

**Medway Council
Local Development Framework
Core Strategy
Examination in Public**

**Hearing Statement
on behalf of Taylor Wimpey**

**Wednesday 22 May 2013
Lodge Hill**

May 2013

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Planning · Design · Delivery

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INTRODUCTION

Taylor Wimpey controls significant land immediately to the west of Hoo St Werburgh (between Main Road and Ratcliffe Highway (A228) and at Mill Hill Gillingham (to the east of Yokosuka Way – A289 and to the south of Lower Rainham Road – B2004). These land holdings fall within two of the broad strategic options that Medway Council has assessed through its Sustainability Appraisal (SA), including the SA Addendum, i.e. Hoo St Werburgh (SA Addendum Option 2) and land to the north of Rainham (that includes land at Mill Hill – SA Addendum Option 5).

Taylor Wimpey has not made representations on the Medway Core Strategy to date. This is because of Medway Core Strategy's reliance on Lodge Hill, Chattenden (identified for strategic development in the now revoked South East Plan) to meet a significant proportion of its housing needs in the Core Strategy plan period (4,275 dwellings out of a requirement of 17,930 dwellings, i.e. just under 24% of Medway's total housing requirement).

However, the uncertainty with regards to the delivery of strategic residential development at Lodge Hill and Medway Council's SA Addendum that reassesses potential alternatives which includes significant land owned by Taylor Wimpey has led to Taylor Wimpey seeking to engage in the Core Strategy process albeit at a relatively late stage.

This hearing statement follows an email to the Programme Officer dated 26 April 2013 requesting the opportunity for Taylor Wimpey to submit a statement and participate in the hearing and a response from the Core Strategy Inspector dated 1 May 2013 stating that a written statement in response to the matters and issues for the Lodge Hill session would be accepted.

Taylor Wimpey do not comment on the merits of the proposed Lodge Hill allocation in terms of policy context (matter 1), potential mitigation/compensation matters (matter 2) or the scoring given to the Lodge Hill option in the SA Addendum in relation to previously developed land (option 4).

This statement focuses on matter 3: SA Addendum (specifically 3ai) and seeks to introduce the Taylor Wimpey land holdings in the event that the Lodge Hill allocation is ultimately found to be unsound in whole or in part. In the event that the Core Strategy allocation at Lodge Hill is found to be unsound in whole or in part, or is significantly delayed, the deliverability of alternative options needs to be considered alongside other work, such as the SA, given the clear intention of the Framework to boost significantly housing supply (paragraph 47 refers). Given its control of both sites and status as a national house builder, the delivery credentials of the Taylor Wimpey sites are very strong.

MATTERS AND ISSUES FOR HEARING ON 22 MAY – LODGE HILL

3) SA Addendum

a) Does the SA Addendum provide a robust assessment of alternative options? In particular:

i) Are there other reasonable alternatives that should be evaluated in greater detail bearing in mind the changing circumstances in relation to Lodge Hill? For example, is it right to reject a more dispersed pattern of development without a more detailed evaluation of what that might mean in practice? Should neighbouring authorities be approached under the duty to cooperate in order to avoid development at Lodge Hill if there really is no reasonable alternative within Medway?

In addition to the Council's preferred option (Lodge Hill) the 4 strategic spatial options assessed through the SA process, including the SA Addendum, are Expanded Hoo (Option 2), Capstone Urban Extension (Option 3), East of Rainham (Option 4) and North of Rainham Urban Extension (Option 5).

Given the constraints in Medway and the need for strategic options to be sustainably located it is not considered that there are any other reasonable strategic alternatives in addition to the 4 alternative options for strategic development identified. Clearly these strategic options are in addition to sites identified within the urban area.

Although described, the physical extent of the alternative options or the quantum of residential (and other) development that they could deliver is not readily apparent in the SA Addendum. Therefore, the basis on which they have been assessed is not obvious.

However, it would appear that based on the Initial Sustainability Appraisal (July 2009), at least options 2, 4 and 5 are assessed in terms of a similar quantum of development as Lodge Hill, i.e. 5,000 dwellings.

The alternative options have been assessed in the SA Addendum on an individual basis and it would appear that they have been assessed as straight replacements for the Lodge Hill allocation. However, a reasonable alternative would be to assess development coming forward on a combination of the sites identified as reasonable strategic options, for example a combination of options 2 and 5 that both include land owned by Taylor Wimpey. Such an approach would reduce

the amount of land required to be used in each strategic location allowing the most appropriate (least sensitive) land to be used in each option. This would positively change on the scoring of options against a number of Sustainability Appraisal Objectives as well as providing greater distribution of development (and its impact and benefits) across Medway.

In the event that the Lodge Hill site is ultimately considered to be unsound in whole or in part, or its delivery is significantly delayed, a quantum of development would be established that would need to be found assuming that the proposed housing requirement is retained, which is clearly the intention of Medway Council.

In such a scenario, the 4 other strategic spatial options need to be considered in greater detail, including the specific land that is actually available and deliverable within each broad area. This would then allow the assessment of elements of a number of the strategic spatial options to be assessed in combination as well as individually.

The Duty to Cooperate is a legal requirement in the preparation of Local Plans as well as being integral to the effective test of soundness (paragraph 182 of the Framework). However, it is considered that there are sufficient reasonable alternatives for Medway Council to meet its proposed housing requirement within its own boundaries should development at Lodge Hill need to be avoided in whole or in part. The 4 identified strategic spatial alternatives should be the starting point for Medway Council to meet any element of its housing requirement that cannot be met at Lodge Hill. Therefore, it is not considered necessary for Medway Council to approach neighbouring authorities under the Duty to Cooperate in order to avoid development at Lodge Hill.

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