

From: charlie.chester34 [REDACTED]
Sent: 21 February 2017 12:40
To: futuremedway
Subject: Local Planning 2035

Follow Up Flag: Follow up
Flag Status: Completed

Dear Sir/ Madam,

Having seen the proposed plan I feel that I must protest for the following reasons :-

1 - nobody is allowed to build on a SSSI and if you do it will open the floodgates for developers to build anywhere in the UK, greenbelt, greenfield or SSSI included.

2 - the plan shows a vast expansion of Hoo village. The problem with that is the total lack of infrastructure ie roads, schools, utilities, leisure facilities etc.

3 - the proposed expansion of the whole peninsula will mean the loss of much grade 1 agricultural land which will be lost forever. This is something that we cannot afford to lose not only as a county but as a country.

4 - the plan will also mean that the identity of the villages on the peninsula will be lost as there will be no separation.

5 - the A228 will become a mass of houses from Strood to Grain with everything merging into one.

I cannot think that I am the only inhabitant of the peninsula to express these concerns and therefore expect the Council to listen to these comments and act accordingly.

C.Chester (resident of Chattenden)

Sent from Samsung tablet.

From: Jonathan Sadler
Sent: 05 April 2017 13:31
To: futuremedway
Subject: Draft local plan

Follow Up Flag: Follow up
Flag Status: Completed

Dear Sir/Madam

The Chatham Maritime Trust welcomes the progression of the Medway Plan as a means of ensuring a plan approached to the growth of this conurbation.

I note there are 4 scenarios under consideration each with a different emphasis on where the new development will be focused. The comments below are strategic points applicable across all scenarios.

1. The plan lacks public transport vision to cope with the increase in traffic within the conurbation resulting from the residential and commercial growth. In particular improving connectivity with developments in Medway and its train stations. Chatham Maritime and Medway City Estate are bottle necks at peak times and without upfront investment in infrastructure this will only get worse particularly with the intensification of development proposed in scenarios 1 and 4.
2. We would like to see greater emphasis in the plan to support the development of employment space to encourage the creative industries and the new flexible ways of working that are emerging from London such as WEWork, Makerspace etc.
3. We would like greater emphasis on how the desired quality/good design of new buildings and new public spaces will be achieved.
4. Adequate car parking needs to be provided for all new residential development. In anything other than city centre sites or around train stations, high density development is difficult to achieve. In large part because of the expense of providing undercroft/underground car parking spaces. Therefore the viability of such sites needs to be tested to see if they can support a high density development and the proposed housing numbers.
5. CMT welcomes the approach in the draft local plan supporting the expansion or provision of new/existing educational facilities within the authority area to deliver sustainable development, and to meet identified need. The Trust supports the expansion of the St Mary's Island primary school.

Kind regards

Jonathan Sadler
Interim Chief Executive
Chatham Maritime Trust
The Observatory, Brunel, Chatham Maritime, Kent ME4 4AF

www.cmtrust.co.uk

| Website



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[REDACTED]

From: CHRISTOPHER COOK [REDACTED]
Sent: 05 March 2017 17:13
To: futuremedway
Subject: Response to Medway Local Plan Proposals.

Follow Up Flag: Follow up
Flag Status: Completed

Chris Cook

Dear Sir / Madam

With regards to the Medway Council Local Plan 2012-3035, I would like to make the following comments:-

I realise that the council is obliged to submit a local plan proposal to the government and has provided a number of options to consider.

I agree that we need a comprehensive plan for homes, businesses, etc. and hope that it will especially provide affordable homes for people living in the Medway towns who at the moment are unable to fulfil their dream of owning their own home.

I am in no doubt that everybody who is responding to your proposals will point out that even without the near 30,000 homes and 100,000 additional residents the plan is proposing, the local health service is struggling to cope and the roads are close to capacity. I am more likely to win the lottery than central government of any persuasion providing sufficient funding to resolve these issues by 2035!

There are no proposals that everybody in the Medway towns is going to agree to, but for a number of reasons which I have summarised below it would seem obvious that your Scenario 1 option is the most sensible.

Thinking about the quarter of a million plus residents who already live in Medway who are going to have to live with the final plan, I suggest that the council reduces its proposed number of homes by at least 10% and challenges the government as to why it should be higher.

Although some homes should be built in the peninsular, every home built is going to generate an increase in traffic to and from the town centres, as there few facilities in the peninsula. With all the major supermarkets and most shops being either the other side of the river Medway or the other side of the main Rochester/Strood road, minimising the number of road trips will reduce further congestion.

The plus point of building higher density housing in the town centres is that those living there can walk / cycle or use public transport to and from work, shops, supermarkets and the train stations. This is not really a solution for those outside of these areas, especially the peninsula.

I notice that there are suggestions that housing should be built on Grades 1 and 3 farmland on the peninsula. At a time when government has woken up to the fact that we do not produce enough food, especially for local consumption, no building should be allowed on these areas. Please stand up to land owners and builders who want an easy life and say **NO**.

(I have no idea why the farmland around High Halstow that the plans suggest could be built on is Grade 3 - the farmers have good crops on this land year after year!)

I attended one of your consultations at St Mary's Island and the young lady that I spoke to, who was representing the council, persuaded me that the council is well aware of all the local issues.

Finally, high quality building design does not have to be high cost. Your executive summary sets high standards, you must maintain them. If poor designs are proposed, go elsewhere, there is plenty of choice.

08 MAR 2017

Medway Council Local Plan 2012-35
Consultation

1/3/2017

Dear Sir,

I attended the meeting at Cliffe Memorial Hall on Sat. Feb 18th to discuss the Medway Council Local Plan. I had a particular interest in the proposal to build 159 houses on Site 837 (Revised SLAA Plan Stage 4) at Cliffe - the land west of Church St. On the consultation document online Appendix 5 Page 55 Site 837 had been shown as green for suitability and availability. I was told, to my relief by the Chief Planning Officer that a clerical error had been made and that the site should have been marked red as unsuitable for development. I was relieved to learn this but would still like to summarise my arguments to ensure that this site is not reconsidered in the near future.

This land is the highest grade (Grade 1) agricultural land and, according to the Government's National Planning Policy Framework Guidelines for Agricultural Land (Paragraph 112) "Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land and should seek to use areas of poorer quality in preference to that of the highest quality." Having lived next to these fields for the last 40 years I can testify to its versatility and productivity, often 2 crops per year. Crops range from wheat to market garden vegetables: courgettes, runner beans, peas, spinach and coriander. These are all hand picked so employ a considerable number of seasonal workers.

The National Farmer's Union stated recently "We cannot afford to lose any more good agricultural land, we import 50% of our foodstuffs and need to preserve our food security" especially after Brexit. The tenant farmer is keen to continue farming but if this acreage was removed for development, it would make farming the remainder less viable.

Medway's Land Character Assessment (March 2011) classed this area as 'Part of the Cliffe Farming Landscape Area' and it is between Cliffe Pools/ Pitts and The North Kent Marshes leading to and overlooking both areas which have environmental protection. This valued landscape would have been damaged by the building of 159 houses.

Another relevant point is the high volume of Traffic, including heavy lorries using Salt Lane, along the B2000. This road is already full to capacity and dangerous, particularly on the narrow section between Cliffe and Cliffe Woods where there are already numerous accidents. The effects of 159 households' cars would cause gridlock.

Cliffe Primary School is already full and the village's relative isolation makes it difficult to travel to other schools easily.

Finally most present Cliffe residents have chosen Cliffe because they want to live in a quiet rural village because of its landscape and community spirit and even because of its relative isolation.

For all these reasons I hope that Site 837 has been permanently removed from the consultation document as it is obviously not a suitable choice.

Yours sincerely

Christine Horsfield

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 it is 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) 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. Locally there are very few benefits in growing service provision in, and around, Hoo St Werburgh, as this is not accessible to residents of the parish without travelling into the outskirts of Strood and across the Wainscott Bypass at Four Elms Hill roundabout – despite it being close, geographically to Cliffe Woods.

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 are of very minimal use to Cliffe and Cliffe Woods._____

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. Cliffe and Cliffe Woods residents need to use Strood, Rochester, Chatham and Gravesend so improvements are needed there.

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 of very little benefit to Cliffe and Cliffe Woods. 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 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

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

- ☐ Member of the public
- ☐ Developer/Consultant
- ☒ Councillor/MP/Parish Council CLIFFE AND CLIFFE WOODS 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.

Local plan consultation response

Vision:

Medway is an area of great historic importance and is an attractive place to live because of a) good transport links and lack of traffic jams b) variety of leisure opportunities c) historical background and places of historic interest d) the river and other natural features e) good business opportunities

HOUSING

1) Better options for old people housing and extra care facilities.

Make sure there are opportunities for people to purchase a retirement home that is aspirational and for all levels of need - including extra care but also the fully able who want a high quality residence with minimal maintenance, future proof for accessibility and social facilities.

2) encourage houses big enough for families with generous minimum size rooms - this is not London where land prices are exorbitant. It is an area where people come to bring up their families. Houses should not therefore be cramped and there should not be an excess of flats. Medway's identity is as a family friendly location where people can afford to buy generously sized houses.

3) Adequate parking with generous minimum parking standards. Parking is a major issue and it can blight new developments which are otherwise high quality with arguments between residents. There should, in new builds, be opportunities for a market to be made for extra parking spaces which people can buy and sell separate to the houses. The price of the parking spaces is then set by the level of demand. Some areas where "in fill " development is now encouraged should be earmarked for commercial parking spaces which people in the area can purchase, not extra houses which will merely exacerbate the parking issues. The issue of parking is making people sell up and move house more than any other problem.

4) Future proof by requesting charging facilities to be built into new homes for electric cars, cycle accessibility and solar panels and good insulation standards. Only those areas near railway stations and near the centre of town can have reduced parking standards on the assumptions that the homes will be marketed for people who do not intend to use a car but instead to use public transport or bicycles.

5) Gypsy /traveller sites. The figure of 22 extra pitches seems high but an improvement is needed on the present situation where travellers are causing issues.

EMPLOYMENT

- 1) Fully support development of extra employment land at Rochester airport which will have high GVA jobs.
- 2) AS we have high levels of out commuting, and as there are changes to business rates which can benefit Medway, we should aim to grow the local economy by a strong infrastructure including broadband, transport infrastructure and a good council/business rates regime, which will encourage businesses to set up here.
- 3) As there have been issues with Medway City Estate, it may be beneficial to seek to provide an alternative location for businesses which has better transport links and eliminates some of the other issues with the Estate, and use that location for mixed use and residential.
- 4) We have a "learning quarter". How about a "cultural quarter" which encourages artistic and creative businesses such as artisans with a mixed retail/artisan use - Medway's own version of the "lanes" at Brighton or the cultural quarter at Margate which is such a success.

TOURISM

- 1) Why are there so few touring camping and caravanning sites and what can the local plan say about this?
- 2) There are sports and activities such as cycling in rural areas, birdwatching, fishing and marathon running which can encourage the use of Medway's great countryside. There is already a weekly running event which is well liked.
- 3) The theatre/concert venue offer in Medway is not competitive with other venues such as the Marlowe in Canterbury or the Leas Cliffe Halls in Folkestone, however it is a lot better than nothing. If there is an opportunity for a better venue which would attract visitors from out of area it should be taken - the Marlowe is thought to add millions of pounds of tourist income to Canterbury. ~If not the Central could be improved by purchasing one of the adjacent buildings and enhancing the site.
- 4) A "historic quarter" could be considered to take note and protect and make the best use of our historic areas, particularly Rochester High Street. There should be protection of Rochester High Street from invasion by High Street branded shops which would render it identical to other High Streets and a presumption in favour of independent stores.
- 5) There should be more bed and breakfast type accommodation available if this can be encouraged.

RETAIL AND TOWN CENTRES

- 1) GILLINGHAM town centre is in need of some serious attention. It offers a very poor shopping experience
- 2) the road in between Chatham and Rochester has potential but at the moment is a no-man's land. It has character and it would be a pity if it was replaced by low quality residential. Mixed use for retail/business/residential at preferential business tax rates might regenerate the area.
- 3) I am looking forward to the improvements to the public realm in Chatham. The bus station has already improved things considerably.
- 4) Under section 6.15 there is no mention of Chatham Maritime cinema/shopping centre. This has grown in success and benefits from integration of parking with the retail so that the parking is free, which is an attractive proposition for shoppers.

Natural Environment and Green Belt

- 1) Can we get the riverside walk completed from Rochester through to Chatham Maritime as one continuous walk?
- 2) Can we get protection for the Horsted valley and improvements to it so that the public can enjoy its natural environment? and that its wildlife can be protected from the encroachment of scrub bushes.
- 3) Cycling is very important and via green routes is even better than along the highway.
- 4) Do not infill develop small areas of parkland such as copper fields which are green lungs within the urban environment and vital for the dog walkers in the community and to keep the suburbs in touch with nature.
- 5) Air quality should be improved by encouraging the move to electric vehicles, and petrol in preference over diesel, taking steps to stop lorries coming into the centre of Medway, encouraging stationary vehicles in traffic to switch off their engines, encouraging or insisting that developers install charging points on new homes, encouraging (or more) buses to use less polluting bus engines. All this should be in a comprehensive air quality plan, and there should be co-ordination between transport, planning and all other areas which have an effect on air quality.
- 6) Can we have in the local plan, some specificity on housing densities for different areas?

Infrastructure

- 1) The City Way is likely to get far busier as Rochester Riverside is built out and also the Horsted Park is finished. There are already queues at certain times of the day. There needs to be a look at completely redesigning the Horsted gyrator which is a pinch point for two major routes , one into Chatham, the other into Rochester.
- 2) Cycle routes need to be designed so that they do not narrow the road and cause congestion of traffic, which will lead to further poor air quality. Similarly with bus lanes, these should not be to the detriment of cars and cause traffic jams. Medway, being a hilly area, is less conducive to cycle transport than other areas such as Cambridgeshire, which is flat. That said, a good and well signposted cycle network would be great.
- 3) Cycle parking could include not only racks, but an air pump , which I recently saw at Lea Valley.
- 4) The length of the Rochester /Strood/Chatham high street would lend itself to a magnificent tram route which would add both to tourism and for local use of the high streets. This is the sort of thing the Victorians would have done. Why can't we do it now? They have in Manchester.
- 5) where there is on street parking, the road should be wide enough so that cars do not have to park with two wheels on the pavement.
- 6) consideration should be given for whole areas of parking to require parking permits just for commercial vans and vehicles (at a cost) this would discourage people from bringing works vans home with them and taking up two parking spaces.

27th February 2017.

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

02 MAR 2017

MEDWAY COUNCIL
FILE REF
02 MAR 2017
TO:
ACTION:

Dear Sir/Madam,

MAKE YOUR VOICE HEARD

Together with other Councillors from Hoo, I attended the meeting at Gun Wharf on 17th January 2017 and the Exhibition at The Village Hall, Pottery Road and I am struggling with the above phrase as it was quite clear from both venues that the residents of Hoo will have nothing to do with the planning of expanding the Village into a 'SMALL RURAL TOWN'. Landowners around Hoo have already offered available land for building which is forming the base of this expansion but with Brexit on the horizon, this land might be urgently needed for feeding the nation in the future but it will be gone forever, as is the case with sport fields, SSI'S, beauty spots, woodland & habitat for animals and birds e.g. nightingales – all gone for EVER.

So you have the land for building houses but what else! There is only one way in and out of the Peninsula and the approaches from London, Chatham, Rochester, Strood and the tunnel are gridlocked during rush hours often forming before 3pm in the afternoon. At the meeting at Gun Wharf on the 17th January 2017, Phil Filmer in charge of Roads etc. did say that 'Although the money was in place for alterations to the road system in the area including Four Elms Roundabout, work would not proceed for 18 months and then improvements are only to deal with the present situation' This does not take into account 1000 houses already in the pipeline! Also there is no sign of any extra amenities to meet the present need for all our services, namely surgeries already closed to extra patients, schools full to capacity so many children have to travel miles to other schools, often with siblings at different schools making getting to school a problem, not to mention parking which officially is non-existent at most schools so chaos reigns morning and afternoons. The list goes on and on – Hospitals cannot cope (in special measures), ambulances not turning up, people either having to wait in ambulances so stopping them answering calls, or waiting on trolleys for hours waiting for attention, or in A & E – 4 hours wait is a far distant memory for many people, whatever the problem. Also sewage, electric, water, shops, wardens, police and all public services are used to capacity and stretched to the limit.

In Scenario 3 (A rural focus) of the Medway Local Plan - In the event of expansion re: Hoo St. Werburgh 'Development of this scale in the rural area would inevitably change the character of Hoo and have an impact on the environment and countryside character bordering the villages. Care would be needed to ensure development is planned in a way to respect key landscape features, respect and enhance the rural setting, and retain separation between urban and rural Medway. Provision of improved green infrastructure links for people and wildlife would be critical' This sounds great but as most of the surrounding countryside is 'highlighted' for houses, how will this work and when will the plans be revealed.

Also in Scenario 3, it is stated that 'This scenario considers the potential of Hoo St Werberg as a focus for growth, expanding the existing large village into a small rural town, This would include developments around neighbouring areas as Chattenden, Deangate and Lodge Hill, and the provision of services and infrastructure to support the expanded town and its rural surrounds (What rural surrounds?!) Other villages with the facilities to support an increased population would also be expanded'.

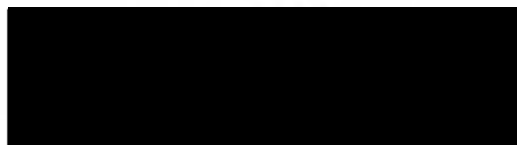
Does this include using the existing railway line and The Halt in Hoo already there, also what about a 'river bus' and using the river more for passengers and freight to reduce the heavy lorry traffic on our roads. What say have the residents in these plans and when will we be able to see these big changes and when will these be done in relation to the building of all these houses – before or afterwards? We haven't seen ANY improvements to the infrastructure and public services with the substantial increase in house building over the last years.

Living in these areas has become a nightmare for residents unable to get an appointment at the Doctors, having buses cancelled or overcrowded when trying to get to local shops etc., going to Hospital, paying unlimited parking and spending hours there only to get stuck in endless traffic jams to get home, the same with a simple shopping trip, not to mention the school trips morning and afternoon with the parking chaos.

Lodge Hill is another story –I do not understand why the number of houses has been reduced to 3000 for the 'Appeal' in 2018 as surely if a small community with all the amenities, services and hopefully extra road infrastructure is included, why not have as many houses off the Government remit in the one area as possible – if it does get the go-ahead which is expected.

The only other comment I have is if this is the Medway Local Plan why such a large part of expansion has been concentrated on our village of Hoo St.Werburgh and evidently as scaled models have already been made, this seems to be a 'Done Deal' so excuse my scepticism at the phrase:

MAKE YOUR VOICE HEARD



Councillor Pamela Pratt – Hoo Parish Council

[REDACTED]

From: Roy Freshwater [REDACTED]
Sent: 16 February 2017 11:34
To: futuremedway
Subject: Fw: local plan - Who is saying Hoo Village should be turned into a Town against the wishes of residents !!!!

Follow Up Flag: Follow up
Flag Status: Completed

I Do you want Hoo Village to be turned into a Town because Medway Council says so? All the roads on the Hoo Peninsula are dangerous - the roads cannot cope with any you want more cars and lorries going through Hoo Village until congestion looks like Strood Town?

Medway Council total of 29,495 new homes should be put on hold until 7,000 already Council approved homes but unbuilt homes are built first -it will take 15 years at the current build rate! That skill shortage and Paramount draw of skills will likely mean that these 7,000 will not be built in the next 5 years!!

We say 'NO' to Hoo Peninsula precious green fields around our villages being built on just because housing developers make more money building on our green fields. They also break promises and do not pay the Council any fair contribution for new services, infrastructure, local housing for local people or new roads or sewer systems. Local people get nothing from developers - let us see improvements first, new affordable housing to rent or buy first, homes for essential and key workers such as nurses first.

We do not trust housing developers who make massive promises getting planning approval but once building starts, give practically nothing back to improve village lifestyles and local communities and will just walk away with £1.3 billion profit after making Hoo into one massive building site with Medway Council getting £55 million extra Council Tax per year.

Medway Council cannot approve any more homes on the Hoo Peninsula until they can guarantee we have GP's in our empty GP surgeries. **WE** have vacant doctors surgeries and not enough doctors with waiting lists, no hospital beds, no major transport schemes and urgently needed new road, totally inadequate public transport, no traffic wardens to protect our children and elderly because of massive illegal parking despite 3 car parks, no promises to replace football and cricket pitches or leisure and parkland, no shops and no additional parking.

We will not be voting for Conservative run Medway Council to destroy our village lifestyle. We will not stand back and say nothing about inappropriate plans for Hoo Village and surrounding small villages of High Halstow, Lower Stoke, Allhallows, Grain, Cliffe and Cliffe Woods and plans for commercial use of land which generate massive more impacts on our lives and already overcrowded roads.

Local residents will are in this fight together through local elections to put the reigns of power into the hands of UKIP who will stop building companies railroading their plans

through the Council without regard local communities needs and destroying our village lifestyles - just lots of hot air promises such as 'balanced and sustainable strategy' and 'new housing would boost the catchment of services and facilities' is not good enough.

Roy Freshwater I

[REDACTED]

From: Carol Donaldson [REDACTED]
Sent: 23 January 2017 16:20
To: futuremedway
Subject: local plan consultation

Follow Up Flag: Follow up
Flag Status: Completed

Dear Medway Council,

I wish to comment on the proposed local plan and urge the council to protect our natural heritage by giving a clear message that there will be no development on greenfield sites, brownfield sites which support wildlife and in particular the SSSI at Lodge Hill.

Medway Council has the opportunity to go down in history as the local authority that gave a clear signal to the rest of the country that development on protected areas will never be allowed. If development at Lodge Hill goes ahead it will green light the destruction of protected areas across the country. Is this really the legacy that Medway wants? For the word Medway to forever be synonymous with destruction of the countryside? It will give a lasting negative impression of the whole area which will taint us all for a long time.

Medway Council should support Option 1 in the local plan which will put homes and business back in towns not allow piecemeal destruction of our countryside.

Medway is a beautiful place, the Hoo Peninsula is a sanctuary to escape the pressures of modern living. Please create a local plan which safe guards the things which make us special and of which we can be proud

Carol J Donaldson
Environmental Consultant
[REDACTED]



Ms C Smith
Planning Policy
Regeneration, Community and Culture
Medway Council
Gun Wharf
Dock Road
Chatham
ME4 4TR

26 May 2017

Dear Ms Smith

Medway Council Local Plan: Development Options 2012 - 2035

Thank you for consulting CPRE Kent on the above document. Please find our comments on the consultation document, the Sustainability Appraisal and the Habitat Regulations Assessment.

We hope that you will give serious consideration to our representations, and we would be glad to meet and discuss with you our concerns and suggestions should you find this helpful.

