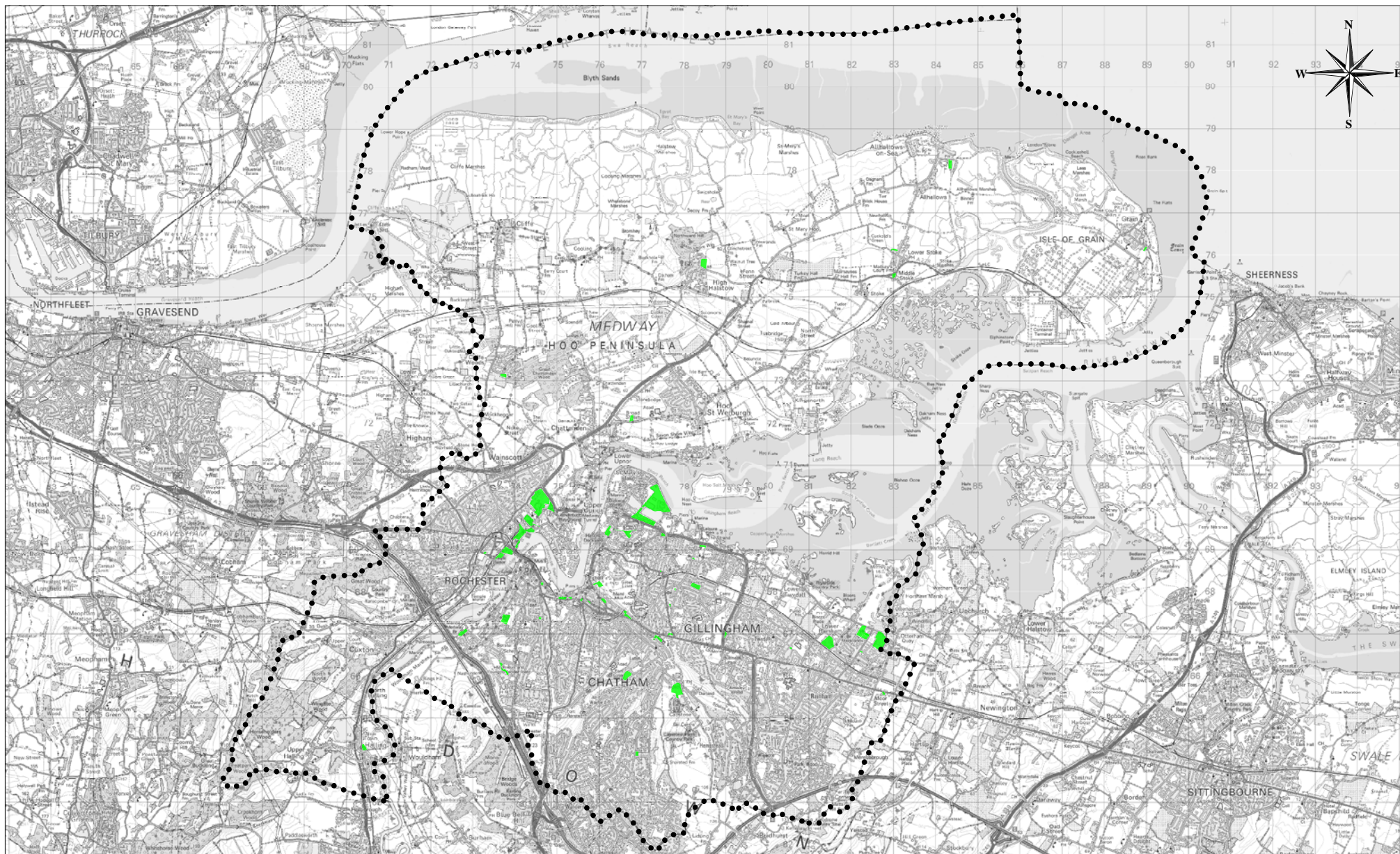
Sketch Site Layout
Alps, Borstal Road, Rochester

17067 / SK01A

Scale 1:500 @ A0 March 2017

Appendix 3.0

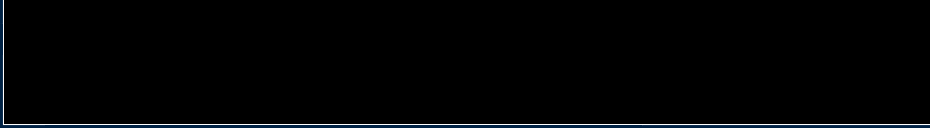
SLAA Map of Suitable and Available Sites



Suitable and Available SLAA sites

Samantha Gibbs MRTPI
Senior Planner

Guy Dixon MRTPI
Associate Director



Representation to the Medway Council Development Options Consultation

Manor Farm, Lower Rainham Road, Gillingham,
Kent, ME7 2XH

Prepared for:

John Harrison

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Appendices

Appendix 1.0 Proposed Site Concept Plan

Appendix 2.0 Proposed Site Constraints Plan

Appendix 3.0 Medway Local Plan 2012-2035: Working towards a Development Strategy

1. Executive Summary

- 1.1. These representations are made to the Medway Council Development Options Consultation on the Emerging Medway Local Plan "Future Medway". This consultation period closes on the 18th April 2017. The Development Options forms the second consultation in the emerging plan process with the first stage, issues and options, having been conducted in January and February 2016. Medway anticipates that the Emerging Plan will be adopted in 2019.
- 1.2. The Plan will replace the adopted Local Plan 2003 and cover the period 2012 to 2035
- 1.3. These representations are submitted on behalf of John Harrison and seek to promote Land at Manor Farm, Lower Rainham Road, Gillingham. The Land is outlined as part of the Concept Plan in Appendix 1 and presents an excellent opportunity sustainable housing development in the Borough. This opportunity could help ensure that Medway is able to meet the housing needs of the community whilst ensuring that the Emerging Plan meets the objectives of the NPPF to boost significantly the supply of housing.
- 1.4. The Site is currently shown in the adopted Local Plan as a an area of local landscape importance, however, this representation demonstrates that The Site does not fulfil this purpose and could be put into greater use of wider benefit to the longer term needs of the Borough.
- 1.5. The Site is currently located nearby existing residential development in Twydall and has a strong relationship with the wider area of Rainham. It also has existing access onto Lower Rainham Road (B2004) and Lower Twydall Lane, the latter of which could be subject to highways works.
- 1.6. A Concept Plan has been prepared and included within these representations with the intention of demonstrating the suitability of the site to accommodate 330 dwellings. The plan also shows the relative densities of each housing block, the accesses onto the site, and the site's positioning relative to the Lower Twydall Conservation Area and Flood zone 2. The plan presented is not a final layout, but a demonstration of what this site could accommodate.
- 1.7. Development of the site would adhere to paragraph 7 of the National Planning Policy Framework in respect of the economic, social and environmental roles that the planning system should follow. The development would provide housing that is needed within Rainham and the borough of Medway more widely, all in a location that provides close access into Twydall, and good access into the town centre of Gillingham.
- 1.8. The level of development proposed would offer a good balance between an efficient use of the land, and protecting the character of the landscape area. Development on this site would be of a high quality design to create an attractive setting for future residents and for existing communities within the area. Future residents on this site would have access into open space delivered on site, but also to the country park that sits nearby to the north.

- 1.9. Medway has an Objectively Assessed Housing Need for 29, 463 units over the plan period, which equates to 1,281 dwellings per annum. Medway also had a history of under-delivering on housing requirements with completions having fallen short of the current 1,000dpa target for the last 3 years. This has resulted in a shortfall of 1,800 units to date. It is therefore critical that Medway secures allocations of all suitable and available sites in the Borough as part of the Emerging Local Plan to ensure that the Objectively Assessed Housing Needs can be met, as required by the National Planning Policy Framework.
- 1.10. The Site is not subject to any statutory designations but is subject to a covenant on a small plot of land to the north. This prevents the erection of any building or structure on the land apart from a boundary fence or hedge and will not use the land for any purpose except that of agriculture. This is a very small plot of land in the wider scheme and The Site can make a valuable contribution towards housing delivery and there should be included in the Emerging Plan as a housing allocation site.
- 1.11. This representation comments on the published consultation documents as part of the Emerging Local Plan. This includes the various policy options and development proposals put forward by Medway Council.
- 1.12. This representation concludes that the Emerging Local Plan would be a significantly stronger policy document should Land at Manor Farm be included as a residential allocation. The inclusion of The Site is essential to ensuring that Medway can sufficiently address the Objectively Assessed Housing Needs of the Borough and ensure that in this respect, the plan is found at examination.

2. Introduction

- 2.1. On behalf of our client John Harrison ("our client"), Savills is responding to the Medway Council Development Options Consultation on the Emerging Medway Local Plan "Future Medway". The Consultation closes on the 18th April 2017 and is the second stage of the consultation process for the Emerging Plan, with the first stage, issues and options, having been conducted in January and February 2016. Medway anticipates that the Emerging Plan will be adopted in 2019.
- 2.2. The Government, through the National Planning Policy Framework (NPPF) requires local planning authorities (LPAs) to plan positively, seeking new opportunities for development that can meet the identified needs of the district of borough. Sufficient flexibility must be applied to allow for rapid change.
- 2.3. To achieve this, LPAs must have an up to date Development Plan that has been informed by an extensive evidence base, formed of various technical studies and reports that have been through a rigorous consultation process and justify the proposals within the Emerging Plan.
- 2.4. To support the Emerging Local Plan, Medway Council have published a number of evidence base documents. Of particular relevance to this representation are the following:
- Strategic Land Availability Assessment (SLAA) (January 2017 update)
 - Strategic Land Availability Assessment (SLAA) (November 2015)
 - Strategic Housing and Economic Needs Assessment
 - Landscape Character Assessment 2011
 - Medway Housing Design Standards (Interim) November 2011
 - Nationally Described Space Standard
- 2.5. This list is not exhaustive, and where relevant, the evidence base documents will be reviewed as part of this representation.
- 2.6. Medway is one of the largest urban areas in the region and forms part of the Thames Gateway, with good commuter routes throughout. As a result, the Borough is fast growing, and there is a need to ensure that the overall strategy for the borough appropriately addresses this rapid change.
- 2.7. In this regard, the Housing and Economic Needs Assessment (HENA) has illustrated a need for over 32,025 homes over a 25 year period. The Emerging Plan covers a 23 year period (2012-35) resulting in a housing need of 29,463 units (1,281dpa). This is a considerable target and if Medway are to meet and exceed this as required by the NPPF, it is essential that all appropriate, developable, and suitable sites are brought forward in the Emerging Plan.
- 2.8. This representation is divided into the following main sections which all seek to review the published consultation documents in light of the promotion of The Site:
- Section 3: Visions and Strategic Objectives for Medway 2035
 - Section 4: Site and Surroundings
 - Section 5: Site Proposals

- Section 6: Evidence Base
- Section 7: Sustainable Development and Development Options
- Section 8: Housing and Design

- 2.9. Recommendations are made throughout as to how, if at all, Medway Council should amend the Development Options.
- 2.10. Savills reserves the right to comment further on any of the published documents at a later date, where applicable to representations that may be made before adoption of the Emerging Plan.

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3. Visions and Strategic Objectives for Medway 2035

- 3.1. The Development Options Consultation sets out emerging approaches to policies which aim to address the key issues facing Medway's communities. The document considers a range of development strategies that plan to fulfil the vision for Medway to 2035.
- 3.2. Medway's Vision is to deliver successful and ambitious growth with wider benefits gained from strategic developments across the borough. The delivery of housing, however, will not be restricted to just strategic sites, but also through the spread of development throughout sustainable locations where a positive contribution can be made to local life, community aspirations and general sustainability of each village, town or settlement. Development should not be constrained by existing site features or local factors, particularly those which can be overcome as a result of new development and supporting infrastructure.
- 3.3. It is plain that upgrades required within the Borough cannot progress without further development coming forward. The vision, for example, states that "*distinct towns and villages that make up Medway will be connected through effective transport networks, and green infrastructure links supporting nature and healthy communities*". Medway plan that growth will deliver homes that accommodate needs for all sectors of the community resulting in "*vibrant towns, and local and village centres that will provide a focus for community life*". The delivery of new housing that is complemented with green infrastructure and landscaping, including social infrastructure where necessary, can help achieve this. In addition, new infrastructure can be supported through planning obligations such as section 106 obligations or contributions from the Community Infrastructure Levy (CIL), including any additional charging schedules that may come forward as a result of the Housing White Paper.
- 3.4. Medway acknowledges that there has been a population rise of 10,000 people in the last three years. This is coupled with an acknowledgement within the SHMA of upward revisions of ONS population projections from 2006 and 2008 to 2012. It is therefore crucial that Medway plans appropriately for high quality new housing to accommodate the additional growth and make Medway an attractive borough to live in.
- 3.5. Medway acknowledges that growth will be spread across the borough. In particular, paragraph 2.35 states that some areas will see significant change. It is the objective of the Emerging Local Plan to "seek to direct growth to the most sustainable locations that have potential to expand" and which will be supported through investment in infrastructure and services. This aim is one reflected through national policy.
- 3.6. The vision for the Emerging Plan can only be met through the identification of suitable and available sites, consisting of varying sizes and locations, to meet the future housing needs of the Borough.

