



FUTURE MEDWAY

***DEVELOPMENT OPTIONS
CONSULTATION
RESPONSE***



**April 2017
DHA/12278**

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1 Introduction

1.1 Purpose of this Statement

- 1.1.1 These representations have been prepared on behalf of Bellway Homes in respect of Medway Council's current Local Plan 'Development Options' Local Plan Consultation.
- 1.1.2 Medway Council is in the process of preparing a new Local Plan to set out a strategy for development for the period 2012 to 2035 and is asking for views on 'Development Options' as a follow up to the 'Issues and Options' consultation that informed the early stages of the preparation of the plan.
- 1.1.3 Bellway Homes has an interest in land at Brompton Farm, Strood, which we believe represents a suitable and sustainable location to sensitively amend the Green Belt boundary for inclusion as a residential allocation.
- 1.1.4 These representations are focussed on how the site could assist in delivering the strategic objectives of the Council and how this would align itself with the emerging strategy options. They primarily focus on the four scenarios presented, albeit we also take this opportunity to reiterate why our client's land represents a suitable and sustainable site that should be included as a residential allocation as the plan progresses.
- 1.1.5 Furthermore, we take this opportunity to provide some further information on Bellway Homes and how having a high quality housebuilder promoting the site will provide a degree of certainty that the land is deliverable.

1.2 About Bellway

- 1.2.1 In just under 70 years, Bellway has grown from a small, family-owned firm to being one of the top 5 largest housebuilders in the UK.
- 1.2.2 Bellway have dedicated workforce of over 2,000 people and built and sold 6,851 homes last year. The Division's pipeline of current developments is as follows:
- 152 houses and flats, Peter's Village, Wouldham
 - 110 houses, Folkestone
 - 120 houses, Stone Cross
 - 73 houses, Signature, Kings Hill
 - 86 houses and flats at Hermitage Lane, Maidstone
 - 186 houses and flats at Imperial Park, Maidstone
 - 250 houses and flats, south east Maidstone
 - 156 houses and flats, Gravesend
- 1.2.3 The promotion of Brompton Farm is being run by Bellway's Kent Division. The Division is located in King's Hill, West Malling and has over 75 full time staff and covers Kent and Sussex.
- 1.2.4 Bellway has a good track record of delivering residential development through the planning process and have also developed in Hoo and the Medway towns in recent years.

1.3 Document Structure

- 1.3.1 Chapter 2 provides feedback on the potential development options being considered by the Council as part of the current consultation.
- 1.3.2 Chapter 3 includes feedback on the more generic housing policy approaches.
- 1.3.3 Chapter 4 promotes the development of sensitive Greenfield release at Brompton Farm, Strood.
- 1.3.4 In order to further assist, this representation is supported by a detailed vision document highlighting the scope of potential at Brompton Farm.

2 Comments on the Development Options

2.1 Strategic Objectives

2.1.1 We understand that the core plan objectives of the emerging Local Plan include:

- *To provide for the housing needs of Medway's communities, that meets the range of size, type and affordability the area needs; and*
- *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.*
- *To deliver sustainable development, meeting the needs of Medway's communities, respecting the natural and historic environment, and directing growth to the most suitable locations that can enhance Medway's economic, social and environmental characteristics; and*
- *To secure the ongoing benefits of Medway's regeneration, making the best use of brownfield land, and bringing forward the transformation of the waterfront and town centre sites for quality mixed use development, a focus for cultural activities; and*
- *To establish quality design in all new development, respecting the character of the local environment and seeking opportunities to boost quality and improve the accessibility and design of the public realm; and*
- *To ensure that development is supported by the timely provision of good quality effective infrastructure, so that the needs of Medway's growing and changing communities are well served.*

2.1.2 We support the principle of all of these objectives and the general thrust of the emerging plan. However, we would suggest some minor modification is needed to ensure the plan is positively prepared and fully aligned with the provisions of the National Planning Policy Framework (NPPF).

2.1.3 Specifically, we consider objectives should be modified to provide more certainty that the full 'objectively assessed' need for 29,463 homes will be met given this is apparent from subsequent chapters.

2.1.4 We consider the housing objective should be modified to read:

To provide for the full housing needs of Medway's communities, that meets the range of size, type and affordability the area needs and explores the ability to meet neighbouring authority needs where they can assist with the upgrade and enhancement of infrastructure.

2.2 Sustainable Development Options

2.2.1 Having regard to the options being considered, we support the promotion of brownfield land ahead of Greenfield sites. Nevertheless, whilst we understand the importance of making best use of urban and PDL sites, the current housing need and implications of changes of the NPPF are so unprecedented that it is inevitable that some Greenfield land

will be needed. Furthermore, given many of the most natural and sustainable locations to extend existing settlements are located within the Metropolitan Green Belt, we consider the Local Plan review should include a comprehensive Green Belt review.

- 2.2.2 For the reason outlined above, we consider the strategy should be more explicit about the need to release potentially sensitive sites and should not give an impression that development can or will be accommodated solely on previously developed land nor should greenfield release be ring-fenced to non Green Belt sites when these can patently offer the most sustainable locations for growth.

2.3 Development Scenarios

- 2.3.1 We note that the consultation document presents four scenarios. However, we do not support any of the specific approach as presented and feel that the principles proposed are too rigid in regard of the options being considered. Instead, we consider elements of each should be considered.
- 2.3.2 We support elements of scenario 1 and maximising the potential of urban regeneration insofar as we support riverside development and regeneration of key waterside sites. Likewise, we agree that the peripheral town centre areas present opportunities, particularly in areas such as Chatham and Strood. Nevertheless, this approach is ultimately could lead to excessive levels of apartments and would fail to deliver much needed family units that help maintain a balanced community. Likewise, it could result in the unacceptable loss of existing employment provision.
- 2.3.3 This being the case, we are concerned that scenario 1 falls foul of complying with paragraph 50 of the NPPF, which seeks to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities that meet the needs of all of the different groups in the community. To make this approach acceptable, it would be necessary to incorporate greater levels of Greenfield release in order to deliver the family accommodation that will be needed.
- 2.3.4 Scenario 2 has greater potential benefit to deliver a mix of homes and we support the release of some Greenfield sites to complement the regeneration proposals within urban confines. Furthermore, a number of Green Belt parcels are available that could deliver sustainable development and clearly the housing need is of such a scale that 'exceptional circumstances' are required to amend Green Belt boundaries. These parcels include land within our client's control at Brompton Farm.
- 2.3.5 Nevertheless, scenario 2 does not seem to appreciate that the Green Belt is not an environmental designation and instead is an anti-coalescence tool. Accordingly, sensitive release of Green Belt could help assist in preserving Greenfield locations of higher landscape and environmental value.
- 2.3.6 In respect of scenario 3, we have severe concerns about the suitability of enlarged growth around any single location, as this places undue pressure on infrastructure and often does not deliver the delivery rates that are required. Likewise, the Council continues to put too much emphasis on Lodge Hill despite the ongoing question marks over its suitability and delivery.

- 2.3.7 We note scenario 4 brings together components of the urban regeneration, suburban expansion and rural development scenarios and included elements of developing at higher densities in waterfront and urban centre sites. However, we consider it wrong that this excludes the potential for Green Belt release, as Green Belt land has a role to play in fulfilling the long term development needs of the area in a sustainable way.
- 2.3.8 In summary, we consider that none of the initial three scenarios provide the right balance as drafted. Furthermore, the exclusion of Green Belt sites from scenario 4 'mix' undermines the effectiveness of that option. In simple terms, we favour a polycentric approach to the distribution of development, which would see a spread of growth distributed proportionally to lessen the need for major strategic growth in any one location. Of course, the focus should be regeneration of existing built up and waterfront areas and the prudent re-use of brownfield land. However, taking a pragmatic approach to releasing Green Belt can have a positive role in preserving more environmentally sensitive land.
- 2.3.9 For the reasons set out above, we consider any future strategy should be informed based on the suitability of the sites that are available, rather than seeking to apply strict 'rules'.

2.4 Deliverability Concerns

- 2.4.1 We are concerned that the scenarios presented do not have enough regard to delivery and legacy. For example, a strategy dominated by small to mid-sized sites disbursed throughout the suburban areas may not generate the critical mass required for significant improvements to infrastructure (schools, highways and healthcare) to benefit existing and new communities. Careful infrastructure planning is therefore needed to ensure that development impact is mitigated in a coordinated way.
- 2.4.2 A geographical spread of sites is advantageous and promotes a steady delivery of homes throughout the Borough, which if part of a coordinated strategy, would assist with delivering a good mix of units.
- 2.4.3 In contrast, we have concerns that strategic development of an area such as Hoo Peninsula would deliver a larger 'pot' of money to invest in new physical and social infrastructure, but would also place much greater burden on existing resources. Furthermore, whilst development of a scale of several thousand houses will generate large income directly related to the development, it will not generate the funds needed to mitigate against the cumulative levels of development within the area.
- 2.4.4 Consideration must also be given to how sites are delivered. Traditionally, strategic sized regeneration based housing sites are complex and often delayed. Accordingly, it does not follow that development will be delivered at the maximum and quickest rates possible, particularly if there are changes in market conditions. For this reason, regard must be had to the value and contribution of sites controlled by developers such as Bellway, with a track record of delivery.
- 2.4.5 In summary, the need to facilitate a steady supply of homes supports a strategy that is based upon a range of size sizes, types and locations.

3 Comments on the General Policy Approaches

3.1 Housing Delivery and Mix

- 3.1.1 The draft document states that 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, with allocations for sites and broad locations for development phased to ensure a supply over the plan period.
- 3.1.2 We welcome this approach and support the bold decision to plan for the full housing need of the area rather than to seek a reduced target.
- 3.1.3 We support the delivery of an appropriate range of house types and size to address local requirements, subject to these requirements being clearly published or specified within future drafts of the plan.

3.2 Affordable Housing

- 3.2.1 We note that initial analysis indicates a percentage of 25% affordable housing could be achieved on residential developments over 15 units.
- 3.2.2 We support the inclusion of this as a formal threshold, subject to the policy containing sufficient flexibility to allow a departure where viability is likely to be undermined.

3.3 Supported Housing, Nursing Homes and Older Persons Accommodation

- 3.3.1 We note that the development of specialist residential accommodation for older people, including care homes, nursing homes and other specialist and supported forms of housing for those with particular needs will be supported where it:
- *Meets a proven need for that particular type of accommodation.*
 - *Is well designed to meet the particular requirements of residents with social, physical, mental and or health care needs.*
 - *Is easily accessible to public transport, shops, local services, community facilities and social networks for residents, carers and visitors. Local services are particularly essential in those developments where residents have fewer on site services and greater independence.*
 - *Will not lead to an excessive concentration of non-mainstream residential uses to the detriment of the character of the particular area.*
- 3.3.2 Again, we support the principle of this approach, but feel that dedicated allocations would be needed. Often these types of facilities should be sustainably located on the outskirts of existing settlements, where sufficient space exists to deliver high quality environments to meet the sensitive needs of the occupants, which still providing a basic range of accessible facilities.

3.4 Housing Design and Density

- 3.4.1 We support the view that new housing developments should provide good living conditions for future occupants with high quality, robust, adaptable housing and functional spaces that respond to changing resident needs throughout their lives. Likewise, we endorse that all new accommodation must meet the relevant nationally described internal space standards and address the Medway Housing Design Standard (MHDS) for external spaces.
- 3.4.2 We support the approach that housing densities should reflect local surroundings rather than meet predefined 'target densities'.

Green Belt

- 3.4.3 We are pleased to note that it is acknowledged that Green Belt is a not a formal environmental designation and that its primary purpose is to prevent urban sprawl by keeping land permanently open.
- 3.4.4 Whilst we appreciate that it has been successful in retaining a strategic gap between Strood and Gravesend, and prevented the coalescence of Strood and Higham, this does not mean that the sensitive release of some Green Belt land will result in these successes being undermined or eroded. To the contrary, we consider there is a balance to be reached in respect of release of some sustainable Green Belt land and preservation more important an open areas that play the key anti-coalescence role.
- 3.4.5 We note that the consultation documents states that if the council determine that there are no such exceptional circumstances to support the release of Green Belt land, it will adhere to its policy that development will be restricted in this location, in line with national policy to ensure that the land remains permanently open. However, from a national perspective, it has been well established that facilitating housing need is tantamount to exceptional circumstances.

4 Promotion of Brompton Farm, Strood

4.1 Overview

- 4.1.1 In line with the comments presented in sections 2 and 3 of this document, we consider a degree of Green Belt release is needed to facilitate an effective planning strategy and to ensure the delivery of an appropriate mix of housing types.
- 4.1.2 In this respect, Bellway Homes Kent Division is now in control of land at Brompton Farm (SLAA Site 0729), which is considered to be a suitable location for residential growth. It has been promoted by the landowners during the course of previous consultations as an area suitable for Green Belt boundary review.



- 4.1.3 Based on the current national and local planning context, we consider Brompton Farm ('the site') to be a suitable area to roll back the Green Belt and to allocate land for housing to help meet the growing need for new homes.
- 4.1.4 We draw this conclusion on the basis that it is one of the few remaining parcels of non-developed land within the border of the A289, which represents an ideal barrier to urban sprawl. We also consider the site has a role to play in accommodating the wider overspill of housing need from London and elsewhere within the South East of England.
- 4.1.5 Within the sections below we summarise the current national planning policy framework in which the emerging plan must be prepared, the implications of the identified 'full objectively assessed need' for housing and the wider constraints that make Brompton Farm well suited for sustainable expansion.
- 4.1.6 We also provide an assessment of the site's characteristics and why it is a suitable for release from the Green Belt, enclosing a concept masterplan of the type of development that could be delivered.

4.2 Planning Policy Context

The National Planning Policy Framework

- 4.2.1 The National Planning Policy Framework (NPPF) was published in March 2012 replacing previous guidance on planning.
- 4.2.2 The NPPF is clear that the primary purpose of the planning system is to contribute to the achievement of sustainable development, which includes providing the supply of housing required to meet the needs of present and future generations. Furthermore, sustainability is a holistic concept and therefore the economic, social and environmental impact of development must be balanced rather than viewed on an individual basis. Therefore, any potential impact of releasing Green Belt land can legitimately be outweighed as a consequence of the social and economic benefits of meeting the housing need.
- 4.2.3 In simple terms, there is a definitive 'pro-growth' starting point that was not apparent in earlier versions of Government planning guidance.

National Housing Policy

- 4.2.4 The NPPF places pressure on Local Authorities to 'boost significantly' the supply of housing by adhering to the requirements cited under Paragraph 47. In order to increase housing supply, Local Authorities are required to;

'use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;

identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land; and

identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15'.

- 4.2.5 Paragraph 52 of the NPPF stresses the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities. This approach is advocated at the site.

National Green Belt Policy

- 4.2.6 Section 9 of the NPPF seeks to protect Green Belt land. As with earlier iterations of Green Belt policy, paragraph 79 states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open and the essential characteristics of Green Belts are their openness and their permanence. Green Belt is not a landscape or environmental protection designation.
- 4.2.7 Paragraph 80 of the NPPF explains the five purposes of the Green Belt, which are as follows:

*To check the unrestricted sprawl of large built-up areas;
To prevent neighbouring towns merging in to one another;
To assist in safeguarding the countryside from encroachment;
To preserve the setting and special character of historic towns; and
To assist in urban regeneration, by encouraging the recycling of derelict and other urban land’.*

- 4.2.8 Paragraph 83 of the NPPF states 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.

Summary and Implications of the NPPF

- 4.2.9 The introduction of the NPPF has significantly changed the context of the planning system, particularly in respect of the plan making process. Emphasis is now on local planning authorities to meet the full objectively assessed development needs of their housing market areas and, where possible, those of neighbouring areas (including the overspill unmet need from London).
- 4.2.10 Whilst it is acknowledged that Medway is constrained, previous housing targets have fallen well short of the level of need required in the area. Consequently, with the NPPF in force it is now necessary for the Council to identify and meet its full requirements.
- 4.2.11 With all of the above in mind, we consider the most sound approach to plan making within Medway would be to roll back the Green Belt to meet housing needs for this plan period and beyond. In this regard, the Government’s white paper also sets out that the existing protection for the Green Belt remains unchanged.