Yours sincerely,

Jillian Barr

The Kent Branch of the Campaign to Protect Rural England exists to promote the beauty, tranquillity and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country.

CPRE Kent, Queen's Head House, Ashford Road, Charing, Kent, TN27 0AD Fax: 01233 714549 Email: info@cprekent.org.uk

Phone: 01233 714540 www.cprekent.org.uk

Medway Local Plan 2012 – 2035 Development Options (Regulation 18 Consultation Report)

Paragraph 2.7 identifies the key concerns of local people about growth at Medway. It is essential that an effective and deliverable Local Plan is prepared that is capable of directing and managing this growth. To this end, it is essential that individual sites are viable and deliverable, but it is also important to ensure that the cumulative impact of sites across the planning area on infrastructure capacity and the environment is understood and planned for.

Developing a vision for 2035

A strong and ambitious vision is necessary to deliver growth, protect the environment, but also to deliver improvements to the environment and community health.

Paragraph 2: The first sentence needs to be clearer. ‘*Secured*’ should be replaced with ‘*protected and enhanced*’. Delete the second half of the sentence, since this seems to suggest that conservation relies on development. The use of the word ‘*intrinsic*’ is unclear.

Paragraph 4: Planned growth should also deliver ‘*access to nature*’ as well as education, health and community services. Green Infrastructure and recognition of the wider benefits of ecosystem services is an important NPPF theme. Growth should not ignore these important aspects, essential to healthy communities.

Paragraph 8: Should refer to ‘*adapted*’ to climate change, as well as ‘*address and mitigate*’. References to enhancing the understanding of landscape scale biodiversity conservation, the contribution of agricultural land to local sustainability, and an understanding of the value of ecological services to well-being, resilience and livelihoods would be welcomed. These are essential to Medway’s future and while paragraph 2.36 recognises the importance of a quality environment, real enhancements are necessary. It is not just a challenge of perception.

Strategic Objectives

A riverside city connected to its natural surroundings.

This section should refer to ecosystem services. As well as ‘protecting’ ecosystems and other aspects of the natural environment from development, we should invest in improving ecosystems for successful development and healthy communities.

Bullet Point 2: *Adaptation* to climate change must be a priority (as well as mitigation) since some significant climate change is already inevitable.

Bullet point 3: This section should refer to the importance of agricultural land, and the conservation of soil, for local sustainability.

Medway recognised for its Quality of Life

This section should refer to the importance of meeting air quality objectives. The links between access to nature, space, dark skies and tranquillity and the health of communities should be also be recognised.

CPRE strongly supports Bullet Point 3. Securing a range of accessible services and facilities for local communities is essential for sustainable and healthy local communities. However, there is a strong relationship between this, and the scale of opportunities that can be identified for new homes. The first half of sentence should explain what is meant by 'role' and clarify the relationship between: the services and facilities available to a community; the extent to which the community can be considered sustainable; and scale of appropriate development.

Delivering Sustainable Development Options.

Scenario 1: Maximising the potential of urban regeneration.

Paragraph 3.18 refers to the SHLAA, which includes: land allocated in the 2003 Local Plan, sites included in development briefs and masterplans, and areas put forward by landowners in response to a 'call for sites'. CPRE believes that the Council should demonstrate it has gone further than this to identify appropriate sites in sustainable locations. A proactive assessment of urban sites should be undertaken to identify underused sites or vacant sites that might contribute to regeneration and meeting the housing need. Some of these sites may be publically owned or they might require effort on the part of the council to assemble land and facilitate development. Sites may be small in size, but small sites are an important element of supply, make an important contribution to meeting development needs, and can be particularly valuable in the early years of the plan. Housing estate redevelopment is also emerging as a sensible option to deliver regeneration and optimise development density. This approach is supported in the Housing White Paper 2017.

Further work is needed to demonstrate that the Council has proactively sought brownfield sites.

It is noted that a modern employment park would be developed around an extended Kingsnorth on the Hoo Peninsula. Although this proposal will make housing land available, might improve the appearance and quality of sites at Medway City Estate and Chatham Docks, and would provide leisure and shopping facilities, it remains that a detailed assessment of the travel implications (and thereby sustainability implications) of this proposal needs to be carefully assessed. Clearly a close relationship between homes and employment is normally preferable, and to mitigate this weakness, a fast and regular bus service would need to be investigated. CPRE is concerned this will not amount to a sustainable option.

It is suggested that as well as leisure and retail, the Council should investigate the potential for incorporating office floor space in the development mix.

Although apartment living in the Medway area may be considered a drawback, it is evident that the availability of land in this locality is particularly constrained. Large areas are already considered urban and undeveloped urban edge sites and parks are likely to be highly valued given their scarcity. Family houses with gardens are development priorities in most local planning authority areas in Kent. This will be harder to achieve in Medway, and urban apartment living, together with excellent access to services and facilities, will need to make a notable contribution to the housing supply in the Medway Council area.

In terms of the Habitats Directive requirements, it is also worthy of note that it is not only homes that need to mitigate their impact on the SPA. Further investigation would be needed to determine the mitigation necessary to avoid impacts on the integrity of the SPA from employment and tourism/leisure development on the peninsula.

Scenario 2: Suburban expansion

Most local planning authorities identify urban edge sites at principal towns and other well served settlements to meet housing needs. These sites are often considered the most sustainable alternative to urban sites, given accessibility to public transport, employment and other services and facilities. They are normally less remote than sites in the open countryside.

Given the extent of urban development at Medway and the scarcity of countryside that remains close to the urban area (easily accessible to the urban population), the option of suburban expansion should be approached with caution and on a site by site basis.

Sites indicated as potential development sites at the eastern boundary in this scenario occupy some of the last areas of undeveloped land in the borough south of the Medway. Subject, of course, to layout and design, it is likely that the loss of land in these locations will be considered unfortunate, reducing the accessibility of local people to space and the opportunity walk beyond the urban edge. This is a particular problem to the north west of Rainham, where remaining countryside will be almost entirely eroded. It is also clearly a concern that development at this location would have a direct impact on the SPA (during both construction and operation).

The countryside around Capstone represents another locally valued landscape, and includes the Capstone Valley Country Park. Together, land in this locality preforms the function of a 'green lung' stretching right from the M2 to almost the A2. It is a really attractive valley landscape, which is enjoyed by both local people and visitors. It is important that communities in urban areas have access to tranquillity and open landscapes, and this serves as a valued resource for the Medway community. The landform does mean that it is possible to enjoy as sense of remoteness within the valley, away from the urban edge.

The Housing White Paper and recent ministerial statements give some additional advice on when it is appropriate to release land in the Green Belt. The requirement to demonstrate exceptional circumstances does, however, remain and this included the need to demonstrate that all reasonable options have been explored.

It is evident that the potential to release sites at the urban edge in the Medway area is not straight forward. It is not possible to agree that this is the most sustainable option, without a site by site assessment of available land, which should consider the extent to which sites are enjoyed by local people, the value attached to landscape and access to countryside, the intrinsic value of a rare resource and the impact on the SPA.

On the mapping (Appendix 1c), the green hatch makes it difficult to understand the urban edge close to the potential urban edge sites, by washing into the urban area. It could be considered misrepresentative of the extent of remaining countryside at the urban edge.

Scenario 3: Hoo Peninsula Focus

A Hoo Peninsula focus for a future development strategy is unlikely to amount to a sustainable strategy because of a range of challenging constraints. The lack of rail services and a very constrained highway network that already suffers from congestion and poor resilience, means that transport infrastructure will be a key issue. The Council has not demonstrated how it proposes to overcome this critical issue and ensure a shift to sustainable transport modes. A transport model will be essential to demonstrate that local plan and infrastructure proposals ensure highway capacity on both the local and strategic highway network. CPRE is pleased to see that this work has been commissioned. Any development likely to contribute traffic on the A2, in particular, must also consider the extent to which it will delay the achievement of air quality targets.

Furthermore, CPRE is concerned that a large proportion of land on the Hoo Peninsula is Best and Most Versatile agricultural land. This should be investigated in detail so that agricultural land quality information is available for decision making purposes. Existing data is not accurate at the site level. While there is land of lower grades on the peninsula, much of this is designated for its habitat interest. Given the national and international importance of habitats on the peninsula and the value of agricultural land it is essential that this division is clearly understood. It is essential that the agricultural land quality and habitat type of proposal sites is defined by site survey. Clearly the outcome of the 'Lodge Hill' planning inquiry is critical. The Council's Landscape Character Assessment should assist when determining the suitability of this option. Much of the landscape is very visible or locally valued.

In terms of the Lodge Hill Development, CPRE recognises that designation of Chattenden Woods and Lodge Hill as a SSSI recognises the national importance of this mosaic of habitats. The Council indicates that its future will be determined by the outcome of a planning inquiry scheduled for 2018. Given this uncertainty CPRE agrees that it shouldn't be phased early in the period of the plan.

Finally, it is the view of CPRE Kent that an increase of housing development of this quantum would require further review of the SAMMS to ensure that management and mitigation measures necessary to conclude 'no likely significant effect' are identified to the satisfaction of Natural England and other competent authorities. The original SAMMS did not specify the numbers of houses anticipated in the Medway area. Although the success of the SAMMS is not very sensitive to detailed housing numbers, there must be a point at which recreation management is insufficient, or proximity to protected sites has a direct impact. It is therefore important to continue discussing the SAMMS and monitoring outputs with the North Kent Environmental Planning Group to ensure it remains adequate. To wait for deterioration to occur would not constitute adequate protection for the purposes of the Habitats Directive, and would risk delivery of housing elsewhere in the North Kent. Monitoring, as required by the SAMM should be available in the evidence base to the local plan.

Scenario 4: Urban Regeneration and a Rural Town

It is inevitable, given the difficult choices to be made in the Medway area, the final suite of sites will be a combination of the options consulted on. It is important that sites, however, are selected according to a sustainable development strategy. Allocation of sites to meet the development strategy is normally guided by a settlement hierarchy, which establishes the sustainability of settlements, with site choice guided by

SHLAA assessments, sustainability appraisal and other consultations with statutory consultees, parishes, forum and other local community /interest groups.

CPRE would like to emphasise the importance of a proactive assessment of urban sites to identify underused sites or vacant sites that might contribute to regeneration and meeting the housing need. Some of these sites may be publically owned or they might require effort on the part of the council to assemble land and facilitate development.

Section 4: Housing

Housing Need

CPRE has previously commented on the SHMA 2015 (letter dated 24th March 2016). This comment concluded that it is important to remember that Objectively Assessed Need should not be used as a proxy for a target, which can only be determined following a proper consideration of environmental and infrastructure constraints, including consideration of the cumulative impact of development. Clearly these constraints are significant in the Medway area and consideration of the proposed SHLAA sites, together with the cumulative impacts of development may result in a conclusion that resultant housing targets need to be constrained.

Referring to the 'policy approach: housing delivery', CPRE notes the reference to phasing allocations to ensure a supply over the plan period. This point is critical and CPRE asks that the council does not seek to rely wholly on very large strategic sites. Smaller sites, including urban sites, are crucial to delivering a 5 year supply in the early years of the plan.

Housing Mix

The NPPF recommends that local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community. They should also identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand. CPRE supports the provision of an appropriate housing mix, type, size, tenure and range, but urges the council to think proactively about the extent to which housing needs can be met at higher densities should construction and planning excellence and quality lifestyle be given particular attention.

Affordable housing

In terms of affordable housing, it is agreed that the % requirement for affordable housing delivery does need to respond to viability testing of the plan. A variable affordable housing requirement may be appropriate if viability is different in different parts of the planning area. It seems unfortunate that the Council is not consulting explicitly on the evidence of initial assessment (i.e. 25%), since the views of landowners would have assisted in drafting the publication version of the plan. As well as the affordable housing requirement, the policy should emphasise the importance of meeting local demand in terms of the size, type and tenure of housing, and establish policy criteria for exception sites at rural centres to meet local needs.

Section 5: Employment

It is noted that a modern employment park would be developed around an extended Kingsnorth on the Hoo Peninsula. Although this proposal will make housing land available, might improve the appearance and quality of sites at Medway City Estate and Chatham Docks, and would provide leisure and shopping facilities, it remains that a detailed assessment of the travel implications (and thereby sustainability implications) of this proposal needs to be carefully assessed. Clearly a close relationship between homes and employment is normally preferable, and to mitigate this weakness, a fast and regular bus service would need to be investigated. CPRE is concerned this will not amount to a sustainable option.

An up-to-date regeneration strategy does not appear to have been published yet. CPRE would, of course, support proposals which seek to intensify and enhance the employment offer of existing employment sites in sustainable locations, but a detailed strategy is required to ensure an alignment between site location and the demands of business, supported by suitable employment formats and public realm. The Council should complete its regeneration strategy before finalising decisions on the location of new employment sites, and consolidation or format changes of existing sites.

The Impact of employment development on the SPA is an important issue that needs to be resolved in advance of submission and the Council should consider whether development (including employment sites such as Kingsnorth) can mitigate their impact on the SPA, so that adverse effects on the significance of designated interest features are avoided. This is cumulative assessment.

Rural economy

In terms of rural economy, CPRE is pleased that the Council has recognised the importance of farming and forestry uses in the area. It is important to understand this issue in detail. Swale Borough Council prepared a study titled '*value of best and most versatile agricultural land in Swale*' and a similar piece of work would be helpful in this area too. This information, together with a detailed understanding of the agricultural land quality of proposed development sites is important information for deciding on a development strategy and select a suite of development sites.

The policy approach refers to directing development to lesser quality (missing word) agricultural land, where 'feasible'. Use of the word 'feasible' word is not helpful to decision making in the planning context and the policy should instead refer to sustainable locations and / or 'where it satisfies the agreed development strategy'.

Similarly, in terms of tourism and leisure activities, these should also be directed to sustainable locations.

Section 7: Natural Environment and Green Belt

Policy Approach: Strategic Access Management and Monitoring.

CPRE Kent supports the inclusion of a policy setting out the tariff contribution expectation for new development within 6 km of the designated sites. The policy should make clear that large developments

and employment / tourism developments may also be required to make a contribution to access management measures. The amount of housing development anticipated within 6km of the North Kent Marshes is considerably greater than was anticipated when the strategy was produced in 2014 and the North Kent Environment Group should reflect on whether the proposed access strategy will continue to suffice as mitigation in the long term. Medway council should also be able to produce evidence of monitoring since the strategy was agreed. The policy, or the supporting text, should welcome on-site recreational space, but be clear that this would not replace defined tariff contributions.

Kent Downs Area of Outstanding Natural Beauty

In terms of the North Downs woodlands, air quality is a significant factor affecting their integrity in some locations. Assessment of air quality should be a cumulative assessment taking into account development in neighbouring districts. The importance of cumulative assessment was highlighted in a recent high court case: *Wealden District Council v Secretary of State for Communities and Local Government & Ors*. Case Number: CO/3943/2016. There are relevant sites in and close to the Medway area.

Medway's Green Infrastructure network

CPRE Kent is pleased to see that the Council recognises the multi-functional benefits of the GI network and supports references to the 'landscape scale' habitat conservation and environmental resilience. At paragraph 7.11 it would be preferable if the reference to 'landscape services' was replaced with 'ecosystem services' which has an aesthetic and recreation element. It is important, however, that the plan focuses more on the biodiversity conservation value of the GI network and should refer to habitat connectivity, movement of species and climate change resilience, and biodiversity opportunity areas. A separate policy would be appropriate.

Policy Approach: Securing strong Green Infrastructure

The proposed policy approach reflects the necessary recognition of a hierarchy of designations. The wording does, however, need to reflect the relevant legislation, and 'highest', 'high level' and 'consider' will not suffice to distinguish the different levels of protection. Similarly the references to the Kent Downs AONB fail to emphasise the statutory duty of regard, and the emphasis on 'great weight' in the NPPF.

The policy tries to incorporate numerous subject areas in the 'policy approach' box, including green infrastructure, wildlife designations, landscape designations, undesignated landscapes, local green spaces, and the Public Rights of Way Network as a single policy area. CPRE encourages the council to consider separating them into separate policies to avoid too much confusion. As above, the policy should refer to ecological networks and Biodiversity Opportunity Areas.

The policy should demonstrate an understanding of the biodiversity duty and ensure that development and development decisions take account of biodiversity and secure enhancements.

In terms of Local Green Spaces, CPRE encourages the Council to undertake a separate consultation on this issue. Local communities do not know about the designation nor understand its value, and Councils are

frequently beginning examinations with few or no proposals. Swale Borough Council was instructed to carry out a 'call' for local green space proposals at a very late stage in the local plan preparation process.

Landscape

CPRE is pleased to see the Council is updating the Landscape Character Assessment. The council is encouraged, however, to continue with designation of development gaps and areas of local landscape importance. These have been supported by Inspectors at numerous local plan examinations, including at Swale and Canterbury, since they are an expression of the value of landscapes to local people. A landscape character policy is important too and this can guide decision making on both designated and undesignated landscapes. CPRE hopes that the Council includes landscape scale biodiversity mapping and opportunities for biodiversity network enhancements in the landscape character assessment. A landscape scale approach to biodiversity conservation can be used to identify areas which provide the greatest opportunities for habitat creation. The Landscape Character Assessment should be adopted as SPD.

Green Belt

CPRE notes the intention to carry out a review of the Green Belt to assess if land meets the purposes established in national policy. The Council is urged to consult on the outcomes of the review prior to publishing a final Local Plan. It is very important that the views of local people contribute to the Regulation 19 version of the Local Plan, particularly if any revisions to the Green Belt boundary are proposed.

As discussed earlier in this representation, the Housing White Paper and recent ministerial statements give some additional advice on when it is appropriate to release land in the Green Belt. The requirement to demonstrate exceptional circumstances does, however, remain and this includes the need to demonstrate that all reasonable options have been explored.

Flood Risk

CPRE supports a policy on flood risk and agrees that it should take account of climate change forecasts as they relate to extent and frequency of flooding. Appropriate sustainable urban drainage methods should be incorporated in new development, and this should contribute to open space and biodiversity enhancements.

Air quality

CPRE supports the proactive policy approach to air quality. The policy should refer to the need to meet pollutant limit values within the AQMAS in the shortest possible time. The plan should refer to cumulative assessments of air quality.

Transport modelling (underway) and air quality modelling will be necessary to assist the council to determine whether local plan allocations are deliverable.

Section 8: Built Environment

Policy Approach: Design

Fundamental considerations of development proposals, set out in the proposed 'design' policy approach should also include the following:

1. Development should respond positively to designated and undesignated landscape character.
2. Development should respond to the cultural and historic qualities of its location and historic assets and landscapes should be protected, enhanced and revealed as appropriate.
3. Development should be proactively designed to reduce carbon emissions. This should include passive design principles incorporated at the earliest design stages, to use site layout and orientation which makes use of local climate and site conditions.
4. Reference to SuDS as part of landscaping schemes that provide biodiversity and place-making benefits as well as surface water management.

Policy Approach: Housing design

Kent has been declared an area of severe water stress by the Environment Agency. As such, CPRE supports the Council's proposal to adopt the lower 'optional' requirement of 110l/p/day for new residential development. CPRE remains, however, concerned about the environmental costs of increased water stress, due to climate change and increasing extraction. The anticipated housing numbers in the Southern Water (and South East Water and Thames Water in part) planning area are unlikely to accurately reflect the projected housing growth in local authority areas and this should be continually reviewed. Water stress concerns should be capable of triggering a review of the local plan.

The local plan should not solely rely on energy efficiency Building Control targets and should proactively encourage housing design (including orientation and site and room layout) to improve energy efficiency.

Policy Approach: Housing Density

CPRE broadly supports the housing density policy. Given the pressure for housing land in the Medway area, development density will be an important theme. A site by site assessment to respond to existing densities is important, but a clear policy approach should be provided in the plan to provide guidance. Development densities have been falling in numerous local authority areas as a result of more generous layouts to meet demands for larger (and often executive) family homes. The council should encourage high quality developments at higher densities (subject to setting and character constraints), since the availability of sustainable sites in the Medway area is very limited.

Policy approach: Heritage

The final policy on Heritage should ensure the 'special regard' for listed buildings and their setting is clearly reflected in the policy. The approach suggested does not yet reflect the importance of protection, conservation, enhancement, revealing and management of heritage assets. The policy and supporting text

should go much further than suggested, to ensure a presumption in favour of conservation, clarify the importance of 'setting' and describe the value of local distinctiveness and character.

CPRE would support the preparation of the heritage strategy for the area and notes that Dover District Council has prepared an excellent example.

Section 10: Infrastructure

It is essential that development decisions in the borough can be led by deliberate strategy that makes use of a detailed evidence base on infrastructure capacity and viability constraints. In particular, transport modelling is required to give a broad network picture and to also test transport interventions (in the form of committed improvements) and a package of the highway changes, and public transport improvements that will (at least in part) need to be funded by development.

The plan making process has a clear role to play in comprehensively considering development needs alongside implications for necessary supporting infrastructure – including health, education, green infrastructure, transport infrastructure and others. Clearly, this information is essential as part of determining whether this plan is deliverable in the long term and the Council should carry out a 'whole' plan viability assessment to ensure the chosen strategy and subsequently the detailed plan, are deliverable.

Section 11: Transport

CPRE is pleased to see that the Council has commissioned a new strategic transport model which can be used to test the impact of proposed development sites on highway capacity and reliability. In particular, this will allow the council assess the impact on areas with existing capacity issues, including the A2. It is essential that the impact on the network is identified so that decisions can be made in the public interest and a reliable transport network is achieved, which supports sustainable transport modes. This is a critical part of the local plan evidence base.

CPRE also hopes that the Local Transport Plan will be amended so that it demonstrates the necessary support for growth proposed in the Local Plan. It should contain the range of interventions that will be necessary to support growth. Not all the necessary interventions are implemented by development in the local plan.

Clearly, the impact of a Lower Thames Crossing will need to be considered, as will current and projected capacity issues on the strategic road network, and associated junctions.

A policy approach to improve air quality is supported, and indeed essential in AQMAs

Transport and the River Medway

In terms of proposed policy approaches relating to 'transport and the river Medway', 'waterfront and river access' and 'marinas and mooring', there are clearly conflicts with the internationally protected nature conservation response. Clearly, recreation is a significant concern in this locality and the Habitats Regulation Assessment must consider this issue. The impacts of employment and recreational uses on the

river should be carefully understood and should not be exempt from contributions to the management strategy.

Scoping Report

The Scoping Report should not be subject to consultation at the same time as the Interim Sustainability Appraisal. Some amendments may be required to the Scoping Report and Sustainability Framework, and this would have 'knock-on' effects for the final agreed sustainability appraisal framework.

The report appears to have been completed by the Council, and CPRE recommends that Medway Council commission specialist consultants to carry out subsequent appraisal to ensure independence and adherence to the SEA regulations.