- 3.7. Our Client's site at Land at Manor Farm, Lower Rainham Road, Gillingham presents an excellent opportunity for Medway council to secure a sustainable site that could be an important means of securing future housing for the Borough. The site is well located in relation to the existing settlement of Twydall and the wider area of Rainham. Not only does the site have the advantage of close access to facilities within Twydall and Rainham by foot, but it also allows for access into the centre of Gillingham by bike or bus in less than half an hour. The Site is also within proximity to Rainham Station will allows for direct access into London.
- 3.8. The Concept Plan in Appendix 1 demonstrates that The Site is capable of accommodating a range of dwelling types, sizes and tenures. Not only is this crucial in terms of providing the range of housing needed in the Borough as identified in the SHMA, but the site could also play an important role in helping local businesses thrive through the increased footfall and demand for their services. This is particularly important in light of concerns expressed in the Emerging Plan regarding the impact upon other nearby towns and shopping centres on the local economy.

4. Site and Surroundings

- 4.1. The Site relates to land at Manor Farm, Lower Rainham Road (B2004), Gillingham, and comprises multiple parcels of open land that consist of both arable farmland and open fields laid to grass. The different parcels are defined and separated by hedgerows. The Site comprises an area of approximately 20.00ha (49.4 acres). Access to the site could be achieved principally via Lower Rainham Road to the north (as is presently the case) but also via Lower Twydall Lane to the west.
- 4.2. There are no public footpaths in or immediately adjacent to The Site.
- 4.3. The north of the site is bordered by Lower Rainham Road (B2004) and in part by existing residential dwellings to the north west. The east of the site is bordered by open fields separated by hedgerows and to the south of the site by an open field which is partly defined by natural contours in the land. The west of the site partly borders Lower Twydall Lane but also existing dwellings towards the south west of the site.
- 4.4. The site is in close proximity to the urban area/rural settlement boundary of Twydall and as such is in close proximity to a diverse range of buildings. This includes, for example, the industrial centre east of Yokosuka Way (A289), south of the railway line and a mix of detached and semi-detached dwellings.
- 4.5. The Site is not within a conservation area, but is immediately adjacent to the Lower Twydall Conservation Area towards the south west of the site. The site does not contain any listed buildings.
- 4.6. Beyond The Site, approximately 300m as the crow flies to the north east from the closest point, is the Riverside Country Park which provides a large amenity space . This is separated from the site by clusters of residential dwellings, fields and a dry boatyard. The site is also within an Area of Local Landscape Importance.
- 4.7. The Site is subject to a covenant on a small strip of land to the north. This prevents the erection of any building or structure on the land apart from a boundary fence or hedge and will not use the land for any purpose except that of agriculture.
- 4.8. No other policy designations impact upon this site and the Site is therefore fairly unconstrained. This is demonstrated by the Constraints Plan in appendix 2.

- 4.9. The application site has been subject to various planning applications since the adoption of the Local Plan in 2003. This purely relates to the lower agricultural barn fronting Lower Rainham Road and not the wider land. This is as follows:

Reference Number	Proposal	Decision
MC/01/1397	Change of use from agriculture to four light industrial units	Refusal Feb 2002
APP/A2280/A/02/1088882	Change of use from agriculture to four light industrial units	Appeal allowed Nov 2002
MC/03/2316	Change of use from light industrial (Class B1 (c)) to mixed use Classes B1 and B8	Refused Feb 2004
APP/A2280/A/04/1147794	Change of use from light industrial (Class B1(c)) to mixed use Classes B1 and B8	Appeal allowed Feb 2005

5. Site Proposals

- 5.1. This representation proposes that The Site is allocated in the Emerging Local Plan for 330 dwellings. This would include a provision of affordable housing in line with emerging local policy and also include access and parking in addition to areas of public amenity space.
- 5.2. A Concept Plan has been prepared to support this representation and can be found in Appendix 1. As is clear from the Plan, the site can easily accommodate this level of development without appearing unduly cramped or overdeveloped.
- 5.3. An indicative Schedule of Accommodation has been prepared as part of the Concept Plan. This is based on an assumption that a normal mix of dwelling types and sizes will be sought by Medway as part of the allocation of the site. The indicative Schedule of Accommodation is below:

Unit type	Market Housing	Affordable Housing
1 bedroom apartment	25	61
2 bedroom house/apartment	62	14
3 bedroom house	121	6
4 bedroom house	32	2
5 bedroom house	7	-
Total	247	83

- 5.4. The proposals as shown would accommodate a residential development at an overall density of 19.69dph dwellings per hectare, but this includes all access roads, open space and play areas
- 5.5. At this stage, the Concept Plan is provided as a means of highlighting The Site's development potential and forms a basis for discussion purposes. No further design work has been progressed, although should Medway Council later allocate this site, our client would be pleased to liaise with both the planning policy team and development management officers to secure an acceptable and sustainable scheme for this parcel of land.

6. Evidence Base

Sustainability Appraisal

- 6.1. The Sustainability Appraisal (SA) published during the Development Options consultation consists of a scoping report, an interim Sustainability Appraisal and two separate appendices; Appendix 1 which reviews the development objectives of the Local Plan against the SA objectives, and Appendix 2 which consists of 'sustainability assessment tables' for Development Options.
- 6.2. The SA assesses the policies and development options on the basis of the following matrix:

Key	Effect
++	Likely to have significant positive effects
+	Likely to have positive effects
0	Neutral
?	Uncertain/insufficient evidence or information available
-	Likely to have negative effects
--	Likely to have significant negative effects

Figure 1: Sustainability Appraisal Scoring Matrix

- 6.3. Appendix 2: Sustainability Assessment tables for Development Options and Policy approaches reviews the four development options that are the focus of section 3 of the Development Options Consultation against the SA objectives. The SA also reviews the proposed policies of the Emerging Plan, but these are not relevant to this representation and have been excluded accordingly. Our client, however, reserves the right to comment on further publications of the SA including on policies, development options and sites that may be selected for allocation as the plan progresses.
- 6.4. The table below summaries the Council's scoring of the four presented development options. These have also been assessed on their sustainability over the short (S), medium (M) and long (L) terms

SA objective / Option	Option 1			Option 2			Option 3			Option 4		
	S	M	L	S	M	L	S	M	L	S	M	L
1. Employment Opportunity	+	+	++	?	O	O	O	+	+	O	+	+
2. Economy	+	++	++	-	-	O	O	+	+	O	+	++
3. Borough Centres	+	++	++	-	-	--	-	O	O	O	+	+
4. Green Networks	+	+	+	?	O	+	O	+	+	O	+	++
5. Climate Change	?	+	+	-	-	--	-	-	O	-	O	O
6. Mitigation	?	+	+	-	O	O	-	O	+	O	+	++
7. Heritage Assets	O	+	+	O	O	O	O	O	+	O	+	+

8. Natural Assets	O	+	++	-	--	--	-	-	--	-	O	+
9. Health / Wellbeing	O	+	+	-	-	O	-	O	+	O	O	+
10. Strong/ Inclusive Communities	O	+	+	--	--	-	-	O	+	O	+	+
11. Housing	+	+	++	+	+	++	+	+	++	+	+	++

Figure 2: SA scoring of the four presented development options

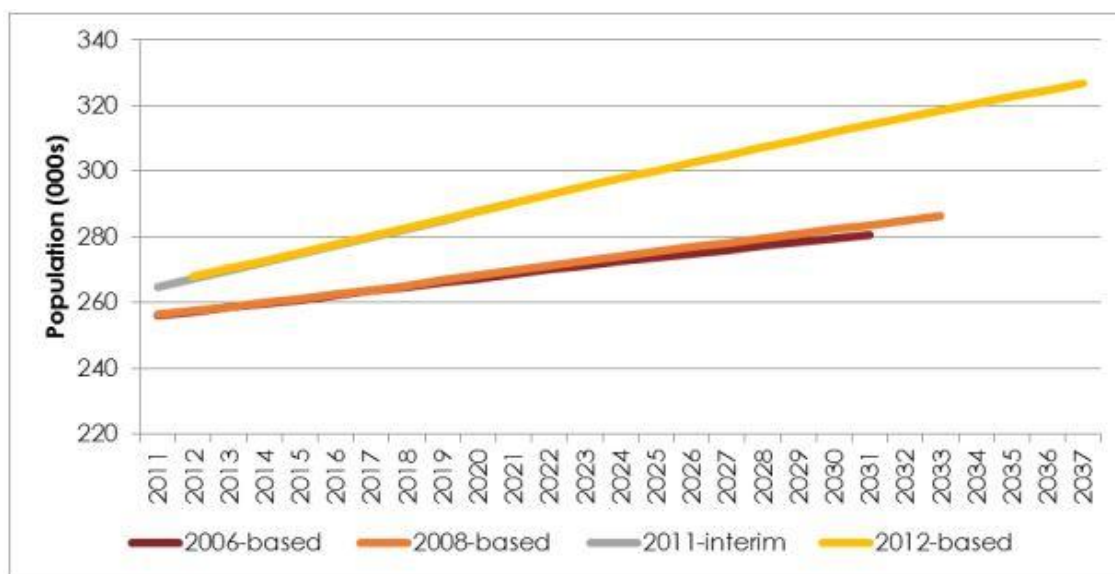
- 6.5. The Council has scored 'Development Option 2: Suburban Expansion' as the least compatible over the short, medium and long term against the sustainability objectives. Development Option 3: 'Hoo Peninsula Focus' is also recognised as having negative impacts against the sustainability objectives, although to a lesser extent. The SA clearly identifies 'Development Option 1: Maximising the potential of Urban Regeneration' as the most compatible strategy with the SA objectives, however in accordance with the commentary on the development options below, option 1 should be rejected. Development Option 1 is simply unable to provide for the wide range of development that is needed across the borough. Not only would this represent poor planning, but it would leave the Council exposed to unsustainable development in the longer term.
- 6.6. Furthermore, whilst Development Option 1 measures well against the SA objectives, there is a limit to the amount of development that can be accommodated in one area before the negative impacts outweigh the benefits. This is particularly the case in an area such as the Hoo Peninsula which has limited transport infrastructure and would create a dependency on private car use.
- 6.7. Medway acknowledges that Development Option 1 would result in higher density housing as a means to accommodate the higher number of dwellings needed in Medway. Even if this approach were to deliver enough homes to meet adopted housing targets, it remains dubious whether this approach would provide sufficient and affordable housing to meet needs in Medway as required by the SA objective. Furthermore it is unclear as how the objective to create strong and inclusive communities can reasonably be considered to be a particularly strong asset of Development Option 1. This should therefore be amended accordingly.
- 6.8. It is demonstrated in this representation that Development Option 2 presents the most effective strategy of those presented in terms of delivering the range of development that is required to meet both the objectively assessed needs of the borough and creating sustainable mixed communities. Subject to the inclusion of sites such as our client's, the expansion of Rainham would have an overwhelmingly positive effect on the local economy in the way of new investment into the borough and new jobs.

- 6.9. The provision of appropriate infrastructure as a means of improving the value of development to the wider community should not be underestimated. Whilst the SA claims that “opportunities for employment land in suburban locations may not attract market investment”, appropriate infrastructure that provides essential services and makes the wider areas around Rainham easy to access may make the area more valuable to market investment. We therefore cannot agree with this outcome and the economic benefits of Development Option 2 should be reassessed by the Council against the SA objectives.
- 6.10. As demonstrated below, Development Option 4: Urban Regeneration and Rural Town is a favourable approach, owing to its inclusion of a range of different options for delivering the required housing growth over the plan period. It is also an approach which has scored favourably against the objectives of the SA, other than on matters of climate change and making the best use of natural resources.
- 6.11. Given the similarities between Development Option 2 and Development Option 4 (other than the non-inclusion of The Site in the latter option), it is not immediately obvious how Medway has drawn its conclusions on climate change, especially when no sites have been selected. Whilst a site positioned on the edge of a settlement may appear to have the greater sustainability credentials, this may not necessarily be the case, owing to numerous factors that weigh in on the subject of sustainability. On this basis, a high level Sustainability Appraisal cannot comment with any accuracy on the sustainability of different scenarios until further information is available.
- 6.12. Further comments on the SA will be provided in the next consultation stage of the emerging plan as and when relevant to our client's site. Further comments may also be forthcoming when additional detail is released by the Council as to the proposed development strategy going forward.