4.3 Overview of Allocation Sought

- 4.3.1 Detailed proposals have not been advanced and any future scheme would be subject to early and meaningful engagement with the local community and Medway Council. Nonetheless, in order to assist with the Local Plan preparation a constraints plan has been prepared in order help emphasise how the site could be developed and how the opportunities and constraints could be factored into any wider scheme.
- 4.3.2 Key constraints are:
- *Proximity to A289 Hasted Road to the north*
 - *Proximity to Metropolitan Green Belt*
 - *Existing trees and hedgerows*
 - *Public rights of way across the site*
 - *Relationship to existing properties on Brompton Farm Road and Gravesend Road*

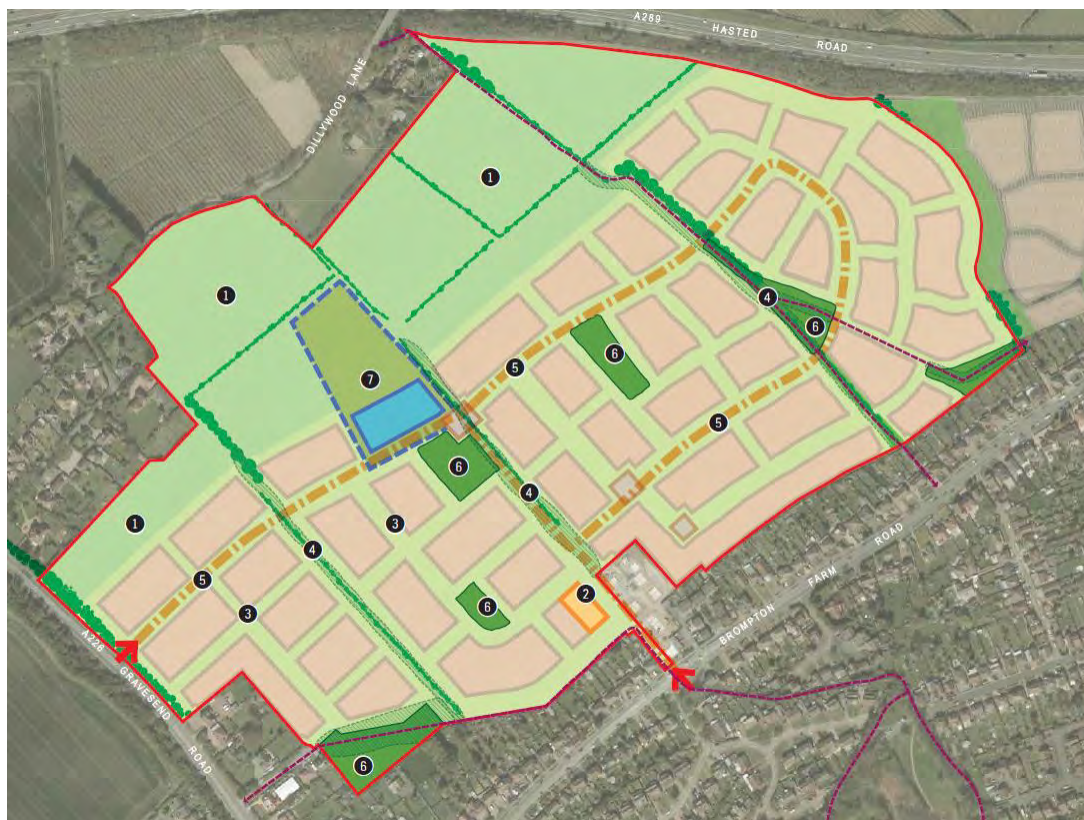


Constraints plan

KEY

- | | |
|---|---|
| — Site boundary | ■ Open space providing buffer between development and Dillywood Lane |
| ● Existing trees and hedgerows | ■ General fall across site |
| --- Borough and Local Plan boundary | ■ Potential extent of residential development |
| --- Public Right of Way | ~ Traffic noise from A289 |
| ■ Rural lanes policy BNE47 | ~ Landscaped buffer zone |
| ▲ Boundary of Metropolitan Green Belt Policy - BNE30 | → Sun path |
| ➔ Potential vehicular site access locations | |

- 4.3.3 These constraints have been fully considered and the design ethos is to provide a residential-led urban extension, whilst creating a development that maintains a natural transition between town and countryside. Homes will bound the rear gardens of existing properties on Brompton Farm Road and bound by A226 Gravesend Road to the west and Stonehouse Lane to the east.
- 4.3.4 A green hub formed of community open space would be provided in the areas north the site that are most constrained. Likewise, a landscape, ecology and open space led scheme would be proposed in order to positively respond to the wider site constraints.
- 4.3.5 The land in Bellway's control amounts to some 44.6 ha. However, the concept masterplan sees the site subdivided into separate development parcels and to retain a significant amount of open space. With this in mind, it is initially envisaged that the site could accommodate in the region of 800 new homes based on a developable area of approximately 23ha.



Concept Masterplan

4.4 Planning Appraisal

Green Belt

- 4.4.1 As set out at paragraph 80 of the NPPF, Green Belt serves five purposes and therefore we address the submission site in the context of each of these objectives below.

To check the unrestricted sprawl of large built-up areas

- 4.4.2 Urban sprawl can be defined as the advancement of sporadic and unplanned development beyond the clear physical boundary of a developed settlement.
- 4.4.3 Whilst this is a legitimate planning matter, there is no basis to assume that a well-planned strategy for Green Belt boundary review here would weaken or lead to any future risk of unplanned encroachment into the countryside. To the contrary, the submission site is located adjacent to the existing settlement boundary, so development would not result in sporadic or isolated housing. Instead, it would create a logical and well planned extension to the existing built development and would follow a similar pattern of development that has taken place elsewhere within the authority area. For example, Liberty Park to the north east.
- 4.4.4 Furthermore, this area of Strood is semi-rural in nature and does not represent a 'large built up area' that needs to be contained in the same way as other urban and London Boroughs that are far more urban in character. Release of the site would also represent a consistent approach to that adopted for sites such as Liberty Park a short distance away.

To prevent neighbouring towns merging in to one another

- 4.4.5 The submission site is located to the north of Strood and west of Wainscott. The closest settlement beyond this is Higham to the north west (1.6km) or Cliffe Woods to the north (2km).
- 4.4.6 If the Green Belt boundary was to be amended to allow development of the submission site there would remain at least 1.25km separation between the closest settlements. Furthermore, both are physically divided by the A289 Bypass.
- 4.4.7 For this reason, there is no basis to assume that there would be any demonstrable erosion of the space between settlements, nor would the development of the site increase the risk of any two settlements merging.

To assist in safeguarding the countryside from encroachment

- 4.4.8 Encroachment can be defined as the presence of development within the Green Belt not connected or adjacent to a built up area. As the site borders the currently defined settlement confines, development on this site would form a natural and logical extension rather than represent encroachment into the countryside. More importantly, it would protect genuine areas of open land from risk of development.
- 4.4.9 Therefore this purpose is not applicable to the site.

To preserve the setting and special character of historic towns

- 4.4.10 Medway as a whole has historically expanded in erratic patterns. However, there is no significant history or special character in respect of this particular area. Furthermore, it does not lie within a Conservation Area.

To assist in urban regeneration, by encouraging the recycling of derelict land

- 4.4.11 Given the lack of brownfield opportunities Green Belt land is needed and therefore this purpose is superseded by the requirement.
- 4.4.12 Taking all of the above into consideration, the site currently plays a limited role in fulfilling the core functions of the Green Belt.

4.5 Generic Planning Issues

Sustainability

- 4.5.1 There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

'an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;

a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and

an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy'.

- 4.5.2 Development on this site would contribute to the achievement of sustainable development due to a series of economic, social and environmental benefits.
- 4.5.3 Provision of housing would help ensure that sufficient land of the right type is available in a sustainable location within the early phases of the emerging plan period. It would provide new homes in a location where people wish to live, namely in a semi-rural location with excellent access to both town, countryside and essential day to day services.
- 4.5.4 The delivery of housing would also provide an economic benefit during and after build out. Construction jobs would be maintained or created, and household expenditure generated by future residents would support economic activity locally. Housing development would also enable the Council and local community to benefit from revenue linked to Section 106, CIL contributions and a New Homes Bonus.
- 4.5.5 From a social perspective, a suitably designed mix of both open market and affordable residential units would provide housing in a sustainable location that has been in short supply in recent years and that will therefore help see the needs of present and future generations being met.
- 4.5.6 Finally, we consider that in selecting sites for development the wider environmental quality of the authority area must be taken into account. From a visual perspective the concept masterplan presented with this submission is clear that a residential and open space led approach is advocated in order to provide an appropriate form of development and a transition between town and countryside. Likewise, opportunity exists to build upon existing ecological potential and to enhance the habitat for protected and non-protected species alike.
- 4.5.7 Having regard to paragraph 7 of the NPPF and core sustainability objectives, we consider the site is sustainable.

Access

- 4.5.8 In terms of vehicular access, the submission site benefits from different opportunities via the Gravesend Road, Brompton Farm Road and Stonebridge Lane. Sufficient land exists to ensure that a safe and efficient access meeting current highway design standards could be provided to serve an urban extension.
- 4.5.9 It is situated within close proximity to Strood (1.6miles) and Higham mainline railway station (2.6 miles) and benefits from excellent access to the strategic road network via the A2.

4.6 Deliverability

- 4.6.1 The NPPF states that for sites to be considered deliverable, they need to be available, suitable and achievable. These tests are reviewed below.

Availability

- 4.6.2 Availability is essentially about confirming that it is financially viable to develop and viability remains a central consideration throughout plan making and this is set out in the NPPF (Para 159).
- 4.6.3 We can confirm that, subject to reasonable S106 contributions being sought, there are no financial restrictions that would impact upon the viability of a housing scheme or that would prohibit development coming through within the early stages of the plan period.

Suitability

- 4.6.4 For reasons set out in this statement the site is considered suitable for development. In summary, the site borders the currently defined town confines and would form a natural and logical extension and would provide a sustainable urban extension.
- 4.6.5 Residential development on this site would make a useful contribution to the housing land supply for both market and local needs affordable housing, which is tantamount to the exceptional circumstances needed to justify the altering of Green Belt boundaries.
- 4.6.6 Finally, in respect of suitability there are no physical limitations or problems such as access, infrastructure, flood risk, hazardous risks, pollution or contamination.

Achievability

- 4.6.7 The site is in two separate ownerships. However, there are no complicated legal agreements or covenants that would prohibit the ability to bring forward the site early in the plan period.

4.7 Response to SLAA

- 4.7.1 The land featured within Medway Council's Strategic Land Availability Assessment (SLAA) in November 2015 under reference number 0729.
- 4.7.2 We disagree with elements of the study that rendered it unsuitable for the reasons outlined below.

Accessibility and Public Transport

- 4.7.3 The Assessment states that the site currently has poor access to services and facilities, albeit it acknowledged that the potential capacity meant that a number of enhancements could be provided. However, we consider that by its very location on the edge of Strood, it is an accessible location with good access to a wider range of services. The town centre of Strood is within 1km of the site, which is an easily achievable walk distance. Likewise, Strood benefits from its own mainline railway station and a whole host of bus stops are available immediately on Brompton Farm Road. Strood Academy and Bligh Junior Schools provide educational opportunities.

- 4.7.4 We consider the SLAA score is misleading in this regard.

Access to the strategic highway network

- 4.7.5 The SLAA makes little of the ability to provide a new connection to the A289 and direct links to the A2/M2 on the basis that no such upgraded is planned or funded at present and focuses far more on potential capacity issues at the Medway Tunnel and other hot spots.
- 4.7.6 Given that Brompton Farm is one of the few sites where such linkages are achievable, this should have scored far more positively within the scope of the assessment. Accordingly, we consider this element undermined the credibility of the SLAA methodology and the overall findings.

Landscape Impact

- 4.7.7 It is acknowledged that the site is situated outside of the built up area, within an area of locally valued landscape. However, there is clear potential for developing the site in a sensitive way that delivers a more sensitive transition between the hard and dense urban edge and the open countryside. Furthermore, this transition has even greater scope to be controlled by virtue of the firm boundary provided by the A289, which also has a significant impact upon the wider landscape.

Heritage, Air Quality, Contamination, Developability, Noise, Flood Risk and Open Space

- 4.7.8 We agree with the SLAA insofar as Heritage, Air Quality, Contamination, Noise, Flood Risk, Developability and Open Space are also issues that can be addressed as part of a high quality master planning process, and do not represent absolute constraints to development.

Agricultural Land Value

- 4.7.9 We question the findings that the site is situated on the best and most versatile agricultural land and as such further assessment of this matter is underway. Furthermore, the Council has now been provided with further evidence to demonstrate that at least part of the land has historically been used for non-agricultural uses, including car parking, and other commercial purposes. In this respect, there are numerous concrete pads from former buildings on the site, and in places rubble to the depth of several feet, which means that the land simply cannot be used for agricultural purposes as machinery cannot be deployed due to the amount of debris below ground.

4.8 Summary and Conclusion

- 4.8.1 Taking all of the above matters into consideration we consider that there are no environmental barriers to new housing being provided on land at Brompton Farm. Furthermore, there are compelling planning reasons that represent the 'exceptional' circumstances needed to roll back the Green Belt; namely the limited contribution of the site to Green Belt purposes and the high need to meet unmet housing need.

Land at Strood



Vision Statement

Bellway

Introduction

2

Bellway Homes are delighted to put forward this submission for the exciting opportunity at Strood.

This document sets out the following:

- Our Vision
- A description of the site
- Identification of the site's opportunities and constraints
- The Development concept
- The background to Bellway
- Bellway's track record in the region

17073 : April 2017.

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Our Vision

The vision for the development site is to create a sensitive, high quality and distinctive residential development as a sustainable extension to the northern edge of Strood.

3

Given the site's location within the Metropolitan Green Belt, an overriding objective would be to deliver a development that offers a better transition between the current hard urban edge and the open countryside. Furthermore after detailed analysis of the site and its context, the proposals would be developed with the intention of:

- Achieving a high quality, attractive environment with good public realm and amenity space;
- Retaining and integrating public rights of way within the layout;
- Responding to the sensitivity of Dillywood Lane with appropriate landscape buffer;
- Forming a development with a strong sense of place where people will want to live;
- Creating a good mix of accommodation to create a diverse community for people of all ages;
- Providing affordable housing to meet local need;
- Exploring the opportunity to provide a new primary school, shop, doctors surgery and any wider social infrastructure needed to create a local neighbourhood centre
- Providing a safe and secure environment with opportunity for crime designed out from concept;
- Creating a permeable layout for ease of movement, together with good links between the site and the surrounding area;
- Providing attractive landscaped open space for informal recreational amenity, formal sporting space and children's play
- Minimising the visual impact of accommodating parking standards.; and
- Providing modern facilities and using contemporary building techniques having regard to current sustainable design requirements.

Site Description

4

The site lies between Brompton Farm Road to the south and Hasted Road (A289) to the north and Gravesend Road to the west. It currently consists of a number of former agricultural fields with hedged field boundaries. The site area is 44.6 hectares.

The site shares part its eastern boundary with the site of a former orchard that is currently the subject of a planning application for residential use.

In terms of vehicular access, the site benefits from different opportunities via the Gravesend Road, Brompton Farm Road and Stonebridge Lane. It is situated within close proximity to Strood (1.6miles) and Higham mainline railway station (2.6 miles) and benefits from excellent access to the strategic road network via the A2.

The town centre of Strood is within 1km of the site, which is an easily achievable walking distance. A whole host of bus stops are available immediately on Brompton Farm Road. Strood Academy and Bligh Junior Schools provide educational opportunities.



Aerial view of site



View 1. West towards Gravesend Road



View 2. North west towards Dillywood Lane



View 3. North towards A289



View 4. Towards potential site access from Brompton Farm Road



View 5. North east from properties on Gravesend Road



View 6. Tall bank on site boundary with Gravesend Road



Aerial photograph of the site with boundary marked in red (not to scale)

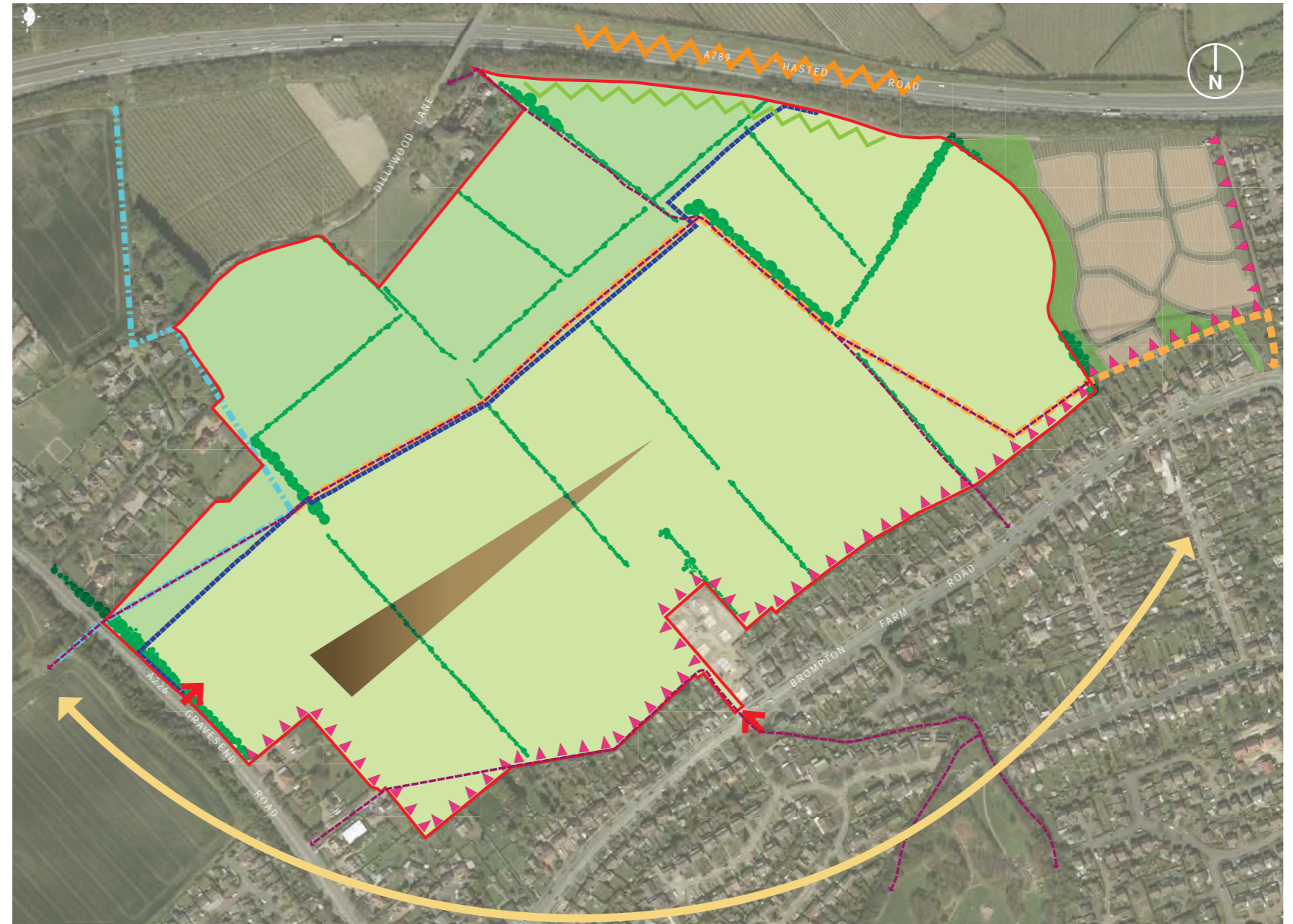
Site Constraints & Opportunities

The design team will carry out an appraisal of the development site and the local context which will include an appraisal of the constraints and opportunities which the site offers. This will inform the development of a design concept for the site and the subsequent evolution of scheme proposals.