In terms of the process of preparation, the process followed is not very clear in the report. The SA Framework should be based on a review of other plans and programmes, baseline analysis and identification of key sustainability issues. The process followed by Medway Council appears to not follow the normal procedure of setting SA objectives as a result of the key objectives and issues arising from the review of plans and programmes, and the key sustainability issues identified through analysis of the baseline conditions. The process needs to be clarified, and CPRE recommends expert review at this stage to check the process is correct.

In terms of the SA Framework in table 2, this is also not clear. SA Objectives are not the same as SEA objectives and the framework should instead list SA Objectives and indicate SEA Directive Topics in bold, or as a separate column.

The Objectives are very brief and probably go too far to rationalise key issues and objectivess. Some key issues are absent. For example none of the objectives, nor key questions, appear to satisfactorily approach the issue of biodiversity. To resolve this, Objective 4 in the framework should read 'conserve and enhance **biodiversity and promote improvements to** the District's Green Infrastructure Network'. There should be key questions relating to conserving and enhancing protected sites, and species diversity. Other key questions could relate to ancient woodland cover and ecological connectivity. Indicators proposed also demonstrate a lack of attention to biodiversity (even in other SA objectives) and this should be resolved.

Although it is recognised that the transport issue has been incorporated in SA objective 5, it is the view of CPRE that there should be a transport SA objective. Similarly a separate water SA objective would be helpful. Currently 'adapt and mitigate the impacts of climate change' conflates biodiversity, water stress, allocation of allotments and flood risk. These shortcomings will not be helpful to the Council when assessing sites.

Habitat Regulations Assessment

Habitats Regulations Assessment

CPRE agrees that contribution to the Strategic Access Management and Monitoring Strategy is the appropriate means by which to ensure that recreation impacts of development is mitigated. It is our view, however, that there has been a significant change in the housing targets that local authorities in the North Kent Environment Group are expected (or potentially expected) to deliver. Although the SAMMS is designed to be flexible and is not very sensitive to housing numbers, this step-change in the new homes anticipated in the area must be potentially relevant in cumulative impact terms in sensitive locations. CPRE is concerned that the NKEG have not yet published monitoring evidence and summary updates on the success of the management strategy, which has now been in place for a number of years. It is essential that the views of NKEPG are sought to confirm with evidence) that they remain of the view that the recreation impact (and the associated contribution) will be mitigated by the Strategic Access and Recreation Management Plan. There is a disappointing level of information currently and it would be inappropriate to wait for deterioration to occur before responding to potential impacts of development. CPRE understands work is now underway.

CPRE Kent disagrees with the Council's assessment in paragraph 3.77 that it is unlikely that development in the emerging plan alone would have adverse effects on the integrity of the SAC through increased atmosphere pollution. North Kent Woodlands SPA, which abuts the A249 north of Maidstone, already exceeds the critical load for Nitrogen Deposition. The exceedance of the identified critical load means, when applying the precautionary principle, that there may be an impact on the favourable status of the SAC in the future. It is not appropriate, at this stage, to dismiss the impact because it is a small area. At this stage, the Council should determine whether increase in traffic levels is likely to be significant. A significant increase in traffic relates to an additional 1000 vehicle movements per day and a 1% increase in pollutants. To meet both of these thresholds would denote a likely significant effect. Measurements are cumulative, i.e. they should incorporate contributions from neighbouring local authorities. Recent case law is relevant: Suffolk Coastal District Council (Appellant) v Hopkins Homes Ltd and another (Respondents)

Medway Council
Planning and Building Department
Gun Wharf
Dock Road
Chatham
ME4 4TR

Email [REDACTED]
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27 February 2017

Dear Sir / Madam

ROYAL MAIL GROUP REPRESENTATIONS:

MEDWAY COUNCIL – LOCAL PLAN DEVELOPMENT OPTIONS – 2015 - 2035

We are instructed by our client, Royal Mail Group Ltd (Royal Mail), to submit representations to Medway Council's Local Plan: Development Options 2015 – 2025.

Background

Royal Mail is the UK's designated Universal Postal Service Provider, supporting customers, businesses and communities across the country. This means it is the only company to have a statutory duty to collect and deliver letters six days a week (and packets five days a week) at an affordable and geographically uniform price to every address in the UK. Royal Mail's services are regulated by Ofcom.

Land use planning is an important issue for Royal Mail with regard to protecting its assets and operations, and in planning future investment across its estate and supporting its infrastructure. On this basis, Royal Mail's involvement in the plan making process and working with Local Planning Authorities to sharpen and influence planning policy is considered critical to the future success of its business and in its continued role as the UK's designated Universal Postal Service Provider.

Royal Mail Properties

Royal Mail has a statutory duty to provide efficient mail sorting and delivery services within the district of Medway. This service is currently provided from the following freehold and leasehold Royal Mail properties:

- Rainham Delivery Office
- Chatham Delivery Office
- Rochester Delivery Office
- Gillingham Delivery Office

Royal Mail has confirmed there are no plans to relocate from any of the above properties in the foreseeable future.

Representation

Cushman and Wakefield has reviewed Medway Council's Local Plan: Development Options 2015 – 2025 in the context of its impact on the operations of the Royal Mail's properties within the borough. The delivery offices are of strategic importance to Royal mail in ensuring they are able to continue to fulfil their statutory duty for mail collection and delivery.

Although the Local Plan is at an early stage, Royal Mail consider it important to make Medway Council aware of their operations within the borough. These representations, made on behalf of Royal Mail, are in reference to the following two key issues:

- 1) Housing Growth
- 2) Employment

Housing Growth

It is evident from the Development Options Consultation that Medway Council has positive housing growth targets for the period up to 2035. The document states that the Council will seek to deliver 29,463 new dwellings over the plan period (2012 – 2035). Such an increase in the number of dwellings is likely to have an impact on the capacity of Royal Mail's operations, including its ability to provide effective, universal postal services across the borough, particularly if demand is not suitably timed or phased.

As an indicative guideline, for every 500 new dwellings proposed, one additional postal round (described by Royal Mail as a "walk") is required. As such, it is considered that the expected growth targets in the New Local Plan Development Consultation document will potentially have major capacity implications for those existing delivery offices. As a result, Royal Mail, as a statutory provider, is likely to seek the expansion of its existing assets or require the allocation of sites for additional delivery offices, particularly those locations where housing developments will be concentrated and where existing delivery offices are bearing capacity.

Consideration also needs to be given to the location of sensitive uses in close proximity to Delivery Offices as operations extend well beyond the normal working day, including associated vehicular movements. The potential juxtaposition of alternative, possibly sensitive land uses, particularly residential uses adjacent or within close proximity to the sites is of direct concern to our client. Given the business functions of Royal Mail, operations often take place in the early mornings and late evenings which involves the constant movement of delivery vehicles which could, therefore, result in significant amenity issues should sensitive land uses, particularly new dwellings, be located nearby.

Given the aforementioned, it is imperative that the ongoing role/functions of Royal Mail are duly considered throughout the forthcoming stages of Medway Council's Local Plan. In this way, Royal Mail must continue to be informed about proposals for strategic locations, planned expansions and growth areas, to allow for appropriate and timely business development and planning.

Employment

The Medway Council Royal Mail sites are well-established, having operated successfully for a number of years, serving a wide catchment area. The consultation document projects a growth of circa 17,000 jobs/businesses in the borough across the plan period, which is likely to have impacts on the operations of Royal Mail and is, therefore, of concern.

As the Local Plan is at an early stage, there are no specific policies set out, however, there are Policy Approaches. Royal Mail is generally supportive of the Policy Approach to Economic Development which seeks to safeguard employment land, identify redevelopment and investment opportunities and allocate new employment sites. It is considered, however, that additional policy wording should be included which makes specific reference to the Royal Mail sites and to ensure that Royal Mail's operations will not be prejudiced. Additional wording should also be included which specifically references protecting employment land against residential development or other incompatible or sensitive uses.

This approach accords with adopted Government guidance set out in the NPPF which advises that local planning authorities should support the existing business sectors, taking account of whether they are expanding or contracting.

The NPPF also states that local planning authorities should help achieve economic growth by planning proactively to meet the development needs of business and support an economy fit for the 21st century.

Conclusion

Royal Mail would welcome further engagement with Medway Council as the Local Plan progresses, particularly where policies and allocations would impact Royal Mail's operations.

I trust that these representations are acceptable and would be grateful if you could acknowledge receipt and keep me informed of future stages of the adoption of the Medway Local Plan and other planning policy documents.

If you require any further information or wish to discuss these representations further please contact me at [REDACTED]

Yours faithfully

Helen Harris BSc (Hons) MA MRTPI
Planning Consultant – Development & Planning Consultancy
Cushman & Wakefield – Development and Planning

Cc Tony Haines Royal Mail Group
 Holly Trotman Royal Mail Group

Cuxton Parish Council

Response to Medway Council Local Plan: Development Options

Cuxton Parish Council has provided a specific response to the consultation document as it applies to Cuxton. Areas have been considered in order of relevance to Cuxton rather than as laid out in the consultation document.

General remarks

The lack of any clear strategic plan to manage the growing traffic congestion is of particular concern to Cuxton Parish Council and its residents. The A228 through Cuxton is already over capacity, and it is difficult to see how any further housing developments along the A228 can be considered if there are no proposals to improve the road infrastructure. Plans for managing traffic from the proposed Lower Thames River Crossing, St Andrews and Temple Marsh development and St Peter's village **must** be in place and funded before any decisions on further housing development are considered. Bus lanes and cycle routes should form part of this plan along with a clear map indicating where the riverside public access will link, so that it is not just a piecemeal plan, that is available to residents of new developments, but does not work for the wider community. This work should be the foundation on which the Medway Council plan is built.

In addition there is specific concern about the lack of planned school places and health facilities such as GPs and pharmacies to support any small, medium or large scale housing development along the section of the A228 between Strood and the M20. Without such essential facilities the community cannot function successfully.

Vision and Strategic Objectives

Medway City? - Gillingham, Rainham, Chatham, Strood.

If there is an intention to create a Medway City this needs to be more explicit, and the costs and benefits of such an ambition clearly stated.

Effective transport networks

Cuxton Parish Council feels that this area of the plan fails to address the current and potential road infrastructure problems.

Duty to co-operate

There seems to have been very limited engagement with Tonbridge and Malling Council regarding the building of St Peter's Village. Opportunities to obtain some financial compensation for villages like Cuxton and Halling do not appear to have been taken. Given the scale of this development we believe there will be an increased flow of traffic from St Peter's Village to the M2 through Cuxton for which we should be compensated.

Development that reduces flooding

Given the threat from global warming and associated increased risk of flooding, Cuxton Parish Council would oppose any development on the land identified as Cuxton Gate. It forms part of the flood plain that protects Bush Road from flooding and a development of that site would place this area at increased risk. It is for this reason that previous planning applications for this site were refused.

Riverside walks

This is an ambition Cuxton Parish Council would support as it provides areas for walking and cycling along relatively flat terrain. This has obvious benefits for health as well as the potential for reducing car usage. However, there needs to be a plan that identifies gaps in the continuity of riverside walkways and identifies ways of joining sections together to make the walk and cycle ways more appealing and useful.

Maintain distinction between towns and villages

Cuxton Parish Council wants to see the green spaces between Cuxton and Strood and Cuxton and Halling maintained. We do not wish to be absorbed in to an urban sprawl.

Delivering Sustainable Development

Options

- *Maximising potential for urban regeneration: high density*
It is the view of Cuxton Parish Council that high density development within the urban areas is a useful way of providing affordable accommodation that is attractive to first time buyers and to the elderly wishing to downsize nearer to services and amenities.
- *Suburban expansion - greenfield sites Strood and Rainham*
Cuxton Parish Council would not support the use of green field sites at this stage.
- *Hoo peninsula focus- includes Lodge Hill*
If this development is approved there must be preceded by improvement to the capacity of the A228.
- *Urban regeneration and Rural Town*

Housing

The housing need projections seem very large and it is not clear how they are calculated.

The dilemma for Cuxton is that as smaller houses come on to the market they are bought and developed in to larger family homes. This also makes it more difficult for local young people to get on to the housing market. There is also a perceived need for more accommodation suitable for the elderly enabling them to downsize. If there is nowhere for young adults and older people to move into, the process draws to a halt and the developers move in.

Affordable homes for young and old are not attractive to developers, but are needed if residents who have been born in Cuxton or lived here for many years can stay in the village. Some form of social housing may be the answer. However, Councillors and residents have commented that Housing Association criteria do not seem to favour local people and that this perpetuates the problems for local people looking for homes.

Recent planning applications have illustrated that some residents are applying to build separate homes on their land to accommodate adult children. This may be an answer for some but increases the density of housing in our rural community.

Other residents have proposed Medway Council consider developing a 'Retirement Village' with suitable medical and social support systems that might provide a healthy and secure environment for older people, such as provided by ExtraCare Charitable Trust. The Centenary Garden in Gillingham has also been highlighted as a way of providing the opportunity to downsize for those who wish to do so.

Potential Development Sites

The consultation document identifies three areas for potential housing development within Cuxton. Cuxton Parish Council would like to make the following comments on the area identified.



0782: Cuxton Gate, Station Road, Cuxton

This area forms part of the flood plain protecting Bush Road Cuxton, and so could be considered unsuitable for housing. It also forms part of the border with Strood and previous outline applications for development were rejected because it was essential green space separating Cuxton from Strood.

0676: Cuxton Station, Station Road, Cuxton

This small area does have potential for development and also contains a station house that has historic interest and could be restored. It could be the site for some small development of affordable smaller homes/flats. The land assessment states that the land 'has poor access to public transport' yet is adjacent to Cuxton station, and so could be said to have excellent access to public transport.

1068: South of Sundridge Hill, Cuxton

This area is adjacent to A228, and given the high volume of traffic on A228 at peak times, it is difficult to see how residents exiting any development here will be able to turn right during peak hours. The proposal for a mini roundabout here seems unrealistic as such a proposal was dismissed for the Bush Road / A228 junction.

1015: Off Sundridge Hill

This location does not appear to be an attractive area to be developed for housing. It also has the same challenges for access to the A228 as the site 1068.

0722: 90-94, Bush Road

Cuxton Parish Council does not consider this a suitable site for development.

0705: Pit 2, Roman Road, Strood and 0686: Digger Land, Roman Way, Strood

Cuxton Parish Council consider that these two sites should not be considered for development until the traffic congestion issues on the A228 are addressed. The impact of the current Temple Marsh development on the already congested A228 is unknown. To consider two more large developments totalling a potential 309 houses in this location would seem unwise.

Of concern to Cuxton Parish Council and residents is that we already have over 80 children from Medway Gate and the Earl Estate attending Cuxton Academy of Schools. Additional children travelling from any new development in Strood to school in Cuxton would further impact on the severe traffic congestion that residents currently experience in Bush Road, during school start and finish time.

Infrastructure

Cuxton Parish Council would support a blanket ban on any development along the A228 until such time as a strategic plan has been developed that addresses the problem of over capacity of the A228 between M20 and M2, and rising school and health care needs. Any plan will also need to include the impact of the Lower Thames Crossing.

Developer Contributions p92

In the past Cuxton residents have seen no benefit from housing developments at Medway Gate and more recently, the waterfront development at Temple Marsh, Strood.

The Developers Contribution from St Andrews Place for traffic lights at the Bush Road/A228 junction may be insufficient to cover the costs. Therefore, it is highly important to Cuxton Parish Council that if any of the proposed development sites that impact on Cuxton and the A228 are agreed, Medway Council ensure that Section 106 agreements are in place so that Cuxton residents are in some way compensated.

There are some significant needs in Cuxton that require funding, and which Cuxton Parish Council needs Medway Council to include in future S106 agreements.

1. Funding a village hall; Cuxton has no village/community hall.
2. Funding for development of the recreation ground (MUGA & parking)
3. Funding to support Riverside walk along diverted RS 206
4. Funding for school bus from Medway Gate and Earl Estate to Cuxton School.

Sustainable Transport

Comments relating to transport plan, strategic road network and connectivity issues are included in the general comments at the beginning of this response.

Residents have expressed concern regarding the impact of the proposed Lower Thames Crossing, Option C on traffic using the A228 through Cuxton. Some have suggested continuing the new crossing to the north of Cuxton (avoiding Cobham), and joining the A228 at the roundabout close to Peters Bridge between Halling and Snodland. This would pass through highly sensitive green, but largely publicly owned land, which would prove unpopular with some. However, it would provide a quicker and less polluting route to the M20 than doing nothing to relieve the inevitable increased congestion on the A228.

Cuxton Riverside Footpath

This item has been on the agenda of Cuxton Parish Council and Cuxton Countryside Group for a number of years now and appeared to be progressing with the application for the diversion of footpath RS206.

In 2012, a public path diversion order was made to transfer the footpath from the southern, riverside of the railway to the northern side. This did not progress, for some unknown reason connected with Network Rail. Port Medway Marina are keen to see this diversion take place, as it will increase the security of their site.

Port Medway Marina are also keen to see a combined foot/cycle path established on their land and have submitted a planning application for an easement from the railway underpass to the M2/CTRL bridge, under the registration MC/12/0468. There are security-fencing financial issues to be dealt with, together with legal fees in developing the path.

Sustrans, the national cycle association, have expressed strong interest in helping with the development of a combined foot/cycle path from Cuxton station into Strood, via the riverside.

Cuxton Parish Council has been involved with the Medway Community Rail Partnership in developing the use of the railway and has established a good contact within Network Rail, who are actively checking the reasons for the non-advancement of the diversion. This partnership is very active and will prove beneficial to our cause.

2017 now appears to be a good year to drive the development of the riverside path forward.

The proposed footpath will, at present, stop at the junction of Port Medway Marina land and the Leisure Centre, underneath the M2/CRTL Bridge. The owners of the Leisure Centre land are not keen to allow a footpath linkage, however, the fact those involved in establishing a path link from Cuxton all the way through to Strood, might encourage them to change their mind.

Natural Environment and Green Belt

Green belt

Maintaining the Green Belt is important to Cuxton Parish Council and its residents

Flood risk

It is important to note that the flood risk to Cuxton will be increased by any housing development approved for 0782: Cuxton Gate, Station Road, Cuxton.

Built Environment

Both residents and Cuxton Parish Council would like to see a diversity of dwellings. There should be more conversion of redundant shops and offices in the town centres to residential accommodation. High rise development in the urban areas should include provision of health and social care facilities, as well as accessible dwellings with adequate lifts and security features, that would attract elderly residents and those living alone. There should also be sufficient car parking space for residents and their visitors.

Developers should be encouraged to provide more bungalows with interior accommodation suitable for the elderly and disabled. There should be more affordable housing with selection criteria weighted in favour of local people.

Some have suggested planning restrictions should be imposed on loft conversion on bungalows to be prohibited their development in to family homes and retain the current stock of small bungalows.

Conclusion

Cuxton Parish Council and residents consider overwhelmingly that all infrastructure must be in place before any development starts and that developer contributions for infrastructure must be paid over in advance of the start of any development to enable this to happen. This should extend to developments outside Medway that will impact on the A228. Infrastructure includes highways; education; medical facilities, public transport. The money should be spent within the village or area affected and not elsewhere in Medway.

There should be a real diversity of housing, with more affordable homes.

Building should be on brownfield sites wherever possible.

Villages must be separated from towns and other villages by green spaces.

The Metropolitan Green Belt must be protected.

Roxana Brammer
Parish Clerk,
On behalf of Cuxton Parish Council

DRAFT

Medway Local Plan to 2035 – Second ('Development Options' Stage) Consultation,

DBC Comments March 2017

1.0 We raise concerns with the approach adopted by Medway's Local Plan so far, particularly in relation to retail evidence and town centres.

1. Recognising all sources of competition in modern retailing

1.1 I previously suggested how usefully Medway could like to consider the changing dynamics of retailing and centres in Kent, and thereby proceed on the basis of formulating a positive local response. I am unaware that this has been considered or been undertaken at all from your written documentation (or taken forward in any other meaningful way e.g. via the Strategic Retail Group at which you are a regular attendee). The consultation documents remain vague in this respect as plan content looks to be limited and the evidence still remains unavailable.

1.2 In particular, it must be recognised the decline in town centres in Medway that has occurred this Millennium. And it must be recognised that throughout this period there has been a significant restructuring in the retail sector.

1.3 This has played out in a number of ways. However, no significant expansion of retail has occurred at all in the regional shopping centre of Bluewater, for instance. Bluewater has suffered increased retail competition from regional shopping centres through the completion of Stratford Westfield a few stops up on High Speed One. Medway has not delivered major new development in its town centres, however like Bluewater (and places such as Dartford town centre) it has suffered from the natural competitive impacts of improvements at places like Maidstone. There are also several proposals in Greater London and Essex that will further increase retail competition in north Kent.

1.4 Moreover there have been fundamental switches towards online retailing, and retailing as an activity undertaken as a leisure experience- based on attractive environments and an enhanced food/ drink offer. These current and future realities are largely passed over in documentation from Medway (relative to the attention given to Bluewater, which was developed two decades ago).

1.5 As stated before, Medway needs to formulate its own response to this and deliver improvements that have occurred at centres such as Maidstone and elsewhere. The consultation does not give confidence this is the focus of Medway's attention.

2. Inappropriate production and use of evidence

2.1 We also object to the principle of selectively citing from evidence, when the documentation remains unpublished despite many months passing. (This is the retail element of the North Kent SHENA). Questions need to be posited- why is this still unavailable, and why are the commissioning parties referring to it if it's unavailable (this is probably rather unprofessional?) The continued lack of explanation of what's going on raises several concerns.

2.2 This palpable lack of transparency raises serious worries over the production of evidence that is supposed to be objective and independent, its future reliability; and it may be susceptible to being out of date by the time it is published.

2.3 We note for example that no evidence is presented on the *change* in the proportion of overall expenditure from Medway ending up at Bluewater, versus at Maidstone, other locations, and online.

2.4 The same consultant's views on retail are however available in outline form in the brief IGNA Technical Paper. This usefully highlights that town centres in Medway are unsuccessfully competing not just with the purpose built regional centre of Bluewater, where Medway would be regarded to be part of its regional catchment as a matter of routine, but also traditional town centres outside Medway.

2.5 The conclusion that Medway's centres have their own inherent weaknesses, when comparing like with like town centres, is inescapable (and also evident from qualitative assessment).

3. Conclusion on positive planning

3.1 We are therefore concerned that no recent positive vision or plans for delivery of improvements for Medway town centres appears to have been set out. This can be regarded as contrary to the NPPF.

3.2 Local town centres suffer where expenditure growth fails to materialise due to a lack of deliverable housing sites or unrealistic economic development policy. Medway should seek to increase its housing delivery through maximising all its opportunities to capitalise on the potential for the relocation of residents (and industry) from London and its fringes.

3.3 Medway can and should play a fundamental role in terms of the possible expectation that may be set for the Kent area to accommodate significant housing and economic development.