Housing and Economic Needs Assessment

- 6.13. The NPPF requires Local Planning Authorities to have a clear understanding of their needs. Paragraph 159 states that LPAs should “*prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing need*”. The SHMA should also “*identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:*
- *Meets household and population projections, taking account of migration and demographic change;*
 - *Address the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and*
 - *Caters for housing demand and the scale of housing supply necessary to meet this demand”.*
- 6.14. The SHMA for Medway Council (as part of the North Kent Strategic Housing and Economic Needs Assessment) relies on the 2012-based Sub-national Population Projections (SNPP). These projections were the latest at the time the SHMA was written, but have since been superseded by the 2016 (2014 based) SNPP.

- 6.15. The 2012 SNPP population projections anticipate that the population of Medway will increase by 21.8% (58,600 people) to an overall population of 326,800 people by 2037 (end of the emerging plan period). The SHMA states that the 2012 SNPP are projecting higher levels of growth than historic projections in 2006 and 2008 and that the annual population growth over the emerging plan period will be 2,344. The table below, taken from the SHMA, highlights the revised projections:



(ONS SNPP Series)

- 6.16. Furthermore, the 2012 household projections anticipate a 29% increase in households to a total of 139,900 households, or an annual growth of 1,270 households. Household projections similarly forecast higher levels compared to relatively depressed projections in 2006 and 2008.
- 6.17. These projections have formed the basis of an Objectively Assessed Housing Need (OAN) in Medway of 1,281 dwellings per annum (dpa) which equates to 32,025 dwellings over a 25 year period. The Emerging Plan covers a period between 2012-2035 and so the OAN over this period at 1,281dpa amounts to 29,643 dwellings.
- 6.18. This OAN is sizeable target which Medway must accommodate over the plan period if it is to achieve its objectives. It is also a target that Medway must meet if it is to meet the identified needs of the community both at local and borough level. Whilst it is appreciated that the OAN represents a 'policy off' figure, Medway must identify a suitable range of sites, or varying sizes and in varying locations, where the identified needs of the community can be met. This is clearly stated in para 47 which is clear that Local Plans should meet "the full objectively assessed needs for market and affordable housing in the housing market area".

- ## Strategic Housing Land Availability Assessment

- [illegible]

6.24. The SLAA determined that the site had the potential for the following development:

14

- 6.25. Despite The Site's development potential, the assessment considered it *"unsuitable for development unless identified constraints can be addressed"*. This was based upon constraints concerning facilities and services availability, public transport accessibility, landscape, agricultural land. The Site was not, however, considered unsuitable for any constraints that specifically related to housing.
- 6.26. Furthermore, the site is assessed as being unavailable on the basis of a lack of active promotion and a lack of information regarding the landowner and his intentions.
- 6.27. We cannot agree with the findings of the SLAA in respect of site 0778. There is no evidence to support the conclusions that the site has unresolvable constraints and these judgements are either wrong or unduly pessimistic. In addition, the promotion of the site in this representation clearly demonstrates its availability for development and the landowner's willingness to engage in this process.

Committee Sites Plan

- 6.28. A Sites Plan, "Medway Local Plan 2012-2035: Working towards a Development Strategy", produced as part of a committee meeting showed a map of potential areas for consideration for development.
- 6.29. The Site was highlighted in this map as an area to be considered. This can be viewed in Appendix 3.

Facilities & Services Accessibility

- 6.30. The site is stated to have unresolvable constraints with regards to its accessibility to facilities and services. The site, however, is less than 200m away from a large, urbanised residential area and less than 600m away from an industrial estate which includes a Co-Op supermarket, a McDonalds and a NHS Treatment Centre. Furthermore, there is a large business park which includes a wide variety of shops, including a large Tesco Extra which is less than 1.4km from the site. Woodlands Primary School and Woodlands Childrens' Centre is less than 1.5km away. It is therefore evident that the site has wide access to local facilities and services.

Public Transport Accessibility

- 6.31. Medway considered The Site to have unresolvable constraints with regards to public transport opportunities. The site is located less than 1.9km from Rainham Station with direct trains to London Fenchurch Street and less than 2.9km from Gillingham Station with direct trains to London St Pancras, London Victoria and London Charing Cross. The site is also well served by bus stops along Lower Rainham Road (B2004) which offer direct routes to Gillingham and to Maidstone (route 131). The Site is clearly well served by train and bus.

Landscape

- 6.32. The site is stated to be located outside of the built up area and within an area of locally valued landscape which is considered sensitive to change. The Site, however, is only 200m away from a large, urbanised residential area and could readily be considered as an extension to that urban form. Furthermore, a residential development already adjoins the west of the site and there is an industrial usage to the north west. There is also residential development adjacent to the site to the north and south west, and residential development to the north of Lower Rainham Road. The site clearly has a relationship to both the urban and rural area and its sensitive development would ensure an appropriate transition between the two without negatively affecting the landscape. A Landscaping strategy for the development of the site would ensure that a suitable approach is secured.

Availability

- 6.33. The site is stated to be unavailable on the basis that The Site is not actively being promoted for development and because the landowner is unknown along with his intentions. Our client, the landowner, has instructed Savills to promote the land as part of the emerging plan. It is therefore made clear in this representation that the site is available for immediate development and that all land submitted as part of this submission can come forward quickly.
- 6.34. The above review of The Site was conducted as part of the 2015 SLAA and the 2017 SLAA update did not review the assessment. There are clear inaccuracies and so it is on this basis that Medway Council should undertake a further review of the sites being dismissed in the SLAA before utilising this information further as part of the Emerging Plan to base their local allocations on what is demonstrably out of date information.
- 6.35. Medway Council should also review the SLAA further as the current assessed sites (60 suitable and available) only amount to a capacity of 5,980 units. Paragraph 14 of the NPPF states that local planning authorities should positively seek opportunities to meet the development needs of their area and that Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change.

- 6.36. Furthermore, Medway Council have a history of underdelivery. The table below shows the Council have failed to meet their housing target of 1,000 homes per year since 2013.

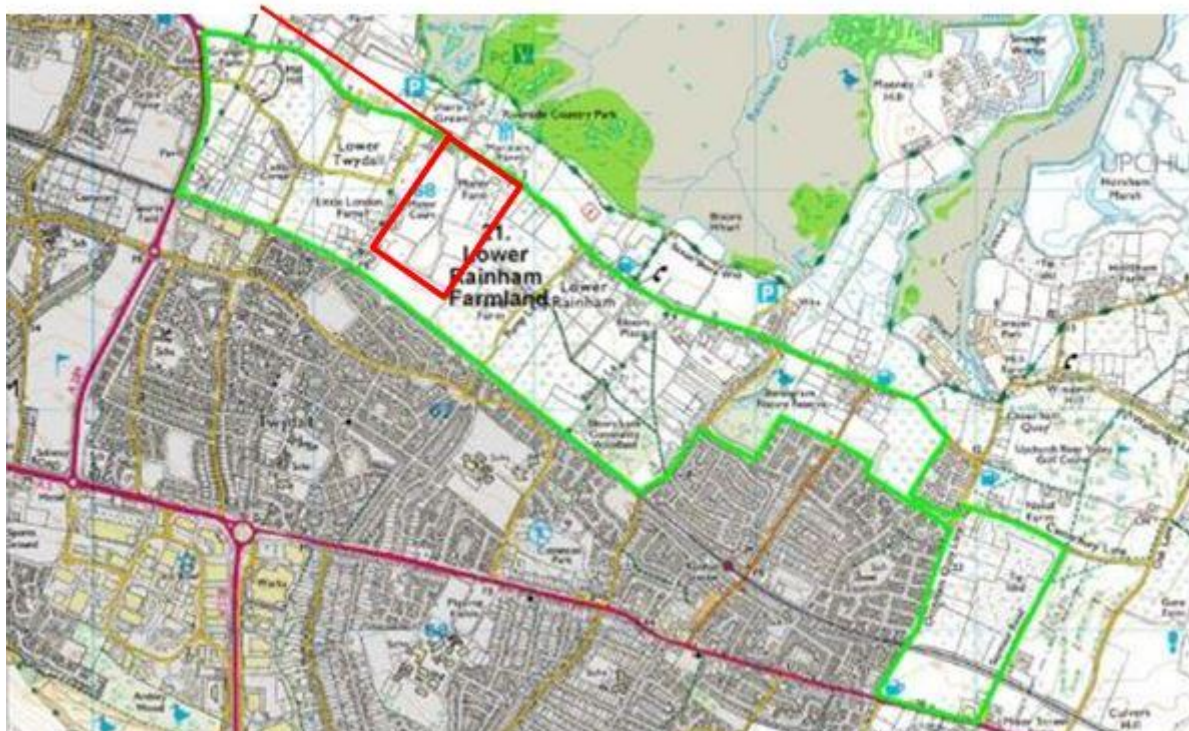
Net additional dwellings in previous years			
	Completions	Requirement	Surplus/deficit
2013	565	1,000	-435
2014	579	1,000	-421
2015	483	1,000	-517
2016	553	1,000	-447
2013-2016	2,180	4,000	-1,820

- 6.37. Paragraph 47 of the NPPF states that local planning authorities should 'boost significantly the supply of housing'. Furthermore, it states that "where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% to provide a realistic prospect of achieving the planned supply".
- 6.38. Our client's site is suitable and available for development. It is in a location where it can positively contribute to both local housing need and the wider character of the area. The SLAA review of the site (0778) should be corrected to show positively the opportunity at the site and this should support an allocation in the Emerging Plan.

Landscape Character Assessment

- 6.39. The Site is located centrally within the Lower Rainham Farmland area (21). This forms part of the North Kent Fruit Belt Character area (KCA 2004). The North Kent Fruit Belt has generally experienced creeping suburbanisation along roads and at edges of settlements. This has resulted in a declining landscape condition, diversity and local distinctiveness.

General location of the site



- 6.40. The characteristics of the area are defined as flat with small to medium scale mixed farmland. There are considered to be some well managed areas of Orchard, shelterbelt, farm buildings, cottages and distinctive rural hedgebanks, but some neglected pockets of land and a busy road give the impression of a gradual trend towards suburbanisation in some localised areas. The landscape area is generally considered to have poor levels of accessibility with regards to east/west and north/south links to urban areas.
- 6.41. An urban extension to the north west of Otterham Quay Lane divides the Lower Rainham Farmland character area and adds to the increasingly urban and industrial feel east of Rainham.
- 6.42. We do not consider The Site to be in-keeping with the character of the landscape due to its close ties to the urban form south of The Site. Whilst some parts of the landscape area are used for agricultural purposes and have a rural feel to them, The Site is in close proximity to the urban area of Twydall and is separated from Twydall by a railway line which disrupts the tranquil nature of The Site.

- 6.43. The site contributes to the increasing trend towards suburbanisation within this landscape area. Residential dwellings are already adjacent to the site and the site already accommodates some industrial uses. Furthermore, there is a sizeable boatyard to the north of The Site which includes a large area of hardstanding used for boat storage.
- 6.44. As already discussed, the lack of general accessibility across the Lower Rainham Farmland area does not apply to this site. The existing access into the site from the B2004 means that access to the wider area of Lower Rainham Farmland and neighbouring urban areas including Gillingham town centre is easily achieved. Furthermore the nearby bus stops provide direct routes to both Gillingham and Maidstone.

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7. Sustainable Development and Development Options

- 7.1. Section 3 of the Emerging Plan concerns the different Sustainable Development options open to Medway and includes the findings of the SHMA which requires a minimum of 29,463 new homes over the 23 year plan period.
- 7.2. At paragraph 3.5, the Council recognises the importance of making the most effective use of land that can deliver the strategic objectives set out for Medway's growth. This is particularly relevant to The Site as it presents a good opportunity to accommodate a healthy amount of residential development which can contribute towards the council's objectively assessed housing needs (OAN).
- 7.3. Aligned with Government policy, Medway wishes to promote the use of Brownfield land over Greenfield land to meet development requirements. It is clear, however, that the authority cannot meet all its development needs through Brownfield sites alone, as demonstrated by the Housing Economic Needs Assessment which has required the delivery of new floorspace in both new locations and within existing sites. Furthermore, Medway Council states in paragraph 3.9 that "*it is unlikely that the full range of development needs could be met solely in the identified regeneration areas on brownfield land*". In order to meet its needs, it is therefore essential that Greenfield land is released to ensure the necessary delivery of development, and ultimately so that Medway Council can guide development into areas which can accommodate development that is sustainable.
- 7.4. Before reviewing the sustainable development options put forward by Medway Council, it is necessary to consider the residential development that is already in the pipeline. Paragraph 3.7 sets out the current position with regards to the supply of developable land. This table is below.