In promoting and explaining the proposals to the Local Planning Authority it will be important to demonstrate the development of the scheme from clear design principles which are embedded in the site and local context. The design team that would work with Bellway have extensive experience in developing similar sites as urban extensions to existing settlements.

Constraints

- Proximity to A289 Hasted Road to the north
- Location within Metropolitan Green Belt
- Existing trees and hedgrows
- Public rights of way across the site
- Relationship to existing properties on Brompton Farm Road and Gravesend Road
- Traffic noise from A289
- Sensitivity of character along Dillywood Lane
- Topography



Constraints plan

KEY

- | | |
|--|---|
| — Site boundary | ■ Open space providing buffer between development and Dillywood Lane |
| ● Existing trees and hedgerows | ■ General fall across site |
| - - - Borough and Local Plan boundary | ■ Potential extent of residential development |
| - - - Public Right of Way | ~ Traffic noise from A289 |
| - - - Rural lanes policy BNE47 | ~ Landscaped buffer zone |
| ▲ Boundary of Metropolitan Green Belt Policy - BNE30 | → Sun path |
| ➔ Potential vehicular site access locations | |

KEY

- Site boundary
- ➔ Potential access into site
- Residential development zones
- Open space buffer with Dillywood Lane
- Green corridors
- - - Principal access and streets
- - - Pedestrian / cycle linkages through site



Opportunities plan










Development Concept

8

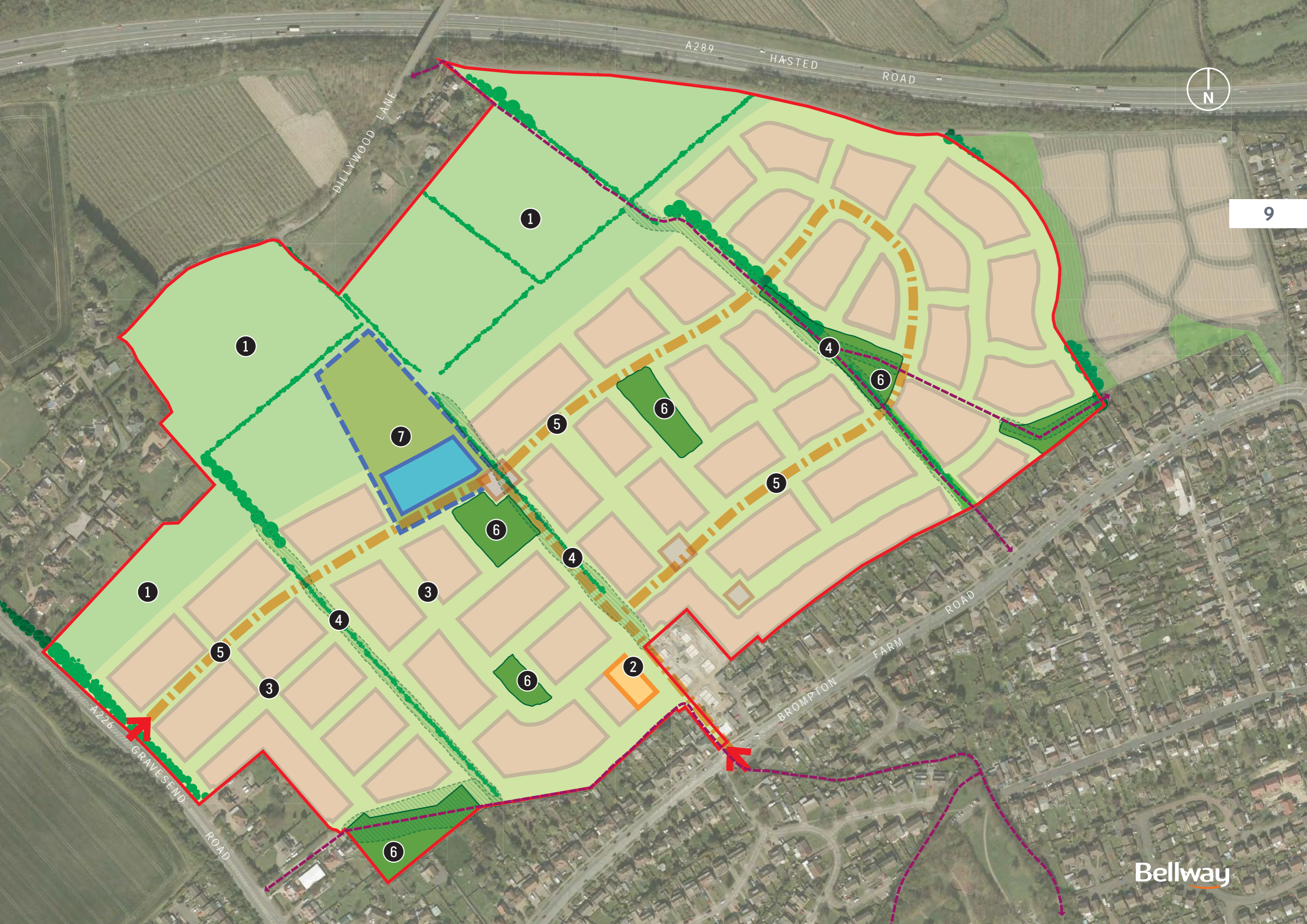
Key Points:

- ① Potential provision of allotments and formal open space along northern edge of site.
- ② Potential shop and doctors' surgery as part of development with easy access from existing community.
- ③ More formal layout in western part of site responds to field pattern and boundary hedgerows.
- ④ Potential green corridors along existing public right of way, hedgerows and tracks running north-south through development.
- ⑤ Potential for existing bus service to be diverted through development.
- ⑥ Potential areas of open space punctuating development as part of green framework with provision of children's' play space.
- ⑦ Potential school site with associated open space

KEY

-  Site boundary
-  Existing trees and hedgerows
-  Potential access into site
-  Potential bus route
-  PROWs retained in green corridors
-  Open space buffer (allotments, play areas, formal sports space and recreational amenity and associated open space)
-  Green corridors
-  Potential school site and associated open space
-  Potential shop and doctor's surgery

Development concept plan →



In just under 70 years, Bellway has grown from a small, family-owned firm to being one of the top 5 largest housebuilders in the UK

In just under 70 years, Bellway has grown from a small, family-owned firm to being one of the top 5 largest housebuilders in the UK. We have dedicated workforce of over 2,000 people and built and sold 6,851 homes last year.

Bellway's intention for this site are to demonstrate that the site does not meet the purposes of its current designation of Green Belt and that the site should be removed from the Green Belt. The site is a suitable, available and viable site for housing and therefore should be allocated for housing in the forthcoming Local Plan. Once this is established Bellway would submit a planning application and delivery would commence shortly after permission is granted.

The project would be run from Bellway's Kent Division. The Division is located in King's Hill, West Malling and has over 75 full time staff and covers Kent and Sussex.

The Division's pipeline of current developments is as follows:

- 152 houses and flats, Peter's Village, Wouldham
- 110 houses, Folkestone
- 120 houses, Stone Cross
- 73 houses, Signature, Kings Hill
- 86 houses and flats at Hermitage Lane, Maidstone
- 186 houses and flats at Imperial Park, Maidstone
- 250 houses and flats, south east Maidstone
- 156 houses and flats, Gravesend



Track Record

Bellway has a good track record of securing favourable allocations of land for residential development through the planning process and have also developed in Hoo and the Medway towns in recent years.

Maidstone

Promoted 3 sites and now allocated in the emerging Local Plan for 120, 190 and 440 new homes respectively.



(OSP Architecture)

The examples below are of current sites that Bellway are promoting or have promoted through the Local Plan process and have the closest similarities with Brompton Farm:

Hinxhill, Ashford

Planning application for approximately 207 houses was submitted last year.



(BDB Design)

Track Record

12

Billingshurst

Local Plan allocation and outline permission granted for 490 new homes, a primary school and other facilities in conjunction with two other developers.



(David Lock Associates)





OSP Architecture
Broadmede House
Farnham Business Park
Weydon Lane
Farnham
Surrey
GU9 8QT

Tel: 01252 267878

www.osparchitecture.com



01684 715183

MEDWAY C
FILE NO:
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INITIALS

14th February 2017

Dear Mr. Smith,

I enclose a response to your recent letter.

I apologise for the delay in replying but I have a new computer and I'm still trying to 'master' it!!

Please do not hesitate to question me about further development, but I'm afraid it will always be the same until hospitals, schools and General Practices are increased before any further development

Yours sincerely



Ms Catherine Smith
Planning Manager- Policy
Medway Council
Dock Road
Chatham
ME4 4TR

12 February 2017

Dear Ms Smith,

Preparation of a new Medway Plan -
Development Options - Consultations.

Thank you for your recent letter concerning the above named.

I have taken the opportunity to discuss this matter with quite a few people - usually with only 3/6 people at a time as I have discovered that in larger groups they are inclined to always agree, rather than putting forward their own opinions.

All people are deeply concerned at the proposals to build more houses in the Medway area. We have also looked at the proposals printed in the local Medway Messenger about development of the Hoo Peninsula.

I am sure you are aware of problems at Medway Hospital concerning - particularly elderly people who cannot be discharged because there is nowhere for them to go - and of course how busy they are with people on trolleys etc.

Are you aware that it can take 4 weeks to get a GP appointment? Are you aware that schools` are overcrowded?

To flood the Medway Towns with more residential property without first making provision for those who already live here is not a proposal to even consider.

Do you know that the Hoo Peninsular was the original Garden of England as it provided London with its fruit and vegetables? To destroy this open space with housing would be totally wrong. Far better to improve the roads to start with!!!

What has happened to proposal to have six hospitals to assist with the present lack of places? The Naval Hospital was never big enough to cope with demand and should never have been used, but in those days there was St Bartholomews and All Saints.

Nearly everyone I have spoken to has said 'I won't be here, so Good Luck if they build all these houses'.

On another line, I did hear a proposal to cover Kent in houses-London to Dover- if that is the long term plan how sad that Kent will no longer be the Garden of England but possibly the biggest housing estate in the world!!

May I wish you well in your plans. Do please make provision for those who already live here rather than make things more difficult for your selves.

I will be pleased to answer any questions if needed - for how long? Well I don't know!!!!

Yours sincerely,

Harabarker

[REDACTED]

From: Diane Welch [REDACTED]
Sent: 05 April 2017 19:13
To: futuremedway
Subject: MEDWAY COUNCIL LOCAL PLAN 2012 TO 2035

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Red Category

From, Diane Welch



I would like to comment on the Medway Council Plan for 2012 to 2035.

My first query is about the date of the plan and I am concerned that the first date mentioned was five years ago. I would like to know why this plan has to be considered in retrospect to 2012. I will highlight the present situation and it is unclear from the draft plan what infrastructure and resources will be put in place, as the plan is extremely vague.

DEVELOPMENT ON THE HOO PENINSULA AND SURROUNDING VILLAGES.

1. All three outline plans include building on the Lodge Hill site. I will return to this later in my comments, but suffice to say that I think and feel that Medway Council is determined to decimate Lodge Hill and destroy such an internationally recognised Site of Special Scientific Interest.
2. The A228 is the only road on and off the Hoo Peninsula and it is congested at peak times now. When an incident or accident takes place, there is no way for folk have access to the Hoo Peninsula, so that it is completely cut off and emergency vehicles cannot get to the scene of an accident or incident, especially if one occurs in Grain.

3. I am very concerned about the pollution from the extra traffic that will be on the road. Just today, 5th March, 2017, our Government has been told that it will not reach the reduction in Air Pollution that is required by the United Nations. In addition to polluting the atmosphere, a study undertaken by one of the local Doctors in the nineteen nineties stated that Medway had a higher proportion of children with asthma than anywhere else in the country. The lack of public transport on the Peninsula means that most people have to drive their cars and this also adds up to more pollution. With development, this will be far worse.

4. At the moment there is a grave concern about the amount of Social Care that is available to vulnerable and elderly people. The Social Enterprise Company wHoo Cares is having to address the needs of loneliness, lack of personal care, isolation and helping people get to medical appointments because Medway Council does not have the resources to look after those at risk or in need. Expanding the population will not help this situation, but only exacerbate it..

5. The Hoo Peninsula is a unique place with a very rural feel about it. Building on green field sites means that farmers will not be able to use the land to grow much needed food once we leave the European Community. I appreciate that there is a short term gain if farmers sell their land for development, but this is a very short sighted strategy.

LODGE HILL

I am concerned that the Lodge Hill Development seems to be a "fait accompli" in all the case studies. I would like to know why Medway Council is so keen to develop this site for housing when their plans have been rejected by the Secretary of State.

The status of Lodge Hill as a Site of Special Scientific Interest seems to have been disregarded completely by Medway Council and the Council seems to be "hell bent" on destroying wildlife, especially the breeding ground for nightingales and a highly

important site for the well being of Medway and the surrounding areas, including London. Destruction of plants, trees and shrubs means a loss of oxygen, which is VITAL for all of us. Sites such as Lodge Hill are the lungs of London.

Finally, I would like to say that I and others are not against housing development in the right places and that our local Parish Councils should be given the opportunity to draw up a Local Plan for each Parish. I do think that this localised approach would be far better than an overall Medway Plan, which has no relevance to the needs of a much loved part of the area, which is THE HOO PENINSULA.

Diane Welch

Retired Teacher who worked in several schools on the Hoo Peninsula.

Medway Local Plan 2035

Development Options consultation January 2017

Medway Council is preparing a new Local Plan to guide the development of Medway up to 2035. The council is consulting on a Development Options document. This builds on the earlier consultation work carried out on Issues and Options in 2016.

You can read a copy of the full consultation document on the council's website at:

www.medway.gov.uk/futuremedway.

You can also view copies of the consultation document at the council offices at Gun Wharf, Medway Council libraries and community hubs, during normal opening hours.

You can find copies of reports and studies that provide the background to this consultation on the 'futuremedway' webpage.

The council welcomes comments on the draft vision and strategic objectives, development options and policy approaches set out in the consultation document. Your responses will be taken into account in the next stages of the preparation of the Local Plan 2035.

Please note that your response will be recorded and published on the council's website as part of the process of producing the Local Plan. However, please rest assured that any personal or sensitive information will be removed.

You can submit comments online through this survey or you can also comment on the proposals by emailing:

futuremedway@medway.gov.uk

Alternatively you can write to us at:

Planning Policy, Regeneration, Community, Environment and Transformation
Medway Council, Gun Wharf, Dock Road, Chatham, Kent ME4 4TR

From 1 March 2017 the submission date has been extended from 5.00pm Monday, 6 March 2017 to 5.00pm Monday, 17 April 2017.

Please note that you do not have to answer all questions on this survey form. You can skip sections if you do not wish to make comments on specific policy areas.

CONSULTATION QUESTIONNAIRE

Do you agree or disagree with the draft vision for Medway in 2035? please see below

Agree

☐

Disagree

☐

Don't know/ No opinion

X

Please explain your response:

At this stage of the Local Plan is it difficult to see the impacts until specific development sites have been published with supporting infrastructure and services – especially Transport (highways).

There is an overestimation of the capacity of the Medway Towns to support the growth stated, and ability to support. Housing is relatively easy to deliver, but support services, infrastructure (especially transport/highways) and economic development (jobs) do not automatically follow and availability of funds on a national, regional and local basis continue to be very constrained. Although some burden for these will be passed to housing development, there is not sufficient available – houses become more expensive and there is likely to be a squeeze on affordable housing.

The Society is concerned that a number of the recent development proposals on the Hoo Peninsular would impact on high grade agricultural land. Noting that the past expansion of High Halstow and recent development in Hoo have resulted in a loss of high grade agricultural land.

The Society is also concerned that there is also a serious risk of settlements coalescing. It is understood that the potential for accommodating development on brownfield sites in Medway is limited and call for sites have failed to identify sufficient suitable sites, against this background the potential impact is unacceptable and the figured for new housing should be reduced.

Vision for Medway 2035

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.