3.4 The fear that the local way forward for Medway has not been sufficiently advanced is supported by the lack of really meaningful and up-to-date information. For example the plan could benefit from setting out how places like Chatham will actually be enhanced to help rise up to the challenge of the modern economy facing all centres and places in Kent, and nationally.

3.5 If concern about Medway's town centres was top priority and retail proposals beyond Medway were of such concern then it would be reasonable to expect the Council to have set out both a clear vision and a set of positive projects in support of key centres. This has yet to be achieved.

3.6 For these reasons we need to raise objection to the strategic approach and retail view taken by Medway Council. Communications from Medway suggest no progress has been made on this. The danger of failing to positively and openly plan ahead for town centres such as Chatham, and failing to recognise the current realities of the dynamic retail market, risks serious inconsistency with the provisions and expectations of national policy and the NPPF.

3.7 Equally a positive approach should be adopted under the Duty to Cooperate to economic development as a whole, given the scale of opportunity in Medway compared to places nearer London, and similarly housing provision too.

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

30 May 2017

Dear Sirs,

Medway Council Local Plan: Development Options Consultation

I am writing to respond to Medway Council's consultation on the development options stage of its new Local Plan, in my capacity as leader of the RSPB Bromley Local Group. The Group was formed in 1972 and aims to bring people together to enjoy and learn about wildlife, and to protect wildlife in our borough and elsewhere, particularly in South East England. The Group has over 150 members in the London Borough of Bromley and the surrounding area.

The Group has always had close ties with North Kent, as it is one of the best areas for wildlife within a short journey from our borough. It is therefore of great concern to our members that Medway Council supports the development of Lodge Hill as a planned new settlement in the development options stage. The Chattenden Woods and Lodge Hill Site of Special Scientific Interest (SSSI) contains a mosaic of habitats including ancient and semi-natural woodland, scrub and nationally scarce unimproved neutral grassland. It was designated as a SSSI for these reasons and also because of a nationally important population of breeding nightingales.

Sadly the nightingale is in severe decline in the UK; its number have fallen by 90% in the last 50 years and it is now Red-listed, which means that it requires urgent conservation effort to ensure its survival as a breeding bird in the UK. Lodge Hill is one of the last remaining strongholds for this species. I note that the Lodge Hill development would lead to the loss of 144 hectares of the SSSI, amounting to 80% of the nightingales' territories, with the remainder being adversely affected by the proximity of the large development. I would therefore urge the Council to reconsider its support for developing Lodge Hill.

The nightingale is a much-loved songbird that spends its summer with us in the UK. No other British bird has been so celebrated in literature and its loss as a breeding bird on our island would deprive future generations of experiencing the wonder of its song. It is sad that Bromley has lost its nightingales; as recently as the 1950s their song would have rung out over our borough. This decline has been mirrored throughout its range in South East England and it is therefore vital that the remaining suitable habitat for the species is preserved. There is still time to save the nightingale; other species have been brought back from the brink by efforts to protect their habitat (for example, bittern and nightjar).

The National Planning Policy Framework (NPPF) states that any proposed development that is likely to have an adverse effect on a SSSI **should not normally be permitted** (paragraph 118). The NPPF also gives particular weight to the need to conserve **ancient woodland** (a key part of the Chattenden Woods and Lodge Hill SSSI), which is a habitat that is not replaceable within meaningful timescales. More broadly, the NPPF makes it clear that the planning system should **contribute to and enhance the natural and local environment** by **minimising impacts on biodiversity** and providing net gains in biodiversity where possible, contributing to the Government's commitment to **halt the overall decline in biodiversity**, including by **establishing coherent ecological networks** that are more resilient to current and future pressures (paragraph 109).

The Council also has a statutory duty to have regard, so far as is consistent with the proper exercise of its functions, to the purpose of **conserving biodiversity**. Conserving biodiversity includes **restoring or enhancing a population or habitat** (section 40 of the Natural Environment and Rural Communities Act 2006).

Development at Lodge Hill would conflict with the NPPF and section 40 duty as it would involve the destruction of scarce and (in some cases) irreplaceable habitat and have a harmful impact on the population of endangered species, including a nationally important breeding nightingale population. A decision to allocate this site for development would not minimise the planning system's impact on biodiversity. Given the severe and ongoing decline in the UK's nightingale populations and the contraction of its range to a few strongholds in South East England, it would make it harder for the Government to halt biodiversity decline. It would also weaken the existing ecological network in the North Kent area for nightingales, which currently includes the RSPB's Cliffe Pools and Northward Hill reserves, along with Lodge Hill.

I note that the development options consultation document states that the Council must show how land can be provided for housing, jobs, infrastructure and services, whilst **protecting important environmental and heritage assets** and how the new Local Plan will seek to **strengthen the condition of the local environment, and respect the need to live within the Earth's environmental limits** (paragraphs 2.9 and 7.2). The inclusion of these statements is much-appreciated but development of the Lodge Hill site would not pass the test that the Council has set itself. It would fail to protect a key environmental asset within the Medway area – the Lodge Hill site, with its ideal habitat for endangered nightingales and other scarce habitats. It would place a greater strain on the natural world, making it harder to live within environmental limits.

The inclusion of Lodge Hill as a site for development in the Local Plan would also set a dangerous precedent, weakening the protection given to SSSIs across England.

For these reasons, I request that the Council decides not to allocate the Lodge Hill site for development in its Local Plan.

Yours faithfully,

David Hampson
Leader - RSPB Bromley Local Group



30th May 2017

by email to futuremedway@medway.gov.uk

Dear Sir or Madam

**MEDWAY LOCAL PLAN 2012-2035: DEVELOPMENT OPTIONS REG 18
CONSULTATION: Representations on behalf of Tarmac.**

Please see attached representations submitted on behalf of Tarmac. Tarmac, a CRH company, is the UK's leading sustainable building materials and construction solutions business. Tarmac's innovative services and solutions help to deliver the infrastructure needed to grow the economy today and create a more sustainable built environment to support the nation's future prosperity.

Tarmac and its predecessors Lafarge Tarmac, Lafarge and Blue Circle have been constructively engaged in Local Plan-making activity over many years. Until recently Lafarge Tarmac were working with Medway Council in the promotion of mixed-use development at Temple Waterfront.

Tarmac has extensive land interests in the Medway Valley associated with the permitted Medway Cement Works and other residual ownerships.

Over the plan period there may be opportunities arising for development within Medway on land within Tarmac's control and given the timescale of the Local Plan and the levels of growth that Medway is required to accommodate Tarmac consider it prudent that the potential future availability of development opportunities within their holding informs the Local Plan process.

The representations respond to the questions raised in the online consultation questionnaire. We would request that the Council confirm receipt of the representations. We will also seek to submit via the online questionnaire.

We would like to meet with Medway Council to further discuss issues raised in these representations, and have contacted Katherine Smith separately with a Call for Sites response to facilitate this. We look forward to hearing from you regarding a mutually convenient appointment.

Yours faithfully

PHILIP COPSEY

Partner

[Redacted signature]

enc reps on behalf of Tarmac

cc David McCabe, Tarmac

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

Agree

Disagree

Don't know/ No opinion

Please explain your response:

2. Tarmac agree with the thrust of the draft vision, but consider that greater emphasis could be placed on maximising the benefits of existing and planned infrastructure such as the Lower Thames Crossing or the Medway Valley Railway line. Suggested amendments to the draft vision are set out below:

Developing a vision for 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 and new strategic infrastructure. 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.

3. 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:

4. Tarmac agree with the strategic objectives but consider that further reference should be made to maximising the benefits arising from new infrastructure. The references to strengthening the transport network and management of the highways network should be more ambitious:
 - a. In recognising the effects of the Lower Thames Crossing in the strategic connectivity of Medway;
 - b. In the strategic response to patterns of movement and activity that will arise on the local road network including links from the M2 to the M20; and
 - c. In committing to working jointly with neighbouring authorities to respond to the opportunities that will arise.
5. In this regard, the proposed Strategic Transport Assessment will form a key element of the evidence base behind the Local Plan.
6. **1 (most preferred) 2 3 4 5 (least preferred)**
 - a. **Option 1 - Maximising the potential of urban regeneration**
 - b. **Option 2 - Suburban expansion**
 - c. **Option 3 - A rural focus**
 - d. **Option 4 - Urban regeneration and rural town**
 - e. **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.**
7. Tarmac notes the challenging scale of growth emerging across this plan period to 2035. Based on the table at paragraph 3.7 some 2,180 residential completions have taken place between 2012-2016, an average of 545 dwellings per annum. There are therefore 27,283 homes to be delivered across the remainder of the plan period, an average of over 1,400 dwellings per annum. In order to achieve this level of acceleration in housing and employment Tarmac consider that a balanced mix of all types of development sites and opportunities must be actively promoted across the area. Consideration should also be given to special purpose vehicles focussed on driving delivery.
8. Tarmac does not consider that it is appropriate to rank the Options but would refer to our comments below.
9. **Please explain why you have ranked the options in this order**
10. **Thinking about option 1 Maximising the potential of urban regeneration please explain what aspects of this potential development you support? Please comment in the box below.**
11. **Thinking about option 1 please explain what aspects of this potential development you do not support? Please comment in the box below.**
12. Tarmac are supportive of the regeneration of sites within the urban area. However, realistic assumptions must be made regarding the density of development that such sites can accommodate, and the rate and pace of delivery of such sites. A number of these sites have been identified in Local Plans over many years. For example, Paragraph 3.8 of the Local

Plan confirms that 35 of 42 Brownfield sites identified already have the benefit of planning permission. Tarmac concur with the view at paragraph 3.9 that it is unlikely that the full range of development needs could be met on brownfield regeneration sites.

13. Tarmac would also note that a single focus on this area could lead to the loss of employment land which will not assist in supporting the economic growth requirements of the Plan. The idea of relocating the Medway City Estate in its entirety is therefore questioned, and such an approach is not considered to be a viable or deliverable basis for meeting growth needs across the Plan period. There may also be conflicts with protecting and safeguarding river related uses.
14. If Medway's growth requirements across the plan period are to be met, it is vital that a balanced mix of sites and opportunities are identified across the Medway area and brought forward at the same time across the plan period.
- 15. Thinking about option 2 Suburban expansion please explain what aspects of this potential development you support? Please comment in the box below.**
- 16. Thinking about option 2 please explain what aspects of this potential development you do not support? Please comment in the box below.**
- 17. Thinking about option 3 A rural focus please explain what aspects of this potential development you support? Please comment in the box below.**
- 18. Thinking about option 3 please explain what aspects of this potential development you do not support? Please comment in the box below.**
19. Tarmac would note that a 'rural focus' approach need not concentrate solely on the Hoo Peninsula. Tarmac consider that opportunities exist in and around the Medway Valley and that there are significant benefits from exploring growth in this area as part of a further direction of growth as set out below. This would also provide some flexibility given the uncertainty around Lodge Hill.
- 20. Thinking about option 4 Urban regeneration and rural town please explain what aspects of this potential development you support? Please comment in the box below.**
- 21. Thinking about option 4 please explain what aspects of this potential development you do not support? Please comment in the box below.**
- 22. 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
23. Tarmac control over 1,000 hectares of land in the Medway Valley in and around the permitted Medway Cement Works. This land includes land both within and outside of the Green Belt. A plan of the wider land control within Medway and Tonbridge and Malling District is provided (see plan reference TAR002/014 Rev A).
24. Tarmac is in the process of reviewing its land resources in this area and the options that exist for promoting growth opportunities. There is significant potential working with the local community and other partners to promote sustainable new growth in this part of Medway.
25. The Medway Valley occupies a strategic location within Medway: the Medway Towns, Medway Gap Settlements and Maidstone create a unique focus for population, economic activity and infrastructure at the heart of Kent. Working jointly with its partner authorities, Medway should take a positive approach to the potentials of this area in providing for economic activity supported by new infrastructure. In particular, the proposed route of the Lower Thames Crossing (due to open around 2025) will transform the connectivity of Medway and the Medway Valley. This will also require a reassessment of linkages from the M2 to the M20.

26. Tarmac consider that opportunities exist in and around the Medway Valley and that there are significant benefits from exploring growth opportunities in this area as part of a further direction of growth as set out below. This would also provide some flexibility given the uncertainty around Lodge Hill.

27. The following opportunities should be considered:

- a. The allocation of land to the west and south of Halling Primary School for up to 130 dwellings. (see plan TAR002/021 Rev A attached). This offers the opportunity to create a new southern edge to Halling up to the new Peter's Bridge road link. Access would be taken from the bridge link. The site offers opportunities to promote riverside development based around Lee's Wharf, and to extend riverside access in the area (including into land controlled by Tarmac south of the bridge) consistent with the Local Plan Vision. Opportunities could also be explored with the local community for improvements including access to Halling Primary School which is planning to expand in the near future. Allocation of this land would support the sustainable incremental expansion of Halling consistent with the spatial scenarios within the Local Plan. A separate Call for Sites submission and accompanying plan is also provided.
- b. Tarmac controls extensive land at Upper Halling (see plan TAR002/014 Rev A) within the Green Belt, and also in part within the AONB. Tarmac is keen to work with the local community and the Council to explore the potential for small-scale opportunities for residential development to be delivered in Upper Halling. In parallel, land could be made available for local projects to address local infrastructure and sustainability issues such as parking, highway width, new or improved open space or local facilities (community buildings etc.). This may require land to be identified and removed from the Green Belt and will require careful assessment of the effect on the AONB. The definition of local development opportunities and projects would require partnership working between Tarmac, the local community and Medway Council and is something Tarmac wish to review further with Medway Council.

28. Do you agree or disagree with the policy approach for housing delivery?

Agree Disagree Don't know/ No opinion

29. Do you agree or disagree with the policy approach for housing mix?

Agree Disagree Don't know/ No opinion

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

Agree Disagree Don't know/ No opinion

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

Agree Disagree Don't know/ No opinion

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

Agree	Disagree	Don't know/ No opinion
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33. Do you agree or disagree with the policy approach for mobile home parks?

Agree	Disagree	Don't know/ No opinion
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34. Do you agree or disagree with the policy approach for houseboats?

Agree	Disagree	Don't know/ No opinion
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35. Do you agree or disagree with the policy approach for houses of multiple occupation?

Agree	Disagree	Don't know/ No opinion
--------------	-----------------	-------------------------------

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

Agree	Disagree	Don't know/ No opinion
--------------	-----------------	-------------------------------

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

Agree	Disagree	Don't know/ No opinion
--------------	-----------------	-------------------------------

38. Are there any alternative sustainable development options for housing that have not been considered?

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

Agree	Disagree	Don't know/ No opinion
--------------	-----------------	-------------------------------

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

Agree	Disagree	Don't know/ No opinion
--------------	-----------------	-------------------------------

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

Agree	Disagree	Don't know/ No opinion
--------------	-----------------	-------------------------------

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

Agree	Disagree	Don't know/ No opinion
--------------	-----------------	-------------------------------

43. Are there any alternative sustainable development options for employment that have not been considered?

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

Agree

Disagree

Don't know/ No opinion

45. Are there any alternative sustainable development options for retail and town centres that have not been considered?

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

Agree

Disagree

Don't know/ No opinion

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

Agree

Disagree

Don't know/ No opinion

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

Agree

Disagree

Don't know/ No opinion

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

Agree

Disagree

Don't know/ No opinion

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

Agree

Disagree

Don't know/ No opinion

51. Are there any alternative sustainable development options for the natural environment and green belt that have not been considered?

52. In line with representations above Tarmac consider that Green Belt boundaries should be reviewed in the Medway Valley:

- a. The level of growth required and the need to promote sustainable patterns of development represent exceptional circumstances.
- b. There is a need to consider all reasonable alternatives as part of the Sustainability Appraisal process.
- c. Green Belt is a strategic policy and hence a strategic issue in the terms of the Duty to Cooperate. Given the prevalence of Green Belt in neighbouring Tonbridge and Malling it is suggested that a review should be undertaken jointly as part of a shared evidence base.

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

Agree Disagree Don't know/ No opinion

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

Agree Disagree Don't know/ No opinion

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

56. Agree Disagree Don't know/ No opinion

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

Agree Disagree Don't know/ No opinion

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

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

Agree Disagree Don't know/ No opinion

60. Are there any alternative sustainable development options for health and communities that have not been considered?

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

Agree Disagree Don't know/ No opinion

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

Agree Disagree Don't know/ No opinion

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

Agree Disagree Don't know/ No opinion

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

Agree Disagree Don't know/ No opinion

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

Agree Disagree Don't know/ No opinion

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

Agree Disagree Don't know/ No opinion

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

Agree Disagree Don't know/ No opinion

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

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

Agree Disagree Don't know/ No opinion

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

Agree Disagree Don't know/ No opinion

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

Agree Disagree Don't know/ No opinion

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

Agree Disagree Don't know/ No opinion

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

Agree Disagree Don't know/ No opinion

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

Agree Disagree Don't know/ No opinion

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

Agree

Disagree

Don't know/ No opinion

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

Agree

Disagree

Don't know/ No opinion

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

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

Agree ✓

Disagree

Don't know/ No opinion

79. Tarmac agree with the policy approach.

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

Agree

Disagree

Don't know/ No opinion

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

Agree

Disagree

Don't know/ No opinion

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

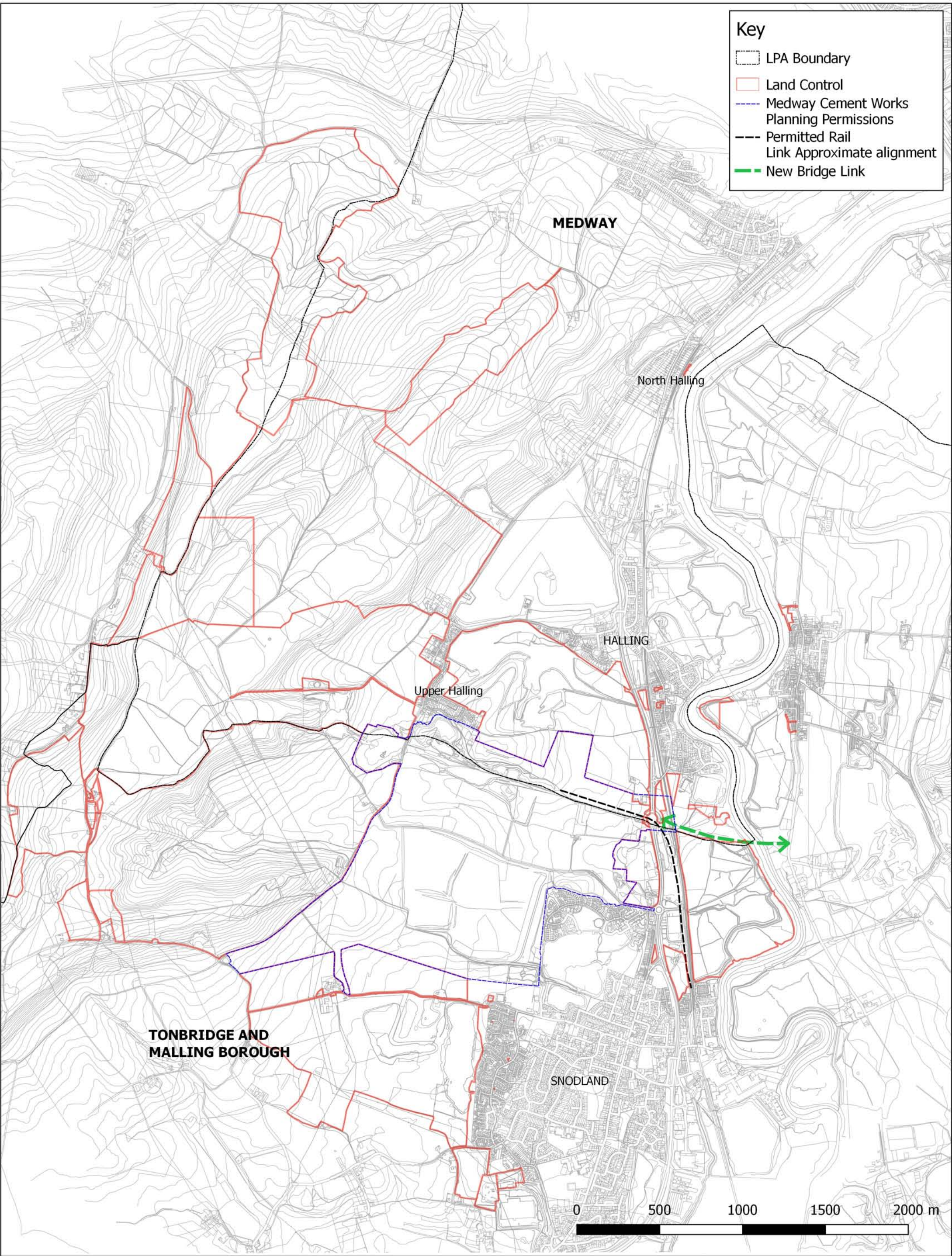
Agree

Disagree

Don't know/ No opinion

83. Are there any alternative sustainable development options for minerals, waste and energy that have not been considered?

84. 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.