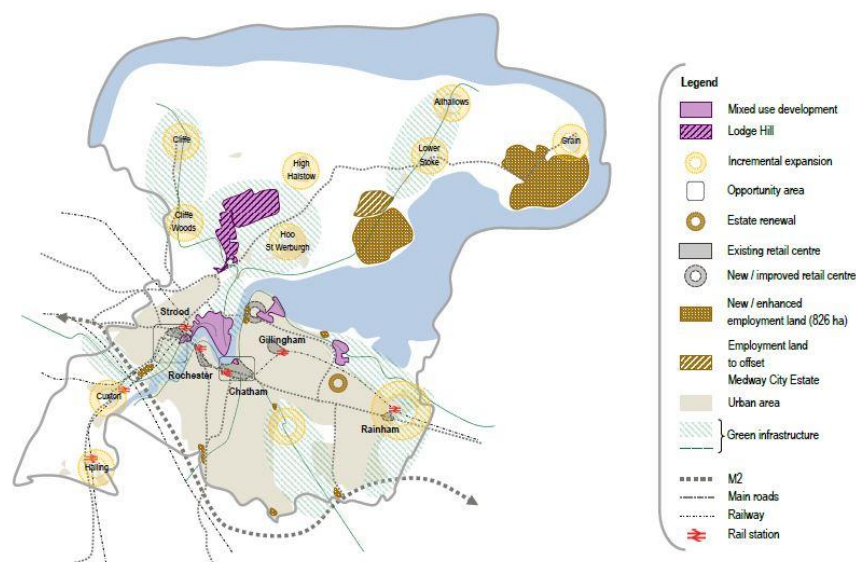
Status	Number of dwellings
Completions 2012-2016	2180
Sites with planning permission	6251
Medway Local Plan 2003 Allocations	356
SLAA* Pipeline sites	8813
Windfalls (years 3-5 only)	606
Total	18, 206

(*Strategic Land Availability Assessment 2015)

- 7.5. It should be noted that the above table (taken from the emerging plan) incorrectly states that the contribution from the identified SLAA sites is 8,813. It is understood that an update to the SLAA was made during the consultation phases of the emerging plan, however the total of 18,206 illustrates an incorrect picture of the numbers of residential dwellings that are expected to come forward.

- 7.6. The SLAA 2017 states that only 5,980 dwellings have been assessed as being suitable and available; 2,833 fewer than suggested by Medway Council. Although some sites may result in a higher level of development coming forward, this is not known, and would be an assumption that goes against the grain of what is typical. The figures put forward by Medway should be amended to make clear the amount of housing that is expected to come forward based on the latest evidence and the consequent shortfall against the OAN of 29,463.
- 7.7. The four development scenarios proposed by Medway in section 3 of the Emerging Local Plan fail to set out the expected amount of development each option is likely to bring forward. This is a point of concern given the high objectively assessed housing needs of the borough. Furthermore, the scenarios do not offer a comprehensive assessment of all locations within the borough, and it is therefore reasonable to assume that none of the methods could sufficiently accommodate for all future development necessary to meet objectively assessed needs.
- 7.8. It is therefore clear that further work is required to review sites across the borough and sites that have not yet been considered suitable should be reviewed.

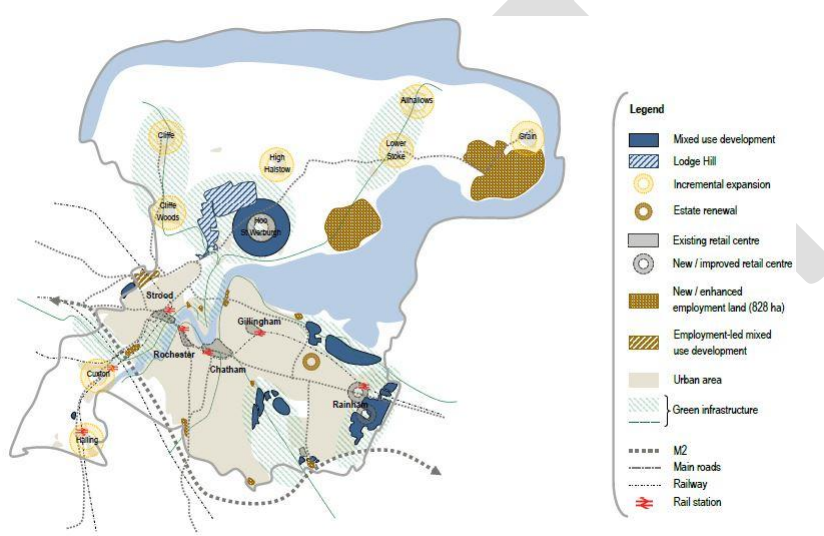
Scenario 1: 'maximising the potential of urban regeneration'



- 7.9. This scenario considers the merits of employment, commercial and mixed use development that would contribute towards the regeneration of waterfront sites. It also considers development in peripheral town centre areas which would see higher densities.
- 7.10. The focus on regeneration and transformation of urban centres in this scenario is based on the idea that development will come forward on sites that have already been subject to development. Although this scenario is likely to increase the attractiveness of waterfront sites and built up areas, this approach often has limitations, especially with regards to sustainability.
- 7.11. There remains an inherent limit to the amount of development an urban area can accommodate without the benefits of such schemes being outweighed by its negative effects. Although development within urban centres often have good access to local facilities and services, a high intensity of development that is focused within smaller areas often creates a significant burden on local services which affects both new and existing residents.
- 7.12. Medway also concedes that this approach would see much of the housing required over the plan period being delivered by high density flats and this solution may not meet the needs of all of the different sectors of the population looking for homes in Medway. If this scenario is progressed, Medway would need to diversify and consider suburban and rural areas to diversify the types of housing that it can deliver.
- 7.13. There appears to be only a limited amount of development shown around the area of The Site and Rainham more generally despite its position as a second tier settlement. Whilst the allocation of some development with the suburban areas of Rainham is welcomed, Rainham, as well as other second tier settlements should be able to accommodate more development to vary the size, type, tenure and location of housing that would otherwise be restricted to urban areas.

- 7.14. It is fundamental that Medway seek to expand existing settlements, especially when there is a clear advantage in terms of sustainability in doing so. As a result of bypassing the majority of second tier settlements, including Rainham, this development option does not reflect the strategic objectives of the NPPF, nor does it sufficiently support the vision and objectives of the Emerging Plan. This scenario is also unlikely to fulfil the objectively assessed housing needs of the borough
- 7.15. **For the above reasons, this scenario should be rejected.**

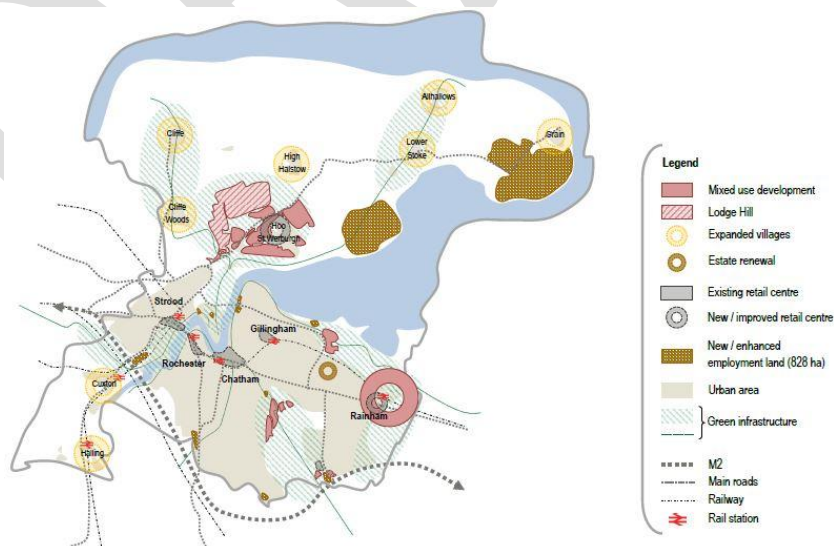
Scenario 2: Suburban expansion



- 7.16. This strategy retains a core element of scenario 1 which promotes urban regeneration but instead focuses on suburban development which can complement a strengthened urban core by meeting the shortfall of development needs elsewhere.
- 7.17. The development strategy employed as part of this scenario would clearly be more effective in delivering the range of development that is required to meet both the objectively assessed needs of the Borough and create sustainable mixed communities. Medway accepts that development can be located in areas that are not previously developed land and this would be a prudent means of increasing the rate of development which is much needed.
- 7.18. Mixed use development in this scenario is shown in areas of Chatham, Gillingham and Rainham which is welcome given the capacity that is available in these areas. It is also arguable that other second tier settlements could accommodate further development. It is clear that these areas do contain land that has an urban feel and could be used to complement the existing urban form. This is especially the case on our client's site which has a large capacity for residential development within an area that is in close proximity to the urban area of Twydall.

- 7.19. What is unclear about this approach, however, is that the 2017 SLAA does not allocate sufficient land to accommodate the proposed levels of development north of the river around the Hoo Peninsula. Furthermore, the suburban areas that have been suggested as areas for mixed-use development to complement urban regeneration have had insufficient SLAA allocations to fulfil this purpose. Rainham is a good example of this deficiency; it has been highlighted as an area for suburban expansion, yet appropriate sites, including our client's site that is both suitable and available, have not had allocations in the 2017 SLAA.
- 7.20. This scenario considers potential development in the Green Belt in areas near Strood. This would require policy change to remove these sites from the Green Belt and make them appropriate in planning terms for residential development. Paragraph 83 of the NPPF is clear that "*Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period*".
- 7.21. To date, Medway Council has not prepared a detailed Green Belt review. It is typical for such reviews to take place in the early stages of the consultation process. In this sense, Medway risks progressing a development strategy that is inherently unsound and that has not considered other, more appropriate sites in more sustainable locations.
- 7.22. **This scenario should certainly be given further review, but would require further sites to be allocated in the SLAA to make such development possible. Our client's site is one such site that should be included in the SLAA as it would be able to make a substantial contribution to housing supply in the Borough over the plan period.**

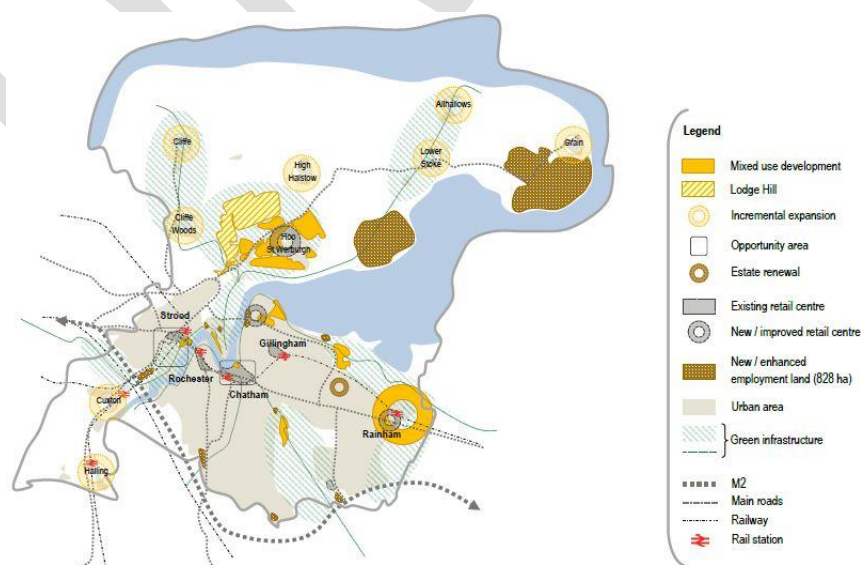
Scenario 3: Hoo Peninsula Focus



- 7.23. This scenario further continues the theme of urban regeneration within the waterfront and in town centre sites. The Hoo Peninsula, like other scenarios put forward, remains a key location for growth. The majority of development is directed north of the river within the Hoo Peninsula although there is additional considerable mixed-use development targeted at Rainham. This represents some consistency with scenario 2 with regards to development in suburban areas.
- 7.24. The key strategic focus of this scenario is the expansion of towns within the Hoo Peninsula which includes reasonably consolidated levels of growth around the village of Hoo St Werburgh. Further development around this area includes the neighbourhoods of Chattenden, Deangate and Lodge Hill. This is in contrast to scenario 2 which just considers a wider ring of growth around the Hoo St Werburgh.
- 7.25. This strategy does differ, however, with regards to the provision of new services and infrastructure to support the small rural town of Hoo St Werburgh and the wider rural hinterland. The emerging policy specifically identifies education, health, leisure facilities, further homes, jobs and shops to meet the needs of the communities.
- 7.26. The Hoo Peninsula has been assessed as part of the Landscape Character Assessment. Specifically, the site's characteristics have been identified as:
- Predominantly agricultural with extensive tracts of marshland and woodland
 - Consisting of three dominant rural landscape types;
 - Flat or undulating arable farmland
 - Mixed farmland with orchards and shelter belts
 - Isolated wooded or farmed hills
 - Including large areas of grade I agricultural farmland
 - Consisting of principal rural settlements on the Peninsula as well as scattered farms and smaller settlements
 - Having a role as providing a rural green buffer between the protected areas of the Thames and Medway estuaries and the urban settlements of Medway.
- 7.27. The principal issues at the Hoo Peninsula within the Landscape Character Assessment are considered to be:
- The loss of landscape structure and fragmentation caused by infrastructure
 - Proximity of rural settlements; poor quality edge treatments; intrusion of urban-rural fringe activities into the countryside; trend towards loss of rural character with the threat of settlement coalescence and loss of local distinctiveness;
 - The impact on the countryside and landscape character of major new development plans on the Hoo Peninsula.