Medway will have secured the best of its intrinsic heritage and landscapes alongside high quality development to strengthen the area's distinctive character. The urban waterfront and neighbouring centres will have been transformed into attractive locations for homes, jobs, leisure and cultural activities. The river will be celebrated as the defining feature linking historic and new development, and extended riverside access will connect communities and destinations.

Medway will have established a regional profile for successful and ambitious growth and accrued benefits from wider strategic developments. New development in Medway's towns and villages will have responded positively to the character of the surrounding environment and needs of existing communities.

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.

The distinct towns and villages that make up Medway will be connected through effective transport networks, and green infrastructure links supporting nature and healthy communities. The quality of design and public realm will have delivered an accessible city where all can move around safely.

Inequalities in health, education, economic and social opportunities will be reduced.

Medway will have successfully grown its economy, capitalising on its learning quarter of higher and further education providers to raise skills levels; gaining competitiveness from its strategic location, delivering high speed broadband services to businesses and communities; securing and developing its diverse business base and attracting inward investment in a range of quality employment sites.

Medway will be defined by development that respects the character, functions and qualities of the natural and historic environments, in order to reduce the risk of flooding, to manage finite natural resources, and to ensure that important wildlife and heritage assets are protected and opportunities are realised to enhance their condition and connectivity. Medway's growth will promote a low carbon economy, seeking to address and mitigate climate change. Development will be managed to facilitate the sustainable supply of minerals and management of waste.

Strategic objectives

The objectives for the plan are focused on environmental, social and economic well being and regeneration, set out under four broad themes:

- A place that works well
- A riverside city connected to its natural surroundings
- Medway recognised for its quality of life
- Ambitious in attracting investment and successful in place-making

Do you agree or disagree with the strategic objectives in Section 2 of the draft Local Plan?

Agree

☐

Disagree

☐

Don't know/ No opinion

☒

Please explain your response to any specific aspects of the strategic objectives:

While agreeing with the direction expressed in the themes, there is concern about the practical delivery of the infrastructure, and the impact on the local environment, required to achieve these aims.

Development Options

Government policy requires Local Plans to plan positively to meet the development and infrastructure needs of the area. By 2035, Medway will need:

- 29,463 homes
- 49,943 m2 of B1 office space, 155,748m2 of B2 industrial land, and 164,263m2 of B8 warehousing land
- 34,900m2 of comparison retail space and 10,500m2 of convenience (groceries) retail space up to 2031
- New schools, health facilities, transport infrastructure, open spaces, and community centres

Section 3 of the Development Options consultation report sets out four potential different approaches to meet these development needs. At this early stage of work on the Local Plan, these are broad approaches. Following this consultation, more work will be carried out to identify specific sites to include in the draft Local Plan.

The Council wants to hear your views on where this development should take place so that Medway grows sustainably. We welcome your comments on how different locations and types of development could contribute to successful growth, and where there may be potential issues to address.

Now you have read about the four potential development options please rank the options in your order of preference, from 1 to 5, where 1 is your most preferred option and 5 is your least preferred option (PLEASE TICK ONE BOX PER ROW AND ONE BOX PER COLUMN ONLY)

	1 (most preferred)	2	3	4	5 (least preferred)
Option 1 - Maximising the potential of urban regeneration	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Option 2 - Suburban expansion	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Option 3 - A rural focus	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
Option 4 - Urban regeneration and rural town	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>
Option 5 - Alternative sustainable development option (if applicable). There is space to tell us about your alternative option in the 'Other alternatives for delivering sustainable development' section further on.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please explain why you have ranked the options in this order

The Town Centres require regeneration and in some cases a re-purposing following the changes to retail. The rural areas have little or no infrastructure to support growth – options look to provide services for the Hoo Peninsula in Hoo St. Werburgh, but these have limited benefits to parts of the peninsula. _____

Option 1 - Maximising the potential of urban regeneration

Thinking about option 1 please explain what aspects of this potential development you support? Please comment in the box below.

Regeneration of waterfront sites, mixed development into retail and employment areas. Much of the supporting infrastructure already exists or can be improved. if necessary.

Thinking about option 1 please explain what aspects of this potential development you do not support? Please comment in the box below.

The need to expand into rural areas to satisfy housing need.

Option 2 - Suburban expansion

Thinking about option 2 please explain what aspects of this potential development you support? Please comment in the box below.

Urban extensions around Rainham and Strood

Thinking about option 2 please explain what aspects of this potential development you do not support? Please comment in the box below.

_Highway pressures around the Wainscott Bypass, Medway Tunnel and other local roads.

Option 3 - A rural focus

Thinking about option 3 please explain what aspects of this potential development you support? Please comment in the box below.

Promise of provision of services and infrastructure (but concern about the practical delivery of this – beyond medical and education)

Thinking about option 3 please explain what aspects of this potential development you do not support? Please comment in the box below.

Development of Hoo from a large village to a small town. Impact on the environment and countryside character bordering villages.

Option 4 - Urban regeneration and rural town

Thinking about option 4 please explain what aspects of this potential development you support? Please comment in the box below.

Promise of provision of new rural services and infrastructure (but concern about the practical delivery of this – beyond medical and education)

Thinking about option 4 please explain what aspects of this potential development you do not support? Please comment in the box below.

Concern about the practical delivery of new rural infrastructure and services (– beyond medical and education)

Other alternatives for delivering sustainable development

Are there any alternative sustainable development options that will meet Medway's growth needs that have not been considered? Please comment in the box below

Highways improvements, use of the Hoo Peninsula Freight Railway (to Strood via Higham) for passenger use and connection of footways and footpaths to provide connections between villages and the town centres. _____

Local Plan approach to policy development

As part of the Local Plan the Council has to develop a number of planning policies that will be used to assess planning applications once the new Local Plan is adopted. The Council needs your help to understand whether the policy approaches set out in the consultation document would be effective in meeting the objectives for Medway’s development.

The Development Options consultation document sets out the council’s proposed approach to policy development in nine areas for your consideration:

- Housing
- Employment
- Retail and Town Centres
- Natural Environment and Green belt
- Build Environment
- Health and Communities
- Infrastructure
- Sustainable Transport
- Minerals, Waste and Energy

Housing

For the housing policy approaches set out in SECTION 4, please indicate below whether you agree or disagree with the following policy approaches:

Do you agree or disagree with the policy approach for housing delivery?		
Agree	Disagree	Don't know/ No opinion
<input type="checkbox"/>	<input type="checkbox"/>	X

Please explain your response:
It is not clear how the required infrastructure and services will be provided to support this level of housing

Do you agree or disagree with the policy approach for housing mix?		
Agree	Disagree	Don't know/ No opinion
X	<input type="checkbox"/>	<input type="checkbox"/>

Please explain your response:
—

Do you agree or disagree with the policy approach for affordable housing and starter homes?

Agree

X

Disagree

☐

Don't know/ No opinion

☐

Please explain your response:

—

Do you agree or disagree with the policy approach for Supported Housing, Nursing Homes and Older Persons Accommodation?

Agree

X

Disagree

☐

Don't know/ No opinion

☐

Please explain your response:

An aging and expanding population will generate a significant need for this. Cliffe and Cliffe Woods is seeing a net reduction in this provision currently.

Do you agree or disagree with the policy approach for student accommodation?

Agree

X

Disagree

☐

Don't know/ No opinion

☐

Please explain your response:

Special care is required to identify suitable locations and also the impacts on that community

Do you agree or disagree with the policy approach for mobile home parks?

Agree

X

Disagree

☐

Don't know/ No opinion

☐

Please explain your response:

Do you agree or disagree with the policy approach for houseboats?

Agree

X

Disagree

☐

Don't know/ No opinion

☐

Please explain your response:

—

Do you agree or disagree with the policy approach for houses of multiple occupation?

Agree

X

Disagree

☐

Don't know/ No opinion

☐

Please explain your response:

Do you agree or disagree with the policy approach for self-build and custom house building?

Agree

X

Disagree

☐

Don't know/ No opinion

☐

Please explain your response:

Do you agree or disagree with the policy approach for gypsy, traveller and travelling show people accommodation?

Agree

☐

Disagree

X

Don't know/ No opinion

☐

Please explain your response:

The criteria should also include Agricultural Land Designations, to prevent the loss of valuable growing land.

Are there any alternative sustainable development options for housing that have not been considered? Please comment in the box below

Provision of infrastructure and supporting services will need to be scheduled, with larger housing allowed on a phased basis in line with this provision. _____

Employment

For the employment policy approaches set out in SECTION 5, please indicate below whether you agree or disagree with the following policy approaches:

Do you agree or disagree with the policy approach for economic development?

Agree

X

Disagree

☐

Don't know/ No opinion

☐

Please explain your response:

There remains a concern about the practical delivery of economic development, but the policy of creating an environment that helps encourage it is welcome – perhaps even more needs to be done.

Do you agree or disagree with the policy approach for the rural economy?

Agree

X

Disagree

☐

Don't know/ No opinion

☐

Please explain your response:

Protection of existing services is welcomed, although it is difficult to overcome 'market conditions'. The growth of rural businesses in suitable locations is also welcomed.

Do you agree or disagree with the policy approach for tourism?

Agree

X

Disagree

☐

Don't know/ No opinion

☐

Please explain your response:

Encouragement/requirement for sustainable transport options and assessment of local impacts are key to this policy.

Do you agree or disagree with the policy approach for visitor accommodation?

Agree

X

Disagree

☐

Don't know/ No opinion

☐

Please explain your response:

Are there any alternative sustainable development options for employment that have not been considered? Please comment in the box below

Retail and Town Centres

For the retail and town centre policy approaches set out in SECTION 6, please indicate below whether you agree or disagree with the following policy approaches:

Do you agree or disagree with the policy approach for retail and town centres?

Agree
X

Disagree
☐

Don't know/ No opinion
☐

Please explain your response:
This is a challenging policy in today’s retail environment of growing online shopping.

Are there any alternative sustainable development options for retail and town centres that have not been considered?
Please comment in the box below

Natural Environment and Green Belt

For the natural environment and green belt policy approaches set out in SECTION 7, please indicate below whether you agree or disagree with the following policy approaches:

Do you agree or disagree with the policy approach for Strategic Access Management and Monitoring?

Agree

X

Disagree

☐

Don't know/ No opinion

☐

Please explain your response:

This policy is already delivering the potential for environment mitigation and improvement in the area. _____

Do you agree or disagree with the policy approach for securing strong Green Infrastructure?

Agree

X

Disagree

☐

Don't know/ No opinion

☐

Please explain your response:

This is an essential policy – as well as supporting and enhancing the existing areas (a green lung for the Medway Towns and further away).

Do you agree or disagree with the policy approach for landscape?

Agree

X

Disagree

☐

Don't know/ No opinion

☐

Please explain your response:

In the absence of an updated Medway Landscape Character Assessment and Green Infrastructure Framework, the existing version should be supported in the plan.

Do you agree or disagree with the policy approach for flood risk?

Agree

X

Disagree

☐

Don't know/ No opinion

☐

Please explain your response:

Do you agree or disagree with the policy approach for air quality?

Agree

X

Disagree

☐

Don't know/ No opinion

☐

Please explain your response:

Are there any alternative sustainable development options for the natural environment and green belt that have not been considered? Please comment in the box below

Built Environment

For the built environment policy approaches set out in SECTION 8, please indicate below whether you agree or disagree with the following policy approaches:

Do you agree or disagree with the policy approach for design?

Agree

X

Disagree

☐

Don't know/ No opinion

☐

Please explain your response:

Do you agree or disagree with the policy approach for housing design?

Agree

X

Disagree

☐

Don't know/ No opinion

☐

Please explain your response:

Do you agree or disagree with the policy approach for housing density?

Agree

X

Disagree

☐

Don't know/ No opinion

☐

Please explain your response:

Do you agree or disagree with the policy approach for heritage?

Agree

X

Disagree

☐

Don't know/ No opinion

☐

Please explain your response:

Although there should also be promotion of existing heritage and a pool of funding to help local projects and organisations.

Are there any alternative sustainable development options for the built environment that have not been considered?

Please comment in the box below

Health and Communities

For the health and communities policy approaches set out in SECTION 9, please indicate below whether you agree or disagree with the following policy approaches:

Do you agree or disagree with the policy approach for health?

Agree

☐

Disagree

X

Don't know/ No opinion

☐

Please explain your response:

The policy aims are supported but there is a great concern that development contributions will not be sufficient, with national shortages of medical staff (especially doctors). There is also concern regarding the ability of Medway Hospital, and local medical facilities, to support the demands of the existing population, let alone the level of growth specified in this plan.

Are there any alternative sustainable development options for health and communities that have not been considered?
Please comment in the box below

Infrastructure

For the infrastructure policy approaches set out in SECTION 10, please indicate below whether you agree or disagree with the following policy approaches:

Do you agree or disagree with the policy approach for general and strategic infrastructure?

Agree

☐

Disagree

☒

Don't know/ No opinion

☐

Please explain your response:

There is concern that the Infrastructure Delivery Plan (IDP) will not have sufficient infrastructure requirements and/or sufficient funds to deliver them.

Do you agree or disagree with the policy approach for education?

Agree

☒

Disagree

☐

Don't know/ No opinion

☐

Please explain your response:

Do you agree or disagree with the policy approach for community facilities?

Agree

☒

Disagree

☐

Don't know/ No opinion

☐

Please explain your response:

In the case of parished areas – this should include engagement with the relevant parish council/s and the need to transfer to bodies such as the parish council or community groups, with ongoing financial support where necessary.

Do you agree or disagree with the policy approach for communication infrastructure?

Agree

☒

Disagree

☐

Don't know/ No opinion

☐

Please explain your response:

Do you agree or disagree with the policy approach for open space and sports facilities?

Agree

X

Disagree

☐

Don't know/ No opinion

☐

Please explain your response:

Do you agree or disagree with the policy approach for utilities?

Agree

X

Disagree

☐

Don't know/ No opinion

☐

Please explain your response:

There is concern about the ability to support the level of growth in this plan without putting an unsustainable pressure on existing utilities

Do you agree or disagree with the policy approach for implementation and delivery?

Agree

☐

Disagree

X

Don't know/ No opinion

☐

Please explain your response:

The outline is supported, but an Infrastructure Delivery Plan (IDP) is urgently required – with sufficient funding from the private and public sector. ____

Are there any alternative sustainable development options for infrastructure that have not been considered? Please comment in the box below

Sustainable Transport

For the sustainable transport policy approaches set out in SECTION 11, please indicate below whether you agree or disagree with the following policy approaches:

Do you agree or disagree with the policy approach for transport?

Agree

☐

Disagree

X

Don't know/ No opinion

☐

Please explain your response:

There is a fear that it does not go far enough to support the growth specified in this plan, and is already suffering from shortages and heavy congestion at times.

Do you agree or disagree with the policy approach for transport and the River Medway?

Agree

X

Disagree

☐

Don't know/ No opinion

☐

Please explain your response:

Do you agree or disagree with the policy approach for waterfronts and river access?

Agree

X

Disagree

☐

Don't know/ No opinion

☐

Please explain your response:

Do you agree or disagree with the policy approach for marinas and moorings?

Agree

X

Disagree

☐

Don't know/ No opinion

☐

Please explain your response:

Do you agree or disagree with the policy approach for aviation?

Agree

X

Disagree

☐

Don't know/ No opinion

☐

Please explain your response:

Do you agree or disagree with the policy approach for vehicle parking?

Agree

X

Disagree

☐

Don't know/ No opinion

☐

Please explain your response:

Agree, but there is concern about the current increase in car and van parking in existing villages, even before the growth as provided in this plan. Some additional, secure, off-road parking will also be required in several locations.

Do you agree or disagree with the policy approach for cycle parking?

Agree

X

Disagree

☐

Don't know/ No opinion

☐

Please explain your response:

Secure parking should be provided as a prime objective. _____

Do you agree or disagree with the policy approach for connectivity?

Agree

X

Disagree

☐

Don't know/ No opinion

☐

Please explain your response:

Although support for the provision and enhancement of strategic routes for pedestrian and cycles should also be supported by developer contributions (in addition to local council support). ____

Are there any alternative sustainable development options for sustainable transport that have not been considered?

Please comment in the box below

Minerals, Waste and Energy

For the minerals, waste and energy policy approaches set out in SECTION 12, please indicate below whether you agree or disagree with the following policy approaches:

Do you agree or disagree with the policy approach for minerals planning?

Agree

☐

Disagree

X

Don't know/ No opinion

☐

Please explain your response:

The impact on local highways needs to be added, with priority given to sites that can be connected by river and rail. _____

Do you agree or disagree with the policy approach for waste planning?

Agree

X

Disagree

☐

Don't know/ No opinion

☐

Please explain your response:

Do you agree or disagree with the policy approach for energy?

Agree

X

Disagree

☐

Don't know/ No opinion

☐

Please explain your response:

Do you agree or disagree with the policy approach for renewable and low carbon technologies?

Agree

X

Disagree

☐

Don't know/ No opinion

☐

Please explain your response:

Impacts do need to be considered at the earliest opportunity, especially with local communities and parish councils.

Are there any alternative sustainable development options for minerals, waste and energy that have not been considered? Please comment in the box below

General Comments

Is there anything else Medway Council should consider about the development options or the policy approaches in addition to what you have already commented on above. Please comment in the box below.

Equalities Monitoring

We collect the following information to help us better understand the communities that we serve so that services and policies can be delivered to meet the needs of everybody. Please feel free to leave questions that you do not wish to answer. All of the information gathered in this questionnaire is confidential.