Medway Cement Works
Land Control



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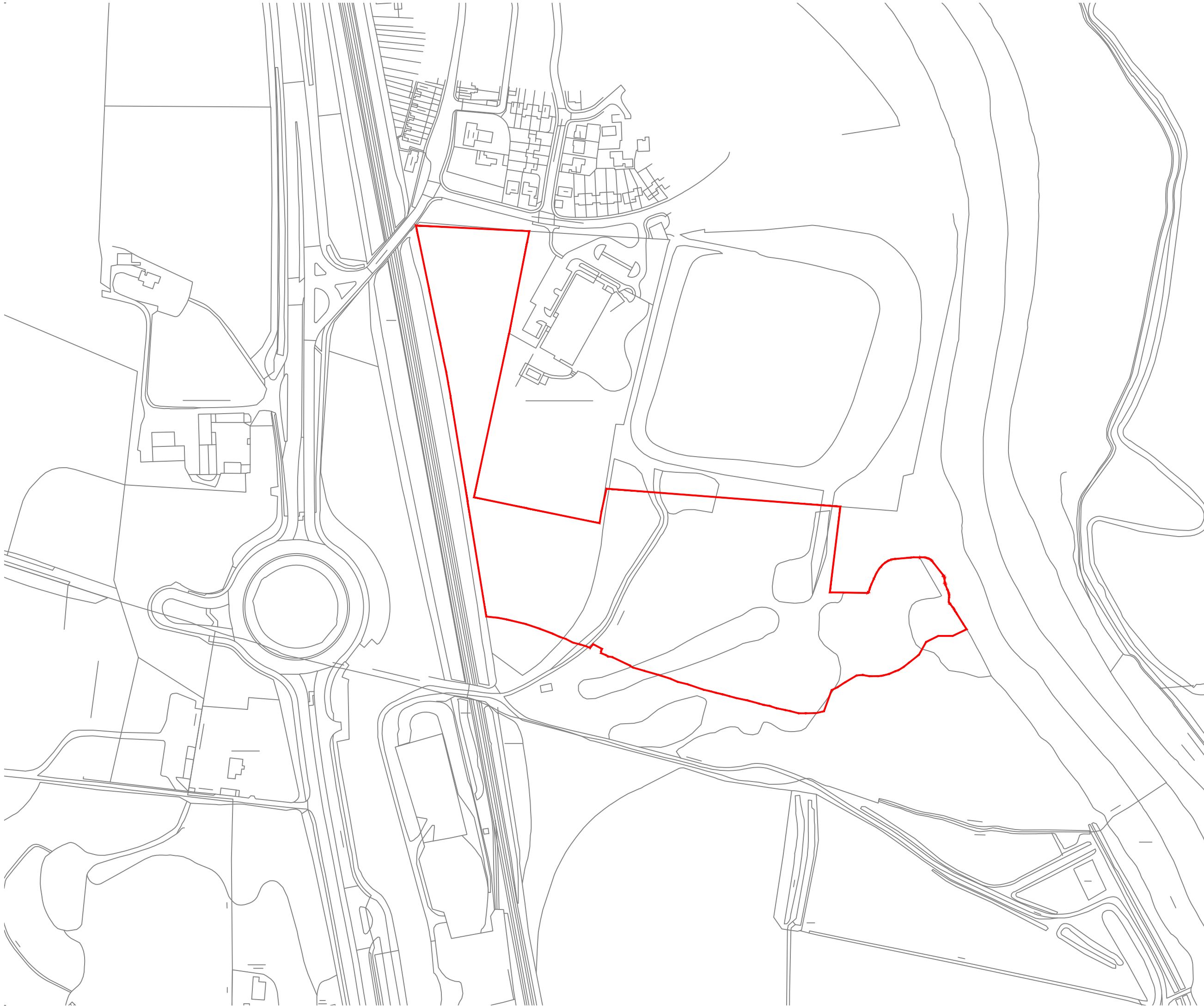
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Scale: 1:20,000			



Dwg: TAR002-014
Rev: A
Do not scale from this drawing

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 Site Boundary

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Client:		



Medway Valley
Call for Sites - Lower Halling, Medway

Scale@A3 : 1:2,500	Drawn: ADW	Designed: KH	Approved: PDC	
				
Drawing Number: TAR002/023	Revision: ---	Date: 21.04.17		
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CONCEPT MASTER PLAN

DRAFT



LOWER HALLING TRIANGLE

APRIL 2017
TAR002/21/a
1:2500@A3

0m 100m

David Lock Associates
Town Planning and Urban Design



Medway Strategic Land Availability Assessment 'Call for Sites' Pro forma

For official use only:

Reference _____
Received _____
Acknowledged _____

- This form should only be completed for sites that could accommodate 5 or more dwellings or are 0.15 hectares or greater in size.
- Please include sites with planning permission that are either under construction, or not started.
- Please complete the form clearly and legibly.
- You must give your name and address for your comments to be considered.
- You must attach a 1:1250 scale map showing the precise boundaries of the whole site and the area suitable for development
- This form should be sent to the Planning Policy Team at Medway Council and received **by Friday 9 May 2014**

DATA PROTECTION STATEMENT AND FREEDOM OF INFORMATION ACT 2000

The information collected in this response form will be used by Medway Council to inform the Strategic Land Availability Assessment and subsequent components of the Local Plan, for example, land allocations. This first page of the pro forma will be kept confidential but the information given on the remaining pages will be made available to the public in a report published on the website. By signing and dating below you are accepting this statement and giving permission for Medway Council to hold your details on our database. Please address any questions or requests regarding our data processing practices to planning.policy@medway.gov.uk. Please note that forms that are not signed and dated will not be accepted.

1. Your details			
Title and name	Mr Phil Copsey		
I am a:	<input checked="" type="checkbox"/> Agent <input type="checkbox"/> Applicant <input type="checkbox"/> Developer <input type="checkbox"/> Landlord <input type="checkbox"/> Occupier <input type="checkbox"/> Tenant <input type="checkbox"/> Full Landowner <input type="checkbox"/> Partial Landowner <input type="checkbox"/> Other (please specify)		
Company/Organisation	David Lock Associates		
Contact address	[REDACTED]		
Contact telephone number	[REDACTED]		
E-mail address	[REDACTED]		
Representing (if applicable)	[REDACTED]		
<table style="width: 100%; border: none;"> <tr> <td style="border: 1px solid black; width: 60%; padding: 5px;">Signed:</td> <td style="border: 1px solid black; width: 40%; padding: 5px;">Dated:</td> </tr> </table>		Signed:	Dated:
Signed:	Dated:		

2. Site details			
Site address	Land to the west and south of Halling Primary School, Lower Halling.		
Site postcode (Insert Grid ref if not available)	Postcode	Easting 570400	Northing 163500
What is the estimated area of site? (hectares)	circa. 4ha		
Are you the Sole owner?	Yes	<input checked="" type="checkbox"/>	
	No – please list all land owners		
Does your site have any previous planning history?	Yes	<input checked="" type="checkbox"/>	
	No	The planning permission for Peter's Bridge covers the lower portion of this site, south of Halling Primary School. This area was used in connection with the construction of the bridge.	
If yes, what is/are the planning reference number(s)?	MC/2005/0756		
Has development started on site yet?	Yes		
	No	<input checked="" type="checkbox"/>	
Please attach a map (at 1:1250 scale) outlining the precise boundaries of the whole site and the part that may be suitable for development (if this is less than the whole). Without this mapped information we are unable to register the site.			

3. Market Interest: Please choose the most appropriate category below to indicate what level of market interest there is in the site.		
Site is owned by a developer	<input type="checkbox"/>	<u>Comments:</u> Site not yet promoted.
Site under option to a developer	<input type="checkbox"/>	
Enquiries received	<input type="checkbox"/>	
Site is being marketed	<input type="checkbox"/>	
None	<input type="checkbox"/>	
Not known	<input type="checkbox"/>	

CURRENT AND POTENTIAL USE

4. What is the current use of the site?	
Please tick all that apply:	
<input type="checkbox"/> Housing	<input type="checkbox"/> Employment
<input type="checkbox"/> Retail	<input type="checkbox"/> Tourism
<input type="checkbox"/> Leisure	
<input checked="" type="checkbox"/> Vacant or derelict (please state historic use) the site includes the Former Lees Cement works, recently used as works area for Peter's Bridge.	
<input checked="" type="checkbox"/> Greenfield% of site coverage	
<input type="checkbox"/> Waste or minerals site	
<input type="checkbox"/> Other (please state).....	

5. Do you think the site would be viable for the following types of development?

Please tick all that apply:

- ☒ Housing
 ☐ Employment
 ☐ Retail
 ☐ Tourism
 ☐ Leisure
☐ Waste or minerals
 ☐ Other (please state).....

6a. For proposed residential uses:

How many dwellings do you think could be realistically provided on this site? (taking full account of site constraints and surrounding uses and character?)

.....approximately 134 dwellings

What type of dwellings?

(for gypsy, travellers and travelling showpeople, please see below)

- ☒ Houses
 ☒ Flats
 ☐ Bungalows
☐ Houseboats
 ☐ Residential Park Homes
☐ Mixed, please give details.....

Would the site provide affordable housing?

- ☒ Yes
 ☐ No
 subject to viability
 If Yes, what percentage? %

Gypsy, travellers and travelling showpeople – please state number of pitches if the site is proposed for this use

N/Apitches

Specialist residential uses – please give details if the site is proposed for any other type of residential use, eg. specialist accommodation for the elderly, self build, live/work units

N/A

6b. For proposed employment uses:

How many business units could be provided on the site?

N/A

What floor space could be accommodated in total (sq m)?

N/A

What type of employment could be accommodated?

Office	N/A
General industrial	N/A
Storage / distribution	N/A

6c. For proposed retail, leisure, tourism, community facilities or other uses:

Please give further details if the proposed use is to contain any of these components. Please include details of floorspace.

There is potential for access improvements to serve Halling Primary School

6d. For proposed waste facilities or minerals:

Please give further details if the proposed use is to contain any of these components.

N/A

Please note, we will follow up with a request for further details for any proposed waste or minerals sites.

PHASING**7. Please indicate below how many dwellings or how much floorspace you estimate will be completed within each timeframe:**

		Housing (no of units)	Employment (sq. metres)	Retail (sq. metres)	Tourism (sq. metres)	Leisure (sq. metres)	Other (please state)
Within the following 5 years	April 14 to Mar 2015						
	April 15 to Mar 2016						
	April 16 to Mar 2017						
	April 17 to Mar 2018						
	Mar 18 to April 2019	134					
5-10 years (April 2019 to March 2024)							
10-15 years (April 2024 to March 2029)							
15-20 years (April 2029 to March 2034)							
20 years + April 2034 onwards							

POSSIBLE CONSTRAINTS

8. To the best of your knowledge, are there any constraints that may affect development on the site? Please provide brief details, including whether any technical studies have been undertaken to inform your understanding:

	Please tick:	Do you believe the constraints on site can be overcome? If so, please explain how and by when:
Access		Access is to be taken from the Peter's Village Bridge link.
Contamination		
Detrimental impact on Air Quality Management Area		
Detrimental impact on Historic Park		
Detrimental impact on Landscape	✓	Development may require the loss of a small wooded area in the centre of the lower portion of the site.
Detrimental impact on Townscape		
Cables, pylons, electricity lines, oil pipelines and gas		
Flood Zone	✓	The south portion of the site is affected by Flood Zones 2 and 3 on its eastern areas. Flood mitigation methods can be considered further at a later stage.
Hazards		
Highway		
Impact on Residential Amenity		
Sewerage / Drainage		
Topography / Adverse Ground		
Water		
Ownership Issues		
Legal Issues		
Infrastructure/utility requirements		
Market viability		
Other considerations	✓	Holborough to Burham Marshes SSSI to the south of the site, however this is outside the site boundaries; a small area of the eastern portion of the site is designated as coastal saltmarsh priority habitat inventory by Natural England.

9. Utilities

Are any of the following utilities available to the site?

Mains water	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Unsure <input checked="" type="checkbox"/>
Mains sewerage	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Unsure <input checked="" type="checkbox"/>
Electricity	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Unsure <input checked="" type="checkbox"/>
Gas	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Unsure <input checked="" type="checkbox"/>
Telephone Lines	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Unsure <input checked="" type="checkbox"/>
Broadband	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Unsure <input checked="" type="checkbox"/>

Have you consulted any infrastructure providers regarding provision of utilities to the site?

Yes ☐ No ☒ If yes, please provide further details below:

SURVEY AND OTHER ISSUES

10. In identifying such a site you are giving permission for an officer of the Council to access the site in order to ascertain site suitability. In this context would there be any access issues to the site?

No access issues are anticipated.

11. If yes, please provide contact details of the person who should be contacted to arrange a site visit.

Phil Copsey at David Lock Associates
PCopsey@davidlock.com

12. Do you know of any other relevant issues that we should be aware of?

N/A

* Please return this form, together with a **map** (at 1:1250 scale) that clearly identifies the site's location and boundaries to:

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

Email: planning.policy@medway.gov.uk

1. Housing

Para 4.3 et seq refers to an assessed need for 29463 homes, of which 17112 should be affordable. This is a ratio of 58% affordable, far higher than the 25% figure given as possibly achievable at para 4.11. Even this lower figure exceeds Government recommendations. I notice that the White Paper on Housing, published last week, refers to a minimum of 10% affordable in new developments. I can't believe the local demographic is so out of kilter with that nationally, as to justify the 25% figure, let alone 58%. There are other arguments which in my view support a lower figure as a matter of local policy:

(i) There are already very large swathes of existing housing stock, particularly in Gillingham, Rainham, Strood and Luton, which are low cost relative to the rest of the South-East region. In any given year, a good percentage of these come on the market, and in the past this has been the mechanism by which the younger and less well off (me included) have got on the housing ladder. It is also a virtuous mechanism, in that these new householders tend to improve this generally older housing stock, giving it a new lease of life and increasing its value, and thereby improving their chances to move up to the next housing rung when finances allow. Of course, Government moves (vaguely promised in the White Paper) to improve the fluidity of the market, in both up and down-sizing would also help.

(ii) Para 5 on Employment sets out the desire to increase productivity through higher value employment. If higher paid staff are to remain in the area as they progress in their careers, they will want progressively higher value homes to move to. Otherwise, you will find that they will move out of the area, and quite possibly to a new out of area job rather than commute. Whilst fully recognising the need for affordable and older persons accommodation, I strongly believe there should be a policy of provisioning for a proportion of housing towards the more luxury end of the market, particularly in new developments on the more desirable waterfront sites. This will help to attract and hopefully retain the more wealthy with their concomitant higher spend on quality local amenities (assuming these come into existence during the timescale of the plan). They also pay higher rates.

I don't know how you arrived at the figure for number of homes required in relation to population growth but Para 4.9 refers to an average Medway household size of 2.44 persons, predicted to fall to 2.33 by 2035. Even using this lower figure and the expected population growth of 53700 implies a need for 23060 homes, more than 6000 fewer than your 29463 figure.

2. Retail

There seems to be some inconsistency in the figures given for comparison and convenience retail space required up to 2031. At para 3.1 they are 34900sqm and 10500sqm respectively, while at para 6.1 the figures are 46100 and 12300, increasing to 70500 and 13200 by 2037. I have not seen the studies which arrive at these figures, or that of over 200000sqm of B1/8 office and warehousing space, but I question the need for these increases which seem to run counter to current and predicted future trends. On the retail side I would be surprised if there were any reversal of the move to internet shopping and home deliveries; instead I can see no

need for any further increase in retail space which in future may be confined largely to niche and day to day convenience stores. The battle for mainstream shopping with the likes of Bluewater is effectively lost and given the already low footfall in Chatham's major stores such as TKMaxx and Debenhams, it is difficult to see how even these can survive much longer. However, as noted in the plan, this presents a golden opportunity for housing developments.

On office and warehousing space, different forces apply but which also will drive down the need for large increase in space. It is true that distribution centres and click and collect facilities may increase in numbers, but this may be counterbalanced by very rapidly increasing use of robotics and ever more sophisticated IT systems. Last weekend's Sunday Times had an article on just this topic, pointing to existing commercial office space which already cannot be let due to decreasing demand as intelligent IT systems take over the traditional roles of many middle managers. It is important to get these estimates right since, if you wish to minimise encroachment on green belt land, there will be fierce competition between housing and commercial developments on the limited brownfield sites available.

3. Development Options

Of the 4 scenarios set out in section 3 I generally favour option 1, but would like to see the boldest possible interpretation of it. Given the current Government desire to increase house building, I can't see them withholding permission for Lodge Hill, provided the case has been properly presented, and forward planning should proceed on this basis. Also, in spite of the undoubted difficulties, I would like to see a commitment to moving Medway City Estate in its entirety to Kingsnorth, and the whole area given over to housing, which should be predominantly high rise (ie up to at least 10 stories). I envisage something like the more classy developments in Canary Wharf, Limehouse, Docklands, Stratford, Woolwich, etc. It being mainly apartments would be counter-balanced by the development of houses at Lodge Hill. At present, the scruffy appearance of Medway City Estate on what is the prime asset of a waterside site is, quite frankly, ridiculous.

In order to make this work the infrastructure would need to include something like the Docklands Light Railway or a tram service, looping through Kingsnorth, Lodge Hill, the new Medway City housing development and connecting with Strood and Rochester railway stations. I also think it would benefit hugely from a new river crossing, from the southern tip of Medway City to somewhere near the bus station. Such a crossing should be for pedestrians/cyclists only, or perhaps include a shuttle bus/tram service (or the above DLR like service), but otherwise exclude vehicular traffic.

4. General Comment

The central problem with plans of this sort is that they always contain motherhood and apple pie statements about more and better schools, improved health services, housing for all, revitalised town centre amenities, etc, with which we can all agree, but are completely silent on how these are to be achieved in the timescale. Since moving to Chatham in 1999 I have seen a plethora of grandiose schemes centred on the waterfront and Chatham town centre, but in all these 18 years nothing of any great import has been achieved. Indeed, if anything Chatham high street has only got worse and must now surely be in the bottom 10%

in the country, measured on appearance. There can only be a very small handful of buildings worth preserving on aesthetic grounds, and this presents a golden opportunity for a wholesale recasting of the area. Unfortunately, if it is left to market forces to redevelop on an opportunity basis, the result will be a piecemeal, very slow and disjointed series of minor improvements. I confidently predict the result in 2035 would be hardly more visually appealing than at present.

The only way round this that I can see is through a truly massive programme of Compulsory Purchase Orders, coupled with a dictatorial stance on the part of the Council, in specifying what it wants from developers and being very strict in not allowing any dilution of the vision. I understand that an Implementation Plan is to be drafted once the current consultation phase is complete and a final version of the Local Plan is approved, scheduled I believe for Spring 2019. Assuming production, consultation and approval of the implementation plan will take at least another year, it seems that no construction work allied to the plan, as opposed to ongoing developments, will start before 2020 which is fully one third through the 2012-2035 timescale of the Plan. Given this shortened timescale, only a vigorous proactive role on the part of the council will accomplish anything worthwhile.

Finally, the title of the Plan is surely a misnomer. I suppose the start date is to align with the end date of the current 2003 plan, but in view of the time that has already passed it should surely be retitled.

David Scott
14 February 2017

**Medway Council Local Plan
Issues and Options 2012-2035**

**Consultation response
by**



April 2017

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APPENDICES

Appendix I - Site Location Plans

Appendix II - Highways & Transportation Representations, Prime Transport

1 INTRODUCTION

1.1 Context

- 1.1.1 Dean Lewis Estates Limited is a professional strategic land promotion company specialising in the delivery of residential and mixed use development.
- 1.1.2 This submission provides Dean Lewis Estates Limited response to and representations in respect of this second round of Regulation 18 consultation into the Medway Local Plan Issues and Options consultation 2012-2035.
- 1.1.3 This submission focuses on the key planning policy considerations for the Medway Local Plan in order to enable its successful implementation, thereby sustainably meeting the identified full objectively assessed needs for housing (OAN).
- 1.1.4 For completeness, it is also appropriate to state that Dean Lewis Estates Limited is part of a consortium of promoter and developer partners that are working together to promote development at Hoo St Werburgh to enable successful delivery of the planned growth required to meet the needs of Medway up to 2035.
- 1.1.5 The Consortium members comprise:
- Church Commissioners for England
 - Dean Lewis Estates
 - Gladman Developments
 - Taylor Wimpey
- 1.1.6 The areas of land within the control of Dean Lewis Estates is capable of being developed in isolation of the consortium land for mixed use residential led development. It should also be noted that the Dean Lewis Estates land has the capability to provide community benefits substantially in excess of that needed to serve the development of solely the Dean Lewis Estates land. It therefore can genuinely be regarded as playing a major role in facilitating further development at Hoo St Werburgh and supporting the needs of the wider community on the Hoo Peninsula.
- 1.1.7 As well as built development, the allocation of this land will secure major environmental and community benefits that will endure for future generations.

2 LEGAL COMPLIANCE

2.1 Duty to Cooperate

- 2.1.1 The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation.
- 2.1.2 Medway adjoins authorities within the south east and shares a functional relationship with wider the area in the context of its housing market area. Significant unmet housing need and demand is evident within this housing market area.
- 2.1.3 The unmet housing needs of London is a crucial factor that must be addressed within the evolution of the Local Plan. This matter also must be properly addressed within the auspices of the duty to cooperate.

2.2 Sustainability Appraisal

- 2.2.1 Section 19 of the 2004 Planning and Compulsory Purchase Act, requires that Local Plans are tested by way of a Sustainability Appraisal (SA), thereby meeting the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004. The SA should be carried out at each stage of the Plan's preparation.
- 2.2.2 Medway Council published its Interim Sustainability Appraisal (SA) on 14 March 2017, as part of the present consultation exercise. Whilst this overlaps with the main Local Plan consultation exercise, it is notable that it was not published wholly alongside the main Local Plan. The Council acknowledges that the Interim SA is very much an early draft, and is yet to be fully informed by the completed evidence base – and in this regard, we recognise the “interim” status.
- 2.2.3 The Interim SA has made interim findings in respect of the four Spatial Development Options presented within the I & O consultation, namely:
- Scenario 1 Maximising the potential of urban regeneration
 - Scenario 2 Suburban expansion
 - Scenario 3 A rural focus

- Scenario 4 Urban regeneration and a rural town

- 2.2.4 In our view, the interim SA demonstrates a clear position that the eventual spatial development strategy cannot pursue a “one size fits all” approach from the four options. The most sustainable option will be derived from a hybrid of the options taking elements of each to formulate a deliverable and sustainable development strategy.
- 2.2.5 It is apparent that “Scenario 4” reflects such an approach.
- 2.2.6 The initial findings of the interim SA reveal that the “maximising the potential of urban regeneration” scenario 1 scores most favourably given the brownfield focus of this option.
- 2.2.7 The environmental and economic and social benefits of regenerating the degraded areas within the main towns of Chatham, Gillingham, Rochester and Stroud is wholly supported. However, the interim findings of the SA also acknowledges that the challenges associated with the delivery of so many of the large scale regeneration schemes presents a major risk to deliverability. Medway has a history of past under delivery related to the stalling of major brownfield regeneration development schemes due to lack of viability, land ownership impediments and susceptibility to adverse market conditions.
- 2.2.8 The accompanying text of the Interim SA acknowledges some of these challenges (ie. Land assembly, site preparation, contamination, impact on highway networks and wider infrastructure services/facilities). However, these challenges, and their implications for sustainability, have not wholly been reflected in the accompanying “scoring” appendices. In this regard, and by way of a single example only, it is considered that “viability” and “deliverability” are two important considerations that are not directly assessed in the present SA/SEA scoring analysis. It would therefore be inappropriate to seek to solely rely upon this spatial option/scenario 1 in the expectation of delivering all of the Local Plan objectives, including housing delivery.
- 2.2.9 The interim SA scores Scenario 4 “Urban Regeneration and a rural town”, second to Scenario 1 – Maximising the potential of urban regeneration. It does so on the basis that it is considered to provide the next greatest number of “significant positive effects”. Whilst a lower score when judged against the maximising urban regeneration option is rational, due to the inclusion of greenfield sites within Scenario 4, it would be irrational to place option 1 above option 4 on an overall

basis as option 1 will not deliver the full objectively assessed needs of Medway within the plan period.

- 2.2.10 Option 4 constitutes a genuine hybrid of all Options. Option 4 can logically be shown to provide the most sustainable development strategy that will deliver the greatest amount of benefit to the community of Medway during the plan period.