- 7.28. Whilst additional infrastructure, whether that be physical, social or green, may go some way to compensate for these issues, it is fairly evident that they will not overcome the landscape limitations that exist. It would also not be in the interests of proper planning to develop an area with constraints and so little infrastructure when other, more appropriate sites already exist in sustainable suburban settlements. Further review of our Client's site and subsequent allocation should therefore take place to secure the required level of housing to meet needs over the plan period.
- 7.29. Paragraph 3.36 considers the expansion of a number of villages that are considered to have a range of services and facilities that could support an increased population. This does not, however, consider additional infrastructure to support these villages that would see an increased level of population. There is very limited justification of this approach when other sites already exist that have good levels of access to existing facilities in areas that are clearly better equipped to accommodate higher levels of development.
- 7.30. In addition, this scenario considers the capacity of infrastructure to support growth with a particular focus on the road network. Medway admits that there is a traffic problem at the Hoo Peninsula that will need further work carried out to accommodate any future growth. This is also likely to be the case within villages that are to expand without the necessary highways infrastructure in place to support such growth. It is therefore clear that our Client's site has a significant advantage in this regard as it is positioned next to Lower Rainham Road (B2004) which has access to Yokosuka Way and so subsequently, the A2. Whilst further highways work may be required as part of an allocation at The Site to support further housing growth, the site is well placed with regard to the wider road network.
- 7.31. **Scenario 3 should be rejected on the basis that it fails to consider more sustainable areas of growth.**

Scenario 4: Urban Regeneration and a Rural Town



- 7.32. This scenario consolidates the development strategies presented above, bringing together components of urban regeneration, suburban expansion and rural development.
- 7.33. Generally speaking, combining a range of development strategies is a favourable approach as it leaves open a range of different options for delivering the requiring housing growth of the plan period. It is also an important means of ensuring that a range of sizes, types, tenures and locations for housing are kept available. It is disappointing to see, however, that The Site has not been included as part of this development strategy, having made scenario 2 a strong case, and when it is an ideal site for contributing towards a sustainable suburban expansion in Medway which is able to accommodate different types of housing.
- 7.34. It is right that Green Belt land to the west of Strood is not released with preference given to using land in other locations as clearly more sustainable locations are available.
- 7.35. It is on this basis that, although this scenario considers development in lots of areas across the borough, it should by no means be an exhaustive list of all the development options open. The scenario should be considered further to include all suitable and available sites in the borough to ensure that the objectively assessed housing needs within the Borough can be met over the plan period.
- 7.36. **Scenario 4 should be considered subject to further work to ensure that all suitable and available sites are included. It is clear that our Client's site would constitute a suitable and available site that could contribute towards the housing requirements in Medway over the plan period.**
- 7.37. It is appreciated that the development scenarios presented above are presenting a rough picture at an early stage in the Plan, and therefore lack critical detail. However, it is considered unlikely that any of these scenarios would realistically accommodate the levels of housing that are required to meet the needs in Medway over the life of the Emerging Plan.
- 7.38. Paragraph 14 of the NPPF is clear that for plan-making, "*Local Planning Authorities should positively seek opportunities to meet the development needs of their area*". Furthermore, "*Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change*".
- 7.39. It is therefore important that Medway Council further considers the development capacity within the Borough to allow for more detailed development scenarios that can accurately assess the options open to them for development. On the basis of the SLAA 2017 which has not allocated sufficient land to accommodate needs, and on the basis that The Site has not been included more often in the development scenarios as part of a sustainable suburban expansion, it is clear more work needs to be done to assess the true potential within the borough.
- 7.40. Until this is completed, there is little substance to Medway's proposed development strategies.

8. Housing and Design

Housing delivery

- 8.1. A core task of the new Local Plan is to provide for the housing needs of Medway over the remaining 23 year plan period. The policy approach to housing in the emerging planning policy is below:

“The council will seek to provide a supply of land to meet the needs for market and affordable housing for 29,463 homes over the plan period, meeting the principles of sustainable development.

Allocations for sites and broad locations for development will be established in the Local Plan, phased to ensure a supply over the plan period.

Housing delivery will be required to contribute to the development of sustainable communities, with the coordination of infrastructure and service provision. Masterplans will be produced for major residential schemes in broad locations identified in the Local Plan.”

- 8.2. It is encouraging that Medway recognises the published objectively assessed housing needs of the Borough. It is also encouraging that paragraph 4.5 of the Emerging Plan recognises that “further work through the consultation on Development Options and supporting technical studies will help determine the capacity of areas to accommodate development and the most sustainable locations for growth”. It is clear that at present, not enough capacity has been identified to meet identified need.

Housing Mix

- 8.3. The SHMA recognises that there is a need for a mix of housing and is transparent in what those needs are. The proposed policy approach for Housing Mix seeks to ensure that a sufficient range of sustainable housing options can be adequately provided to meet the wide ranging needs of a growing and changing population.
- 8.4. The policy further states that larger development schemes must demonstrate that sufficient consideration has been given to custom and self-build plots as part of the housing mix. In this respect, The Site is ideal for accommodating some custom and self-build plots of the housing mix. The Site's size and ability to deliver a substantial level of housing also increases the flexibility afforded to the Council with regards to differing sizes and types of housing.

Affordable Housing and Starter Homes

- 8.5. The SHMA identified a need for 17,112 affordable dwellings over the plan period. The Council has considered that to deliver the required levels of affordable housing, 25% affordable housing could be achieved on developments over 15 units. The policy further suggests that some areas could support a higher proportion of affordable housing although it is unclear where these areas are.

- 8.6. Due to the lack of information on affordable housing, further comments will be put forward at the next consultation stage of the plan.
- 8.7. The policy approach taken on the provision of affordable homes must be congruent with Government advice, now entrenched in the Planning Practice Guidance. Any departure from government advice will need to be robustly justified.
- 8.8. Medway Council has legitimately remained cautious with regards to the provision of Starter Homes in light of recent publication of the Housing White Paper. The Paper has reeled back on mandatory requirements for 20% starter homes and have instead introduced a clear policy expectation that *“housing sites [will] deliver a minimum of 10% affordable home ownership units”*.
- 8.9. Medway will need to come forward with an approach to starter homes provision. The White Paper has stated that “it will be for local areas to work with developers to agree an appropriate level of delivery of starter homes, alongside other affordable home ownership and rented tenures. It may be best to leave the matter to national Government for inclusion in the NPPF and, if necessary, a SPD could be produced at a later date to adopt a standardised strategy that Medway may want to follow.

Design

- 8.10. Medway’s policy approach to housing design has introduced 9 requirements that include the enforcement of the nationally described internal space standard for individuals units and the Medway Housing Design Standards (MHDS) which include amenity space, shared access and circulation, refuse and recycling, visual privacy and private outdoor space. The emerging policy also includes policy to ensure that all habitable rooms have an acceptable outlook and where possible, receive direct sunlight and that there is an extensive use of trees.
- 8.11. It is necessary to ensure a high quality of living accommodation is provided, but Medway Council has a considerable OAN which should be met over the plan period. It may not therefore be possible to meet minimum standards in all cases and policy should reflect this. Applications should be justified on a case-by-case basis in this respect.

Housing Density

- 8.12. Medway’s policy approach to housing density rightly seeks the efficient use of land through supporting developments at higher densities in appropriate locations. The policy also offers some flexibility on housing density depending on the location of development.
- 8.13. It is necessary to ensure an appropriate density of development on sites, however there should be some flexibility when considering the substantial objectively assessed housing needs that face the Borough. It is important to note, however, that larger sites, such as our client’s site, within suburban extensions are likely to be able to accommodate more appropriate densities should they be allocated.

9. Summary and Conclusions

- 9.1. The Development Options Consultation puts forward a policy approach and four development strategies for the Borough. These policies and the development strategies will guide development over the life of the Plan. The development scenarios lack critical detail but irrespective of this, it seems unlikely that any of the scenarios would accommodate the levels of housing that are required to meet the needs in Medway over the life of the Plan. There is relatively little justification for the approaches set out in the development strategies and why suburban areas of the Borough have not been identified as preferred locations for development. This is regrettable as they represent some of the most sustainable parts of the borough, and sites which are likely to be quick to deliver the requisite housing numbers.
- 9.2. The development options also fail to state the amount of development that is expected to be provided in each location, either as an indicative figure or as a percentage. The development options have also failed to highlight which sites may be most appropriate in bringing the development strategies forward.
- 9.3. This may be in part due to the lack of a comprehensive SLAA which has not allocated sufficient land to accommodate needs. This could certainly be considered the case in the SLAA 2017 which has only allocated for 5,980 sites. It is therefore very difficult to plan ahead without sufficient knowledge of sites to come forward.
- 9.4. Medway Council has a published Objectively Assessed Housing Need of 29,463 dwellings over a 23 year period. This equates to 1,281 dwellings per annum. The Council has confirmed in its housing policy approach that it intends to supply the land to meet the needs for market and affordable housing for 29,463 homes. It does not appear, however, that the SLAA is able to deliver on policy promises and deliver the necessary housing.
- 9.5. The SLAA assessment takes the view that there are only 60 sites suitable and available for development. If all sites were to be delivered at the numbers expected, Medway would still fall short of meeting its Objectively Assessed Housing Needs by circa 10,000 dwellings over the plan period. On this basis, Medway Council are not fulfilling policy commitments to offer a mix of housing within sustainable communities across the Borough and therefore further work is required in the Emerging Plan to ensure that suitable development options are available to meet the Borough's OAN.
- 9.6. Various policy approaches have been published as part of this consultation, some of which concern housing and the built environment and are therefore relevant to this site. Emerging policy has supported the need to deliver the required housing to fulfil the Borough's OAN. Given this, it is clear that Medway has further work to progress before it is able to produce a plan that will be found sound at examination. This includes expanding on existing documents within the evidence base, and preparing new documents. What is absolutely clear is that Medway needs to consider all development options open to them to ensure that the objectives can be met, and that our client's site could form an important means of delivering the Council's vision.

- 9.7. Accordingly we urge Medway Council to formally allocate The Site in the next consultation stage of the emerging Local Plan. The capacity and developability of The Site is further emphasised by the schematic masterplan which is included with these representations.