Are you?

☒ Male

☐ Female

☐ I prefer not to say

In which of the following age bands do you fall?

☐ Under 16

☐ 16-24

☐ 25-34

☐ 35-44

☐ 45-54

☐ 55-64

☐ 65-74

☐ 75+

☐ I prefer not to say

Do you have any long-standing health problem or disability? Long-standing means anything that has lasted, or is expected to last, at least 12 months.

☐ Yes

☐ No

☐ I prefer not to say

If yes, what is the nature of your health problem or disability? (please tick the appropriate box)

☐ Health Diagnosis

☐ Hearing Impairment

☐ Learning Disability

☐ Mental Health

☐ Physical Impairment

☐ Sight Impairment

☐ I prefer not to say

☐ Other

If other please specify

What is your ethnic group?

☐ White - English/ Welsh/ Scottish/
Northern Irish/ British

☐ White - Irish

☐ White - Gypsy or Irish Traveller

☐ Any other White background

☐ Mixed - White and Black Caribbean

☐ Mixed - White and Black African

☐ Mixed - White and Asian

☐ Any other mixed / multiple ethnic
background

☐ Black / Black British - African

☐ Black / Black British - Caribbean

☐ Any other Black / African/ Caribbean
background

☐ Asian / Asian British - Indian

☐ Asian / Asian British - Pakistani

☐ Asian / Asian British - Bangladeshi

☐ Asian / Asian British - Chinese

☐ Any other Asian background

☐ Other - Arab

☐ Any other ethnic background

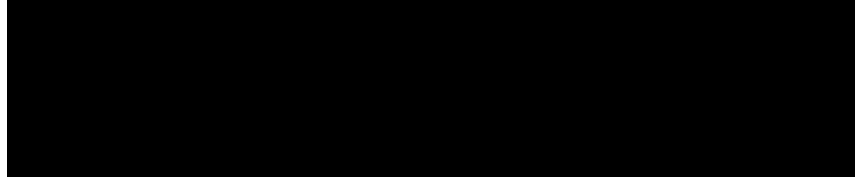
☐ I prefer not to say

Other, please state

Your Contact Details

Full Name

Chris Fribbins



Type of Consultee (Please select one of the below option)

- ☐ Member of the public
- ☐ Developer/Consultant
- ☐ Councillor/MP/Parish Council
- ☐ Local Authority
- ☐ Government Department/Public Bodies
- ☒ Charity/Community/Faith Group
- ☐ Business
- ☐ Other

Other, please state below

We will record your contact details and use them for further consultation stages on the Local Plan, and to keep you updated on the progress of the plan preparation. We will not share your details, or use them for any other purposes. The responses and contact details will be kept as part of the formal record of the preparation of the Local Plan. This will be for a minimum of five years.

Medway Council will keep the information provided above as confidential. Access to, retention and disposal of this information will be strictly in accordance with data protection requirements. Your personal data will be processed in accordance with Medway Council's Data Protection notice.

- ☐ If you **do not** wish to be informed about the work on the Medway Local Plan, please tick here.

Thank you for taking part in the consultation on the Medway Local Plan 2035 Development Options document. At the end of the consultation, the council will collate and consider all responses received. The findings of the consultation will be published, together with the council's response. The information gathered through the consultation process will be used in developing a draft version of the new Local Plan.

Please note that all comments received will be publicly available and will be included on the council's website.

If you would like to receive this information in another format or language please contact Customer Contact on 01634 333333.

Planning Policy, Regeneration, Culture, Environment and Transformation
Medway Council
Gun Wharf
Dock Road
Chatham
ME4 4TR

futuremedway@medway.gov.uk

6 April 2017

Dear Sir/Madam,

Medway Council Local Plan: Development Options Regulation 18
Consultation Report
Response from the Diocese of Rochester

The Diocese of Rochester is one of the largest stakeholders within the Medway Council area. Apart from the obvious attraction of the Cathedral as a tourist destination and the role of its churches in serving the community, the work of the Diocese: generates a significant level of employment; is a major landowner throughout the Council area; contributes to education needs through church-sponsored schools; provides considerable welfare support (e.g. night shelters for the homeless); engages with local communities through participation in civil parish councils and neighbourhood forums; provides considerable support to local activities through the provision of church halls and other facilities; and provides friendship and counselling support where needed.

Based on this extensive and considerable engagement with the communities of the Medway Towns, the Diocese submitted a detailed response to the Issues and Opportunities consultation in 2016. The response addressed the questions raised by the Council in detail. It also provided many examples of how the church was contributing to needs within the Council area and also suggested that the Diocese would like to contribute further in the future.

The strategic nature of the document makes it difficult to assess the degree to which the points raised by the Diocese were considered. One example relates to town centre policies. Question 25, within the 2016 document, *asks... "Should we focus investment & retail capacity on Chatham to consolidate its position as Medway's highest order centre?"*. Whilst there is a lot of narrative about town centres and retail functions there is no real indication as to whether this question has been addressed. Chatham town centre is discussed very little and what is said has little bearing on its role within the settlement hierarchy. There is no discussion about: the role of offices;

potential scope for mixed uses; an assessment of potential footfall; challenges of personal security and so on. The best offer provided in the document is to state that housing developments should be in locations accessible to town centres. It is the opinion of the Diocese that this subject needs to be discussed and explained in greater detail within the Local Plan proposals.

The way that the document is structured makes it difficult to identify the package of proposals which apply to any specific location. There is a need for the strategic and theme-based approach to be accompanied by detailed area-specific policies. It is noted that neighbourhood plans will, in part, fill this role in villages and some suburban locations, but there is still a need for area policies for: each of the main town centres; large settlements such as Rainham; and major development areas, such as The Medway City Estate.

The one area which is mentioned most often is the Learning Quarter. This refers clearly to the area in Chatham Maritime (and Gillingham) close to the centres of higher education. In the view of the Diocese, the combined effects of the proposals which relate to this area (and to students) will lead to a situation where students will be more isolated from the town. Integration is not seriously considered and an objective to reduce the number of students occupying rented housing, combined with stricter measures required for the creation of new homes in multiple occupation (bedsits), will likely exacerbate this trend. It is the view of the Diocese that this section of the proposals should be reviewed.

There is much narrative linked to welfare and wellbeing, notably linked to healthy lifestyle and proposals to facilitate changes to dwellings which will meet the needs of the elderly and disabled. These are laudable objectives but, in the view of the Diocese, there is a lack of focus on welfare issues at the locality or community level. Significantly, there are no proposals for changes to meet the needs of the homeless.

Neighbourhood forums and parish councils are identified as potential drivers for creating neighbourhood plans. This appears to be the only reference to voluntary organisations in the document: The role of the church is not considered anywhere other than as a provider of tourist attractions.

Taking the points raised in this response collectively, it is the view of the Diocese, that the document requires more detail and clarity to facilitate constructive and creative responses. This is particularly relevant with regard to: area policies; the opportunities to create and develop multi-purpose uses of town centres; the integration of students within the region; and provision for the most deprived social groups.

The Diocese would like to stress its willingness to participate in the local plan process. It would welcome feedback to the comments made in this response and would like to be engaged more productively in the next stages of the development of the Local Plan.

Development Sites

The Diocese has identified three development sites, located on Diocese-owned land, that are being presented as part of the Strategic Land Availability Assessment (SLAA) process in a parallel submission to this document. These sites, located in (1) Cliffe and Cooling, (2) Cuxton and (3) Halling, provide opportunities for meeting many of the strategic objectives of the Local Plan, particularly in relation to housing. The Diocese has instructed further technical work (ecology, landscape and transport) for the site in Halling (as noted on the SLAA form), and will follow-up with an additional response shortly in relation to this site.

It is the hope of the Diocese that these comments are helpful and can be used constructively to address many of the issues raised.

Yours sincerely,



Matthew Girt MA (TP) FRSA
Director of Strategy & Implementation

Cc: The Bishop of Rochester
Archdeacon of Rochester
Diocesan Secretary
Director of Education, Diocesan Board of Education
Diocesan Agents

To: Planning Policy Team
Planning Service
Medway Council
Gun Wharf
Dock Road
CHATHAM
Kent
ME4 4TR

From: Dr Michael Ryan

Mobile: [REDACTED]

Work: [REDACTED]

Email: [REDACTED]

26 March 2017

Dear Sirs

I wish to register my extreme opposition to the proposed Lodge Hill development. My name is Michael Ryan and I am the owner of Berry Court Wood, which is a 48 acre SSSI (Site of Special Scientific Interest) woodland site adjacent to the proposed Lodge Hill development.

I find it quite astonishing that this is even being considered for development as this would be in complete contravention of local and national planning laws and guidelines.

The development options that Medway Council sets out in the Consultation document includes development of a large part of 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 that totally contradicts the vision that Medway Council sets out for its Local Plan.

Lodge Hill is not brownfield land, as is claimed by the Council as justification for its development. Their own brownfield register confirms that this is the case. It is designated a Site of Special Scientific Interest. These reasons alone should be sufficient to prevent development. It is appalling and I believe deliberately misleading that the consultation fails to make it clear to readers that Lodge Hill is a SSSI Site of Special Scientific Interest, NOT as is claimed brownfield land. Even if Lodge Hill was at some stage registered as brownfield, the SSSI status still takes precedence under national planning guidance. Why have these national guidelines been ignored?

The vision that Medway Council sets out for its Local Plan is that it is seeking to look after its "stunning natural assets." How can this be true when it is even considering the development of SSSI land and the environmental devastation this development would bring?

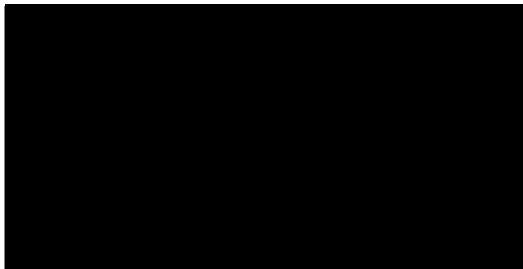
Medway Council's Strategic Land Availability Assessment process says that it has screened out all sites of National or International Environmental Designation from consideration, and yet Lodge Hill SSSI has not been screened out. Why has Lodge Hill not been screened out? Are they unaware of the Nightingale Population? Fewer than 6000 singing males occupy territories in the whole of England. Ornithological surveys carried out at Berry Court Wood indicate Great Chattenden Wood to be one of the largest population of Nightingales in England. Development would bring this already endangered bird close to extinction. Development of Lodge Hill would mean the population of Nightingales at Lodge Hill would be lost, and it is acknowledged that the impact on the surrounding SSSI including Berry Court Wood (my land) would be devastating.

Where development is proposed for a SSSI, national planning guidelines instruct authorities to follow what is called an "avoid-mitigate-compensate" hierarchy. This means that the Council should do all it can to try to avoid developing the SSSI. This has not happened; instead the Council says it supports development of Lodge Hill SSSI without any attempt to show it is trying to avoid its development.

Over 10,000 people have submitted responses to the Consultation asking for Lodge Hill not to be developed.

All of these issues mean that the Council risks the Plan being found unsound - again - by the Local Plan Inspector. Medway Council must not ignore the national guidelines and the advice it has previously been given.

In conclusion, a Council is required to draw up a Local Plan that is sustainable, and that means the Plan must look after the things that are of importance in its area. Things do not get much more important than a nationally important wildlife site. Medway Council must withdraw Lodge Hill from its Local Plan if the Plan is to be credible. As the owner of Berry Court Wood my family and I have always been totally committed to the preservation of the wildlife with which we share this beautiful woodland. We have been complemented many times on the successful implementation of sound woodland management principles. We find it difficult to express in words the strength of our opposition to this appalling development.



Michael Ryan

[REDACTED]

Medway Council
Gun Wharf
Dock Road
Chatham
Kent ME4 4TR

27th February, 2017.

Dear Sir/Madam

I have recently viewed the "Local Medway Plan" for 2020-2035 and have the following comments and suggestions.

We are all aware of the requirement for new housing in general in the UK however; this always seems to be at the expense of adequate infrastructure and services required by the increasing population.

I understand that such infrastructure is normally only put in place once certain trigger points are reached, such as number of housing units built and increased road usage. This I contend is "back to front".


In my opinion once a threshold of numbers of houses with planning permission is reached in an area, this is the point when services need to be planned into the centre of developments and built. This will not suit the developers but it will ensure that once the houses are built the services are in place and functioning in the heart of the communities not tagged on (if at all) at the fringes with new roads as required built to take the increased traffic flow.

I note that in developments mooted, those off of Mierscourt Road in Rainham and Sundridge Hill in Cuxton are adjacent to roads, which are already causing concern at peak times.

It is imperative that road infrastructure is put in place in these areas as a pre-condition for planning approval.

In addition the proposed developments on "Temple Marshes" in Strood, the pit opposite Roman Road and the new St. Peters' Pit development are and will continue to make further changes to the A228 inevitable if total gridlock is to be avoided. Indeed I am surprised any threshold for road improvement has not already been "triggered". Things again seem "back to front" far from anticipating problems on the roads and planning a new or improved road, there appears to have to be a "lets see what actually happens". In reality it will be worse because of outside influences (see below).

I note with concern that the M25 third crossing will also cause real problems on the A227 in Gravesham and the A228 here in Medway. The A229, the "projected route" for this traffic, is itself one massive bottleneck at 5-7 p.m. and would force traffic onto the other routes i.e. the A227 and A228 in a vain attempt to dodge



the jams. This will only get worse as more traffic uses the 3rd crossing and the A229 gets backed up at all times of the day and night.

I would urge the planning committee to rigorously apply planning laws and to get “inventive” to head off appeals to central government by approving developments, subject to the planning in of roads and services within the applications against the threshold of numbers of houses with planning permission in any given area.

I believe that your planning department can from the submitted areas for development (in the 15 year plan), determine the likely number of houses to be developed and hence the roads and services required (adding in the developments between 2012 and 2020, which may breach this “threshold”). This can be provided to the developers to show what will be expected, based on their overall planning submissions.

In the event of tentative plans of part of the “development” being submitted instead; indicate that if further development plans are submitted in that area, “triggering” the above “threshold”, new roads and services within the development may require the demolition of recently built properties, (with the developer recompensing any buyer of such property), where the overall plan of the council’s “planning department” has been ignored. I am sure your lawyers can come up with a solution.

Yours faithfully,

Dr. R. A. Merrett.

Responses to Medway Local Plan

General comments:

I respect the need for new housing. But this needs to be suited to local residents and aimed at people in Medway, not at Londoners looking to leave the city. There should be an emphasis on houses of the type that Medway residents need the most: smallish 2- and 3-bedroom houses (especially terraced/semi) with small gardens rather than 4-bedroom detached that are only affordable to London expats! Medway should be aiming for 30% of its new houses to retail at less than £250K and a further 30% to retail at £200K or less. £400K houses will not benefit the majority of people in Medway.

New developments – housing, leisure, retail, infrastructure – need to be very sensitive to the environmental impact not just on the site under consideration, but adjacent sites, nearby biodiversity-rich sites, and the overall ecological landscape of Medway. Bear in mind that Medway will be judged 50 years from now in the face of climate change and chronic, severe biodiversity loss, on the basis of the decisions made now. Defiling or destroying the few remaining greenspaces and habitats left across the towns will be hard to explain to future generations when they deal with the consequences of further degradation.

We should also be aiming for sustainability in all things – in the sources of power we use, in the way we dispose of waste, in the way we travel – because we owe it to the future (and the future inhabitants of Medway) to leave it in a better condition.

How progressive and trailblazing would it look, nationally, if Medway committed – really committed, with money, resources and ethos – to being the most sustainable, biodiversity-centred council in the country, and brought the whole diverse population along with it on that path?

Specific comment:

I emphatically DO NOT SUPPORT development at Lodge Hill. The environmental consequences would be catastrophic. Developing this site would have long-term negative impacts in terms of biodiversity loss (and subsequent loss of ecosystems services) that make it simply indefensible.

Specific comments to targeted questions:

What are the most effective means to secure and strengthen Medway's environment, in the context of the area's development needs?

- Medway has a variety of biodiversity-rich sites but a lot of them are poorly maintained due to chronic underinvestment
- Examples: Berengrave Natural Reserve, Rainham/Bloors Community Woodland, Lower Lines Park, *all* the ancient woodland, most roadside nature reserves
- Urgent need to invest in proper management to secure the value of these sites for people and nature – appropriate and sensitive cutting regimes, scrub clearance on some sites, coppice cycling in woodland
- The best way to improve this provision and secure it is to keep ecology at the heart of all further development, by emphasising:
 - o Habitat diversity
 - o Habitat connectivity
 - o Considering all types of biodiversity (insect, plant, bird, reptile, amphibian)
 - o Use of native plants in all new development across Medway

- Encouraging Medway residents to respect the environment and penalising damage to it (e.g. vandalism, dog fouling, flytipping) severely
- Need to bear in mind the biodiversity value of **brownfield** as forage for pollinators, feeding places for birds, basking sites for reptiles, etc. – biodiversity increases exponentially with the continuous habitat area available, so loss of even low- and medium-quality sites, if they can be used at all, will impact SEVERELY on Medway's wildlife
- Underpinning this needs to be 1. Financial investment rather than just relying on charities; 2. Meetings that bring different conservation stakeholders together so that each site isn't working as an island; 3. Proper data collection about which notable species (of all organism types) are present in Medway and considering how housing, road and leisure development will affect them
- Model what will happen to bee, bird, newt, snake populations in 20-50 years if current and possible future plans go ahead, and make a cast-iron guarantee that Medway will ensure populations of all of these will NOT DECREASE between now and 2050.
- Any mitigation site/wildlife area that is proposed by a developer as part of planning an industrial/leisure/housing development needs to be protected from any other use for minimum 100 years.
- Any development needs to be considered in the context of the long-term impact on surrounding sites – e.g. will increased traffic gradually erode a nearby greenspace such that it will go from high to low quality? Will littering or fly-tipping increase? Will there be "creep" of development?