2.3 Habitat Regulations Assessment

- 2.3.1 Medway Council published its 'Habitat Regulation Assessment: Screening Report' on 18 April 2017 in support of the present consultation exercise.
- 2.3.2 The Report has been prepared in response to the requirements of the Habitats and Species Regulation (2010, and as amended in 2012), which aims to protect habitats and species of European nature conservation importance. Given the presence of several European sites within the Medway plan area, as well as several further areas close to Medway, the Consortium considers it prudent that the Habitats Regulation Assessment (HRA) process is commenced in support of the present consultation exercise - it is clearly important that the HRA process robustly informs the selection of the preferred policies and site allocations as the Plan emerges.
- 2.3.3 It is noted that the "screening" exercise that has been undertaken at this stage is an "initial screening and high level assessment of the potential impacts" (paragraph 1.9). Thereby the exercise comprises a relatively limited amount of detail. Given that the Local Plan is at an early stage of preparation, the Consortium considers that this approach is appropriate, particularly as the report makes clear that **"further work will be needed to determine preferred development allocations and policies"**.
- 2.3.4 Drawing upon the analysis in the Report the comments below highlight that the proposed expansion of Hoo St Werburgh would be unlikely to (individually) impact upon any of the identified European sites.

Habitat Fragmentation and Loss

- 2.3.5 The Report highlights that the most direct potential impact is the fragmentation or loss of protected habitat, and highlights that the Council will seek to avoid this through the allocation of land for development in the emerging Local Plan.
- 2.3.6 In developing the proposals for the expansion of Hoo St Werburgh the Consortium have ensured that none of the land proposed for development includes areas

subject to European designations, protecting against direct habitat fragmentation and loss.

- 2.3.7 A relatively small part of the Consortium land (the area to the south of the village, adjacent to the River) is within the Medway Estuary & Marshes SPA. As identified in the Development Framework Plan, the Consortium is proposing that this land, which is currently in agricultural use, is given over to green infrastructure, with the specific intention of enhancing this habitat and its ecological interest.
- 2.3.8 The Consortium is keen to work with statutory agencies and non-statutory bodies to ensure that these areas are carefully managed to contribute toward supporting the stated 'Conservation Objectives' of the Medway Estuary & Marshes SPA thereby delivering a substantive environmental gain as part of the expansion of Hoo St Werburgh. The consortium considers this element of the Hoo St Werburgh Development Framework to be central to the strategy of delivering a genuinely sustainable development.

Disturbance

- 2.3.9 The report highlights evidence suggesting that all development within 6KM of the identified European sites, which means that all the potential strategic development locations in the Borough, have the potential to increase recreational disturbance upon these sites.
- 2.3.10 The Consortium agrees that the strategic mitigation approach that the Council has developed with its partners, will ensure that the risks of increased recreational disturbance is properly dealt with, and thereby should not prevent the Council delivering its housing requirement for the plan period.
- 2.3.11 It is also noted that the report identifies the potential for new green infrastructure to "help accommodate recreational activities away from sensitive European sites". Within this context the Consortium notes that the proposals for the expansion of Hoo St Werburgh propose significant areas for new green infrastructure for recreational purposes, notably a new Country Park which will help mitigate recreational pressure arising from the expansion of Hoo, but also given its scale and location, has the potential to mitigate impacts from other housing growth in the Borough as well. It is important to highlight that the areas of green infrastructure proposed for recreation are entirely separate from the areas proposed for ecological and habitat enhancement.

Water Resources and Quality

- 2.3.12 The Report acknowledges that the scale of development that will be delivered in Medway cumulatively has the potential to impact upon water resources and quality. However, it is agreed that by working closely with water providers and statutory agencies, new infrastructure can be delivered in a managed way which will ensure that impacts upon water resources, and thereby sensitive European sites, are unlikely to arise.
- 2.3.13 Similarly, water quality impacts can be properly managed and mitigated through the proper use of SUDS. It is noted that large scale strategic development, such as that proposed for Hoo St Werburgh, has the potential to deliver this new water supply and SUDS infrastructure in a more coordinated manner than ad hoc smaller scale developments.

Air Quality

- 2.3.14 The report acknowledges that growth, and the traffic increases associated with it, has the potential to increase air pollution which has the potential to impact upon some of the identified European sites, depending upon the characteristics and sensitivities of the protected habitat.
- 2.3.15 The report notes that the critical issue is increased traffic along major roads near sensitive areas. However, it is also highlighted that “determining the significance of this impact in relation to the integrity of European sites is extremely complex”.
- 2.3.16 However, it is also noted that the Report highlights that: “Estuarine habitats are generally not considered to be particularly sensitive to air pollution effects, given that they already receive high nitrogen loads in water.” (paragraph 3.68). The report goes on to highlight at paragraph 3.76 that “the majority of development options being considered within the emerging Local Plan indicates that it is unlikely that there will be significant adverse effects on the integrity of the estuarine European sites”.
- 2.3.17 Given that the only European sites relatively close to the Consortium land are estuarine habitats, it is considered that the proposed expansion of Hoo St Werburgh is unlikely to give rise to any detrimental air quality impacts upon these sites. It is also acknowledged that further assessment should be undertaken by the Council, regarding cumulative impacts upon particularly sensitive European sites which are proximity to major roads.

- 2.3.18 The Consortium has also engaged in positive dialogue with Arriva. From these discussions it is evident that there is a realistic prospect of providing a high quality, frequent bus service to Hoo St Werburgh that will offer a genuine alternative to the private car, thereby providing the potential to further any adverse impacts on air quality.
- 2.3.19 'Carbon Capture' schemes from extensive tree planting are also becoming widely regarded as highly beneficial to the improvement of air quality. The delivery of a major new country parkland area to the south of Hoo St Werburgh with extensive new tree planting will make a significant contribution in this regard.
- 2.3.20 In summary, the preliminary analysis set out in the 'Habitats Regulation Assessment: Screening Report' indicates that the proposed expansion of Hoo St Werburgh would be unlikely to have an impact (individually) upon any of the identified European sites. This is principally because the land proposed for development is not subject to any designations, but also because the proposals include the delivery of significant new green infrastructure for both recreational and habitat enhancement purposes. As the assessment is refined as the plan proceeds, it is appropriate that the positive effects of these environmental benefits be considered fully in the context of the overall sustainability assessment.

3 OBJECTIVELY ASSESSED HOUSING NEED

3.1 Ensuring Delivery

- 3.1.1 It is noted that Medway Council carried out a public consultation exercise in respect of the Strategic Housing Market Assessment and the Employment Land Needs Assessment during February and March 2016. The outturn of that process concluded that the Local Plan needs to provide for 29,463 new homes over the plan period.
- 3.1.2 The Strategic Housing Market Assessment also considered the range, type and mix of housing needed in Medway. The need for 'affordable housing' demonstrates a high level of demand for 17,112 over the plan period.
- 3.1.3 The councils identified potential development options will only serve to begin to meet this high demand if the location of strategic allocations provides genuinely viable development sites that can withstand the cost of the affordable housing provision. Development Scenario 1 "Maximising the potential of urban regeneration" is highly unlikely to provide anywhere near the amount of affordable housing required to meet the identified need.
- 3.1.4 The housing market generally on a countrywide basis and within the regional market of Kent is presently relatively stable and showing signs of continued growth. Whilst this is encouraging it will also place added pressure on affordability during the plan period. The added unknown effects of 'Brexit' could bring about a downward market pressure whereby the viability of sites presently considered to be viable could be adversely effected and affordable housing delivery could become severely pressured.
- 3.1.5 The successful delivery of the OAN will depend upon the durability of the Local Plan strategy. Development Scenario 4 will provide the greatest degree of certainty within the plan area. It is, in effect, the most realistic of options in contrast to the other three.

Option 4 will deliver the planned growth in suitable and sustainable locations. This option will enable delivery of the OAN in so far as it will deliver the range and mix of housing types, to provide homes suitable for different groups in society. Infrastructure, services, green spaces, shops and employment areas would also be planned as part of new residential areas to provide balanced growth.

4 MEDWAY ISSUES AND OPTIONS

4.1 Question 1 – Vision

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

4.1.1 The 'Vision' for Medway is **supported** and is, in our view, ambitious. It recognises the needs of the community as an underpinning principle and importantly distinguishes between the need to facilitate the planned growth of a city with complimentary town, local and village centres. We would specifically endorse the element of the 'Vision' that aspires to create distinct towns and villages that make up Medway ensuring their connection through effective transport networks, and green infrastructure links supporting nature and healthy communities.

4.1.2 The development proposals at Hoo St Werburgh will deliver on this key element of the 'Vision'.

Hoo St Werburgh will become a sustainable, small rural town, sensitively integrated into the Peninsula landscape. The settlement will play an enhanced service centre role, with improved transport links, shops, facilities and services, sustainably and viably meeting the daily requirements of local residents and nearby rural communities. The settlement will have an extensive green infrastructure network, integrating new development into the landscape, and providing access to the surrounding countryside for residents and enhancing biodiversity."

4.2 Question 2 – Strategic Objectives

The objectives for the plan are focused on environmental, social and economic well-being and regeneration, set out under four broad themes: Do you agree with Strategic Objectives?

- 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

- 4.2.1 We support the four objectives and note that the desired objectives will be best realised via Development Scenario 4 in so far as it brings together the opportunities for urban regeneration and with the realistic need for suburban and rural growth.

Development Options

4.3 Question 3 Where is your preferred option?

- 4.3.1 The 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

- 4.3.2 Of the four Development scenarios identified by Medway Council to deliver the growth set out above, Dean Lewis Estates **Supports Scenario 4** as its first preference.

- 4.3.3 This option constitutes a genuine hybrid of all Options including a significant component of Option 1. It can logically be shown to provide the most sustainable development strategy that will be both deliverable and will achieve the greatest amount of benefit to the community of Medway during the plan period.

Scenario 1 - Maximising the potential of urban regeneration (Appendix 1B)

- 4.3.4 Hoo St Werburgh has a strong functional relationship with the urban area. Whilst we are firmly supportive of the regeneration of Medway's urban areas, it is imperative that assumptions regarding the development capacity, viability and timescales for development within the urban area are realistic.

- 4.3.5 Appendix 1B of the consultation document explains that maximising urban regeneration comprises “a more radical approach...to deliver a substantial increase in development...building at higher densities...and bringing forward new areas for development”.
- 4.3.6 It is suggested that this approach could deliver some 10,500 units through the redevelopment of sites including: Medway City Estate, Chatham Docks and waterfront sites in Chatham and Strood.
- 4.3.7 Caution should be exercised in this regard. It is unclear from the consultation document, or indeed the SHLAA exactly how many of these 10,500 units would come forward through the intensification of sites that already benefit from planning permission, and how many would come forward on entirely new sites which are not currently being promoted for development.
- 4.3.8 Sensibly the Council note within their consultation document (para. 3.26) that the redevelopment of brownfield sites is ‘challenging’.
- 4.3.9 These sites are often the most difficult to develop with fragmented ownerships and technical constraints such as contamination, flood risk and insufficient highways and infrastructure capacity. Alongside these technical issues there are also implications for the character of the urban area, particularly in respect of mix of uses, building heights and impacts upon the historic environment.
- 4.3.10 It is important that the Council remains realistic about the deliverability and capacity of the sites within the urban areas. Little mention is made as to the viability of these sites in the context of delivery of affordable housing.
- 4.3.11 Overall, the plan must pass the test of soundness and therefore assumptions regarding the capacity and deliverability of the brownfield sites must be based upon both recent and historic evidence. When the market has become weakened, or has even failed, the effect on the delivery rates of brownfield regeneration sites within Medway is clear. They have stalled and have taken years to become viable again. A major under delivery of affordable housing also remains a serious threat with an over reliance on these types of sites.
- 4.3.12 Based on historic development rates and the significant impediments manifest within the urban areas as set out in Scenario 1, the 10,500 units will not be deliverable in its entirety within the Plan period.

- 4.3.13 Notably Scenario 4 - Appendix 1E of the consultation document suggests that the regeneration sites could accommodate some 6,500 units within the plan period at Chatham Docks, Medway City Estate, Chatham and Strood Waterfront. This is considered a more realistic assumption.

Scenario 2 - Suburban Expansion (Appendix 1C)

- 4.3.14 Scenario 2 proposes sustainable urban extensions around Rainham, Capstone and Strood of circa 10,700 units, 3,000 at Lodge Hill and 2,000 units at Hoo St Werburgh and a residual 900 in the rural area.
- 4.3.15 The consultation document notes that the delivery of infrastructure in this option presents some significant constraints. It is also evident that significant environmental constraints are also present within this option that reduce the capacity of these areas to accommodate growth. The consultation document also highlights that highways capacity is likely to be an issue in these areas. This will have significant implications for the viability and deliverability of development in these locations.
- 4.3.16 In addition, it is noted that an urban extension to Strood would require amendment to Green Belt boundaries. The recent Housing White Paper has reiterated that that Green Belt boundaries may only be amended in "exceptional circumstances", indicating that this would need to include a full assessment of all other reasonable options before exceptional circumstances could be demonstrated.

Scenario 3 - Rural Focus (Appendix 1D)

- 4.3.17 Scenario 3 comprises delivery of a rural town centred around the existing Hoo St Werburgh. The scenario promotes development including 6,500 homes, investment in transport, a new retail centre and employment land, a secondary school and 5 No. primary schools, community facilities including a Healthy Living Centre, library and community centre, open space including play areas and local amenity greenspaces and two country parks around the Saxon Shore Way and Deangate.
- 4.3.18 In directing this scale of growth towards Hoo St Werburgh this scenario recognises that:
- The expansion of Hoo St Werburgh comprises an opportunity to realise genuinely sustainable development, delivering a mix of uses including retail and employment alongside housing, and properly served by

infrastructure including transport investment, new schools, health and community centres, and open spaces including a new country park.

- The land around Hoo St Werburgh is largely free from strategic environmental constraints, particularly in respect of International and National landscape designations.
- The existing infrastructure serving Hoo St Werburgh with some improvement, has the capacity to accommodate growth. In contrast the suburban expansion is constrained by the capacity of the existing roads that serve the urban area which have only limited potential for improvement.

4.3.19 This Scenario also has regard to the wider Hoo Peninsula noting that Lodge Hill could deliver up to 3,000 homes, schools, community facilities, including health, library and community centre provision, employment space, retail centre and leisure and open space, play areas and country park. The regeneration of this former MOD site would be complementary to the development envisaged around Hoo St Werburgh.

4.3.20 This Scenario also recognises that the existing villages of Cliffe, Cliffe Woods, High Halstow, Lower Stoke, Allhallows, and Grain could accommodate around 2,600 homes, primary schools, parks, health and community facilities.

4.3.21 It is noted that strengthening the role of Hoo St Werburgh as a key service centre for the Peninsula will help improve access to services and facilities for these surrounding villages thereby further enhancing the sustainability of these smaller settlements.

Scenario 4 (Appendix 1E) – Urban Regeneration and Rural Town

4.3.22 This approach brings together the key components of the urban regeneration, suburban expansion and rural development scenarios:

- It includes elements of building at higher densities in waterfront and urban centre sites in Chatham and Strood, and seeking opportunities to consolidate development sites in these urban areas and for estate renewal schemes. Notably it does not include an allowance for the redevelopment of Medway City Estate which is recognised as having deliverability issues within the Plan period.

- It includes suburban expansion supported to a level that is considered sustainable, having regard to anticipated environmental capacity, avoiding urban sprawl and facilitating sustainable travel. It is also noted that it does not involve the release of land in the Green Belt to the west of Strood.
- It also includes the development of Hoo St Werburgh into a small rural town as well as development at Lodge Hill. It is anticipated that the expansion of Hoo St Werburgh would accommodate some 6,500 units and Lodge Hill would accommodate some 3,000 dwellings.
- It also includes some growth at the villages of circa 900 dwellings.

4.3.23 Dean Lewis Estates consider that distributing growth between the different areas, as suggested under this scenario is both sensible and achievable.

4.3.24 This approach supports the regeneration of the town centres, capturing the social and economic benefits, whilst also recognising that to effectively meet the housing requirement for the Plan period a significant amount of growth will be required in sustainable greenfield locations such as Hoo St Werburgh.

4.3.25 Importantly this scenario acknowledges that Hoo St Werburgh is the most sustainable greenfield strategic location in the Borough, with a higher quantum of growth directed to this location rather than towards 'suburban' areas. This scenario also acknowledges that, by directing growth towards Hoo St. Werburgh, the sustainability of the communities on the wider Peninsula will also benefit from enhanced facilities and infrastructure provision.

4.3.26 **Overall, it is considered that Scenario 4 represents the most deliverable and sustainable approach to growth with Medway. It is the most appropriate option.**

4.4 Question 4 Housing

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

4.4.1 Dean Lewis Estates **supports the Policy Approach to Housing Delivery with the following suggested alteration.**

- 4.4.2 The policy approach should omit the word '**seek**' in exchange for the words '**will 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. This approach is categoric rather than implied.
- 4.4.3 Dean Lewis Estates **supports** the establishment of allocations for sites and broad locations for development in the Local Plan. We also support the principle of a phased approach to ensure a supply over the plan period. The purpose of phasing should be clear in so far as it only required to guide Housing delivery with the coordination of infrastructure and service provision. Masterplans will be produced for major residential schemes in broad locations identified in the Local Plan.
- 4.4.4 Scenario 4 will provide the most effective growth strategy in this regard. The coordinated and timely delivery of essential infrastructure and service provision will best be achieved with the balanced growth portfolio that Scenario 4 provides.
- 4.4.5 The coordinated approach being pursued by the consortium at Hoo St Werburgh will provide the Council with the necessary certainty required to ensure that the plan can meet the test of soundness.

4.5 Question 5 Economy

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

- 4.5.1 Dean Lewis Estates **supports the Policy Approach to Economic Development.**
- 4.5.2 Development Scenario 4 will provide Medway with the greatest potential to secure the desired levels of job growth and economic prosperity across the whole of the area. The balanced approach set out with Scenario 4 will ensure that the economic benefits of growth are distributed equitably across the communities of Medway. The inter relationship between the rural and urban economies is pivotal to the successful implementation of the development strategy. If, for instance, scenario 1 were to be chosen as the preferred growth strategy, not only would the full OAN fail to be delivered but the prosperity of the suburban and rural communities would be diminished at the expense of urban regeneration. Ultimately, the

sustainability and prosperity of the rural and suburban communities must be enhanced alongside the urban areas.

4.6 Question 6 Retail and Town Centres

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

- 4.6.1 Dean Lewis Estates supports the general principles of the Policy Approach that seeks to strengthen and enhance its network of town, neighbourhood, local and village centres to provide a focus for retail, leisure, cultural and community activities. Hoo St Werburgh is recognised as a higher order centre that serves not only its own resident population but the needs of the community across the wider peninsula. As a key Service Centre Hoo St Werburgh should accommodate new retail provision to serve the planned growth up to 2035. This approach will support the viability of the whole area and will enhance its vitality. The increase and enhancement of local retail facilities to serve Hoo and the peninsula should be commensurate with a small rural town. This approach will enhance the overall accessibility for people living on the Peninsula to local centres. These local centres within Hoo St Werburgh will also provide places to meet the community and social needs of residents and workers such as health care centres, community buildings and other community facilities.

4.7 Question 7 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

- 4.7.1 The council's approach is to work in collaboration with local planning authorities in north Kent to contribute to the delivery of a strategic access mitigation scheme to address potential damage from population increases on the designated habitats of the Thames, Medway and Swale Estuaries and Marshes. Development within 6km of these areas designated as the Special Protection Areas and Ramsar sites that has the potential to generate additional visits to these coastal areas will be required to make a defined tariff contribution to a strategic package of measures agreed by the North Kent Access Management and Monitoring Strategy (SAMMS) Project Board.
- 4.7.2 This approach is **supported by Dean Lewis Estates** with the provision that the 'strategic access mitigation scheme' is defined as early on in the plan period as

possible so that development is not unduly delayed. The policy should also enshrine **flexibility** to reflect the potential for proposals that deliver major environmental benefits such as country parks to receive a reduced tariff. Such facilities would provide the equivalent benefits of the 'strategic access mitigation scheme'. Equally, major environmental mitigation and enhancements schemes such as flood elevation provision should also be regarded as having equivalent environmental benefits to the 'strategic access mitigation scheme'. Developments incorporating these types of features should either be released from the tariff or the tariff be reduced in recognition of the wider environmental benefits.

- 4.7.3 The Local Plan Policy Approach to Securing strong Green Infrastructure is **supported by Dean Lewis Estates**.
- 4.7.4 The development at Hoo St Werburgh will provide for major new green infrastructure that will support the successful integration of development into the landscape and will contribute to improved connectivity and public access. Biodiversity enhancements will be secured and landscape conservation of the most important landscape areas will be enabled by focussing development around Hoo. Development of the area to the south of Hoo on Main Road beneath the Saxon Shore Way ridgeline achieves this principle. With good design and appropriate management measures the new community parkland at Hoo St Werburgh will be sensitively integrated into the landscape that in turn will provide an excellent recreational resource. This strategic and planned approach will strengthen the resilience of the natural environment. Overall the master planned approach at Hoo St Werburgh enshrines the principles of good design in a well planned development that will deliver environment benefits as well as effective future maintenance and management of environmental assets.
- 4.7.5 The development of Hoo St Werburgh is entirely consistent with the council's policy approach of ensuring that the highest protection is given to the Kent Downs AONB to conserve and enhance its natural beauty and setting.
- 4.7.6 Further, the development of Hoo St Werburgh avoids intrusion into the Metropolitan Green Belt. At present the council has not identified that exceptional circumstances exist to justify any amendments to the green belt boundaries. The development at Hoo would assist in protecting the existing green belt boundaries.

4.8 Question 8 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:

- 4.8.1 The Council's Policy Approach in respect of Design seeks to ensure that Development in Medway will be expected to be of high quality design that makes a positive contribution appropriate to the character and appearance of its surroundings. **Dean Lewis Estates supports this policy approach.**
- 4.8.2 Development at Hoo St Werburgh presents an opportunity to improve its character with the introduction of a community hub centred around the existing high school and new primary school and swimming pool facility. The settlement of Hoo St Werburgh is attractive and vibrant, although its centre has become somewhat marginal to role and size. New growth centred around the location described will bring together a more cohesive settlement that functions not only to meet the day to day needs of the residents of Hoo but also serves the resident community of the wider Peninsula.
- 4.8.3 New housing developments at Hoo St Werburgh will 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 and support the undertaking of necessary day to day activities. Density will be reflective of the surroundings whilst making the most effective and efficient use of land.

4.9 Question 9 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:

- 4.9.1 **Dean Lewis Estates strongly supports** the Council's policy approach of its commitment to reducing health inequalities, increasing life expectancy and improving quality of life. It will support work to improve economic and social opportunities to tackle disadvantage across Medway. Further, it is noted that the council will seek new developments to be located within a sustainable distance of local health practices and, where this is not possible, seek contributions towards improving existing healthcare facilities.
- 4.9.2 The development at Hoo St Werburgh will deliver new health care facilities to reinforce the existing provision and to serve the needs of new residents.