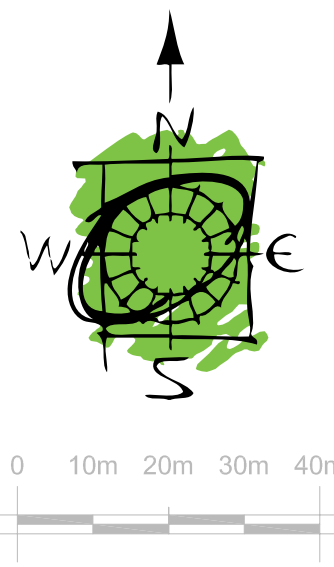
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Appendices

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Appendix 1.0 Proposed Site Concept Plan

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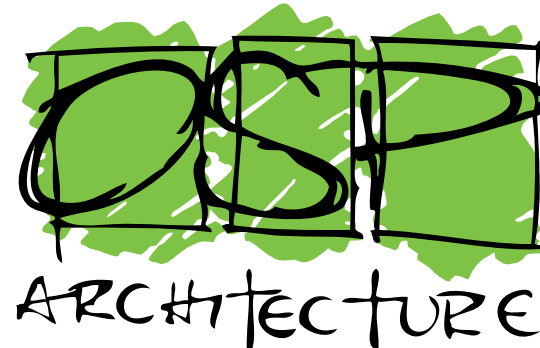


Key

- Site boundary (20.0 hectares)
- Conservation Area
- Country Park
- Extent of flooding from River Medway (flood zone 2)
- Existing access points into site reconfigured
- Existing access points downgraded to footpath/ cycleway/ emergency access only
- Proposed bus route diversion
- Proposed development areas
- Proposed open space areas
- Proposed circulation
- Existing trees on and adjacent to site
- Existing hedgerows/ scrub on and adjacent to site
- LEAP (Locally Equipped Area for Play)
- LAP (Local Area for Play)

Indicative Schedule of Accommodation

Affordable	No.	Sq ft
1 Bedroom Apartment (538 sq ft)	61	40,888
2 Bedroom House/ Apart (850 sq ft)	14	14,450
3 Bedroom House (903 sq ft)	6	7,224
4 Bedroom House (1043 sq ft)	2	2,086
Total	83 (25%)	64,648
Private	No.	Sq ft
1 Bedroom Apartment (550 sq ft)	25	17,050
2 Bedroom House (750 sq ft)	62	58,500
3 Bedroom House (1,150 sq ft)	121	173,650
4 Bedroom House (1,550 sq ft)	32	62,000
5 bedroom House (1,800 sq ft)	7	16,200
Total	247 (75%)	327,400
	330	392,048



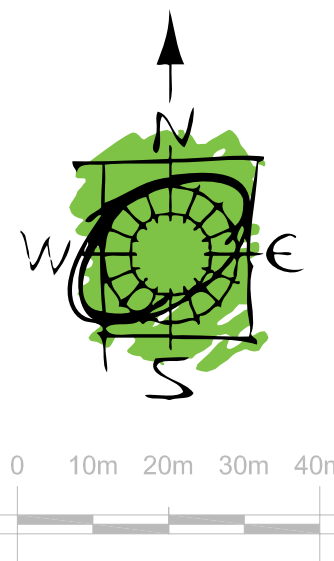
Proposed Site Concept Plan
Land at Manor Farm, Gillingham

17068 / C02A













Scale 1:1000 @ A0 February 2017

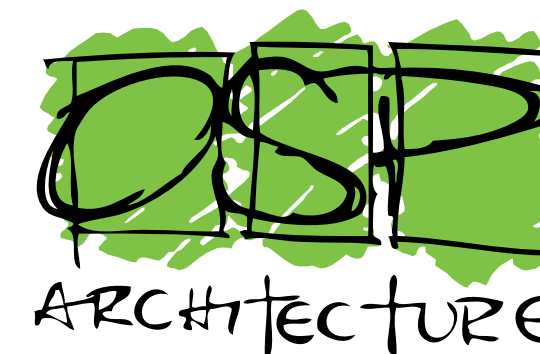
Appendix 2.0 Proposed Site Constraints Plan

DRAFT



Key

-  Site boundary (20.0 hectares)
-  Conservation Area
-  Country Park
-  Extent of flooding from River Medway (flood zone 2)
-  Existing access points into site
-  Rural Lane
-  Lower Rainham Road (B2004)
-  Slope (pointing down)
-  Existing trees on and adjacent to site
-  Existing hedgerows/ scrub on and adjacent to site
-  Existing site buildings
-  Relationship with adjacent properties

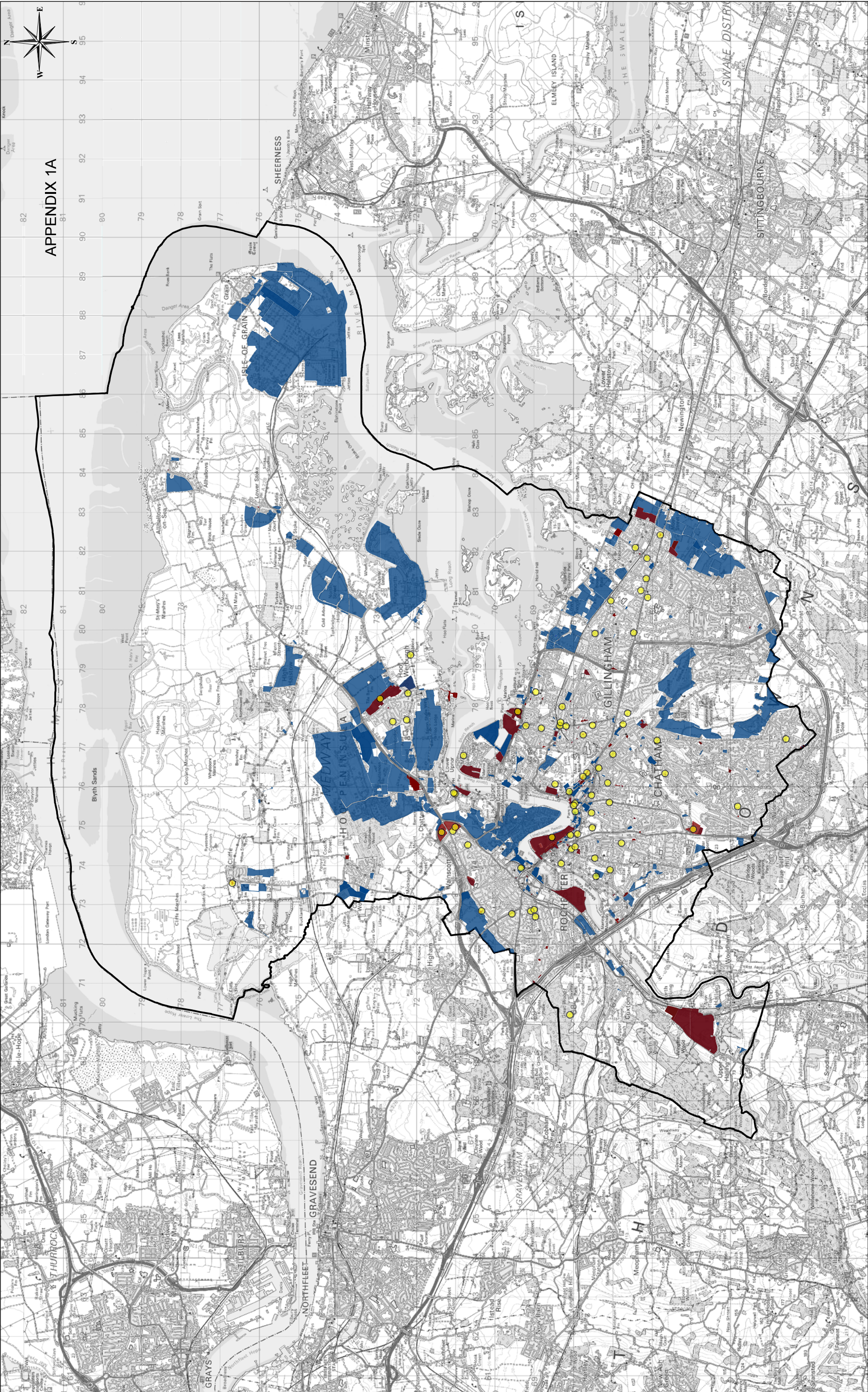


Proposed Site Constraints Plan
Land at Manor Farm, Gillingham

17068 / C01A

Scale 1:1000 @ A1 February 2017

Appendix 3.0 Medway Local Plan 2012-2035: Working towards a Development Strategy



Title: Medway Local Plan 2012-35: Working towards a Development Strategy

**Potential areas for consideration
for development - residential,
employment, retail and
community services**

Completions (2013-16)

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Nick Challis
Planner

[REDACTED]
[REDACTED]
[REDACTED]

Guy Dixon
Associate Director

[REDACTED]
[REDACTED]
[REDACTED]


DRAFT

18 April 2017

The Savills logo, featuring the word "savills" in a red, lowercase, sans-serif font, positioned within a yellow rectangular background.

Planning Policy Team
Planning Service
Medway Council
Gun Wharf
Dock Road
Chatham
Kent
ME4 4TR

Diana Thomson

A black rectangular redaction box covering contact details.

33 Margaret Street
London W1G 0JD
T: +44 (0) 20 7499 8644
savills.com

Sent via Email to futuremedway@medway.gov.uk

Dear Sir / Madam

**CONSULTATION ON THE MEDWAY LOCAL PLAN DEVELOPMENT OPTIONS
ROCHESTER AIRPORT INDUSTRIAL ESTATE, ROCHESTER, ME1 3QR**

Thank you for providing us with the opportunity to engage in the consultation on the Medway Local Plan Development Options. We write on behalf of our client, Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited, who have an interest in a site at Rochester Airport Industrial Estate and have begun working to develop proposals for its redevelopment.

Our client's site is currently designated within the Laker Road Industrial Estate Employment Area. Whilst the Development Options document does not specifically identify the proposed designation of the site within the emerging Local Plan, we consider that it would be appropriate for the provision of new residential dwellings. We are supportive of the Council's aspirations for growth and consider that the redevelopment of our client's site can make a significant contribution to the success of the district.

The Site

The site measures approximately 5.7 hectares in size and currently comprises a number of warehouse / commercial blocks which together form part of the Rochester Airport Industrial Estate. There are a variety of businesses and uses currently present on the site including manufacturing industries as well as a cash and carry, children's amusement centre, dance school and health club. Parking areas are provided adjacent to each of the units. The site is accessed from Maidstone Road to the east. A site location plan is enclosed with this letter for your reference.

To the east and south of the site are further industrial buildings, beyond which lies the Rochester Airport runways to the southeast of the site. To the west of the site, on the opposite side of Maidstone Road, is a further small cluster of industrial buildings including a Royal Mail distribution warehouse. The site is bound to the north by Kings Rochester Sports Centre and associated playing pitches, as well as an open green space, beyond which lies residential areas comprising the south of the settlement of Rochester.

The site does not contain any statutorily or locally listed buildings and there are no listed buildings in the immediate surrounding area. The site is not located within a conservation area or an archaeological priority area. With regards to the Environment Agency's flood mapping, the site is located within Flood Zone 1 (i.e. it has the lowest probability of river or sea flooding).

The site is located in close proximity to a wide range of local amenities in Chatham (located approximately 3.2 km to the northeast of the site) and Rochester (located approximately 3.3 km north of the site). In addition, there is a large superstore located approximately 1.6 km southeast of the site as well as a small local centre on Shirley Avenue (located approximately 1 km to the southeast of the site) comprising cafe, restaurant and takeaway uses.

There are a number of educational facilities in the area surrounding the site, including Warren Wood Primary Academy and The Thomes Aveling School, both of which are located approximately 800 metres to the northeast of the site, as well as Horstead Infant and Junior schools which are located approximately 1.2 km southeast of the site. With regards to healthcare facilities, West Drive Surgery is located approximately 1 km to the southeast of the site.

The site is located approximately 2.9 km from Chatham Rail Station and approximately 3.5 km from Rochester Rail Station, both of which provide National Rail services to London's Victoria, Charing Cross and St Pancras stations as well as destinations in Kent and the wider South East including Gillingham, Faversham, Ramsgate and Dover. Cookham Wood bus terminus is located approximately 600 metres north of the site and provides services towards Chatham. In addition, the site is located approximately 2.5 km from the A2 which provides access to the wider road network between London and Canterbury.

Comments on the Local Plan Development Options

As a general comment, we note that the National Planning Policy Framework (NPPF) requires all plans to be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.

Paragraph 158 of the NPPF requires the use of a proportionate evidence base which provides adequate, up-to-date and relevant evidence about the economic, social, and environmental characteristics and prospects of the area.

It is welcomed that the focus of the Plan is on growth and regeneration in order to meet local development needs through sustainable development. However, we consider that the proposed development options and policy approaches do not go far enough to ensure the needs of the district are met. We set out our concerns in the following paragraphs.

Section 3 – Development Options

Section 3 sets out four development options which are proposed to provide a framework for the emerging Local Plan and to guide development in the district over the plan period. However, in order to achieve the level of development required, including the delivery of 29,463 new homes, we consider that further work is required and alternative options pursued in addition to those currently proposed.