What opportunities should be pursued in the Local Plan to extend connectivity for wildlife and people throughout urban and rural parts of Medway?

Big issues:

- Fragmentation of ancient woodland
- Lack of consideration of biodiversity on brownfield
- "Rivers of flowers" – there was some attempt to maintain wildflowers on verges around Bowater roundabout a few years ago but this seems to have been abandoned. This is a pity as that provided connectivity between East and West Hoath Woods/Darland Banks and the gardens in Twydall – now lost

Solutions:

- ALL open/amenity space should be planned with biodiversity in mind – e.g. if you're putting in a lawn, make it a wildflower lawn and reduce the cutting on half of it to twice a year only (April and September); greenspace should be planned into corridors to connect larger semi-natural spaces
- Require ALL developers to use native plants, and commit to a **15-year legacy** on wildlife management on their offsetting habitats – no more of the nonsense as seen around KFC/Tesco/Dobbies of using random South American shrubs and so on, and no more of the developers abandoning the management of the "wild" sites nearby once their development is complete
- Developments to include small corridor modifications: gaps in fences to allow wildlife to pass between gardens; small ponds at ground level; flower beds and on-street planting to be accessible to wildlife like frogs and beetles
- Better enforcement of dog fouling penalties, especially at Riverside CP and Darland Banks and actually, all of Gillingham. Preferably extremely harsh penalties. This will allow better use of the sites by other people
- Identify micro-habitats for wildlife, e.g. small verges, abandoned land, centres of roundabouts, and provide either funding for council staff to maintain them as wildlife patches or incentives for community groups to look after them – these can be essential to maintaining connectivity
- Educate the contractors doing verge/site management. The maintenance of Hoath Way is *despicable* – cutting very roughly without thought for the impact on plants' growth, and leaving a large amount of waste wood. Verge cutting and scrub clearance, etc. need to happen according to a plan, not just "cut back the entire length by 2m" – especially during bird nesting seasons

- Stop people in Twydall from using lawn areas as parking spaces – fence them off, add in more planting (e.g. small shrubs, bulbs, etc.) or anti-vehicle spikes around the edges. They are ruining the amenity value of the area, they are ruining the habitat and limiting the ability of the green space to act as corridors for people and wildlife, and they are behaving dangerously. I notice it especially around the Beechings Rd/Eastcourt Lane/Featherby Road mini roundabouts area.
- Improve public transport connectivity to country parks and rural areas so non-drivers can use the countryside more. Perhaps rather than constant services that are barely used, try one-off “visit your country park” days with special bus routes, subsidised travel and, most importantly, **good advertising** so people know it’s happening.
- Consider that Medway is part of the UK and the world, and evaluate all developments on the assumption that the same type of changes will happen across the UK – so negative impacts on wildlife, biodiversity and ecosystems services will not be mitigated elsewhere, especially not long-term.
- **Do not support** the Gillingham Football Ground proposal at Mill Hill. This does not satisfy demand for more housing. It doesn’t improve environmental connectivity between habitats. It will cater for a relatively small percentage of the population, and the knock-on effects on surrounding areas have not been properly explored (e.g. increased antisocial behaviour and littering at Riverside CP).
- Work with Network Rail on management of the trainlines for biodiversity.

What approach should be taken to determining the role of landscape in producing a spatial strategy for the new Local Plan, and development management policies?

The first and most essential job should be to consult ecologists at ALL stages of development – inception, planning and throughout the implementation.

- Also, you need to do a **complete assessment** of biodiversity on any site flagged as possible for development, including brownfield – including plants/insects.
- Consult with local groups, e.g. Kent Field Club, BWAG, KMBRC, etc. about biodiversity present on sites and its needs – actually sit down with them and see whether an acceptable plan can be agreed before it goes to the planning permission stage.

The second job should be to avoid fragmentation and destruction of habitats, with this aim having higher weighting than the economics – consider existing high, medium *and* low quality habitats and all classes of living things within them, and work with (good) spatial ecologists to model how organisms would move across Medway. Where there are no obvious corridors, there should be an aim to create them.

Is it an appropriate ambition to preserve the integrity of the open space estate, or should we be seeking to rationalise the estate?

I don’t think there is anything wrong with seeking to understand how existing greenspace is used – e.g. if there is a children’s play area that is never used by children, it makes sense to repurpose it (being mindful of the **other benefits** the area provides, e.g. flood control, wildlife, carbon sink, etc.) and perhaps change it to dog exercise area/skate park/wildlife site if the area would benefit from that better. I think selling it off should only be done as a last resort as there is, as was pointed out, not a lot of green space left already. Ideally, the council should be looking to acquire more green space from private owners.

Should we continue to set a local space standard and seek to address shortfalls by new provision, and if so is the current level of 3.25ha per 1,000 population appropriate?

We should be aiming to double that, but without destruction of wildlife habitat. The aim should be to fall into line with neighbouring boroughs – aim for 6ha.

Should we move to a multi-functional hub model of provision, and what might this look like in practice?

I don’t see why not. Open space areas providing for recreation, wildlife, flood management and carbon management would be very nice. Aim for something other than lawn and flowerbeds – how about a combination open space hub incorporating secondary woodland, mixed chalk grassland and pathways?

For a really nice model, try researching something like Daegu, South Korea, or International Drive, Orlando, of mixed use greenspace/amenity/infrastructure.

Should new development provide on-site open space, investment into the existing estate, or a balance of the two approaches?

BOTH

What management models and priorities should we consider? Should we seek to increase community involvement in open space provision and how might this be accomplished?

“Friends of” groups are good and very well-meaning, but mostly consist of retired people as everyone else is too busy. This means there is little buy-in from other stakeholders, e.g. low-income groups, parents with school-age children, young professionals. Schools likewise are often overstretched and underfunded already. Need to put your money where your mouth is if you actually care about open space – how about hiring an Openspace Coordinator (trained in ecology and community outreach) who works with local groups and is not afraid to be firm in advocating for active and pro-active management. Work with university students on Environmental Science/Geography/Ecology courses to design and implement space management plans for different sites. Also, what about charities like KWT? Or smaller ones? Can they be subcontracted to oversee some of it?

Community involvement is great, especially if you give community groups enforcement powers to ensure respect for open space areas (e.g. ability to fine people, ban people, ban certain pets if causing nuisance). The more control/empowerment they have, the more they are likely to stay engaged.

How about trying some innovative things to improve community buy-in from non-traditional groups – combine an event they’re interested in with activities/venue/opportunities that benefit the greenspace. For example, markets, outdoor cinema, music events, but with information “sneaked in” about how their engagement will ensure the greenspaces continue.

What infrastructure is required to support Medway’s growth over the plan period?

Rational cycle routes – i.e. fewer interruptions in them, and safe routes through dangerous areas like A2 Rainham East, which is too narrow and has heavy trucks so is dangerous for cyclists.

Better bus services:

- Cheaper
- Timelier
- Reliable
- Cleaner
- With wifi

Invest in ANYTHING that makes parents stop driving their children to school unnecessarily. Very few children over the age of 11 need driving to school by their parents. Better school bus provision, off-road cycle routes, etc.

Explore the idea of river taxis!

What measures should be considered to increase public transport usage and rates of walking and cycling in Medway?

Make it more expensive to drive/park – discretionary taxes on large vehicles (e.g. SUVs), restrict number of cars each household can get a parking permit for.

Enforce parking restrictions and limits rigorously and consistently – some areas in Medway are not policed at all (or approx. twice a year) so the double yellow lines may as well not be there.

Make buses MUCH cheaper and more efficient/reliable.

I used to use Medway buses daily for work commuting and leisure. I stopped and bought a car for the following reasons:

- Buses often late
- Buses sometimes early, so missed them when I was on time
- Buses very overpriced
- Buses often no-show – could wait 40 minutes for a bus on a service supposedly every 12 minutes
- Buses filthy and stinking

At present, an annual Arriva bus pass costs £900 per year. For myself and my partner, that would be £1800 per year to commute to work. My car costs around £1000 per year after initial purchase costs (insurance/tax/servicing and fuel), takes 20 minutes **less** each way on my commute (30 minutes if you take into account it's necessary to be at the bus stop 10 minutes early in order to avoid missing early buses), is clean, and also permits access to rural areas, and runs properly on Sundays and public holidays. At the moment there is no reason I would want to use a bus except when I intend to drink...and then the train is cheaper, more reliable and quicker. There are few incentives to abandon one's car for journeys across much of Medway.

It is ludicrous that for Rainham to Chatham journeys, the bus offers no benefits over the train for a working age person – buses cost more, smell worse, take longer and are less reliable.

Connectivity with Maidstone is also an issue. While the 101 is pretty good as buses go, the number of changes required to get from somewhere like Rainham, Wigmore or Lords Wood to Maidstone on public transport becomes rather silly. The train links are very poor as the Medway Valley Line is infrequent and takes you to a less useful part of Maidstone. A direct train from somewhere more central in Medway (i.e. Chatham or Rochester) through to Maidstone East would probably be good for business AND sustainability. Consequently, a visit to somewhere like Aylesford for me would typically call for train-bus-train or bus-bus-train and take up to 2 hours, whereas it takes around 30 minutes to drive.

Also, the standard of driving in Medway is extremely poor at present. Improving driver courtesy and behaviour would make cyclists and pedestrians feel safer.

Finally, how about making use of the river? We have multiple piers, many close to major workplaces. A fast, affordable river taxi service might be worth exploring!

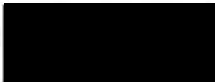
What provision should be made for car parking?

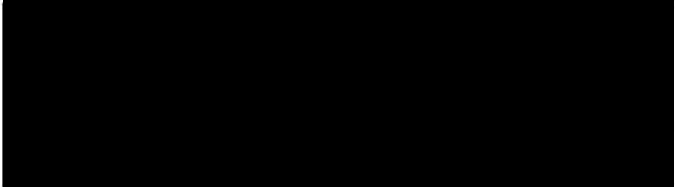
Make ALL (or most) parking in Medway resident or visitor's permit only, one resident's permit per household, visitor's scratchcard only, cost of resident's permit: £300 per year unless blue-badge holder. Alternatively, tier the cost of residents' permits: £50 pa for first car, £200 for second car, £1000 for third car. Seriously, there are too many households running more cars than people. (See Dorset Square, for an example where this makes it quite dangerous.)

There needs to be proper enforcement of parking restrictions – people on my road park on the double yellows constantly, sometimes partially blocking the road such that ambulance access or fire engine access to some properties would be impossible, but there is never any enforcement.

People using local businesses should use P&D car parks, not residents' roads – if they can afford a £20 manicure they can afford a £1.50 P&D ticket.

Consider adding in underground car parks to new developments, and indeed to existing developments. That is one direction we can still build without impacting as badly on biodiversity.

Telephone: 


22 February 2017

Medway Council
Planning Policy, Regeneration, Culture, Environment and Transformation
Gun Wharf, Dock Road, Chatham, Kent. ME4 4TR

Dear Sirs

Medway Council Local Plan 2035

The Council has invited residents to submit their comments – hence this letter. We are totally dismayed at the prospect of thousands of new homes being built in the area as well as land being required for office space and industrial purposes. The Medway towns are vastly overcrowded already.

Medway Hospital is constantly in Special Measures, GP surgeries are closing down, and school places are in short supply. They will not be able to cope with a massive influx of people.

Chatham, in particular, is one of the worst towns in Kent for air pollution and a further 29,463 homes in Medway would only make matters worse. The roads in Medway and on the local motorways are already highly congested especially during the rush hours. Rush hour trains to and from London are overcrowded too.

There are far too few open spaces left in the Medway area. We do not want to see any more of our beautiful countryside destroyed. In particular, we do not want any further building to take place in the Capstone area. With Brexit looming, we should be keeping as much land as possible available for agricultural purposes. Once land has been built on, ancient woodland, flora and fauna will be lost for ever. We need places for people to exercise in fresh air.

We have been informed that, due to insufficient rain in November/December last year, there are again likely to be water shortages this summer. A vast influx of people will only exacerbate the situation.

We should be grateful if you would keep us informed of the Council's decisions.


Edward Gilbert


Heather Gilbert

Medway Council Local Plan 2012-2035

Section 3. Delivering Sustainable Development Options

1. Wherever possible, development should take place on brownfield sites.
2. Chatham town centre needs to be revitalised; it is scruffy and run down, and is unsuitable as a centre of enlarged Medway Towns. It should be redeveloped along the lines of Maidstone town centre. It needs to be able to compete with out of town shopping centres.
3. Need to maintain the ease of access of public and private transport to Chatham town centre.
4. Chatham town centre needs to be attractive to large retailers, there should also be more leisure facilities, namely cafes, bars and a theatre/cinema.
5. Need adequate car parking for mothers with small children.

Section 4 Housing

1. There needs to be an adequate supply of affordable houses for sale and for rent. This should include social housing.
2. With the increasing numbers of people over the age of 65 in the area, there needs to be adequate construction of one and two bedroom properties for sale or to rent.
3. There will be a need for extra care homes in the area.
4. Do we need to make provision for homeless hostels, or can social housing serve this need?

Section 5 Employment

1. The Medway Towns have a poor skills base. This needs to be improved to attract employers.
2. Need to release land for industrial use.

Section 7 Environment and the Green Belt

1. I am not pleased with the prospect of developing on green belt land to the west of Strood.
2. Need to preserve the coastal area from Gillingham to Rainham.
3. Need adequate flood defences for low lying areas.
4. Need to protect country parks as open spaces for leisure activities.

Section 8 Built Environment

1. Housing developments need to be sensitive to the needs of the community and create a community, rather than a dormitory.
2. Need to make provision for community centres and religious buildings, churches.
3. We need to retain and create open spaces for leisure activities and where children can play.

Section 9 Health and Communities

1. Medway Hospital is currently inadequate to serve the community and will need to be enlarged or replaced by a new larger hospital.
2. Currently the Medway Towns are short of 23 general practitioners.
3. Need to consider measures to limit air pollution, to reduce the impact on health.

Section 10 Infrastructure

1. Need to consider the location of emergency services, in relation to the proposed developments.
2. Will the proposed levy on the developers be adequate to provide schools and other community buildings?
3. Need to make provision for local shops, village halls, community centres, sports venues, cultural buildings, public houses and places of worship.
4. Also need open spaces, where people can relax and children can play.
5. Need to consider changes to the electricity, gas, water and wastewater infrastructure necessary to support new developments.

Section 11 Sustainable Transport

1. Should consider using the existing goods line to Grain to also carry passengers, with stations at Hoo and Grain. This would reduce the traffic on the A228, which is already experiencing problems at the Four Elms roundabout.
2. The road network, serving the Hoo peninsula is inadequate to serve major developments. A new access road should be considered, with possible construction of a new River Medway crossing.

3. The major roads serving the Medway Towns already experience congestion. This needs to be dealt with before major expansion in the area. The use of the Lower Rainham Road as a bypass for Rainham should be investigated.
4. The possibility of using tramways for passenger traffic should be considered.
5. Need to consider the effect of the new Thames crossing on traffic in the area, particularly Blue Bell Hill, with possible knock on effects in the Medway Towns.
6. Transport and infrastructure need a coordinated plan, with provision of public transport for new developments.
7. Need to route heavy vehicles away from urban areas.

Section 12 Minerals, Waste and Energy

1. Need to consider the impact of electric vehicles on the power network.
2. Need to ensure that the LNG storage has adequate safeguards against terrorist attack.
3. Need to consider the use of waste heat, from power plants, for district heating.
4. Need to protect the aquifer.
5. If there is an expansion of waste industries in the Medway Towns, this needs to be done in a way to minimise the impact on the community from traffic, noise and air and water pollution.

[REDACTED]

From: [REDACTED]
Sent: 07 March 2017 07:21
To: futuremedway
Subject: local plan

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Red Category

Dear sir

I am opposed to proposals to develop on the Capstone valley area, this should be retained as a green area and the plan is out of balance in that way.

Yours sincerely

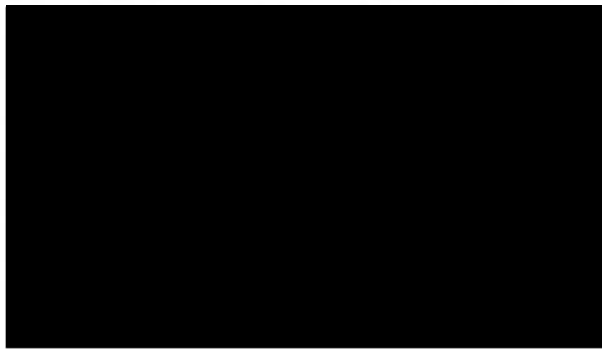
E Kehoe/Kehoe family

Response to Medway Council Plan 2012-2035.