4.10 Question 10

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

- 4.10.1 The council recognise that the timely provision of infrastructure is a vital component of the Local Plan as it is essential for a place to function well. Infrastructure planning is a key requirement of Government planning policy. To ensure that existing and new residents/businesses benefit from the growth that will be delivered in Medway over the plan period it is important that infrastructure is delivered in support of new developments in a timely fashion and in appropriate locations.
- 4.10.2 The development at Hoo St Werburgh, in line with Scenario 4 will deliver new and expanded schools to meet the needs of Medway's communities as well as other complementary community facilities. It will ensure that such infrastructure is delivered in a timely manner and be located appropriately.
- 4.10.3 The council must also be realistic that such provision can may be, in part, reliant on public funding being made available to compliment funds drawn from CIL or S106 agreements. Growth should not be held back for this reason as the needs of the population would suffer greater harm if their housing needs are not met as priority. Therefore, the policy approach should remain focused on encouraging growth and to institute either a CIL or S106 regime at realistic and viable levels. It should not be so punitive to deter development.

4.11 Question 11 Sustainable Transport

- 4.11.1 See supplementary report produced by Prime Transport – Appendix II.

5 SITE SUBMISSIONS

5.1 Dean Lewis Estates Interests

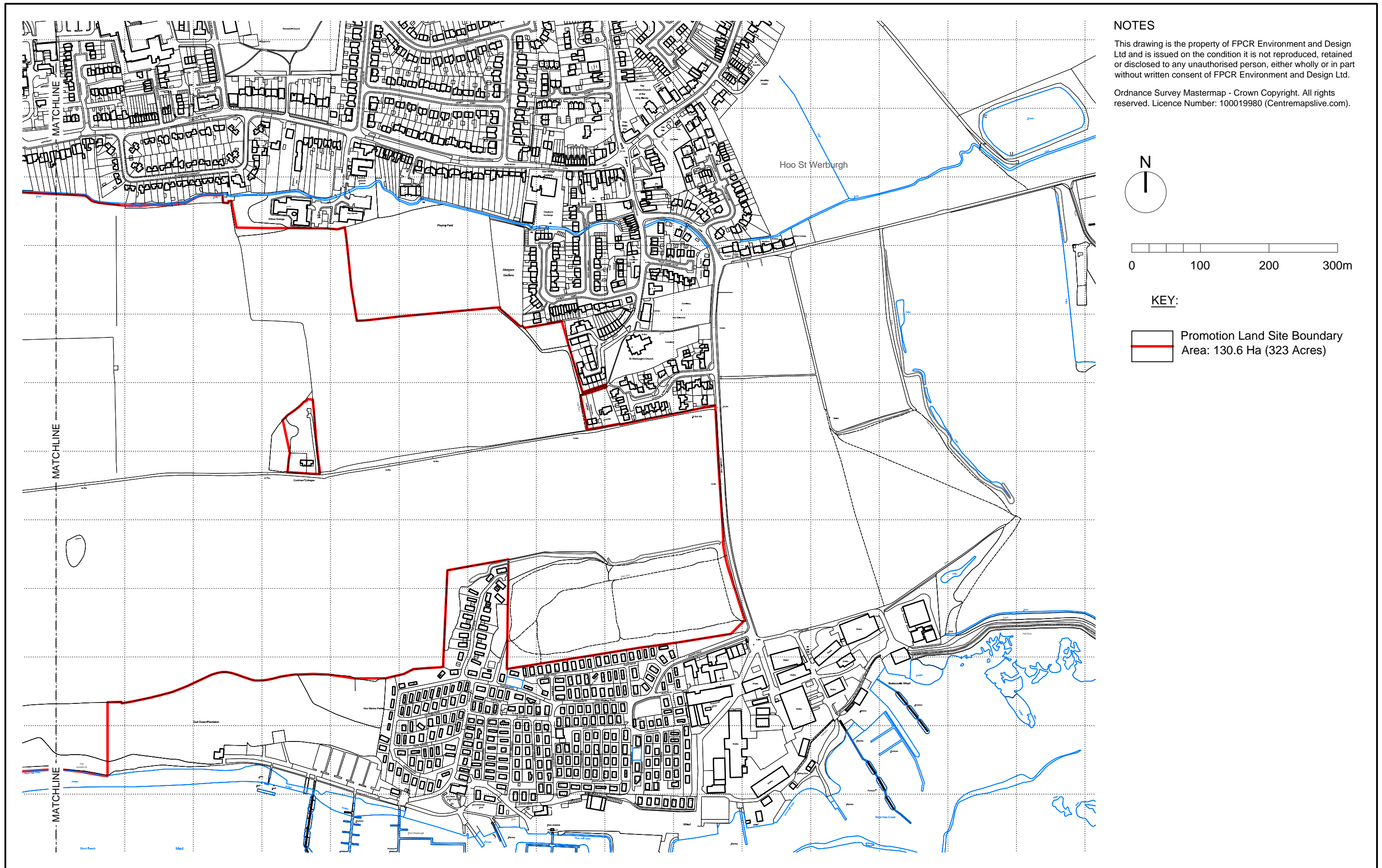
- 5.1.1 Dean Lewis Estates controls land to the south and to the east of Hoo St Werburgh. In total, just in excess of 582 acres.
- 5.1.2 These land holdings provide suitable, available and deliverable development land that will enable successful delivery of the identified growth with the emerging Medway Local Plan.
- 5.1.3 Development that follows the principles set out within Scenario 4 of the development options within the emerging Local Plan consultation document will best serve the needs of the Medway and ensure that the council is able to demonstrate soundness of the plan.
- 5.1.4 For reference please see the site location plans attached at Appendix Ia to Appendix Ie inclusive.
- 5.1.5 Sites Ia & Ib comprise land to the south of Main Road Hoo and is development land. Additional land referred to as the 'Retained Land' (shown on plans Appendices Ic & Id) is land that can be drawn upon for development and environmental mitigation and enhancement purposes.
- 5.1.6 Appendix Ie comprises 3 parcels of land on either side of Stoke Road Hoo. Parcel 1 of this land could be brought forward early on in the plan process and will directly contribute toward the delivery of the council's five-year land supply. Parcels 2 & 3 would follow on from the development of parcel 1 and would be integrated into the wider master plan proposal for Hoo.
- 5.1.7 These sites are demonstrably sustainable and capable of helping meet Medway's housing growth needs together with a commensurate amount of community infrastructure.
- 5.1.8 For reference, the site submission summary information submitted in our previous representations at the 1st stage Issues and Options (February 2016) should also be cross referred to in respect of the deliverability of these sites.

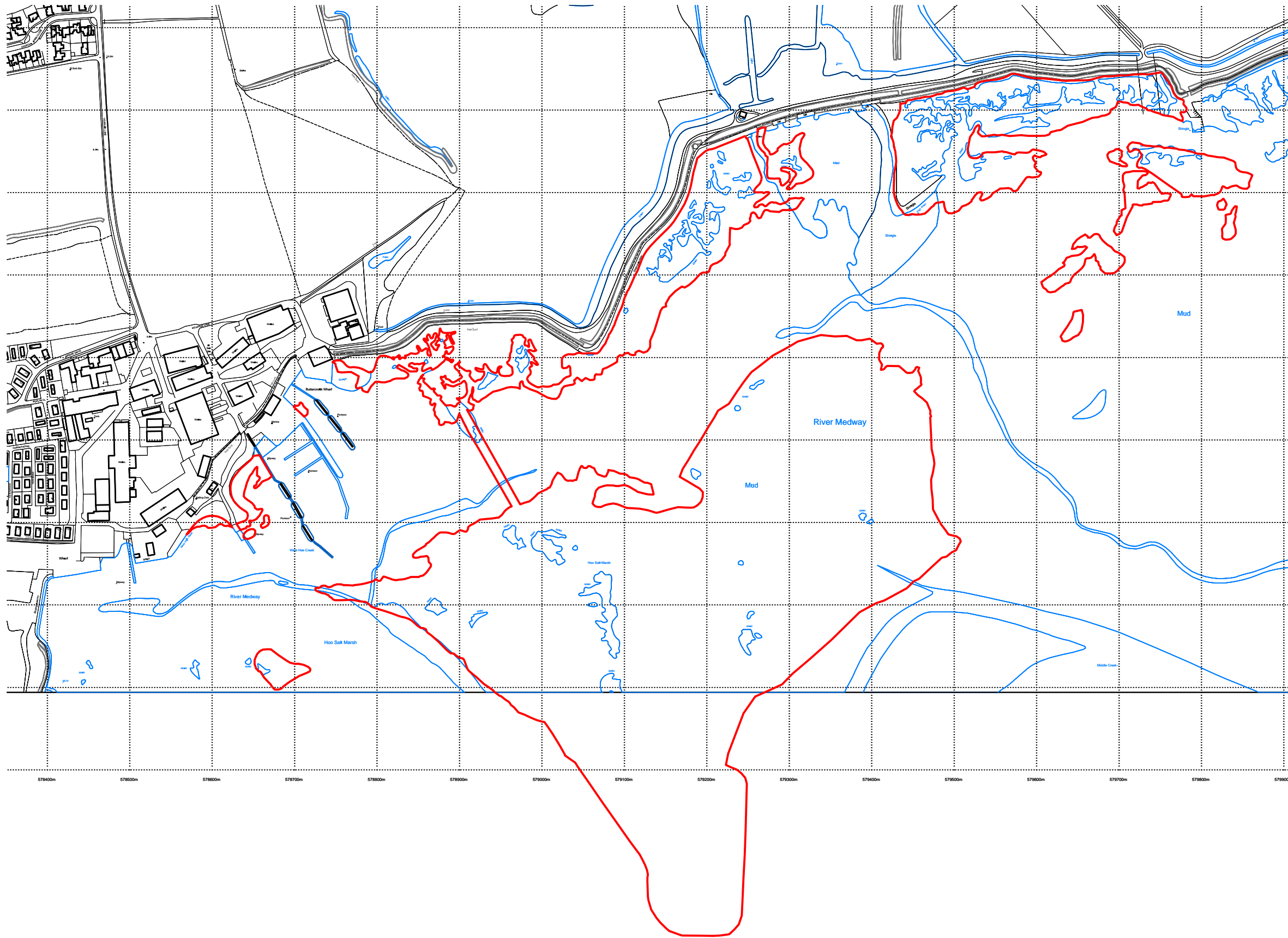
APPENDIX I

SITE LOCATION PLANS

APPENDIX II

HIGHWAYS & TRANSPORTATION REPRESENTATIONS HOO ST WERBURGH LOCAL PLAN OPTIONS, MEDWAY PRIME TRANSPORT

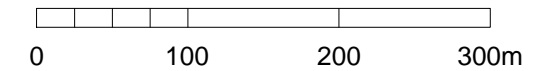





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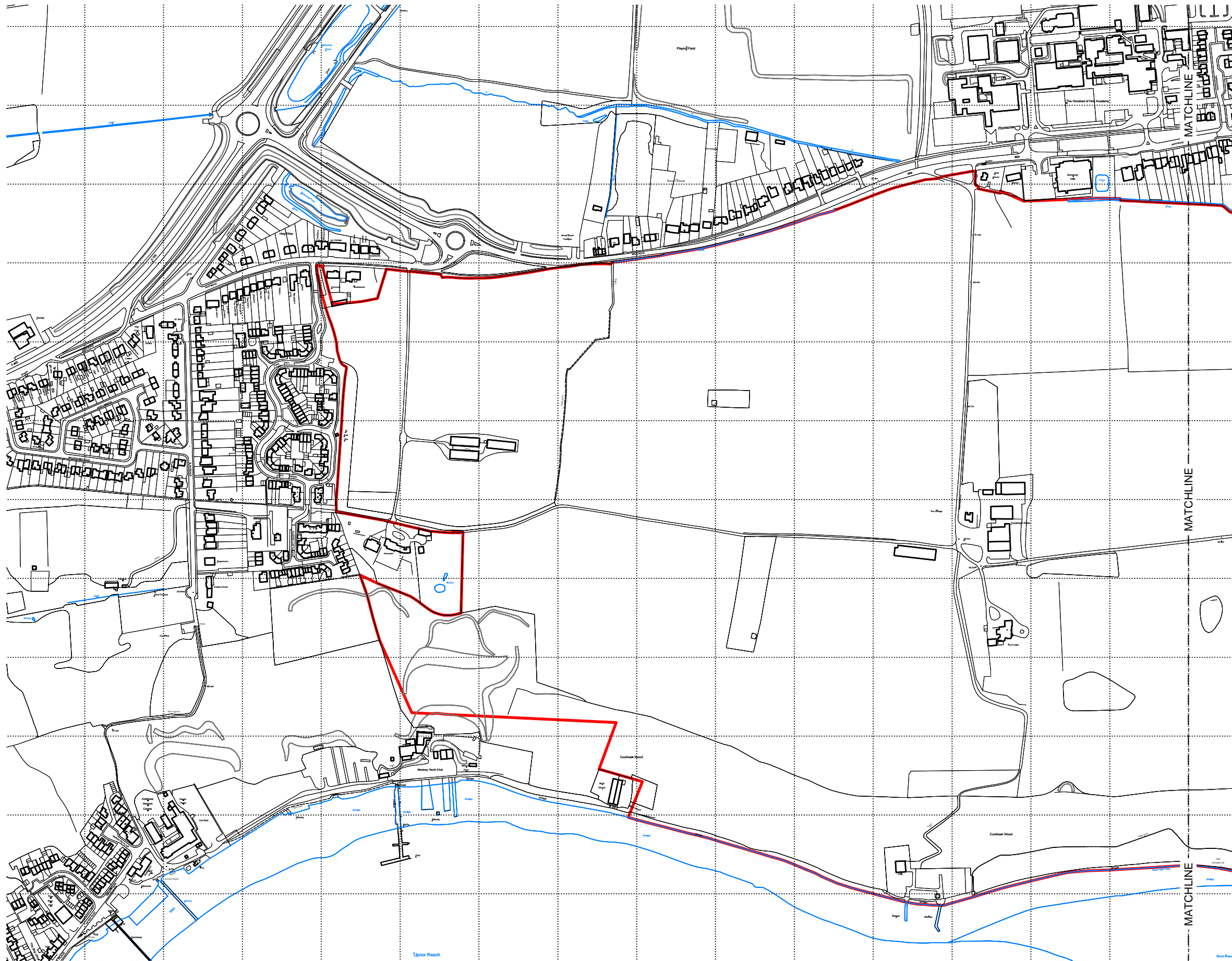
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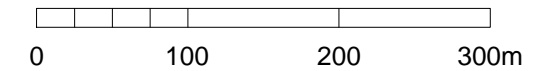
-  Retained Land 2 Site Boundary
Area: 30.3 Ha (75 Acres)



NOTES

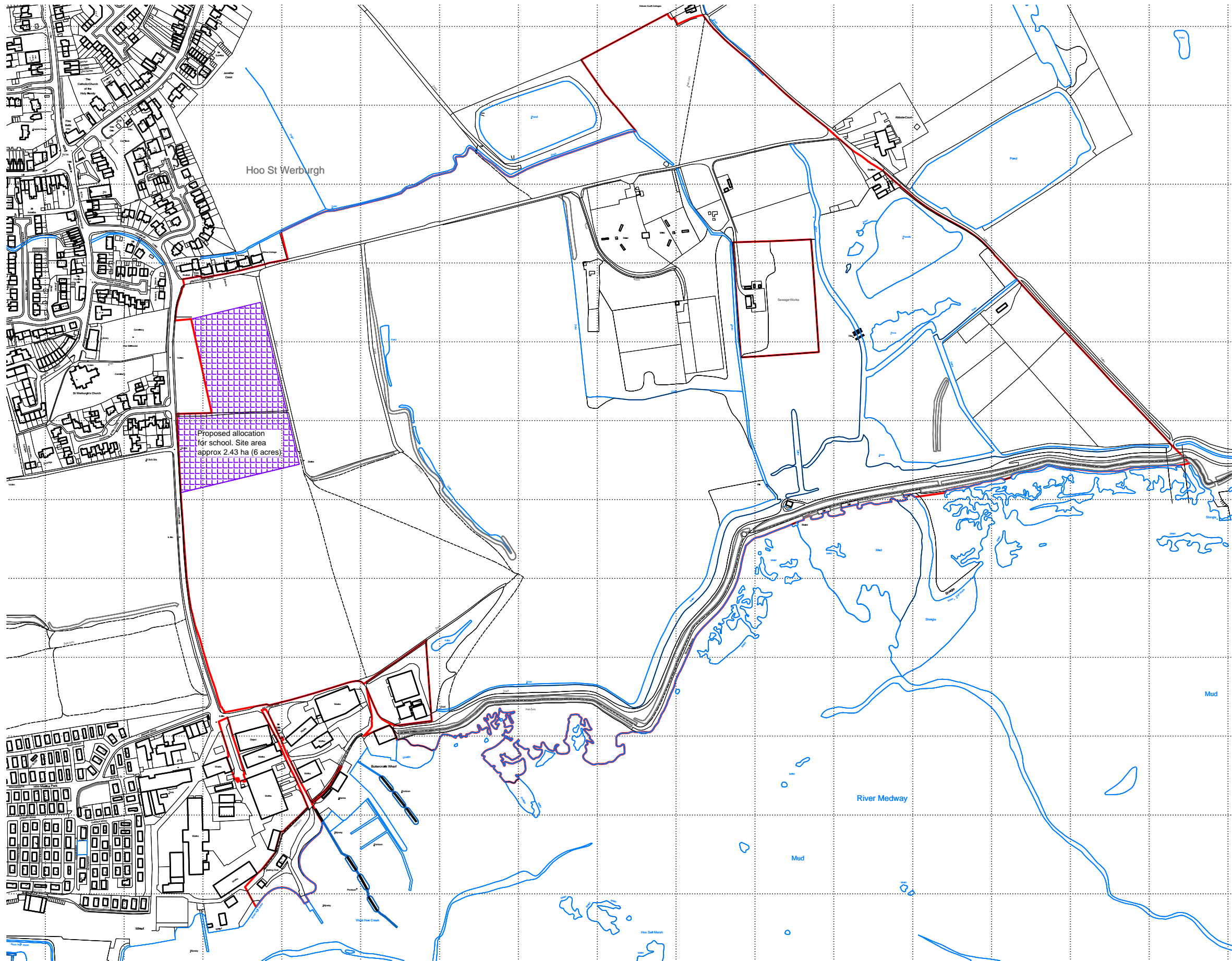
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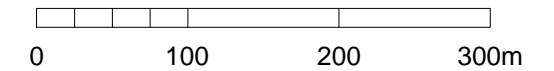
- Promotion Land Site Boundary
- Area: 130.6 Ha (323 Acres)



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KEY:

Retained Land 1 Site Boundary
Area: 65.3 Ha (162 Acres)
excluding Sewage Works

Land at Hoo St Werburgh

RETAINED LAND 1

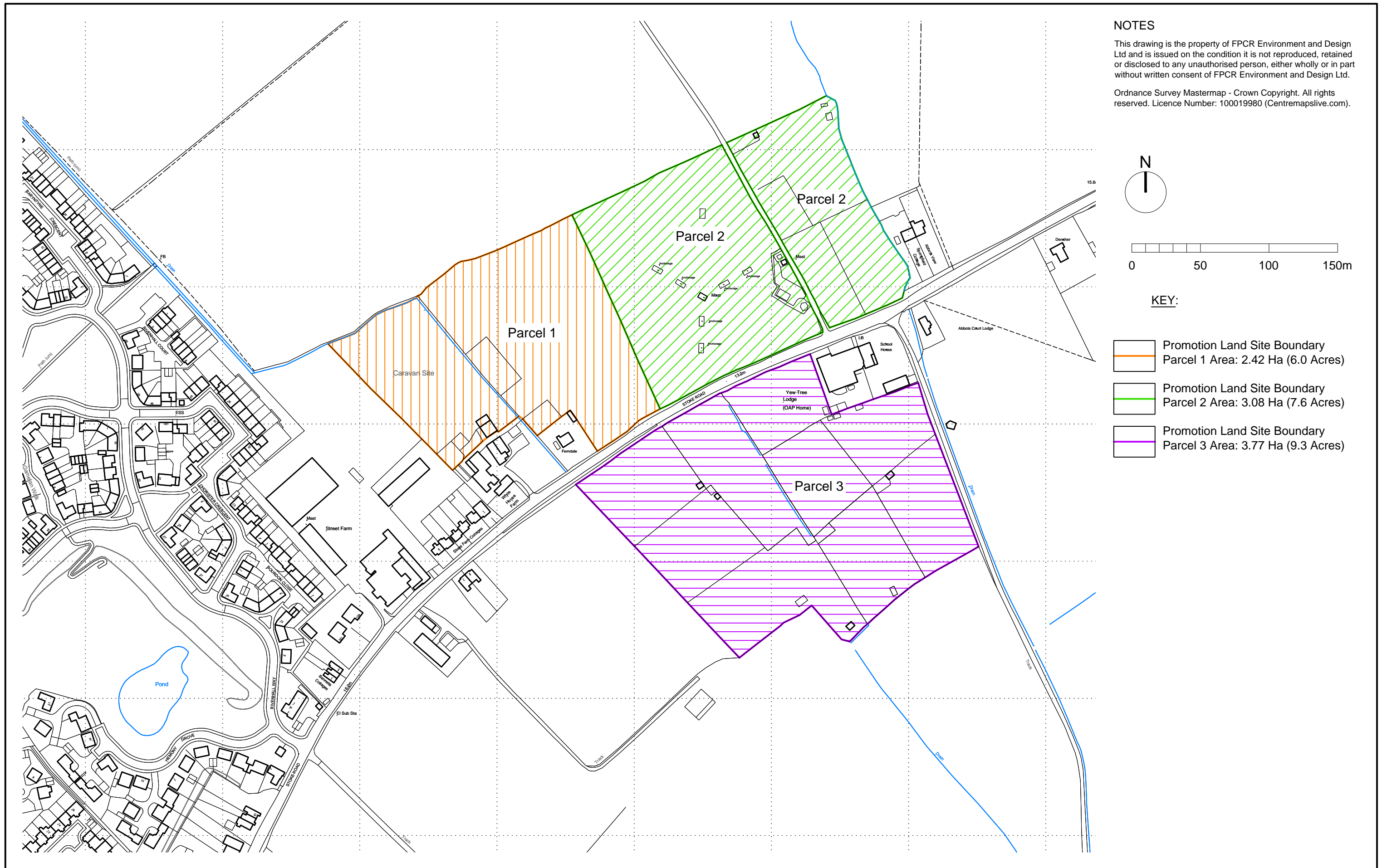
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15 March 2017 TP / TP

7455-L-03 rev A

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Dean Lewis Estates
Land at Hoo St Werburgh

PROMOTION LAND, STOKE ROAD

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Our Ref: ESFA/Local Plan/Medway2017

25th May 2017

Dear Sir/Madam,

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

Consultation under Regulation 18 of Town and Country Planning (Local Planning) (England) Regulations 2012

Submission of the Education and Skills Funding Agency

1. The Education and Skills Funding Agency (ESFA) welcomes the opportunity to contribute to the development of planning policy at the local level.
2. The ESFA, launched on 1st April 2017, brings together the existing responsibilities of the Education Funding Agency (EFA) and the Skills Funding Agency (SFA), to create a single funding agency accountable for funding education and training for children, young people and adults. The ESFA are accountable for £61 billion of funding a year for the education and training sector, including support for all state-provided education for 8 million children aged 3 to 16, and 1.6 million young people aged 16 to 19.
3. The ESFA aims to work closely with local authority education departments and planning authorities to meet the demand for new school places and new schools. As such, we would like to offer the following comments in response to the proposals outlined in the above consultation document.