Medway's Strategic Land Availability Assessment (SLAA) (2017) and Annual Monitoring Report (AMR) (2016) both identify a significant under delivery of housing and it is calculated that the Council is currently not able to demonstrate a five year supply of deliverable land for housing. This demonstrates the importance of the Council bringing forward a Local Plan that will boost delivery of housing to meet its development needs, to ensure the requirements of paragraph 47 of the NPPF are met.

We note that the Development Options document recognises that the proposed "scale of growth is challenging" and that "it is unlikely that the full range of development needs could be met solely in the identified regeneration areas".

Employment sites could provide suitable locations for sustainable brownfield development which will make more efficient use of urban land. The development options incorporated within the emerging Local Plan should recognise the contribution that can be made by such sites and should therefore be expanded to include a focus on the regeneration of inefficient employment sites in order to meet development priorities such as the delivery of housing.

The site at Rochester Airport Industrial Estate comprises a brownfield site located within the existing urban settlement area of Rochester. The site is located in an accessible location, supported by community facilities such as schools and healthcare providers, and good transport links, and is adjacent to existing residential neighbourhoods.

The site is considered to be a sustainable location for residential development and could become available for redevelopment within the next five years. The site could therefore help to “boost significantly the supply of housing” as sought by Paragraph 47 of the NPPF. In addition, the site is not located within an area at risk of flooding and is not within the designated Green Belt. Redevelopment of the site for such residential development would therefore contribute to meeting the Council’s housing targets.

Section 5 - Employment

The site at Rochester Airport Industrial Estate is designated within the adopted Policies Map within the Laker Road Industrial Estate Employment Area. Saved Local Plan Policy ED1 states that development will only be permitted for business / industrial uses (Class B1, B2 and B8) and loss of such uses will not be permitted.

The Policy Approach to Economic Development set out in Section 5 of the Development Options document states that the Council is seeking to make provision for the scale, range, quality and locational requirements of the employment land need identified for the district. In addition, the Council is seeking to increase the productivity of the local economy and focus on those employment uses of higher values. The Council will consider whether employment uses are best aligned to the characteristics and location of a site and is specifically seeking to strengthen the role of town centre locations in providing employment opportunities.

The current use of the site comprises an inefficient use of land and does not contribute to the Council’s strategy which focuses on a ‘knowledge economy’ and high quality, high value employment uses. As set out in the previous section, we consider that the site could be better used to provide much needed new residential development. NPPF Paragraph 22 states that planning policies should avoid the long term protection of sites allocated for employment use where alternative uses have the potential to provide different land uses to support sustainable local communities. We consider that the Local Plan should reflect this national guidance and make provision for the redevelopment of the existing employment site in order to meet other needs such as housing. In this regard we propose that the site at Rochester Airport Industrial Estate is removed from the Employment Area designation.

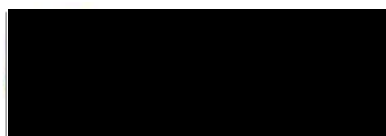
In addition, we note that the development of Rochester Airport, comprising of the land to the south and east of the site, is guided by the Rochester Airport Masterplan (2014) which seeks for enhanced aviation heritage facilities as well as the creation of a knowledge-based employment hub. The redevelopment of the Rochester Airport Industrial Estate site to provide new residential dwellings will support this aim through the provision of new dwellings for employees of the airport and in contributing to the creation of a high quality, mixed use and successful place.

Future Participation

We trust that the above is of assistance in the preparation of the Local Plan. We would like to be kept up to date with the progress and look forward to further opportunities to engage.

We look forward to confirmation of receipt of these representations. Please feel free to contact me if you have any queries or if you would like to discuss.

Yours faithfully



Diana Thomson
Associate Director

cc. Richard Summers, JLL

Enc. Site Location Plan

The map displays an industrial area with various buildings and infrastructure. A prominent red line outlines a specific site area. Key features include:

- Stirling Park**: A large open area in the center-right.
- Works**: A building labeled 'Works' near the center.
- Warehouse**: Several buildings labeled 'Warehouse' are scattered throughout the site.
- Depot**: A building labeled 'Depot' is located near the top center.
- El Sub Sta**: A substation labeled 'El Sub Sta' is located near the top left.
- Ward Bely**: A road or path labeled 'Ward Bely' is on the left side.
- B 209H**: A road labeled 'B 209H' runs along the bottom left.
- MAIDSTONE**: A road labeled 'MAIDSTONE' runs along the bottom.
- Scale**: A scale bar at the bottom left indicates distances from 0m to 75m.
- North Arrow**: A north arrow is located in the top left corner.

[REDACTED]

From: Sharon [REDACTED]
Sent: 03 March 2017 23:24
To: futuremedway
Subject: Medway Local Plan Consultation

Follow Up Flag: Follow up
Flag Status: Completed

Dear Sir,

I would like to respond to the consultation on the new Local Plan for Medway. I am a local resident.

The Medway towns have two internationally and nationally important assets, the area's heritage - the castles, Chatham Dockyard, museums etc, and the surrounding countryside - the river estuary and marshes, The Marine Conservation Zone, the Kent Downs ANOB, nature reserves such as Northwood Hill and Ranscombe Farm and SSSIs such as Lodge Hill. Medway Council has a duty today and for future generations, to preserve and care for all these assets.

Section 7 of the consultation – 'Natural Environment and Green Belt' discusses in detail Medway Council's plans for protecting and developing the local environment for the benefit and enjoyment of local residents in the future. But it is noticeable that there is no mention of Lodge Hill, which is an SSSI, and has been conspicuously left out as the area is earmarked for housing in all four scenarios listed.

Lodge Hill was listed by the government as a Site of Special Scientific Interest because it is one of the most important sites for Nightingales in the country. These birds have declined in numbers by 90% over the last 50 years. This makes Lodge Hill a special place and I cannot see why Medway Council would choose to destroy it.

Please do not allocate Lodge Hill as land for development, instead keep it as a nature reserve for local people to enjoy.

Yours,

Sharon Pallent

[REDACTED]

Planning Policy Team
The Planning Service
Medway Council
Gun Wharf
Dock Road
Chatham
Kent
ME4 4TR

18th April 2017

Dear Sirs,

Medway Council Local Plan 2012 – 2035

Development Options Consultation - Representations on behalf of Location 3 Properties Ltd.

On behalf of our clients, Location 3 Properties Ltd, we are instructed to submit representations in respect of the above document. Our client has an interest in land at Plot 1, Anthony's Way, Medway City Estate which is subject to a current planning application (Ref; MC/16/1084) with Medway Council. That application proposes the construction of retail development in the form of a retail park comprising some 9,354sqm of new floorspace together with car parking, servicing and landscaping. The application was submitted in March 2016 and awaits determination.

The site subject to our clients' planning application has a long history of retail planning consents for a comparable or greater quantum of retail floorspace to that proposed in the current application. Those previous consents include a Secretary of State's decision from September 2006 (MC/2003/1301) which permitted 14,430sqm of retail floorspace and, in 2011, the 'Sainsburys' consent (MC/10/2125) which granted consent for some 9,354sqm of unrestricted Class A1 floorspace. The 'Sainsburys' consent has been commenced and, as accepted by the Council, is an extant consent which could be built out at any point in time.

The land at Plot 1, Anthony's Way has, as such, a long history of retail planning permissions for a significant quantum of retail floorspace and moreover benefits from an extant and commenced retail permission for 9,354sqm of retail floorspace.

Each of the previous retail consents on the site have included the provision of a Park and Ride facility. However, in the light of decisions taken by the Council in relation to the former Horsted Park and Ride and on legal advice the Council has obtained (see GVA's comments of January 2017 on our clients' current planning application) it is now accepted that the existing policy requirement for a Park and Ride on the Anthony's Way site is out of date and that the 'Sainsburys' consent could be implemented without the requirement to build out the Park and Ride component of that consent.

The representations below, on behalf of our client, are made in the context of this important and significant planning history for our clients' site. The Development Options document, in our opinion, fails to recognise the planning context to this important site. In short the site has a long history of retail planning consents, has an extant retail permission which can be built out and is subject to a fully worked up current retail proposal. It is inconceivable that the site will not be developed for retail purposes, in all likelihood in the very near future and accordingly any future versions of the emerging Local Plan should reflect this planning reality.

Against this background, our comments on the Development Options Consultation are:

3. Delivering Sustainable Development – Options (Para 3.24 and Appendices 1B and 1F)

Whilst our clients do not object to the identification of land at Medway City Estate as a potential mixed use development opportunity and, indeed, see considerable merit in the redevelopment of the area to provide higher density mixed use proposals, any future iteration of the Local Plan should acknowledge the realities of our clients' site, namely it has consent and will be developed for retail purposes. The site could and should therefore form the retail focus of any wider mixed use redevelopment of the regeneration area. Any subsequent allocations document or plan (such as Appendices 1B and 1F) should acknowledge the site's extant retail planning consent. To fail to recognise the site's retail context will merely render this component of any subsequent Plan worthless.

As a minor technical point Appendix 1F is incorrectly noted as 1E.

6. Policy Approach: Retail and Town Centres

We support the policy approach that suggests the new Local Plan will look to review the existing town centre boundaries. Changes in shopping habits, as the Retail Study and Development Options document acknowledge, have resulted in a reduced demand for floorspace in town centres or for space of a different format to that currently provided. Against this background, and in the context of Chatham in particular, there is a strong case for reducing the defined extent of the town centre and concentrating the retail focus of the centre on a smaller area. In areas beyond that tightly defined centre, alternative uses including residential uses should be encouraged. It is our view that Chatham, at present, has too much floorspace of the wrong type, in locations too devoid from the prime retail core. Allowing greater flexibility in uses in these non prime areas, for example the eastern part of the High Street, could help to revitalise these areas and therein bring increased vitality to the centre as a whole.

Allied to the above point, and consistent with the findings of the Retail Study, Chatham should seek to refocus on its leisure and evening entertainment role. The town centre has under representation of such uses and actively seeking such uses together with increasing residential provision within the centre is a realistic way to improve the centre's attractiveness and therein vitality. Given the proximity and strength of Bluewater it is unrealistic to assume that Chatham will ever achieve the comparison shopping role its catchment area population might suggest it should. The reality of Bluewater for comparison shopping purposes should be acknowledged and therein the strategy for Chatham should be to consolidate on its current position in terms of comparison shopping and achieve growth through a greater diversity in uses, particularly leisure and evening economy uses.

In drawing up new retail policies the NPPF is clear that retail needs should be met in full. The NPPF also recognises that there will be town centre uses that cannot be accommodated in town centres or on their edge. It therefore requires Local Plans to set policies against which such uses can be assessed. That is the approach the new Plan should take to out of centre proposals and not, as could be interpreted from the current Options document, a strong opposition to such proposals. Large format retailing, which often cannot be accommodated in town centres or on their edge, is a legitimate part of the retail provision of a town and a type of retailing that is demanded by the shopping public. The new Local Plan should recognise such proposals will continue to come forward, can be complimentary to town centre shopping and, as such, should include a simple criteria based policy against which those proposals will be judged. The criteria to any such policy should not extend beyond the tests of the NPPF; namely the sequential approach and impact tests. Subject to demonstrating flexibility, considerations such as scale, format and car parking provision are no part of a policy test against which such proposals should be assessed. A new policy which included such considerations, as might be suggested by the current Policy Approach, would run directly contrary to the NPPF (and legal precedent) and is not justified.

On a technical point we are concerned that already the GVA Retail Study, in terms of its data sources is becoming out of date and would question how sound it is as a basis for policy formulation. We note for example that it:

- Relies in places on data from the October 2014 Experian Retail briefing Note, when more up to date notes are and were available.
- Takes an unduly cautious approach to floor space efficiency.
- Reports notably higher vacancy rates in centres than recent work would suggest.
- Fails, we understand, to treat our clients' site as an existing retail commitment.

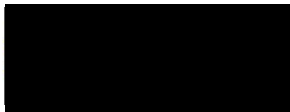
Against this background we would urge a partial review/update of the Retail Study particularly in the context of the key centres as part of the Local Plan formulation.

11. Policy Approach: Transport (Page 94)

The suggested policy approach which includes, amongst other points, improving 'park and ride' services, is wholly inconsistent with the Council's recent approach to park and ride facilities within Medway and, as such, should be omitted from any future document. The Council's decision to sell the Horsted Park and Ride site, thereby ending that facility shows the Council is not committed to a Park and Ride within Medway. Inclusion within the new Local Plan of a Park and Ride policy (similar to existing Policy T17) is wholly unjustified, would not be supported by the Council's past approach to Park and Ride facilities and could merely serve to sterilise land, such as our clients' site, that could be better used for other purposes.