1. The movement of people across the area for work and access to health, education and leisure services must be a prime consideration
2. Flow & density of traffic already a problem, development to the east (Rainham) would ~~exacerbate~~ exacerbate this.
3. A crossing at Fiddisbury would increase traffic problems through Gillingham & Chatham. Better for a Thames crossing to open up that Northern area.
4. Landscape round Capstone vital to preserve these green spaces.
5. If development at Chatham Docks & Medway City Estate is to help the town centres and not just add to the area as a commuter town there has to be a big focus on encouraging companies to set up & develop locally so people can actually work and live here.

6. There needs to be a real range of houses including ones at affordable social rents, long term tenancies to help with housing waiting lists & homelessness. What about an imaginative plan using the new kinds of instant kit housing?
7. Health services already over stretched and very centrally focused at Medway Hospital.
A new hospital needed.

Elizabeth Thehurst.



MEDWAY COUNCIL	
FILE REF	
20 FEB 2017	
TO:	
ACTION:	DELS

Planning Policy

Regeneration Community &
Culture

Medway Council

Gun Wharf

Chatham

ME4 4TR

futuremedway@medway.gov.uk

17 April 2017

Medway Council Local Plan – Development Options 2012-2035

Response from Friends of the North Kent Marshes

Friends of the North Kent Marshes is a voluntary group, formed in 2004 out of the No Airport at Cliffe Campaign Liaison Group, following the successful fight against the proposals for an airport at Cliffe. The North Kent Marshes stretch from Dartford in the west to Whitstable in the east and include the Hoo Peninsula, the River Thames, the River Medway, the Swale and Isle of Sheppey. They are some of the most unspoilt landscapes in Kent and are very rich in wildlife. Our aim is to promote the Marshes and the ways in which everyone can enjoy them. We work both with the local communities that live on and around the Marshes, and with groups such as the RSPB as they develop flagship visitor sites here. The area faces many threats as pressure for land and development in the southeast continues. We welcome the opportunity to respond to the Medway Council Local Plan – Development Options 2012-2035 consultation.

1. The Vision

- We are very pleased that the headline Vision includes for Medway to be noted for its *"stunning natural and historic assets and countryside."*
- We also wholeheartedly support the commitment that *"The distinct towns and villages that make up Medway will be connected through ... green infrastructure links supporting nature and healthy communities."*
- We also offer our support to the statement, *"Medway will be defined by development that respects the character, functions and qualities of the natural and historic environments."*
- But, we have grave concerns about the blanket commitment by the Council to want to develop Lodge Hill SSSI in section 3.39: *"The council supports the development of Lodge Hill as a planned new settlement, delivering a balance of homes, infrastructure, jobs, services and open spaces on a redundant military site on the Hoo Peninsula")*. It appears as the consistent element in *all* four alternative scenarios presented.

This is wholly irreconcilable with the Vision. To seek the destruction of a nationally protected site is totally at odds with the Vision and could be seen as misleading for people taking part in this consultation process. National planning guidance is clear - SSSIs are a last resort for development. We worked with Medway Council to fight the No Airport at Cliffe and No Estuary Airport campaigns on the basis that it would destroy sites of national and international importance. It would actually be an own goal, for if it sets this precedent and weakens the protection afforded to protected sites, we will all have less chance to prevent unsustainable development of other protected places in future. And we all lose something that makes Medway special.

The new Medway Council Local Plan must ensure that there is no adverse effect on designated European and domestic sites of nature conservation. A substantial part of the northern area of the Medway Plan contains the Thames and Medway estuaries that are designated under EU law as Special Protection Areas (SPA). There are other important designated habitats such as Special Areas of Conservation (SAC), Marine Conservation Zones (MCZ), Sites of Special Scientific Interest (SSSI) and National Nature Reserves (NNR) in and around Medway.

There are many natural and cultural heritage sites within Medway both designated and undesignated that are of great importance to local people and any inference that these may not be important or protected is very misleading. Indeed Medway's regeneration cannot take place at the expense of our rich and diverse natural and cultural heritage, it would destroy Medway's greatest assets and our very sense of place.

2. Achieving a sound Local Plan

We believe that the absolute priority must be to create a Local Plan which will be seen as 'sound' and signed off by the Plan Inspector as these kind of processes and consultations are very expensive for local taxpayers.

In order to achieve a sound Local Plan and not repeat the mistakes of the previous unsuccessful Plan, the advice from the previous Local Plan Inspector must be understood and acted upon.

We have grave concerns that the Inspector's advice in her letter to the Council on 21 June 2014, regarding how the Council should apply the National Planning Policy Framework appears not to have been acted upon.

"2.2.3. Read as a whole, 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."

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

7.1. Paragraph 152 of the Framework advises that significant adverse impacts on any of the dimensions of sustainable development should be avoided by, wherever possible, pursuing alternative options."

Development at Lodge Hill would have a significant adverse impact on the SSSI and the Framework's objective of halting the overall decline in biodiversity. For the reasons given above, I am not convinced that there are no reasonable alternatives to the proposed development at Lodge Hill. The Framework only requires mitigation and compensation measures to be considered where adverse impacts are unavoidable. However, in considering the balance to be struck between all the dimensions of sustainable development I am not persuaded that the social and economic benefits that would flow from development on this site would outweigh the harm to a site of national importance for biodiversity."

We think that Plan Inspectors advice is clear: Medway must seek alternatives to development of Lodge Hill SSSI. Sadly we can find nothing in Medway's consultation to suggest that this has been done - in fact in section 3.39: *"The council supports the development of Lodge Hill as a planned new settlement, delivering a balance of homes, infrastructure, jobs, services and open spaces on a redundant military site on the Hoo Peninsula"* and Lodge Hill SSSI appears as the consistent element in all four alternative scenarios presented.

If Lodge Hill is not already pre-determined then where is Scenario 5? The Scenario that doesn't contain Lodge Hill SSSI as a site where *"The council supports the development of Lodge Hill as a planned new settlement, delivering a balance of homes, infrastructure, jobs, services and open spaces on a redundant military site on the Hoo Peninsula"*

We are gravely concerned that this seemingly pre-determined conclusion appears in the consultation.

We understand why Medway Council has been so determined to develop Lodge Hill. It invested time and money in drawing up a development brief in 2009 (although it is not clear why that should have fallen to a Council to do; it is as if the Council is an 'interested party' at Lodge Hill). However, a Council knows better than anyone what can happen in seeking to develop a large and little-known site - all sorts of things can turn up. It could have been any matter of things that would have made development difficult or impossible; it turned out to be nationally important wildlife.

3. The Consultation

There are various aspects of the consultation which give cause for concern.

a) Housing allocation numbers

The third page of the online consultation questionnaire says "By 2035, Medway will need 29,463 homes." This may be correct in the context of a plan from 2012-2035, but this is not made clear. Indeed, the press has been allowed to report the need as '30,000'. We asked Medway Council on 17th January for how many are actually needed between 2017 - 2035, given that some are already built or have planning permission, but have not received a reply. We estimate that it is probably 20,000-22,000. This radically affects the breakdown of how many houses might be allocated to different areas of Medway, and affect the assessment of alternatives to Lodge Hill. We are concerned that this has been hidden because it would prove that there are alternatives to Lodge Hill.

b) Lack of transparency that Lodge Hill is a SSSI

We have grave concern that Lodge Hill's SSSI status, and the implications of it, are not mentioned at all in the Development Options paper (there is one map in an appendix which marks SSSIs but does not indicate where Lodge Hill is). This is a key fact which should have been made available to all consultees but has been excluded from the consultation and has not been made available to the public.

c) Brownfield

We have grave concerns that in the Council's Interim Sustainability Assessment, the Council says that *"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...4.16 The council has considered the inclusion of land designated as a SSSI at Lodge Hill in this context. This is based on the extent of Previously Developed Land on the potential development site."* This perpetuates a myth that the Council has repeated many times before. It is vital, if a Consultation is to be seen as valid, for the facts to be given. The facts are as follows, and should have been set out by the Council:

i) Lodge Hill is not on the Council's brownfield register

ii) the amount of land that could be regarded as Previously Developed Land was estimated by the previous Plan Inspector as towards the lower end of a range estimated as 15%-54%

and iii) even if the site was on the brownfield register (which it isn't), the fact that it is SSSI makes that irrelevant under NPPF.

d) Screening

We have grave concerns about the Plans screening process. The Council's own screening process for determining possible sites for allocation says that SSSIs are excluded. It is therefore extremely concerning that Lodge Hill SSSI was not screened out at this stage.

4. Conclusions

We understand that the human population of Medway is growing, and there is great pressure to find space for housing, especially affordable housing. We also realise that it is very inconvenient that Lodge Hill has proven to be an unsuitable place for development under national planning guidance.

However, all the evidence in the consultation indicates that Medway Council do not appear to have followed the Planning Inspectorate advice on the NPPF and appears determined to allocate Lodge Hill SSSI for development. This potentially sets the Council on a path that puts the Medway Local Plan in jeopardy with the Planning Inspectorate.

We ask that the Council seriously reconsiders its position, and addresses some of the major flaws in its consultation as follows

- a) We ask that the Council create **Scenario 5** - The Scenario that **doesn't** contain Lodge Hill SSSI as a site where *"The council supports the development of Lodge Hill as a planned new settlement, delivering a balance of homes, infrastructure, jobs, services and open spaces on a redundant military site on the Hoo Peninsula"*
- b) We ask that the Council finds a different course of action with regard to Lodge Hill SSSI that preserves the SSSI status and brings different benefits to the people of Medway other than housing. With creative thinking by Medway and the site owner (the government), surely there is a Plan B for Lodge Hill that would add to Medway's reputation, not damage it.
- c) We ask that the Council publicly sets out the actual and accurate housing need for 2017-2035.
- d) We ask that all Medway Councillors are fully and transparently briefed about the NPPF and how it relates to SSSIs, especially the requirement for an 'avoid-mitigate-compensate' hierarchy.
- e) We ask that Medway Council seeks transparent, independent and impartial advice to investigate our view that the draft Plan as it stands, with Lodge Hill SSSI included, is at complete odds with the previous Inspector's advice and is at high risk of being found unsound, to the detriment of the people of Medway.
- f) In view of the fact that there is so little actual detail in the Development Options as they stand, it feels that the public have so far only been consulted on what are very vague and not well defined options; they are not even Preferred Options. We ask that Medway Council should make it very clear, as soon as possible after this consultation closes on 18 April 2017, just what level of public consultation will be offered when the full draft Local Plan is released.
- g) We ask that the Draft Local Plan consultation is a full public consultation, open to all.

We thank you for the opportunity to make our submission, we ask that you please keep us informed about the Local Plan and we trust that our grave concerns for our natural and cultural heritage and our communities will be taken into account.

Kindest regards

Gill Moore Joan Darwell George Crozer

Friends of the North Kent Marshes



From: George Jude Masey
Sent: 28 March 2017 12:04
To: futuremedway
Cc: harris, dave
Subject: Development options Reg. 18 consultation.

Follow Up Flag: Follow up
Flag Status: Completed

To Catherine Smith
Planning Manager – Policy

INTRODUCTION

NPPF Policy.

1.4 1st bullet point :- (LPA's should seek to meet the development needs of THEIR area.) This should be the Councils aim, too many homes built in the past have gone to outsiders, indigenous people should be considered first.

VISION AND STRATEGIC OBJECTIVES.

2.2 Slightly ambiguous statement regarding age of population in Medway. The increasing number of people over 65 years now, will be over 80 in 2035, this should be reflected in required home figures; as many homes will surely become vacant.

2.7 Local people are CONCERNED NOW at the increase of growth in Medway. The Chatham, Rochester and Strood Riverside proposed developments should be the limit for anyone to have a quality of life. Someone please inform the Government enough is enough! (as stated by the former leader of the Council in 2005)

2.8 The people of Frindsbury and Wainscott have received very little benefits from all the growth in this area.

2.9 Do not agree that growth does not mean losing the character of the area. People in F'bury and W'scott used to be able to walk footpaths through orchards. Walk a country Lane. Have lost panoramic views over the river from the top of Windmill St. and country views from a footpath now closed. Loss of hedgerow and many trees. Congested roads. The development strategy of protecting, has fallen short in this area.

2.11 If more and more development is allowed, you will not be able to meet your three key priorities for the area. Should be less housing, more employment. Especially in view of Government funding in the future.

JOINT HEALTH AND WELLBEING STRATEGY

2.14 making it easier and more enjoyable to walk and cycle as part of daily routines. May I suggest the promised pedestrian bridge to connect Stonehorse Lane be included with the other works planned for the by-pass i.e (4 Elms roundabout to Medway Tunnel) As money for this project has been available for some time, the pedestrian bridge could be started now. This would help fulfil bullet point one and four at 2.20 Medway's Cultural Strategy,(and bullet point one Medway recognised for its quality of life 2.39)

2.39 Last bullet point, to ensure that development is supported by the timely provision of good quality effective infrastructure, so that the needs of Medway's growing and changing communities are well served. Don't let this just be meaningless words on paper.

DELIVERING SUSTAINABLE DEVELOPMENT- OPTIONS.

3.10 In view of this paragraph. It is sad to lose the quarry area in Commissioners Road. Whilst housing (but a lower number) is preferable to previous application for employment (wrong site) it would have been welcome to have kept as open space, in view of all the development proposed for the Canal Road area.

SCENARIO 1

3.23 Do not agree to the redevelopment of Medway City Estate. It should be made clear in the Local Plan what is the future for the estate, as it could deter businesses starting up if they thought the future of the site was uncertain. Due to online shopping and the demise of some retail, maybe some development in the Towns would be acceptable, but in view of my statement at 2.7 above, I have no more comments on the different Scenarios. A quality environment can help boost the economy. Businesses are attracted to places that present a good image (2.36.)

GYPSY AND TRAVELLER ACCOMMODATION

4.50 Are the travellers aware of the sites they can use? As they keep using sites that are not authorised!

RURAL ECONOMY

5.23 Pleased to see it stated that farming and forestry are important land uses. And no doubt will become more so as we leave the EU. It is sad to see so many of the local fields with poly tunnels, wonder if they are really necessary!

NATURAL ENVIRONMENT AND GREEN BELT.

7.2 This paragraph is encouraging. I sincerely hope we will keep all our protection areas post EU exit. Long may we keep the Green Belt.

Air Quality

7.22 States that air quality is an important consideration. With the A 228 already a AQMA I hope the Council will have this in mind when they consider future development proposals affecting the A 228 i.e Manor Farm, Lodge Hill, Hoo Peninsula etc. And further west the Temple Waterfront.

SUSTAINABLE TRANSPORT

11.4 I fail to understand why the promised pedestrian bridge to connect Stonehorse Lane has never been put in one of the Local Transport Plan's for funding. It meets 4 of the 5 priorities for key actions in the last Transport Plan.

11.6 I trust the Mayor of London's recently published report reference the London Plan refers to Ebbsfleet when it speaks of enabling housing and other developments beyond London!

11.7 /8 Could the new strategic transport model assess the possibility of a one way system with speed control on local roads in Frindsbury, with the exception of busses which would need two ways. Congestion is bad made worse by on street parking.

TRANSPORT AND THE RIVER MEDWAY.

11.13 Hopefully a River taxi ferry would help relieve some congestion on the roads.

Finally I hope some views will be saved when the Rochester /Strood Riverside development's get built.

Judith Masey (Mrs)

FWCA Mem. Sec.

27th February 2017

Consultation Local Plan 2017

With reference to the Housing Provision in the above Plan the Council makes no provision to obtain a balance of housing needs across all Planning Applications to be considered by the Council, it looks only at encouraging building of family housing starting with 2 Bedroom Homes up to 4/5 Bedroom Homes. It completely overlooks the provision of Bungalows for the elderly despite the fact that we have family homes with one or two residents living in them but unable to downsize because of lack of smaller properties in the area, due to no provision under the Planning System which require Developers to include these types of property within any proposed planning applications.

It is with interest that I saw that Medway Council recently announced the opening of a bungalow development in Centenary Gardens in Gillingham, highlighting that it is important that there is an opportunity to downsize for those who wish to do so. This provision allows for those who live in social housing to do so, but does not provide for those who live in owner occupied homes. In the last twenty to thirty years we have seen the over development of all existing bungalows turning them into family homes and the Planning System ignoring the pressure that is occurring in the market for downsizing. It is also quite unbelievable that the same Council that employs the Planning Department is promoting the importance of building bungalows, we really do need a planning policy under the local plan that helps to stop this overdevelopment of bungalows into family houses,

I note with interest that the consultation document raises this issue under 4.25 which says " Strategic Housing Needs Assessment good quality smaller units to encourage downsizing" but again falls short of recommending a policy to enforce this policy statement. We need a proper lead in this area of planning in order to correct this wholesale destruction of our bungalows in the Medway Area, if not then downsizing objectives we all strive to achieve cannot take place.