General Comments on the Local Plan Development Options Approach to New Schools

4. The ESFA notes that significant growth in housing stock is expected in the borough; the Development Options document confirms a housing target of 29,463 new homes over the plan period to 2035. This will place additional pressure on social infrastructure such as education facilities, as noted in section 2 of the Local Plan. The Local Plan will need to be 'positively prepared' to meet the objectively assessed development and infrastructure requirements.
5. The ESFA welcomes the draft infrastructure policy (p.81) including the requirement that *"Development must be supported by the provision of on and off site infrastructure, services and facilities that are identified to meet the needs arising from new development."*
6. The ESFA particularly welcomes the section on education (paragraphs 10.6 – 10.10). The focus on boosting educational attainment, qualifications and skill levels is strongly supported, as is the recognition of the positive role for the Local

Plan in supporting this priority, including by supporting the provision of schools. Paragraph 10.9 highlights the existing limited school capacity and the need for new development to contribute towards addressing this:

'The council's education planning team has identified that there is currently limited capacity for additional school places and new facilities are needed across all ages within the authority area. Therefore any additional residential development would be expected to contribute to an expansion of existing educational facilities or the development of new facilities, to address the increase in demand.'

7. The ESFA supports the draft education policy (p.82), including the clear statement of the council's support for the expansion or provision of new/existing educational facilities to meet identified need; the requirement for new residential developments 'of a significant scale' (threshold to be defined) to seek to provide educational facilities within their development where suitable; and the requirement for smaller developments to contribute towards offsite education provision through developer contributions.

'Medway Council supports the expansion or provision of new/existing educational facilities within the authority area to deliver sustainable development, and to meet identified need.'

New residential development proposals of a significant scale should seek to provide educational facilities within their development where suitable. This will support the development of balanced communities and inform quality place-making.

Smaller developments that cannot support onsite provision of educational facilities should contribute towards offsite education provision through developer contributions to make a development acceptable in planning terms.'

8. In light of the draft policy above, emerging ESFA proposals for a Forward Loan Fund to support delivery of schools at an early stage as part of large mixed use developments may be of interest to the council. We would be happy to meet to discuss this opportunity at an appropriate time.
9. You will have no doubt taken account of key national policies relating to the provision of new school places, bearing in mind the requirement for Local Plans to be consistent with national policy, but it would be helpful if they were explicitly referenced within the document to support the draft education policy. In particular:

- The *National Planning Policy Framework* (NPPF) advises that local planning authorities (LPAs) should take a proactive, positive and collaborative approach to ensuring that a sufficient choice of school places is available to meet the needs of communities and that LPAs should give great weight to the need to create, expand or alter schools to widen choice in education (para 72).

- The ESFA supports the principle of Medway safeguarding land for the provision of new schools to meet government planning policy objectives as set out in paragraph 72 of the NPPF. When new schools are developed, local authorities should also seek to safeguard land for any future expansion of new schools where demand indicates this might be necessary. At this early stage of development of the Local Plan alternative growth scenarios have been proposed and site allocations have not yet been drafted. The next stage of the Local Plan

should demonstrate a more detailed forecast for school places to justify the approach adopted, building on the baseline data provided on primary and secondary school provision in the Infrastructure Position Statement (January 2017). The evidence base for the policy and site allocations should be clearly signposted. The next version of the Local Plan should also identify specific sites (existing or new) which can deliver the school places needed to meet demand. The ESFA would like to be included as early as possible in discussions on potential site allocations, as there are a number of pipeline school projects in Medway which may be appropriate for specific designation. We would welcome the opportunity to meet with the council in the near future to discuss these projects.

- Medway should also have regard to the Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on '*Planning for Schools Development*'¹ (2011) which sets out the Government's commitment to support the development of state-funded schools and their delivery through the planning system.

10. In light of the above, the ESFA encourages close working with local authorities during all stages of planning policy development to help guide the development of new school infrastructure and to meet the predicted demand for primary and secondary school places. In line with the Duty to Cooperate, please add the ESFA to your list of relevant organisations with which you engage in preparation of the plan.
11. In this respect, the ESFA commends, for example, the approach taken by the London Borough of Ealing in producing a Planning for Schools Development Plan Document (DPD)². The DPD provides policy direction and establishes the Council's approach to providing primary and secondary school places and helps to identify sites which may be suitable for providing them (including, where necessary and justified, on Green Belt/MOL), whether by extension to existing schools or on new sites. The DPD includes site allocations as well as policies to safeguard the sites and assist implementation and was adopted in May 2016 as part of the Local Plan. The DPD may provide useful guidance with respect to an evidence based approach to planning for new schools in the emerging Medway Local Plan, securing site allocations for schools as well as providing example policies to aid delivery through Development Management policies.
12. Ensuring there is an adequate supply of sites for schools is essential and will ensure that Medway can swiftly and flexibly respond to the existing and future need for school places to meet the needs of the borough over the plan period.

Developer Contributions and CIL

13. One of the tests of soundness is that a Local Plan is 'effective' i.e. the plan should be deliverable over its period. In this context and with specific regard to planning for schools, there is a need to ensure that education contributions made by developers are sufficient to deliver the additional school places required to meet the increase in demand generated by new developments. Medway does not currently have a Community Infrastructure Levy (CIL) in place but does have a clear approach to section 106 planning obligations set out in its Development Contributions Guide (2014). The ESFA note that the council has produced an

¹

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6316/1966097.pdf

² https://www.ealing.gov.uk/info/201164/local_plans/1961/planning_for_schools_dpd

Infrastructure Position Statement (January 2017) to assess the current level of infrastructure provision in Medway, including current school provision, need/deficiency and planned projects. This states that further work to develop an Infrastructure Delivery Plan will be progressed alongside the emerging Local Plan. The ESFA support the council's proposal to also use this evidence to inform their approach to developer contributions, including an assessment of the potential for implementing a CIL charging schedule in future.

14. The ESFA would be interested in responding to any draft Infrastructure Delivery Plan produced (or any other review of infrastructure requirements) and any proposals for a revised approach to developer contributions, including CIL. As such, please add the ESFA to the database for any future consultations on CIL or developer contributions.

Conclusion

15. Finally, I hope the above comments are helpful in shaping Medway's Local Plan, with particular regard to the provision of land for new schools. Please advise the ESFA of any proposed changes to the emerging Local Plan policies, supporting text and/or evidence base arising from these comments, or any development of the evidence base, site allocations or approach to developer contributions.
16. Please do not hesitate to contact me if you have any queries regarding this response. The ESFA looks forward to continuing to work with Medway to aid in the preparation of the Local Plan.

Yours faithfully,

SJ Powell

Samantha Powell MRTPI
Head of Forward Planning



Web: www.gov.uk/esfa

Planning Policy
Regeneration, Culture, Environment & Transformation
Medway Council
Gun Wharf, Dock Road
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Our Ref: DHA/DB/12193

30 March 2017

By E-mail Only

futuremedway@medway.gov.uk

Dear Sir/Madam,

**MEDWAY LOCAL PLAN – FUTURE MEDWAY
REGULATION 18 ‘DEVELOPMENT OPTIONS’ CONSULTATION**

On behalf of Bellway Homes Ltd (Kent), please accept this letter as our formal response to the current Local Plan Regulation 18 Consultation.

Background

We understand that 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 that the Council is asking for views on ‘Development Options’ as a follow up to the ‘Issues and Options’ consultation that has informed the early stages of the preparation of the plan.

Our client has an interest in land at Chatham Driving Range, which we believe represents a suitable and sustainable site to promote for residential development as the Local Plan progresses. Accordingly, these representations are focussed on how the site could assist in delivering the strategic objectives of the Council.

REGULATION 18 RESPONSE

Strategic Objectives

We understand that the core plan objectives include:

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

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- *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.*

We support the principle of these objectives, albeit 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). 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.

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.

Sustainable Development Options

Having regard to the options being considered, we support the promotion of brownfield land ahead of greenfield sites. In this regard, Chatham Driving Range is a predominantly brownfield site and is situated within established urban confines and so should rightly be prioritised ahead of any greenfield land. However, 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. Accordingly, 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.

We note the four scenarios presented by the Council and that each of these has clear benefits and disbenefits. However, we do not support any single approach as presented.

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 likely to 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.

Scenario 2 has some benefits 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 as clearly 'exceptional circumstances' exist to amend the Green Belt boundaries.

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 provide 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.

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. A review of the Green belt in light of infrastructure and development that has happened recently is also long overdue.

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 the 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 such as Chatham Driving Range. However, most areas contain surplus sites or pockets of land capable of providing new homes that would allow them to evolve organically.

We also consider that the scenarios as presented are extremely idealistic and do not necessarily reflect what might be deliverable. 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. However, equally strategic development of any one single area 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.

Consideration must also be given to how sites are delivered. Traditionally, strategic sized or regeneration based housing sites are controlled by the national house builders operating in direct competition and tough financial parameters. 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 non-strategic sites of the scale proposed at Chatham Driving Range.



Housing Delivery and Mix

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.

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.

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.

Community Facilities and Sports Provision

We note that there is a presumption against the loss of community facilities in rural and urban areas. However, it is important that any future policy clearly defines what falls within the scope of a community facility and what evidence is required to justify any loss of provision.

Likewise, we note that existing sports uses shall be protected from loss and that a change shall only be permitted where:

- *It is a redevelopment that will replicate or improve the existing level of provision;*
- *It is evidenced that existing provision is unviable;*
- *It is identified that there is an existing overprovision of the specific offer and lack of need in the local community.*

Based on the draft plan, it is unclear as to whether Chatham Driving Range would fall within the scope of being a community facility, sports provision or both. Accordingly, the policy need to be more specific about the nature of the facilities being protected.

Suitability of Chatham Driving Range

Having regard to the emerging policy direction, we consider Chatham Driving Range represents a suitable and sustainable location to allocate for future residential redevelopment. This is particularly prevalent given that it is clear that emerging housing targets cannot be met solely from brownfield or urban sites.

Detailed proposals have begun to be progressed and it is envisaged that approximately 125 new homes could be provided at the site consistent with the emerging policies for housing design, density, mix and having regard to emerging affordable housing policy. An indicative layout is appended to this representation, which highlights how the site could come forward.



The site is well placed to deliver sustainable development. It is situated to the north of Street End Road, located approximately 2.5 miles to the south east of Chatham Town Centre within the defined urban area. It is currently used as a Golf Driving Range, comprising the driving range, golf club buildings and a small area for car parking to the west. The topography of the site is relatively flat with a steep bank at the eastern end and comprises established dense perimeter planting along the northern, eastern and southern boundaries.

To the north of the site is Daisy Banks - a large area of open space, steeply sloping upwards to the north west with areas of woodland, behind which is Victory Academy (secondary school and sixth form). To the east the site is bound by allotments fronting Street Front Road and then commercial development along Second Avenue. To the south the site is bound by residential development, comprising large two storey semi-detached units, whilst the western boundary of the site is defined by Public Right of Way – (path RC4 which runs from Magpie Hall Road to Street End Road), beyond which is a children's play area, ball courts and grassed football pitches.

The site has existing suitable vehicular access via Street End Road and it should be noted that a residential use would likely be less intensively used than the current facility resulting in a net reduction in vehicle movements. A potential new access from Street End Road could also be delivered.

The existing owners of the site have found the business to not be sustainable going forward. Furthermore, the tight nature of the site has resulted in a number of neighbour issues with golf balls consistently travelling beyond boundaries despite best endeavours to stop this happening.

We do, of course, acknowledge that a significant portion of the site is located within Flood Zone 3, an area of protected open space, an Area of Local Landscape Importance and a Site of Nature Conservation and /or Local Plan Nature Reserve.

Nevertheless, in respect of flood risk paragraph 103 of the NPPF states that when determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere and only consider development appropriate in areas at risk of flooding where (if informed by a site-specific flood risk assessment following the Sequential Test, and if required the Exception Test) it can be demonstrated that:

- *within the site, the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location; and*
- *development is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning; and it gives priority to the use of sustainable drainage systems.*

In this regard, it is important to stress that Medway Council officers and Members raised no issues regarding flood risk and mitigation during the course of recent pre application discussions. To the contrary, it was expected that this could be managed and that the site would pass the sequential test for flood risk. Further discussions are also ongoing with the Environment Agency and I



understand that a potential solution could be reached to overcome and concern regarding the risk of flooding. A full Flood Risk Assessment would, of course, be required in due course.

The site falls within a Site of Nature Conservation Interest where development that would materially harm, directly or indirectly, the scientific or wildlife interest will not be permitted. Nevertheless, as this site is predominantly brownfield and is an active golf driving range it is considered its role as part of the SNCI is extremely limited and could be proved via the necessary ecological surveys.

The site is situated within an Area of Local Landscape Importance and as such landscape appraisal work will be required, nevertheless subject to careful design and planning landscape impact should not be a constraint to development. To the contrary, even in areas of outstanding natural beauty compelling housing need has been deemed the 'exceptional circumstances' necessary to overcome landscape impact.

We note that the site is situated within close proximity to a scheduled ancient monument – Fort Luton (one of the five late Victorian land front forts built to defend the overland approaches to Chatham). The impact on this would have to be addressed in a forthcoming application to assess the impact of development on the setting. However, given that the site benefits from established planting along the northern boundary, and woodland in between the site and Fort Luton, views to and from the monument would be screened and it is not anticipated to be a significant issue.

Finally, we would stress that at the heart of the NPPF is the presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. There are three dimensions to sustainable development, 'economic, social and environmental' (NPPF paragraph 7).

An economic role includes *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* (paragraph 7). In this respect, the site is suitable, sustainable, available and deliverable for development and could help contribute to the areas housing need. Development will allow for investment in the new built fabric and contribute to local construction employment, whilst significant household expenditure generated by future residents will help to support economic activity locally and help to sustain the jobs and services within the local area. The new dwellings will also contribute to the public purse in respect of Council Tax and the New Homes Bonus.

From a social perspective, a social role includes *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* (paragraph 7). In this respect, development at the site could provide for a quality residential units to meet the needs of the local population. The proposed development can provide approximately 125 additional units to meet this supply and therefore can positively contribute towards the social role identified in the NPPF.



From an environmental perspective, redevelopment would not involve the loss of land that is of high agricultural or ecological value. To the contrary, it will simply make best use of an underutilised site within established urban confines.

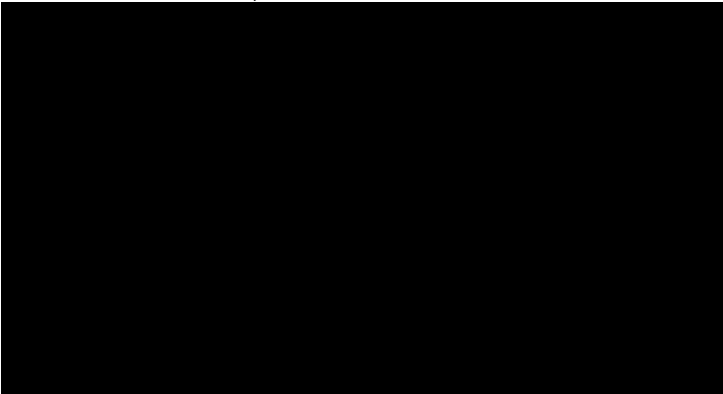
Summary

Taking all of the above into consideration, we support the general direction of travel of the Local Plan and the commitment to meeting the full housing need. However, the options presented need refinement and we endorse a mixed approach that balances the prioritisation of previously developed sites and sensitive Greenfield/Green Belt releases.

As part of this balanced approach, we consider a sound planning case exists to support the allocation of Chatham Driving Range as part of a wider well-coordinated distribution of development making best use of its location within defined urban confines.

We hope that this response aids the Council's consideration of wider strategic matters. However, if you require any further information about our client's site, please do not hesitate to contact me.

Yours faithfully,





Planning Policy
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Medway Council
Gun Wharf, Dock Road
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Kent ME4 4TR

Our Ref: DHA/DB/12278

18 April 2017

By E-mail Only

futuremedway@medway.gov.uk

Dear Sir/Madam,

**MEDWAY LOCAL PLAN – FUTURE MEDWAY
REGULATION 18 ‘DEVELOPMENT OPTIONS’ CONSULTATION**

On behalf of Wallace Land, please accept this letter as our formal response to the current Local Plan Regulation 18 Consultation.

Background

We understand that 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 that the Council is asking for views on ‘Development Options’ as a follow up to the ‘Issues and Options’ consultation that has informed the early stages of the preparation of the plan.

Our client has an interest in various parcels of land in Medway that are potentially suitable and sustainable for residential allocation in the emerging Local Plan, including land south of Stoke Road, Hoo (site plan attached). Given the stage of the plan making process, these representations primarily focus on the options and objectives being considered by the Council, however we do summarise why land at Stoke Road is potentially suitable.

REGULATION 18 RESPONSE

Strategic Objectives

We understand that the core plan objectives include:

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

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- *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.*

Our client supports the principle of these objectives, albeit 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).

Specifically, we consider the suggested objectives should be amended to provide more certainty that the full 'objectively assessed' need for 29,463 homes will be pursued given this is apparent from subsequent chapters of the consultation document. 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.

Sustainable Development Options

Having regard to the options being considered, we recognise that there is a national desire to prioritise brownfield land ahead greenfield sites. However, whilst the importance of making best use of urban and PDL opportunities is understood, 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. Accordingly, we consider the Council's strategy should be a little more explicit about the need to release undeveloped land and should not give an impression that development can or will be accommodated wholly on previously developed land or within built up confines.

We note the four scenarios presented by the Council and that each of these has clear benefits and disbenefits. However, we do not support any single approach.

We support elements of scenario 1 and maximising the potential of urban regeneration insofar as riverside development and regeneration of key waterside sites should be welcomed. Likewise, we agree that the peripheral town centre areas present opportunities for higher density development. Nevertheless, this scenario could lead to excessive levels of apartments being provided to such a



degree that it would be at the expense of family homes. Likewise, utilising all urban and brownfield sites for apartments could result in the unacceptable loss of existing employment provision or land better suited to commercial uses.

Scenario 2 has more balance and we support the release of greenfield land to complement the regeneration proposals and use of brownfield land. Furthermore, carefully selected Green Belt parcels could deliver sustainable development as clearly 'exceptional circumstances' exist to amend the Green Belt boundaries.

In respect of scenario 3, we have reservations about the suitability of strategic growth around any single location, as this can place undue pressure on infrastructure and often does not provide the housing delivery rates needed. Likewise, the Council has historically placed too much emphasis on Lodge Hill despite the ongoing question marks over its suitability and delivery. Over reliance on single locations therefore undermine flexibility. However, we do support the concept of growth being channelled towards the Hoo Peninsula given it has the infrastructure to accommodate a substantial degree of growth.

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. This seems to be the most balanced and sensible approach, yet it seems wrong that this otherwise sensible strategy excludes a degree of Green Belt release.

In summary, we consider that the initial three scenarios do not provide the right balance. Furthermore, the exclusion of Green Belt sites from the 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 throughout settlement areas 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. Likewise, growth in Hoo is welcomed. However, more generally most rural areas and villages areas, such as Cliffe Woods for example, contain sites or pockets of land that could be made available for housing without undermining countryside objectives. For example, land at Stoke Road could be brought forward to deliver housing that would have little demonstrable harm. We therefore support well distributed growth.

We also consider that the scenarios presented are extremely idealistic and do not necessarily reflect what is deliverable. 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 mitigate the impact or benefit existing and new communities. However, strategic development of any one single area 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.



Consideration must also be given to how strategic sites are delivered. Traditionally, large strategic housing sites are not always delivered at the rates the Council requires to continue to meet its rolling Housing Land Supply position. It does not follow that development will be delivered at the quickest rates possible, particularly given the high levels of competition on these larger sites where for example, there is more than one developer on site building. For this reason, more consideration should be given to the value and contribution of smaller sites delivered by private land owners, land promoters and local developers and the role this plays in sustaining a steady supply of housing.

Housing Delivery and Mix

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.

We welcome this approach and support the decision to plan for the full housing need of the area rather than to seek a reduced target. We also 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.

Affordable Housing

We note that initial analysis indicates a percentage of 25% affordable housing could be achieved on residential developments over 15 units.

We generally support the inclusion of this as a formal threshold if supported by sufficient technical evidence, subject to the policy containing sufficient flexibility to allow a departure where viability is likely to be undermined.

Supported Housing, Nursing Homes and Older Persons Accommodation

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.*



Again, we support the principle of this approach, but feel that dedicated allocations may 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. Often urban locations are too constrained and better meet the needs of families and younger generations that are more reliant on links to shops, job opportunities and recreational facilities.

Land at Stoke Road, Hoo

Based on the current national and local planning context, we consider land at Stoke Road to be a suitable area to allocate land for housing to help meet the growing need for new homes. We draw this conclusion on the basis that it represents an area capable of accommodating growth, particularly having regard to the fact that the site immediately to the west of the site has recently received outline planning permission for 127 dwellings (MC/16/2837).

Development on this site would contribute to the achievement of sustainable development due to a series of economic, social and environmental benefits. 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.

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.

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.

In respect of deliverability, The NPPF states that for sites to be considered deliverable, they need to be available, suitable and achievable. 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.

In respect of suitability, there are no physical limitations or problems such as access, infrastructure, flood risk, hazardous risks, pollution or contamination. To the contrary, residential development on this site would make a useful contribution to the housing land supply for both market and local needs affordable housing.

Finally, we believe there are no complicated legal agreements or covenants that would prohibit the ability to bring forward the site early in the plan period.



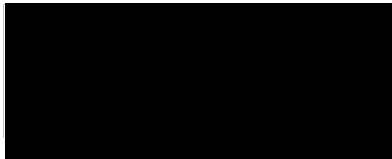
Summary

Taking all of the above into consideration, we support the general direction of travel of the Local Plan and the commitment to meeting the full housing need. However, the options presented need refinement and we endorse a mixed approach that balances the prioritisation of previously developed sites and sensitive Greenfield releases and distribution of development proportionately.

Land at Stoke Road, Hoo is also demonstrated to be a potentially suitable and available site for allocation.

We hope that this response aids the Council's consideration of wider strategic matters. However, if you require any further information about our client's site, please do not hesitate to contact me.

Yours faithfully,



David Bedford
Associate Planner
DHA Planning Limited



Phase 2, Land South of Stoke Road, Hoo, Kent