We trust that the above representations are helpful and that they will be taken into account in the next stages of the Local Plan's formulation. We are obviously happy to discuss or elaborate on these representations should you wish otherwise we look forward to being kept informed on progress with the new Plan

Yours sincerely,

A solid black rectangular box used to redact the signature of Roger Birtles.

Roger Birtles
Director

From: Laura Hutson
Sent: 07 April 2017 12:50
To: futuremedway
Subject: Medway Local Plan

Follow Up Flag: Follow up
Flag Status: Completed

Dear Madam/Sir,

Thank you for consulting Sport England on the above named documents. Please find herein our formal comments for your consideration.

Sport England has an established role within the planning system which includes providing advice and guidance on all relevant areas of national, regional and local policy as well as supporting local authorities in developing the evidence base for sport.

Sport England aims to ensure positive planning for sport, enabling the right facilities to be provided in the right places, based on robust and up-to-date assessments of need for all levels of sport and all sectors of the community. To achieve this our planning objectives are to seek to PROTECT sports facilities from loss as a result of redevelopment; to ENHANCE existing facilities through improving their quality, accessibility and management; and to PROVIDE new facilities that are fit for purpose to meet demands for participation now and in the future.

We work with the planning system to achieve these aims and objectives, seeking to ensure that they are reflected in local planning policies, and applied in development management. Please see our website for more advice: <http://www.sportengland.org/facilities-planning/planning-for-sport/>

Evidence Base

Paragraph 73 of the NPPF requires that:

“Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessment should identify specific needs and quantitative deficits or surpluses of open space, sports and recreational facilities in the local area.”

It is noted that Medway has committed to undertaking a Playing Pitch Strategy, however as yet no progress appears to have been made on this (such as a Stage A meeting taking place). Without a Playing Pitch Strategy well underway to form a robust part of the local plan evidence base, Sport England will be unable to support the Local Plan.

Policy Approach: Open Space and Sports facilities

The council’s commitment to seek to secure and promote access to sports facilities is welcomed. It is noted that new development will be required to assess the ability for provision of new sports facilities on site or, if agreed as appropriate by the council, an offsite contribution made towards sport facilities. The NPPG advises that Sport England should be consulted on new developments of over 300 dwellings or more.

The protection against the loss of sporting facilities is welcomed. Sport England would however request the following wording in order to ensure a robust policy and compliance with the NPPF:

Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

It is also necessary to define exactly what is meant by 'unviable' in relation to a sporting facility. We would suggest facilities are independently valued and marketed accordingly for 18 months before they are determined to be unviable or surplus to requirements in an area, particularly in the absence of a fully-formed PPS.

Additionally, there is no reference to coastal (harbour) or canal sports facilities or activities in this policy or text. Such facilities/activities should be recognised and protected in accordance with NPPF 73 and 74 if they form an important element of sport and recreation in the Local Plan area

Policy approach – Economic development

Sport England wishes to highlight the fact that sport makes a very substantial contribution to the economy and to the welfare of individuals and society. It is an important part of the national economy, contributing significantly in terms of spending, economic activity (measured using Gross Value Added) and employment. For those who participate there are health and well-being (or happiness) impacts. Its economic impact places it within the top 15 sectors in England and its wider economic benefits mean that it is a key part of society, which results in huge benefits to individuals and communities. Sport England would therefore request that the value of sport to the economy is reflected within the Local Plan.

Site allocations

It is noted that this is not a site allocations document, however, I would reiterate that no sites including playing fields should be allocated for development if this would include the loss of playing field or prejudice the use of the playing field.

Playing pitches

Any new playing pitches should be constructed in line with Sport England guidance, currently available on the website

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/other-design-guidance/>

New pitches should also be provided in line with specifically identified needs and only after a robust assessment, as outlined above.

Health and wellbeing – Active Design

Sport England and Public Health England have recently refreshed our 'Active Design' guide which provides some really useful advice and case studies with clear reference to the NPPF to maximise the opportunities for design in physical activity. Sport England would commend this to you and suggest the concept of 'Active Design' be incorporated into policy – please see website extract and link below:

Active design

We believe that being active should be an intrinsic part of everyone's daily life – and the design of where we live and work plays a vital role in keeping us active.

Good design should contribute positively to making places better for people and create environments that make the active choice the easy choice for people and communities.

That's why Sport England, in partnership with Public Health England, has produced the Active Design Guidance. This guidance builds on the original Active Design (2007) objectives of improving accessibility, enhancing amenity and increasing awareness, and sets out the Ten Principles of Active Design.

Ten principles

The ten principles have been developed to inspire and inform the layout of cities, towns, villages, neighbourhoods, buildings, streets and open spaces, to promote sport and active lifestyles.

The guide features an innovative set of guidelines to get more people moving through suitable design and layout. It includes a series of case studies setting out practical real-life examples of the principles in action to encourage planners, urban designers, developers and health professionals to create the right environment to help people get more active, more often.

The Active Design Principles are aimed at contributing towards the Governments desire for the planning system to promote healthy communities through good urban design.

Active Design has been produced in partnership with David Lock Associates, specialists in town planning and urban design.

<http://sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design>

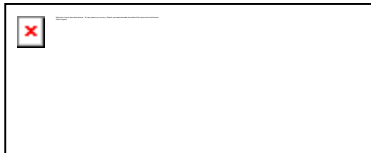
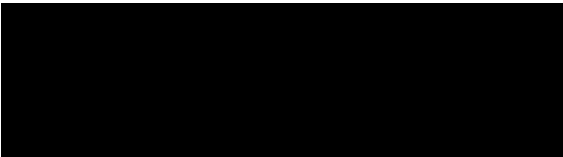
Or watch our short video here <https://www.youtube.com/watch?v=mDaVBh1Bs7Y>

Thank you once again for consulting Sport England. Please do not hesitate to contact me should you have any queries.

Kind regards,

Laura

Laura Hutson MRTPI
Planner



1st Floor, Bloomsbury Street, London, WC1B 3HF



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St.Mary's Island Residents' Association (SMIRA)

Analysis of residents' observations following presentation of Medway Council's Strategic Local Plan, St. Mary's Island Community Centre. 1st March 2017.

Method: Upon leaving the presentation residents were invited to make positive/negative comments on post-it notes. It should be noted that some individual respondents made more than one comment. These comments were retained by SMIRA officials and analysed in two broad categories: Positive and Negative.

Positive:

There were **0** positive/supportive comments.

Negative:

There were **119** negative comments/suggestions, viz;

Subject	Comment	No. of Commentators
Environment	The SSSI at Lodge Hill has been ignored in the report.	9
	"There are 16 references to protecting the natural environment in sections 2 & 3 of the Plan. This is not compatible with the development of Lodge Hill".	2
Health	No precise report suggestions for a new general district hospital. Residents' location suggestions include: Lodge Hill and Rochester Airport. "A brand-new District Hospital is desperately needed". Better road communications into the new hospital. More parking spaces. Air ambulance access.	12
	Suggested site for new District General Hospital on Isle of Grain.	2
	Concern that increased residential development won't have commensurate increase in GP, Clinic, Hospital Services.	12
	Comment that Medway Maritime Hospital is currently poorly sited (surrounded by housing etc.) and cannot be expanded. Also awkward to get to.	4

Education	Concern that increased residential development doesn't have commensurate increase in pre-school nurseries, primary and secondary/grammar schools.	12
	University City?? Make better public use of the Universities at Medway's libraries – "a centre for learning"	2
Housing	Insufficient planning for older residents. Dislike for apartments/tower blocks. Demand for single storey/ground floor living (i.e. Bungalows)	7
Heritage	Medway has fallen behind Margate, which has re-branded itself as an 'Arty' town, over last 5 years.	3
Infrastructure	Insufficient information in the Plan about increased infrastructure for incoming residents. E.g. a Park & Ride scheme to prevent SMI being used as a commuter car-park.	9
	Prevent the "Garden of England becoming a Concrete Jungle".	1
Transport	Chatham Town Centre already suffers with poor/inadequate road capacity. What additional roads are planned to reduce congestion and associated pollution?	8
	Careful consideration should be given in the Plan to diverting heavy goods traffic away from residential areas/roads.	3
	Create more 20mph residential zones for safety and pollution reduction.	1
Culture	Severely restricted cultural offer in Medway. Poor quality theatres/live entertainment venues.	3
Leisure	No mention of a new Conference Centre. Arts Centre? Convert the failed Dickens World into a cultural/art/exhibition/conference centre/gallery.	5
Retail	Provide/encourage a broader range of shops at the Dockside Outlet (e.g. fresh food/goods, Waitrose or M&S Food Stores, cobbler (Timpson's), Delicatessen).	4
	Remove restrictive conditions on the type of retail outlets permitted at Dockside.	
Community	Use the success of St. Mary's Island as a model for the development of other "flagship sustainable communities".	3
	Support the re-purposing of the Medway City Estate as prime residential by creating another community like St. Marys Island with its own Community hub (GP surgery, school, community hall, etc.)	4

	Provide practical and financial encouragement for businesses to move from Medway City (industrial) Estate to a new site e.g. on Grain Power Station land.	1
Safety/Security	Medway police, fire and ambulance resources/manpower must be increased <u>at least</u> pro-rata with any increase in population,	9
On the Plan presentation itself.	Needed a large wall map of Medway to illustrate proposed new residential areas etc. Difficult to imagine without.	3
	Total Comments/Suggestions :-	119

Prepared by Allan Sneller
V/Chairman SMIRA.



Facebook

Steff Malone posted in The Isle Of Grain Appreciation Society.



Steff Malone

25 January at 09:44

So people of The peninsula ...(this will effect you all too for the roads and Doctors so wanted to make you all aware) today is the day we need to unite and make Bellway and Medway council aware that we will not tolerate the continual rape and pillage of Hoo village and further afield & the surrounding fields towards high halstow which is impacting more and more on our quality of life and eroding our rural way of life. There is a meeting between 3pm and 7pm at the bowls club at the top of Bells lane in Hoo tonight 25.1.17.

We will be given forms to fill in to write down our concerns etc. At the blossom park meeting we were given said forms and by the time Bellway submitted the final application they advised Medway council that the feedback forms mainly supported the developement !....

If I wasn't at work today I would of done a poll at the door so we had an alternative opinion to submit.

A lady called Karen Hughes from Hoo has written the following ... I know for a fact this land was purchased Three years ago and that Medway council along with BAE land estates were so desperate for this site to be sold for developement that they advised Bellway planning would be a formality. There was even a draft plan submitted by Bellway at this time.

My objections will be :

Appalling lack of infrastructure to the peninsula....supported my Monday mornings fiasco with traffic backed up for hours.....Medway council have been so short sighted in this area allowing the recent developments and not insisting on the developers contributing to improved access. With the thousands of houses that are to be built on the peninsula in the new local plan we are looking at a huge increase of vehicular traffic with still one road !.?.....buffoons!

Lack of school places for our children.....

The third world provision of accessing a gp!

When the land east of bells lane had original provisional plans submitted Medway council advised that our burial ground was full ...this was in 2004!!!...they stated that although the parish council had purchased new land for burials Bellway were to contribute to its development with planting fencing etc.....none of this has happened and Medway council planning dept have never enforced much of their recommendations from this time in other areas.

We need new sewers.....and upgrades to our utilities

I also think that bells lane DOES NOT need any more traffic using it!.....

This proposed site and the site over the road are currently sports fields and provided football pitches,cricket square ,squash courts,swimming pool and training facilities.....where are these facilities to be provided for ?


Medway council refused Taylor wimpeys application which is nearby so what is different a few hundred yards along the road?

I know this application will get approved as it was rubber stamped three years ago and I'm also advised that Bellway have negotiated the purchase of the fields behind to expand the village borders out to ropers lane.....surely we can all make an effort to secure the best for our village.....I fear that the usual apathy will be the case though.....

Hope our ward councillors and Kelly I'll support you all...tolhurst are in attendance.

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[REDACTED]

From: Stoke Parish Council Clerk [REDACTED]
Sent: 18 January 2017 10:05
To: futuremedway
Subject: Local Plan comments from Stoke Parish Council

Importance: High

Follow Up Flag: Follow up
Flag Status: Completed

Please find comments from Stoke Parish Council on parts of the plan that affects Stoke.

As far as Stoke is concerned the proposals would be over development in a small village with insufficient infrastructure being shown and the use of grade 1 agriculture farm land should not be used in this way. Parts of the proposals are in a flood plain which the Parish Council have been informed by the environment agency that no flood defences will be put in place and that part of the area will be allowed to flood then drain back into the river.

Mr Rod Morrad, Clerk, Stoke Parish Council

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