Yours G. Chalker
Resident and Parish Councillor Cuxton.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
9th April 2017

Dear Sirs

Medway Local Plan 2012-2035

There is clearly a need to increase the volume of house building within Medway although I appreciate that this is a target imposed by central government for you to work with, however the vision for Medway should not just be on housing and this is an opportunity for the Council to come up with a vision that covers so much more for the future of all its residents

Medway Maritime Hospital

Although the documents refer to working with Medway NHS to plan for the future acute care within Medway and investigate the options for redevelopment of the Medway Maritime Hospital or relocation to a new site, it should be obvious by now that a new site is required for a major hospital covering all the needs of the community. This Plan should have had the resolution of this issue as its number one priority for the care of residents now and into the future with the rest of the plan being built around it. This in addition would enable the current site to be redeveloped for housing

It maybe easier to accommodate the new hospital at Lodge Hill without having the major impact on the environment rather the current Lodge Hill proposal for the housing development and this should be seriously considered before anything else

Environment

I think some people have looked at the map and seen a large open area and believe that this would make it ideal for major developments in particular at Lodge Hill and Hoo. Medway Council should be extremely proud it has several designated SSSI areas in its midst and not looking to destroy them. I can well understand the need not to develop Capstone Farm because it is green space but I think the powers to be need to understand that the area on the Hoo Peninsula is just as if not more important and every effort should be done to ensure it is protected like the Council did when the airport discussions were being undertaken not so many years ago. Once you have developed on this area, you won't get it back and future generations will not thank you for that

Farming Land

Some of the land that has been identified for potential development is graded 1 or 2 farmland and does this not represent a total misuse of this land with regard to sustainability into the future. Is it sensible to use this land for housing when over the years it has been developed to feed the community it supports?

We have award winning farmers/fruit growers in our midst, would it not make more sense to encourage them to expand their business providing employment as well sustaining their current operations and keeping the land being used?

Leisure Facilities

It is good to see in the report that the Council will seek to secure and promote access to sports facilities. I would expect with the number of extra housing properties being provided that there would be a need to increase capacity and would hope that some of the developers money would be spent on improving facilities such as Deangate Ridge, Strood Sports centre etc

It is too easy to look at facilities and say close them down and redevelop for Housing forgetting that the new residents would like leisure activities to be available to them once the novelty of a new house has worn off

With regard to walking, we already attract a large number of visitors who partake in walking on the various trails. Would you expect these same people to come out and walk through a housing estate?

Village Identity

Villages on the Hoo Peninsula each have their own identity, which for many is why they came to villages in the first place and this should be retained. Many people chose not to live in a heavily built up town and it seems like in many cases this is being overridden against our wishes. It seems to be easier for people to become more involved in their communities, perhaps because they are of a smaller size, and take part rather than relying on the Council to make things happen. The Council in reducing the need on its overstretched services should see this as a blessing

The villages have taken considerable development in recent years so it is not a case of we have never contributed to the overall needs of Medway and I accept that the villages will need to play a part in accepting some of this extra housing requirement this time as well. It also has to be remembered though that with the previous developments no additional services came with the increased housing although many promises were made at the time and I would hope lessons have been learnt for any future developments that are proposed and agreed

What I think all the villages do not want is the constant urban sprawl, which has been allowed to happen to Hoo St Werburgh in recent years where its identity is changing too fast as well, as seeing no additional services to the community as a whole

Alternative Suggestions

As I have already alluded to it has to be accepted at present that there is a need and a target to be achieved so it is incumbent on people who object on one hand to offer alternative suggestions.

- **Mountbatten House/Pentagon**

It was mentioned earlier in the year about turning this site into flats/restaurant facilities and would hope this would come to fruition in finally utilising a building which has been empty for most of its life

- **Development of Chatham High Street**

With much of the plan really concluding that Medway would become even more of a commuter town and the residents would need to leave Medway for much of their employment needs it is also abundantly clear that peoples shopping habits have significantly changed over the years which has caused many high streets to go into decline. Whilst I like many others wish to live in a village environment I have to accept that many people also wish to live closer to town centres due to the proximity of many services not always available in the village environment. As a result would it not make sense to redevelop parts of these areas into housing not only providing the necessary housing

numbers but creating a market for the shops that remain. Transport issues in getting to the town centre would not arise and with the proximity to Chatham and the new Rochester Train Station the ability to commute to work would also come into consideration for people wishing to live in a town centre. The small block of flats next to Anchorage House (I know people who live there) love the fact they are close to the shops especially as some of them don't drive. Could this type of scheme not be replicated down the rest of that part of the high street down towards the old Rochester Station? Would this not give this part of the towns a much needed lift whilst providing to both Rochester and Chatham High Street traders potential customers to their services and therefore attract some better shopping outlets for the whole of Medway?

- **Compass Centre, Chatham**

This site again would be close to services in Chatham and road networks and therefore should be considered for redevelopment

- **Mixed Developments**

The plan mentions about the issues relating to air quality in that large potential polluting developments including those that generate a significant amount of vehicle movements (such as out of town industrial, leisure, retail or office developments etc) and yet you have identified the two biggest sites for new enhanced employment land to be at the far end of the Isle of Grain and Kingsnorth, meaning a significant increase in traffic flow on the peninsula with no real improvement in traffic management. Would these two sites be better if classified as a mixed development for both housing and employment needs in order to reduce the need for travelling and therefore reducing air pollution.

This argument could also be used for Strood Industrial Park whereby some of the business capacity could stay whilst developing the remainder for Housing as well as reconsidering the need to develop the airport at Rochester and use this land to develop both business and housing needs for the benefit for the whole of Medway

- **Village Developments**

Perhaps it is time that consultation was undertaken with the various Parish Councils in determining the best way each Parish could accommodate its fair share. In particular in High Halstow, additional bungalow provision as well as accommodation like Willow Grange in Hoo, would free up current family homes whilst enabling the older community to stay within their communities for as long as possible. This surely is better for both the individuals as well as the Council in trying to reduce the pressure on its adult social care budgets. In addition with regard to bungalows, planning permission shouldn't be given to turn these into houses in order to preserve some housing stock which would be better suited for the older generation and to keep them in their communities and enable family homes to become available as the population ages and moves

Conclusion

As you will see I am opposed to the proposed development on the Hoo Peninsula in its current form and trust you will take these views into account and come up with a plan that resolves a number of issues rather than just the housing element

Yours faithfully

Gary Thomas

From: Geoff Taylor [REDACTED]
Sent: 18 February 2017 12:43
To: futuremedway
Subject: Medway Local Council 2012 - 2035 comments

Follow Up Flag: Follow up
Flag Status: Completed

Hi
I am Geoffrey Taylor and Live in Cliffe Woods
My Comments to the Medway Local Plan 2012 -2035 are as follows

1. Enhanced Transport links need to be put in place before Incremental Expansion is considered for Agreed Planning Permission.
I understand this is an investment in the Local Area, but Development Creep is unfair towards the Local community.
Roads need upgrades before Agreed Planning is given Permission. The roads to the Isle of Grain and out towards Cliffe need to be improved
before expansion is approved, it would give good notice to the local communities that changes is on it's way and life would be more tolerable.
2. Brown field Sites need to be re-developed before Green Spaces are loss for ever, Lodge Hill is a Brown Field Site... This must be considered first before open green spaces. there is provision for Road connections towards Motorways and Local road connections (Medway Tunnel) Joined up developments like at Peter's Village and the New Medway Crossing must be utilised first to connect with developments Halling. Transport Links were put in to the action this before development and this has worked well, the local communities get to use the facilities and acceptance is easier.
3. Utilities will need to be upgraded and these need to be put in place before agreed planning is approved
4. The New / Enhanced development on the Isle of Grain is not really a major area of Expansion due to the Lack of good roads to the area and large industrial sites which include a **Control of Major Accident Hazards (COMAH) properties**. Not really a good Idea putting huge amount of people and buildings in these area.

Regards Geoff

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I am writing to oppose the above plan especially with regard to site 837 the farmland West of Church Street, Cliffe.

I am led to believe that it is at Stage 4 and that there is one more SLAA sift/consultation planned. This land should not have even got to this stage.

With regard to the site the land is high grade agricultural land (grade 1) and food security. The NFU have reported that they cannot afford to lose any more agricultural land. Food security in the UK is only 50% self sufficient and the recent bad weather in Southern Europe have highlighted how quickly food shortages can happen.

The government states in their National Planning Policy Framework Guidelines that when allocating land for development the local planning authorities should take into account the quality of the land and that it should be brownfield and areas of poorer quality land in preference to that of higher quality i.e. first brownfield then Grade 3 and below before they start looking at the most productive and versatile land.

The farmer who is current farming the land is very keen to continue farming it and according to the Medway Landscape Assessment March 2011 Cliffe is part of the Cliffe Farmland landscape area and should not therefore be changed for housing.

The Grade 2 land in Cliffe Woods west of Town Road does not have green lights next to it but Cliffe higher Grade 1 land does, which does not make sense.

These are the main points of my opposition, but I list below my views on all other aspects.

- 1) The proposed houses as per the current plan will destroy the village completely. Currently there is still a community where residents know one another and this will be destroyed.
- 2) Parking is already a very large problem. More and more cars are parking in our cul-de-sac. Residents are now not only parking their own cars, but are now also bringing their works vans/lorries adding to the congestion we already face. The entrance to our road has vans/lorries parked on the pavements on the corner of our road and if there was an emergency then an ambulance/fire engine would have no chance of gaining access as we are a cul-de-sac. Residents from other roads that are unable to park in their own roads are now using our parking area. By building more houses this problem will get worse. The B2000 which is already extremely busy especially with the Lorries and Nationwide Platform Vehicles which barely fit the road using it will get even worse. More vehicles, more accidents.
- 3) Currently there are only two small shops in the village and one doctor's surgery. This will not be enough to support the large developments as outlined in the proposed plan. It is not easy to get a doctor's appointment at the moment let alone in the future – we actually don't have our doctor in the village as our own doctor in Shorne agreed to keep us on as they knew places were scarce.. School places are also under pressure. The class sizes have doubled in the last 2 years – the reception class for 2016/17 and Year 1 are now at 32 which is at fully capacity. Reception class in 2015/16 started at 17 children!

- 4) Nowhere in the overall plan is there any mention of a new hospital. I don't think Medway Hospital can cope with any more patients. We are forever hearing on the news that hospitals cannot cope with the number of patients. How about building a new hospital instead of increasing the number of houses.
- 5) The new residents in Cliffe are likely to be mainly from London as the housing will be cheaper and therefore they will have to commute to London to work. Higham station has no more parking spaces available after 7am on a weekday as it is so congested with commuters.
- 6) Local public transport is also an issue as buses are few and far between. You only need one set of traffic lights for road works etc. on the B2000 and this causes congestion in and out of the village. There is no plans for sorting the infrastructure in to and out of the village so increased traffic will mean the roads will become congested to
- 7) With the new propose development noise levels will increase mainly from the increased traffic and the increase in the number of people. Pedestrians will be at risk.
- 8) Also if the proposed new crossing goes ahead at Shorne there will be more pollution in the area along with increased noise levels and more disturbances.

Our ref: ND/HVSC

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

1 March 2017

Dear Sir/Madam

Representations to the Medway Local Plan – Development Options (February 2017)

On behalf of our client, the Trustees of the Hempstead Valley Shopping Centre (hereafter “the Trustees”) we wish to make the following representations to Medway’s Local Plan Development Options.

The aim of the Local Plan is to ensure Medway grows sustainably and in accordance with the NPPF (the “Framework”) these policies must be positively prepared. Following the Issues and Options consultation in 2016 the Development Options consultations is intended to consider how development could be allocated across Medway.

The Trustees remain committed to maintaining and improving the retail and leisure offer within Medway and therefore welcome Medway Council’s (MC) preparation of the Development Options Local Plan and the opportunity to engage further in its preparation. However, the decision on which locations are most suitable for development is critical for the Local Plan and as a major investor in Medway, the Trustees have serious concerns with the approach being taken to predicting and accommodating future retail capacity in Medway over the Plan period.

Given the Trustees’ interest in the Hempstead Valley Shopping Centre (HVSC), these representations focus upon Section 6 of the emerging Local Plan – “Retail and Town Centres”.

Previous objections

Representations have previously been submitted on behalf of the Trustees in response to MC’s consultation on the Draft Core Strategy (2011) and on the emerging Medway Local Plan (2012-2035) Issues and Options. These latest representations build upon the Trustees’ previous submissions, which still stand and can be summarised as the Local Plan’s:

- Failure to provide an up-to-date and robust evidence base in support of the emerging policies; and in light of this;
- Short-sighted approach to the future role of HVSC.

Hempstead Valley and the Trustees

The HVSC reflects the Trustees’ commitment to, and investment in, its success as a sustainable, popular District Centre. The allocated Hempstead Valley District Centre forms a key part of Medway’s retail hierarchy, serves the local and wider population’s needs in terms of shopping provision and provides consumer choice.

The Trustees' investment has been consistent with the 'Town Centre First' principle, which is a corner stone of adopted planning policy at both the national and local level. The Trustees' ongoing commitment to the HVSC is evident in the recent expansion and enhancement of the retail and leisure provision within the District Centre which has contributed to Medway's local economy and the clawing back of trade currently leaking from Medway's administrative boundaries. It has also assisted in securing new retail entrants to Medway.

In this context the Trustees consider it extremely important to ensure that the emerging Local Plan is based upon sound planning principles, a robust evidence base and provides the most appropriate strategy for the area, as required by the Framework. As drafted the Development Options do not meet these criteria.

Representations

Retail hierarchy

The Framework is clear (para 23) that:

"In drawing up Local Plans, local planning authorities should: recognise town centres as the heart of their communities and pursue policies to support their viability and vitality".

Local planning authorities should therefore seek to maximise opportunities to meet identified development needs within existing centres.

The Development Options reiterate Chatham's position at the top of the retail hierarchy (para 6.4) and acknowledge that there is potential for the role of Medway's centres, plural, to evolve (para 6.15). However, HVSC's role is restricted to supporting day-to-day uses (para 6.4) and continuing to perform a local function (para 6.15), despite it being an established and allocated centre within the hierarchy which performs an important role in sustainably meeting the development needs of its catchment. This apparent restriction on the Centre's role and its growth is all the more confused when the emerging Plan acknowledges (para 6.15) that HVSC represents a high value shopping and leisure destination which is the preferred location within Medway of national retailers (para 6.14).

Whilst the Trustees welcome the removal of references to HVSC not performing the same role as the 'traditional' town centres as included in the Issues and Options, the emerging Plan's approach to HVSC is still confused and does not, as we consider below, appear to be based upon a robust evidence base as required by the Framework.

Unlike its predecessor PPS4, the Framework does not provide a definition of the function or role of District Centres so it is extremely important that any policy is sound as the implications for the future of a Centre and its contribution to the wider economy could be far reaching. The emerging Plan still appears to focus retail development in Chatham Town Centre, a strategy which as the Trustees have previously stated (representations to the Core Strategy) is dependent upon such development being commercially realistic and attractive to major new retail investment. To date, despite policy support, Chatham has struggled to deliver such regeneration.

Evidence base

The Framework requires Local Plans to be based upon an up-to-date evidence base that identifies development needs and allocates this need/capacity in full over the Plan period. As a consequence the emerging Medway Local Plan must plan proactively to meet fully the objectively assessed economic development needs of its administrative area and identify the quantitative and qualitative economic needs, including need for retail and other town centre uses.

It is unclear from the emerging Plan or MC's website how this has been assessed or in what document this information is contained. The previous Local Plan was informed by the 2009 Medway Retail Needs assessment prepared by NLP. The emerging Plan makes reference (para 6.1) to the findings of the North Kent Retail Study. No date is given for this document but base upon the Issues and Options document we assume this is the 2015 North Kent Housing and Economic Needs Assessment (SHENA) prepared by GVA.

The Trustees' representations to the Issues and Options consultation raised concerns with the appropriateness of relying on the SHENA as it was incomplete and failed to identify the full development needs of Medway.

We had understood, following pre application discussions with MC in 2016, that a new Retail Assessment had been commissioned and indeed we are aware that proposals by Medway City Estates (St Anthony's Way) in Rochford made specific reference to its findings. However this latest assessment of retail capacity is not in the public domain so it is impossible to objectively assess the assumptions underpinning MC's retail evidence base or its findings.

In the circumstances and based upon the Trustees' previous concerns on this matter, we question the appropriateness of MC considering capacity/need and where this should be accommodated over the Plan period until such time as the up-to-date Study is made publically available and its conclusions properly considered.

Conclusions

Whilst the Trustees welcome the ongoing consultation on Medway's emerging Local Plan they remain concerned at MC's approach to growth and how and where this will be accommodated. The approach appears confused and at odds with the role HVSC is currently performing.

Bearing in mind that this is the second round of consultation on the Local Plan it does not appear to have progressed significantly or addressed the previous shortcomings with its evidence base. Indeed the policy approach to Retail and Town Centres (page 59) is little more than a list of aspirations that the Local Plan should achieve. In the absence of a transparent and robust evidence base the emerging Plan is not sound and limited weight should be afforded the policy approach to Medway's retail hierarchy and how Medway should develop over the Plan period.

The policies and objectives contained within the emerging Medway Local Plan are intended to ensure that MC are able to plan proactively to meet the development needs of Medway over the Plan period in full. Consequently, the accurate identification of those development needs over the plan period is critical if the emerging Medway Local Plan is to successfully manage the future development, ensure the health of its centres and accommodate retail capacity. Therefore, the strength and robustness of the evidence base in identifying the development needs (including retail and leisure), is fundamental in the preparation of the emerging Medway Local Plan.

The Trustees have previously questioned the robustness of the SHEA which underpins many of the policy recommendations within the emerging Local Plan. We had been led to believe that the Council were in the process of commissioning a new Retail Capacity Assessment but this is not referred to in the consultation draft. The lack of a credible evidence base therefore remains a concern and limits the robustness of any policy recommendations.

We trust you will take these further comments into account in your consideration of the application. Please keep us informed on the next stages of decision making.

Yours sincerely



Nick Diment
Director

c.c: Eric Hall – TDH Estates